US ERA ARCHIVE DOCUMENT

Retail Gasoline Sales Sector Environmental Results Project VT Department of Environmental Conservation Waste Management Division

For the Period: April 1, 2008 to June 30, 2008

Marc Roy Underground Storage Tank Section Chief This is the quarterly report for the VT Department of Environmental Conservation "Retail Gasoline Sales Sector, Environmental Results Project (ERP)". The report covers the time period April 1, 2008 to June 30, 2008.

Most of the time in this quarter was spent conducting our 100 randomly-selected inspections to determine the post-certification compliance rate, and on tasks resulting from the first filing of self-certifications.

Progress Toward Milestones:

- 1. We worked with facility owners and operators who had received Notices of Alleged Violations (NOAVs) for failure to submit self-certifications. In April, we had reduced the number of facilities who had not filed to twenty-three. These facilities have been targeted for inspection.
- 2. We have effectively dealt with the 103 Return to Compliance Plans we received. Many facilities have completed their plans, and the others are on schedule.
- 3. We have completed inspections at 100 randomly selected facilities to determine the post-certification compliance rate with a statistical validity of 95% with 5% +/-. For 100 inspections we only wrote 16 NOAVs, giving us a compliance rate of 84%. This is a 16% improvement from the baseline compliance rate of 68% (calculated in 2005).
- 4. We have signed a contract for IT services (Industrial Economics of Cambridge MA). We held an initial meeting on 6/26/08, where the contractor staff and staff from the Agency of Natural Resources Information Technology Division met to share information on our current system.

Impediments: The need for IT services continues to be an area of concern. The hiring of the contractor this quarter is a great step. The biggest issues initially identified are: the up-loading of facility data to pre-populate electronic inspection checklists (on tablet PCs), the down-loading of completed checklists to the database; and report development to allow for the detailed analysis of self-certification data. The issue of IT services continues to be the most serious impediment to the success of this project. The analysis of self-certification data is the crux of this project, and those applications have yet to be developed.

Financial Report: Confidential business information removed by EPA.

QAPP Revision: there are no revisions to the QAPP this quarter.