

US EPA ARCHIVE DOCUMENT

**Virginia Environmental Results Program for USTs**  
**Assistance Agreement No. EI-97340101-0**  
**24rd Quarterly Report**  
**March 2012 – May 2012**  
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## **Synopsis of Accomplishments during the Reporting Period**

Again, no actions occurred this quarter awaiting a new state software development contracting mechanism. **Due to the many delays, an email request to extend the grant to June 2013 was submitted to EPA R3 and the extension has been granted.**

Another (new replacement) business analyst has been hired by DEQ to assist with database and UST inspector tablet PC coordination planning and will hopefully include UST ERP and Operator Training into the master plans. The ERP Pilot project has been completed and reported to EPA as planned. EPA R3 final QAPP revisions have been made and accepted by EPA to complete the QAPP. As reported earlier, we sought and were granted by EPA R3 an extension of the grant period until 6/1/2011 since some \$91,502 of grant funding remains uncommitted and is planned to be used to: properly complete the existing TurboTank online software tool after the Pilot Project ended (post Pilot refinements); incorporate the Energy Policy Act of 2005 UST secondary containment requirements that will take effect by regulation in VA on September 15<sup>th</sup>, 2010; make the TurboTank system more robust to accommodate an Operator Training function; and, provide better interfacing with the VA-DEQ CEDs UST compliance tracking computer systems and create screens for real time TurboTank data reviews.

Ongoing meetings with key participants have better refined the project scope and the planned interfacing of the online UST ERP tool with existing DEQ database platforms and programs.

## **Narrative Discussion**

Ongoing meetings with DEQ-Office of Information Systems staff have helped to refine the project approach and interfacing of the ERP tool with the DEQ-GIS-VCU-hosted tool and with other software platform integrations. State budget reductions, contracting limitations, and staff changes have hindered some progress.

As a quick review of the pilot project final status, the UST database was randomly sampled for the approximately 100 selected ERP facilities with the 20 UST facility type categories (e.g. airline, gas station, commercial, utility, etc.) being used and samples weighted based on the total active facilities existing within each type. A broad spectrum of owners and facility types are included. The associated UST owners and their association representatives were contacted to begin the process of encouraging them to volunteer for participation in the ERP project. DEQ inspection staff and facility owners made up the key stakeholders for this pilot project. Due to contracting delays with development of the online tool the actual initial UST facility inspections occurred during the spring (March-June 2009) with the online ERP TurboTank tool becoming available at the same time.

Of the facilities contacted only some 50 attempted the online tool and of that group 36 completed the application successfully. Analysis of the 6/30/09 results data for the 36 facilities has

proven complex when considering all the variables affecting the data, i.e. most volunteers were compliant willing conscientious computer savvy owners to begin with. A large percentage (~75%) of the online user facilities were already UST compliant and the conscientious owners gladly filled the online questionnaire out. A sample review on 2/2/12 of DEQ CEDs facility data to see if compliance was being maintained showed continued good compliance rates. But you also must factor in the fact that the onsite 3-year inspections by DEQ UST staff have continued to remind owners of their responsibilities and is likely a prime reinforcing agent for continued compliance.

### Project Tasks and Milestones

**(Reflecting Accomplishments for this Quarter, and Projection of Activities and Major Expenditures for Next Quarter Report)**

The following is a listing of project tasks, descriptions, milestones, timelines as well as status.

<b>Table 1: Schedule of Major Project Tasks</b>				
This project's major tasks and timeline are outlined in the table below.				
Task	Task Description	Start Date	End Date	Milestone/Status
Stakeholder Outreach	Initial and ongoing outreach to internal and external stakeholders (including Pilot Project facilities) about the project.	6/1/06	6/1/09	Set up mailing list; letters; emails/phone; Ongoing effort
Goals identification	Finalize the goals of this project, upon which metrics will be based.	6/1/06	7/15/07	Provide EPA list of goals
Develop Logic Model	Develop a finalized logic model with stakeholder involvement. Logic model can assist in development of metrics and data measurement needs.	7/15/06	10/1/06	Provide refined logic model
Measures identification	Development of final metrics to be tracked by this pilot project.	7/15/06	8/1/07	Include metrics in final QAPP; VCU Contractor evaluating
Request for Proposals (RFP) for Contractor	Develop Request for Proposal (RFP) for CD-ROM/Online UST ERP Self-Certification Workbook development and retain contractor.	8/1/06	6/1/09 ongoing/revised scopes of work	Provide copy of final agreement to EPA; Provided upon request
Quarterly Reports	Provide EPA with quarterly progress.	10/1/06	6/1/11 Revised to 6/2013	Provide reports; Ongoing: Submit first Quarterly Report to EPA (10/06) (all others follow quarterly through 6/11); Ongoing
Contractor develops Beta version of CD-ROM/Online UST ERP	VA-DEQ with stakeholder input advises and reviews development of Beta version of CD-ROM/Online UST ERP Self-Certification Workbook.	3/1/08	10/1/08-extensions to 8/1/09	Ongoing based on delays

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UST Pilot Program Facility identification	Determine the exact characteristics of pilot facilities to be targeted, and compile a random list of 100 facilities from reliable sources. Selected participants in Pilot Program - major oil, state, federal facilities, etc.	8/1/06	1/1/08	Provide list; List Provided—List may be revised “randomly” based on other factors as agreed by EPA
Statistical methodology (included in QAPP)	Development of a statistical methodology to drive performance measurement and analytical tasks.	8/1/06	12/1/09	Develop statistical methods report; VCU contractor
Data input & management	Development and implementation of an approach to cost-effectively inputting and managing ERP data, including primary and secondary data (linking VA-CEDs UST registration database and screens for ERP use/display investigated). Primary data consists of data from audit inspection reports and facility forms (including self-certification forms). Secondary data sources include percentages of compliance under the existing onsite inspections system; Analysis of the percentage of compliance of the Pilot Program facilities prior to ERP and after self certification.	12/1/07	12/1/09	Review efficacy of data measurement tools; VCU Contractor
QAPP finalization & approval	Finalize QAPP based upon results of the measures identification, statistical methodology, and data management tasks. Primary data collection will not occur before relevant parts of the QAPP are finalized and approved by EPA.	8/1/06	12/1/09	Provide final QAPP report to EPA (awaits VCU input under contract—will be delayed)
Baseline onsite inspections	DEQ inspections conducted at Pilot Program facilities to establish a performance baseline. Facilities selected at random from the entire targeted Pilot Program population, based upon sample design from statistical methodology. NOTE: Any UST violations noted at any ERP stage (and any Return to Compliance Plan) will be handled as would any other facility violation under the VA-DEQ Agency Enforcement Compliance Manual (2001) and applicable DEQ/program guidance memoranda. The VA DEQ developed and delivered mandatory and voluntary training sessions to key parties to ensure quality data collection, to the extent practicable.	7/1/08	05/15/09	Compile list of sites baseline-inspected; compare with DEQ UST Checklist results and send summary to EPA—delays have pushed inspections to March-May 2009

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Workbook and Certification Form Finalization	Finalization of CD-ROM/Online UST ERP Self-Certification Workbook, outreach and assistance materials, web resources, and certification forms.	6/1/08	3/1/09	Provide final online workbook link to EPA; Decision Tree link provided
Facility assistance/Outreach	Delivery of compliance/technical/online- workbook assistance to pilot facilities/owners, which is expected to take the form of workbooks, fact sheets and/or teleconferences/workshops.	7/1/08	8/1/09	Provide list of pilot facilities assisted to EPA; Facility List sent to EPA
Online Self-certifications performed by owners with deadline for completion	Implementation of a voluntary facility self-certification approach for up to 100 Pilot Program facilities owned by up to 20 entities. Self-certification refers to the submission of a legally binding record of a facility's compliance and beyond-compliance practices. (If statistical methods and staffing time permit, two cycles of testing the online ERP and onsite inspection follow-ups will be considered, e.g., 2 owners of ~10 facilities then 20 owners of ~100 facilities.)	10/1/08	7/1/09	Report status online use  Complete statistics and report issues/problems encountered
Analysis of Self-Certification Data	Analysis of Self-Certification data with primary purpose of identifying opportunities for selective follow-up (next step).	12/1/08	10/1/09	Performed on a case by case basis as analysis dictates.
Selective follow-up	Selective follow-up with self-certifying facilities, based upon analysis of self-certification data. Targeted follow-up may include phone calls, inspections and enforcement.	12/1/08	10/1/09	Ongoing effort.
Post-certification inspections	Inspections at facilities to establish whether sector performance measures (and other measures) have changed since the baseline. Inspection data also used to cross-check self-certification data at inspected facilities. Facilities selected at random from the entire targeted population, based upon sample design from statistical methodology.	12/1/08	10/1/09	Report on status and findings
Data analysis	Analysis of baseline, self-certification, and post-certification data to understand change in facility performance and overall outcomes of interest. Assessment of project efficiency.	4/1/09	12/1/09	Ongoing effort

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Preparation of Final Project Report	Draft and finalize final project report.	6/1/09	6/1/11 Revised to 6/2013	
Reporting to EPA	Reporting shall include quarterly, annual and final reports.	6/1/09	6/1/11 Revised to 6/2013	Initial Grant Period Effort Report sent to EPA and Senior DEQ Management (10/1/09)
Extension Granted by EPA to 8/1/11— further extended to 6/2013	Final Reporting will await agreement on next stage work to incorporate EPACT Secondary Containment requirements, Operator Training enhancements, and EPA Regulation amendments projected in the next two years.	8/1/09	8/1/11 Revised to 6/2013	

## Financial Report

The VADEQ has made payments for the UST ERP “decision tree” development, and Phase I work with VCU for a total of \$119,041 to date. Additional committed expenditures include the Phase II development for \$42,957 currently being invoiced. Of the \$253,500 total grant \$161,998 has been committed with \$91,502 remaining.

Budget Category	Approved Budget	Spent This Qtr	Cumulative To Date
Personnel	0		0
Fringe	0		0
Travel	1,500		0
Operating Services	0		0
Supplies	2,000		0
Contractual	250,000	42,957	161,998
Equipment	0		0
Total	253,500		161,998
Less Op Svs & Sup	0		0
Indirect Costs	0		0
Total	253,500		161,998