

US EPA ARCHIVE DOCUMENT

**Virginia Environmental Results Program for USTs**  
**Assistance Agreement No. EI-97340101-0**  
**4<sup>th</sup> Quarterly Report**  
**June 2007 – August 2007**

**Synopsis of Accomplishments During the Reporting Period**

During this period VA-DEQ ERP Project staff held meetings and teleconferences with internal inspectors and staff from the DEQ Office of Information Systems, the Virginia Commonwealth University – Center for Environmental Studies (the contractor), DEQ Regional Inspectors, and the DEQ Small Business Assistance group. The meetings have better refined the project scope and the planned interfacing of the online UST ERP tool with existing DEQ database platforms and programs.

Teleconferences with EPA NCEI and Region 3 staff helped to develop and refine proposed QAPP logic and interstate ERP cooperation with other UST-ERP states (Vermont and Rhode Island).

Major efforts to review the UST ERP “decision tree” for correctness were undertaken during this period. Revisions are being incorporated for the final version.

Intensive review of the next Scope of Work with Virginia Commonwealth University’s Center for Environmental Studies was performed to insure all facets of the online and software project will provide the needed outcomes.

On September 21, 2007 we will hold the first EPACT external stakeholder UST regulation development meeting which will include some discussion and outreach of the UST ERP online tool development. Much more outreach to the selected UST facility owners will occur as the baseline inspections start up later in the year.

**Narrative Discussion**

Second-phase contract negotiations continued during the period with the Virginia Commonwealth University’s (VCU) Center for Environmental Studies and their software contractor for refinements to a Scope of Work (SOW) to continue the project by developing the online ERP tool and provide interface software with VA-DEQ’s and VCU’s hosted database systems. Key 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.

Outreach to DEQ regional inspection staff occurred during the period via review of the UST ERP “decision tree”. Decision tree development was near completion. A final draft of the decision tree was provided to all via a web link at: [www.worldviewsolutions.net/osrr](http://www.worldviewsolutions.net/osrr) (see “complete diagram”). Second phase development work (ERP online tool) will be underway after signing of the second VCU contract under review.

A revised Quality Assurance Project Plan (QAPP) remains under development. In-house and VCU statistics faculty have been consulted and are included in the next contract for metrics and EBPI development for the QAPP revision project. EBPIs will be in concert with Vermont's ERP EBPIs for USTs in an effort to more effectively compare outcomes.

As a quick review of the project 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 will be contacted to begin the process of encouraging them to volunteer for participation in the ERP project over this next year. DEQ inspection staff and facility owners will make up the key stakeholders for this pilot project. Due to delays in the online tool decision tree development, the actual initial UST facility inspections are planned to occur during the winter of 2007-2008 with the online ERP beta tool becoming available in early to middle 2008.

**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	10/1/07	Provide copy of final agreement to EPA; Provided upon request

**Table 1: Schedule of Major Project Tasks**

This project's major tasks and timeline are outlined in the table below.

Task	Task Description	Start Date	End Date	Milestone/Status
Quarterly Reports	Provide EPA with quarterly progress.	10/1/06	6/1/09	Submit first Quarterly Report to EPA (10/06) (all others follow quarterly through 6/09); 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.	5/1/07	8/1/08	Decision Tree to be complete 10/1/07; Online Workbook contract from 10/1/07 to 8/1/08
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. chosen at random.	8/1/06	1/1/07	Provide list; List Provided;
Statistical methodology (included in QAPP)	Development of a statistical methodology to drive performance measurement and analytical tasks.	8/1/06	12/1/07	Develop statistical methods report; VCU faculty 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.	11/1/07	12/1/08	Review efficacy of data measurement tools; VCU Software 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	1/1/08	Provide final QAPP report to EPA (awaits VCU input under contract—will be delayed)

**Table 1: Schedule of Major Project Tasks**

This project's major tasks and timeline are outlined in the table below.

Task	Task Description	Start Date	End Date	Milestone/Status
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.	10/1/07	4/1/08	Compile list of sites baseline-inspected; compare with DEQ UST Checklist results and send summary to EPA
Workbook and Certification Form Finalization	Finalization of CD-ROM/Online UST ERP Self-Certification Workbook, outreach and assistance materials, web resources, and certification forms.	1/1/08	4/1/08	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.	4/1/08	8/1/08	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.)	5/1/08	8/1/08	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).	8/1/08	10/1/08	
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.	10/1/08	3/1/09	

**Table 1: Schedule of Major Project Tasks**

This project's major tasks and timeline are outlined in the table below.

Task	Task Description	Start Date	End Date	Milestone/Status
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.	11/1/08	3/1/09	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.	3/1/09	6/1/09	
Preparation of Final Project Report	Draft and finalize final project report.	6/1/09	7/01/09	
Reporting to EPA	Reporting shall include quarterly, annual and final reports.	6/1/09	8/1/09	Final Report sent to EPA and Senior DEQ Management (8/1/09)

## **Financial Report**

*Financial Information removed by EPA as confidential business information.*