

US EPA ARCHIVE DOCUMENT

**Promoting Environmental Excellence through Environmental Leadership and Voluntary
Performance Improvements**

Assistance Agreement No. EI-96489208-0

Quarterly Report

March 1, 2007

Project Synopsis

During this reporting period, the Division of Compliance Assistance determined that it will target retail gasoline stations through its Targeted Assistance Program (TAP). For the compliance improvement portion of this project, an emphasis will be placed on the operational requirements associated with USTs. However, additional environmental requirements will also be included.

Selection of this sector was made in December after considering data extracted from TEMPO, the department's enterprise data system. The division evaluated the compliance rates of all of the various sectors regulated by the Department. In addition to assessing the actual compliance rates, the Division counted the number of inspections conducted at these locations and considered the likelihood of sector participation in the TAP. The division also solicited agency input regarding sectors with a significant need for assistance. After the retail gas station sector was selected, a baseline compliance rate was also established.

In January and February, detailed analysis of UST inspections was conducted of entities regulated by the Underground Storage Tank program. This allowed the division to determine that a large majority of the violations identified at UST facilities are operational in nature. It is expected that this analysis is reflective of retail gasoline stations regulated by this program.

The Division also met with department programs that regulate retail gas stations to learn of their current activities aimed at performance improvement and compliance assurance.

The Division's upcoming efforts will include soliciting stakeholder input and initiating the development of training materials. These efforts will be conducted in partnership with the Department's Underground Storage Tank Branch and other department programs that regulate retail gas stations. Other pertinent resources prepared by other states will also be evaluated.

Narrative Discussion

To date, there have not been any significant or unforeseen obstacles to the success of this project. Data contained in TEMPO was easily accessed and the analysis proved to be straight-forward.

During discussions with department programs, the Division was pleased to learn that this project will complement an ongoing effort of the Underground Storage Tank Branch, which is

developing an on-line training program for UST operators. It is not entirely clear what the UST Branch’s schedule for completion of this training module will be, but in an effort to avoid unnecessary and expensive overlap in efforts, the Division may want to adjust the TAP project schedule to complement the UST program’s effort. The division will be meeting with the UST branch over the next couple of months to define an appropriate schedule. Notwithstanding this potential adjustment, the Division is currently on schedule with the project workplan.

Because there are nearly 10,000 known retail gasoline stations in Kentucky, the Division is evaluating if it will be more effective to implement the TAP in a geographic area of the state rather than applying the program statewide initially. This would allow the division the ability to better target its efforts. It will also allow the division to compare project results not only in comparison to the determined compliance baseline, but also to compliance rates between geographic areas. Discussions with program staff indicate that entities listed as having a sector of “Unlisted” is weighted heavily toward UST sites. If this is accurate, there may be 5,000 - 7,000 additional entities in the retail gasoline station sector and a geographic approach may be even more necessary.

Project Tasks and Milestones

(Reflecting Accomplishments for this quarter and projection of activities for next quarter)

<i>Implementation Activities</i>	<i>Start Date</i>	<i>Target Completion</i>	<i>Status/Notes</i>
Identify sector for TAP	10/07	12/07	Completed Retail gasoline stations were selected. An emphasis will be placed on operational requirements for USTs.
Determine compliance baseline for identified sector	01/08	02/08	Completed
Collaborate and solicit input from stakeholders	03/08	03/08	Not Started This effort is anticipated to begin in late March, 2008. The division is identifying which stakeholders to include in these discussions.
Develop TAP materials	04/08	09/08	Not Started

			<p>Over the next two quarters, the Division will begin to develop assistance resources such as: training materials, sector specific compliance handbook, and self-assessment checklist.</p> <p>The Division will also develop materials to promote environmental leadership activities that will encourage participants to join KY EXCEL.</p> <p>Some of these efforts may be delayed to complement efforts currently underway by the UST branch.</p>
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Financial Report

Financial Information removed by EPA as confidential business information.