

US EPA ARCHIVE DOCUMENT

State Innovation Grant Project
Rhode Island Department of Environmental Management (DEM)
Progress Report #2

April 1, 2007 to June 30, 2007

Project Title: Underground Storage Tanks—Alternative Inspection Programs and the U.S. Energy Policy Act of 2005

Section 1 – Summary of Activities. The major activities that took place during the reporting period included baseline data management, meetings/conference calls, and preliminary economic analysis. As part of the Environmental Results Program (ERP), baseline information for the randomly selected 100 facilities was segregated, checked for completeness, and partially formatted to be analyzed as Environmental Business Practice Indicators (EBPI's). Several meetings were held with DEM and URI project participants. As part of the interstate comparative model development, initial communications with New Hampshire State UST program staff took place as part of an effort to compare ERP with the traditional inspection program used in NH. Though preliminary contact with Florida UST staff had taken place in the last reporting period, there was no progress in this reporting period in obtaining the information needed for the comparative analysis. Also as part of the comparative model, an economic analysis was started to evaluate costs for each program.

Section 2 – Accomplishments/Problems. While URI project staff continued to work closely with DEM staff to understand the new tracking software for UST inspections, information from the 100 baseline inspections performed in 2004 is in the process of being formatted for statistical review. Each facility checklist is read through carefully and all responses inputted into an Excel spread sheet. At the end of this reporting period, approximately 50% of all the baseline checklists had been inputted (see attachment). Key EBPI's have not yet been selected, but project staff have begun to evaluate potential EBPI's based on regulations in the 7-8 major areas (e.g., tank corrosion protection, tank leak detection). The post-ERP inspections for the first round are currently ongoing and expected to be completed by the end of the next reporting period (September 2007), at which time another 100 facilities will also be selected at random to gather all the information needed for the first round statistical analysis.

A total of 249 facilities submitted 1097 return-to-compliance forms (RTC's). Project personnel are still reviewing each checklist and organizing the RTC's into a single Excel file (see attachment for partial list).

A key goal of the project is to compare the ERP approach with an established, traditional UST inspection program such as that found in Florida. While initial communication with FL had taken place in the last reporting period, difficulties arose in obtaining information needed to perform a comparative analysis. The checklist used for the UST inspections is critical to be able to compare potential indicators; but FL has converted to a 100% electronic system that precludes hard copy printouts, and RI does not have access to the same software that FL uses. Efforts are on going to retrieve the information needed from FL.

During this period of determining how to obtain the FL checklist, it was decided to contact New Hampshire, another state that utilizes the "traditional" inspection approach and also employs an electronic system for UST inspections. URI and DEM representatives visited NH UST staff and were able to obtain the inspection checklist details with the help of a contractor hired by NH who

extracted the checklist information into an Excel format (see attachment). Once the RI data is properly formatted and key indicators selected, a direct comparison to the indicators selected in NH's checklist can be performed. Economic analyses are also ongoing to compare the UST inspection programs in different states.

Section 3 – Schedules. In reference to the original project timeline, the tasks and milestones are for the most part in line with the expected schedule. The partner states for the project have been selected, FL and NH, though FL has yet to provide their checklist. Baseline data is in the process of being organized and prepared for statistical analysis.

Section 4 – Funds. *Financial information removed by EPA as confidential business information.*

Section 5 – Estimates. It is anticipated that the original timeline and funding schedule will be followed for the remainder of the project. Updates will be provided in future progress reports.