

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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NOVEMBER 14, 2006

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: FY 2006 End-of-Year Activity Report

FROM: Cliff Rothenstein, Director
Office of Underground Storage Tanks

A handwritten signature in black ink, appearing to read "Cliff Rothenstein", is written over the "FROM:" line.

TO: UST/LUST Regional Division Directors, Regions 1-10

This memo provides you with the FY 2006 semi-annual End-of-Year Activity Report (see attached) for the Underground Storage Tank program. I want to thank you and your staff for providing the information to OUST and conducting a quality assurance/quality control review of the numbers reported.

I am pleased that we are continuing to make progress in cleaning up petroleum leaks, in reducing the cleanup backlog, and in preventing future releases. As you know, for FY 2006, our GPRA goals include: (1) completing 13,600 cleanups; (2) completing 30 cleanups in Indian Country; (3) increasing our significant operational compliance rate to 66 percent; and (4) decreasing newly reported confirmed releases to fewer than 10,000.

At the end of FY 2006, we:

- Completed 14,493 cleanups, exceeding the GPRA goal by 893;
- Completed 43 cleanups in Indian Country; exceeding the GPRA goal by 13;
- Achieved 62 percent significant operational compliance; 4 percent below the GPRA goal; and
- Confirmed 8,361 new releases, exceeding the GPRA goal by 1,639.

Your success this year in almost all of the GPRA goals has contributed to the long term success of our program. Since the beginning of the program, we have cleaned up almost 75 percent of all reported releases (350,813), and reduced our cleanup backlog to 113,919, a 4 percent decrease from last year. As you can see on the attachment, we are below our GPRA goal for the significant operational compliance rate. However, some states have been targeting inspections at previously uninspected facilities in response to the Energy Policy Act, which may account for the decrease in compliance rates.

I know that achieving these results was not easy. Congratulations for overcoming the many technical and resource challenges we face.

Attachments

cc: Susan Bodine, OSWER
Scott Sherman, OSWER
Barry Breen, OSWER
Susan Bromm, OECA
Walker Smith, OECA
Dave Kling, OECA
Michael Stahl, OECA
Earl Salo, OGC
Sue Priftis, OSWER/ARMS
Howard Rubin, OSWER/ARMS
Lucille Baker, OSWER/ARMS
Jessie Price, OSWER/ARMS
UST Regional Branch Chiefs, Regions 1-10
UST Regional Program Managers, Regions 1-10
OUST Staff

Updated LUST Performance Measures

1. Number Of Confirmed Releases: The cumulative number of incidents (not UST systems) where the owner/operator has identified a release from a Subtitle I regulated petroleum UST system, reported the release to the state/local or other designated implementing agency and the state/local implementing agency has verified the release according to state procedures such as a site visit (including state contractors), phone call, follow-up letter, or other reasonable mechanism that confirmed the release.

***Clarification:** “Confirmed Releases” is a cumulative category—even as a cleanup is initiated and is completed, it is still counted in the “Confirmed Releases” category. For a site undergoing closure activities, a confirmed release is counted only if petroleum contamination is discovered and verified. In that case, the release is counted under both the “Confirmed Releases” and “Closed Petroleum UST Systems” categories. A release which requires no further action as determined by the implementing agency would still be counted as a confirmed release.*

***Example:** A confirmed release is identified by the incident, not by the receptor(s). For example, ten contaminated residential wells would be considered one release if the contamination was caused by a leaking tank at a single gasoline station. This accounting would be true even if it were discovered that more than one tank at that station was leaking. If tanks at three gasoline stations were found to be leaking, however, then three confirmed releases would be recorded, regardless of the number of receptors. Additionally, the initiation of a new cleanup response indicates a separate confirmed release. The discovery of a leaking tank at the gasoline station, for example, two years after completion of the original cleanup would be classified as a new confirmed release.*

2. Number Of Cleanups Initiated: The cumulative number of confirmed releases at which the state or responsible party (under supervision as designated by the state) has **evaluated the site and initiated 1) management of petroleum-contaminated soil, 2) removal of free product (from the surface or subsurface environment), 3) management or treatment of dissolved petroleum contamination, 4) monitoring of the groundwater or soil being remediated by natural attenuation or 5) the state has determined that no further actions are currently necessary to protect human health and the environment.** [Subset of Measure 1]

***Clarification:** “Cleanups Initiated” is a cumulative category—sites should never be deleted from this category. Even as a cleanup progresses and is completed, it is still counted in the cleanups initiated category. “Cleanups Initiated” indicates that physical activity (e.g., pumping, soil removal, recovery well installation) has begun at the site, **unless a state has evaluated the site and has determined that no physical activity is currently necessary to protect human health and the environment. Site investigations and emergency responses DO NOT qualify as a cleanup initiated unless one of the five actions listed in the definition has occurred.** Sites being remediated by natural attenuation can be counted in this category when site characterizations, monitoring plans, and site-specific cleanup goals are established for these*

sites. It is no longer necessary to report separately those cleanups initiated that are state-lead sites using state money and those that are responsible-party lead sites. It is, however, still necessary to report the number of cleanups initiated that are state lead with Trust Fund money.

3. Number Of Cleanups Completed: The cumulative number of confirmed releases where cleanup has been initiated and where the state has determined that no further actions are currently necessary to protect human health and the environment. This number includes sites where post-closure monitoring as long as site-specific (e.g., risk-based) cleanup goals have been met. Site characterization, monitoring plans, and site-specific cleanup goals must be established and cleanup goals must be attained for sites being remediated by natural attenuation to be counted in this category. [Subset of Measure 2]

Clarification: “Cleanups Completed” is a cumulative category—sites should never be deleted from this category. It is no longer necessary to report separately cleanups completed that are state lead with state money and cleanups completed that are responsible party lead. It is, however, still necessary to report the number of cleanups completed that are state lead with Trust Fund money. A “no further action” determination made by the state that satisfies the “cleanups initiated” measure above, also satisfies this “cleanups completed” measure. This determination will allow a confirmed release that does not require further action to meet the definition of both an initiated and completed cleanup.

4. Number Of Emergency Responses: The cumulative number of sites where the implementing agency takes immediate action to mitigate imminent threats to human health and the environment posed by an UST system release (e.g., venting of explosive vapors, providing bottled water).

Clarification: “Emergency Responses” is a cumulative category—sites should never be deleted from this category. In a situation where petroleum contamination is found during an emergency response, the site is counted under both the “Emergency Responses” and “Confirmed Releases” categories. “Emergency Responses,” however, are not included as cleanups initiated or cleanups completed unless activities listed under those categories has occurred.

Updated UST Performance Measures

1. Percentage of UST Facilities in Significant Operational Compliance with the UST Spill, Overfill, and Corrosion Protection Regulations (the “1998” Regulations): The percentage of underground storage tank (UST) facilities deemed to be in significant operational compliance with the UST spill, overfill, and corrosion protection requirements.

Clarification: This is a percentage (rather than a number) based on the initial inspections at facilities during the respective reporting period. This measure applies to the spill, overfill, and corrosion protection requirements that were phased in through 12/22/1998. Reports should reflect the “operational” instead of “equipped” compliance; is reported on a facility basis rather than per tank; is based on inspections conducted within the past 12 months; and is based on an initial (instead of follow-up) inspection at a facility. Significant operational compliance generally means that the UST systems at a facility have the proper equipment/procedures in place, and are being properly operated and maintained in order to detect a release.

2. Percentage of UST Facilities in Significant Operational Compliance with the UST Leak Detection Regulations: The percentage of underground storage tank (UST) facilities deemed to be in significant operational compliance with the UST leak detection requirements.

Clarification: This is a percentage (rather than a number) based on the initial inspections at facilities during the respective reporting period. This measure applies to the leak detection requirements that were phased in through 1993. Reports should reflect the “operational” instead of “equipped” compliance; is reported on a facility basis rather than per tank; is based on inspections conducted within the past 12 months; and is based on an initial (instead of follow-up) inspection at a facility. Significant operational compliance generally means that the UST systems at a facility have the proper equipment/procedures in place, and are being properly operated and maintained in order to detect a release.

Table of Contents for Attachments

UST Corrective Action Measures for End of Year 2006 (Cumulative as of September 30, 2006): This attachment provides the regions', states', territories' and tribal cumulative reported information, as well as the "actions this period" for Confirmed Releases and Cleanups Completed and the national totals.

UST Compliance Measures for End-of-Year FY 2006 (as of 9/30/2006): This attachment provides the regions', states', territories' and tribal annual compliance reported information and the national total.

States with Requirements more Stringent than the Federal Significant Operational Compliance Requirements: This attachment provides a brief synopsis for those states that report more stringent compliance requirements than the federal compliance requirements.

UST National Backlog: FY 1989 through End-of-Year 2006: This attachment provides an illustration of historical cleanup backlog trends.

UST Corrective Action Measures for End of Year FY 2006 (Cumulative as of September 30, 2006)

Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cummulative		Actions This Year	Cummulative		
ONE									
CT	11,439	20,437	32	2,497	2,444	75	1,671	826	111
MA	11,211	22,426	83	6,186	5,982	204	5,230	956	5,056
ME	3,308	12,440	98	2,261	2,229	99	2,173	88	448
NH	2,891	11,004	57	2,275	2,275	60	1,449	826	628
RI	1,648	7,161	22	1,260	1,260	28	1,006	254	26
VT	3,039	5,275	15	1,945	1,933	40	1,176	769	288
SUBTOTAL	33,536	78,743	307	16,424	16,123	506	12,705	3,719	6,557
TWO									
NJ	17,467	55,169	220	9,889	9,032	155	5,889	4,000	52
NY	28,749	83,158	870	24,898	24,881	1,026	21,926	2,972	1,306
PR	4,603	5,433	4	1,026	882	18	458	568	187
VI	144	278	0	22	14	4	6	16	14
SUBTOTAL	50,963	144,038	1,094	35,835	34,809	1,203	28,279	7,556	1,559
THREE									
DC	720	3,104	27	841	841	25	597	244	235
DE	1,606	6,702	53	2,337	2,222	67	2,093	244	406
MD	9,317	28,496	330	10,421	10,162	360	9,641	780	336
PA	25,116	60,700	310	14,171	13,641	661	10,329	3,842	28
VA	22,101	55,818	331	10,805	10,571	445	10,107	698	63
WV	5,891	18,935	79	2,988	2,776	122	1,873	1,115	10
SUBTOTAL	64,751	173,755	1,130	41,563	40,213	1,680	34,640	6,923	1,078

¹ The terms "confirmed release," "cleanup initiated," and "cleanup completed" are defined terms available on the OUST website at <http://www.epa.gov/oust/cat/pm032603.pdf> and attached to this memo. In March 2003 OUST clarified these definitions (see website) to include as a cleanup initiated and cleanup completed a site where a state has determined no cleanup action is necessary to meet a states risk-based cleanup levels.

UST Corrective Action Measures for End of Year FY 2006 (Cumulative as of September 30, 2006)

Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cummulative		Actions This Year	Cummulative		
FOUR									
AL	19,063	28,898	175	11,059	10,830	181	9,450	1,609	348
FL	30,051	96,365	335	24,325	15,216	664	9,425	14,900	204
GA	30,081	45,277	320	11,343	10,988	580	8,953	2,390	12
KY	12,749	35,990	307	13,458	13,448	355	11,051	2,407	159
MS	8,610	21,945	82	6,626	6,534	78	6,302	324	122
NC	29,424	64,448	291	23,811	22,527	574	17,516	6,295	585
SC	12,027	31,858	153	8,851	8,344	248	5,573	3,278	99
TN	17,575	34,507	282	13,124	13,224	439	12,331	793	68
SUBTOTAL	159,580	359,288	1,945	112,597	101,111	3,119	80,601	31,996	1,597
FIVE									
IL	22,875	62,727	461	22,871	21,586	818	15,358	7,513	1,834
IN	14,111	35,653	207	8,488	7,745	609	5,568	2,920	253
MI	20,420	65,955	307	21,129	20,665	320	12,060	9,069	83
MN	14,414	28,057	136	9,740	9,697	254	8,756	984	511
OH	23,594	43,025	525	24,116	23,309	1,110	21,410	2,706	417
WI	13,757	65,485	182	18,469	17,977	480	15,513	2,956	387
SUBTOTAL	109,171	300,902	1,818	104,813	100,979	3,591	78,665	26,148	3,485

¹ The terms "confirmed release," "cleanup initiated," and "cleanup completed" are defined terms available on the OUST website at <http://www.epa.gov/oust/cat/pm032603.pdf> and attached to this memo. In March 2003 OUST clarified these definitions (see website) to include as a cleanup initiated and cleanup completed a site where a state has determined no cleanup action is necessary to meet a states risk-based cleanup levels.

UST Corrective Action Measures for End of Year FY 2006 (Cumulative as of September 30, 2006)

Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cummulative		Actions This Year	Cummulative		
SIX									
AR	9,597	20,114	30	1,324	1,023	56	1,006	318	14
LA	14,047	29,502	110	3,110	3,110	175	1,901	1,209	802
NM	4,089	12,265	19	2,490	1,809	73	1,706	784	83
OK	11,378	24,780	117	4,398	4,398	80	3,852	546	141
TX	56,265	110,759	354	24,655	21,743	1,017	21,137	3,518	534
SUBTOTAL	95,376	197,420	630	35,977	32,083	1,401	29,602	6,375	1,574
SEVEN									
IA	7,492	22,420	54	5,839	5,544	157	4,143	1,696	0
KS	7,102	19,728	52	4,673	4,449	114	2,751	1,922	118
MO	10,274	28,797	77	6,252	5,875	132	4,928	1,324	347
NE	6,915	14,249	73	6,021	4,332	182	4,023	1,998	11
SUBTOTAL	31,783	85,194	256	22,785	20,200	585	15,845	6,940	476
EIGHT									
CO	7,981	21,022	201	6,742	6,720	222	5,824	918	42
MT	3,308	12,215	65	2,963	2,601	36	1,821	1,142	44
ND	2,168	6,979	2	814	805	10	789	25	3
SD	3,019	6,814	9	2,357	2,357	50	2,197	160	21
UT	4,065	12,739	43	4,240	4,200	103	3,796	444	3
WY	2,037	7,830	6	1,995	1,592	87	1,011	984	65
SUBTOTAL	22,578	67,599	326	19,111	18,275	508	15,438	3,673	178

¹ The terms "confirmed release," "cleanup initiated," and "cleanup completed" are defined terms available on the OUST website at <http://www.epa.gov/oust/cat/pm032603.pdf> and attached to this memo. In March 2003 OUST clarified these definitions (see website) to include as a cleanup initiated and cleanup completed a site where a state has determined no cleanup action is necessary to meet a states risk-based cleanup levels.

UST Corrective Action Measures for End of Year FY 2006 (Cumulative as of September 30, 2006)

Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cummulative		Actions This Year	Cummulative		
NINE									
AS	16	52	0	7	7	1	7	0	1
AZ	6,875	20,090	82	8,273	5,764	365	6,788	1,485	2
CA	37,750	123,000	498	44,967	44,510	955	30,865	14,102	0
CNMI	75	21	0	9	8	0	4	5	0
GU	259	429	0	135	135	0	111	24	0
HI	1,755	5,074	34	1,874	1,780	52	1,575	299	0
NV	3,721	6,770	4	2,420	2,419	41	2,207	213	52
SUBTOTAL	50,451	155,436	618	57,685	54,623	1,414	41,557	16,128	55
TEN									
AK	1,142	6,288	11	2,292	2,228	90	1,636	656	48
ID	3,395	9,672	19	1,364	1,335	21	1,205	159	12
OR	6,181	25,433	77	6,935	6,709	182	5,646	1,289	56
WA	10,299	35,284	98	6,240	5,933	150	4,265	1,975	38
SUBTOTAL	21,017	76,677	205	16,831	16,205	443	12,752	4,079	154

¹ The terms "confirmed release," "cleanup initiated," and "cleanup completed" are defined terms available on the OUST website at <http://www.epa.gov/oust/cat/pm032603.pdf> and attached to this memo. In March 2003 OUST clarified these definitions (see website) to include as a cleanup initiated and cleanup completed a site where a state has determined no cleanup action is necessary to meet a states risk-based cleanup levels.

UST Corrective Action Measures for End of Year FY 2006 (Cumulative as of September 30, 2006)

Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cummulative		Actions This Year	Cummulative		
REGIONAL CORRECTIVE ACTIONS FOR INDIAN COUNTRY									
REGION 1	12	2	0	0	0	0	0	0	0
REGION 2	179	21	0	7	1	0	0	7	2
REGION 3	0	0	0	0	0	0	0	0	0
REGION 4	61	55	1	12	11	0	4	8	0
REGION 5	393	988	3	207	200	6	138	69	0
REGION 6	301	213	3	48	48	2	42	6	1
REGION 7	82	97	0	20	15	0	8	12	0
REGION 8	543	1,918	2	442	415	12	277	165	5
REGION 9	720	1,250	18	217	168	12	132	85	0
REGION10	384	919	5	154	152	11	128	26	3
SUBTOTAL	2,675	5,463	32	1,107	1,010	43	729	378	11
	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanup Backlog	Emergency Responses
			Actions This Period	Cummulative		Actions This Period	Cummulative		
NATIONAL TOTAL	641,881	1,644,515	8,361	464,728	435,631	14,493	350,813	113,915	16,724

¹ The terms "confirmed release," "cleanup initiated," and "cleanup completed" are defined terms available on the OUST website at <http://www.epa.gov/oust/cat/pm032603.pdf> and attached to this memo. In March 2003 OUST clarified these definitions (see website) to include as a cleanup initiated and cleanup completed a site where a state has determined no cleanup action is necessary to meet a states risk-based cleanup levels.

UST Compliance Measures for End-of-Year FY 2006 (as of 9/30/06)

Region/ State	% in Significant Operational Compliance with Release Prevention Regulations	% in Significant Operational Compliance with Release Detection Regulations	% of UST Facilities in SOC w/UST Release Detection and Release Prevention
ONE			
*CT	98%	62%	61%
ME	77%	72%	68%
MA	81%	40%	23%
NH	68%	66%	53%
*RI	86%	67%	61%
*VT	64%	70%	59%
SUBTOTAL	84%	57%	48%
TWO			
*NJ	6%	55%	5%
NY	79%	77%	67%
PR	87%	87%	82%
VI	90%	69%	60%
SUBTOTAL	55%	70%	47%
THREE			
DE	67%	74%	60%
DC	74%	56%	56%
MD	89%	86%	80%
PA	83%	73%	63%
VA	73%	68%	58%
WV	83%	73%	62%
SUBTOTAL	80%	73%	64%

Region/ State	% in Significant Operational Compliance with Release Prevention Requirements	% in Significant Operational Compliance with Release Detection Regulations	% of UST Facilities in SOC w/UST Release Detection and Release Prevention
FOUR			
AL	82%	65%	61%
FL	88%	87%	85%
GA	88%	76%	73%
KY	54%	54%	39%
MS	82%	76%	73%
NC	69%	71%	62%
SC	87%	83%	76%
TN	87%	89%	81%
SUBTOTAL	81%	76%	70%
FIVE			
IL	59%	61%	40%
IN	73%	81%	74%
MI	74%	45%	39%
MN	61%	70%	55%
OH	77%	64%	59%
WI	81%	78%	68%
SUBTOTAL	71%	65%	54%
SIX			
AR	69%	68%	56%
LA	80%	66%	55%
NM	93%	89%	86%
OK	90%	74%	69%
TX	75%	74%	64%
SUBTOTAL	78%	73%	64%

These compliance rates indicate the percentage of recently-inspected facilities found to be in significant operational compliance (SOC) with federal UST requirements. In accordance with EPA guidelines, states are allowed to report based on requirements more stringent than the federal SOC requirements. Connecticut, New Jersey, Rhode Island, and Vermont indicated they had done so, as described in the addendum on the next page. Furthermore, states have different approaches to targeting inspections. For example, some states focus inspections on suspected non-compliant facilities, while other states conduct random inspections. In FY 2006, many states focused inspections on previously uninspected facilities in response to the inspection requirements in the Energy Policy Act of 2005.

* States reporting based on requirements more stringent than the federal SOC requirements.

** DNA = Data Not Available N/A = Not Applicable

**UST Compliance Measures
for End-of-Year FY 2006 (as of 9/30/06)**

Region/ State	% in Significant Operational Compliance with Release Prevention Regulations	% in Significant Operational Compliance with Release Detection Regulations	% of UST Facilities in SOC w/UST Release Detection and Release Prevention
SEVEN			
IA	82%	90%	74%
KS	81%	85%	71%
MO	62%	78%	51%
NE	59%	55%	44%
SUBTOTAL	70%	77%	59%
EIGHT			
CO	80%	75%	71%
MT	88%	83%	75%
ND	85%	81%	70%
SD	62%	71%	63%
UT	83%	72%	64%
WY	92%	95%	88%
SUBTOTAL	81%	77%	71%
NINE			
AS	**DNA	**DNA	**DNA
AZ	82%	80%	80%
CA	80%	85%	75%
GU	77%	87%	75%
HI	98%	94%	92%
CNMI	100%	100%	100%
NV	88%	85%	76%
SUBTOTAL	82%	85%	76%

Region/ State	% in Significant Operational Compliance with Release Prevention Requirements	% in Significant Operational Compliance with Release Detection Regulations	% of UST Facilities in SOC w/UST Release Detection and Release Prevention
TEN			
AK	84%	77%	73%
ID	79%	61%	55%
OR	88%	82%	76%
WA	75%	61%	51%
SUBTOTAL	80%	68%	60%
INDIAN COUNTRY			
REGION 1	**DNA	**DNA	**DNA
REGION 2	**DNA	**DNA	**DNA
REGION 3	**N/A	**N/A	**N/A
REGION 4	**DNA	**DNA	**DNA
REGION 5	86%	56%	54%
REGION 6	86%	68%	64%
REGION 7	**DNA	**DNA	**DNA
REGION 8	96%	80%	79%
REGION 9	72%	55%	50%
REGION10	85%	51%	48%
SUBTOTAL	84%	62%	59%
NATIONAL TOTAL			
National Total	76%	72%	62%

These compliance rates indicate the percentage of recently-inspected facilities found to be in significant operational compliance (SOC) with federal UST requirements. In accordance with EPA guidelines, states are allowed to report based on requirements more stringent than the federal SOC requirements. Connecticut, New Jersey, Rhode Island, and Vermont indicated they had done so, as described in the addendum on the next page. Furthermore, states have different approaches to targeting inspections. For example, some states focus inspections on suspected non-compliant facilities, while other states conduct random inspections. In FY 2006, many states focused inspections on previously uninspected facilities in response to the inspection requirements in the Energy Policy Act of 2005.

* States reporting based on requirements more stringent than the federal SOC requirements.

** DNA = Data Not Available N/A = Not Applicable

States With Requirements More Stringent Than The Federal Significant Operational Compliance Requirements

CONNECTICUT

Release Prevention: Operation and Maintenance of CP

- Lining not allowed.

Release Detection: Testing

- Tanks and piping require weekly and monthly monitoring for releases and records must be available (for 2 of the most recent consecutive months and for 8 of the last 12 months).
- Statistical Inventory Reconciliation (SIR) not allowed as a stand-alone method.

NEW JERSEY

Release Prevention: Spill Prevention

Hydrostatic test required when spill bucket full of debris/liquid or otherwise appears compromised.

RHODE ISLAND

Release Prevention: Operation and Maintenance

- All tanks and piping are required to be tightness tested after a repair. No exemptions.

Release Prevention: Operation and Maintenance of Cathodic Protection

- Impressed current cathodic protection systems are required to be tested every 2 years.
- Sacrificial anode systems are required to be tested every 3 years.

Release Detection: Testing

- Records required for the past 36 months.
- Inventory control is required for all tanks (single-walled and double-walled).
- The automatic tank gauge (ATG) has to be checked monthly and have an annual test conducted.
- Tightness testing schedule is different than the federal requirement; it depends on the type of tank.
 - o Tank tightness must be performed on all single walled tanks.
 - o Tightness tests must be performed every 5 years after the installation of the ATG until the tank has been installed for 20 years and every 2 years thereafter.
 - o UST systems upgraded with interior lining and/or cathodic protections are not required to have an ATG for 10 years after the upgrade. Tank tightness testing must be conducted annually during these 10 years. After 10 years, an ATG is required and tank tightness testing must be performed every 5 years until the tank has been installed for 20 years and then every 2 years thereafter. The results of all tightness tests shall be maintained for 3 years beyond the life of the facility.
- Groundwater or vapor monitoring not accepted as a method of leak detection.
- SIR not accepted.

VERMONT

Release Prevention: Operation and Maintenance of CP

- Lining not allowed unless with impressed current.

Release Detection: Method Presence and Performance Requirements

- Weekly monitoring required for tank and piping. Records must be available for the two most recent consecutive months and for 8 of the last 12 months.

Release Detection: Testing

- Inventory control /Tank Tightness Testing (TTT) not allowed as a release detection method after 6/30/98.
- Manual Tank Gauge (MTG) allowed alone up to 550 gallons; 551-1,000 gallons, MTG with annual TTT.

UST National Backlog: FY 1989 Thru End-of-Year FY 2006

