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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
Mail Code 5401P

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

December 5, 2007

MEMORANDUM

SUBJECT: FY 2007 End-of-Year Activity Report

FROM: Cliff Rothenstein, Director
Office of Underground Storage Tanks

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

This memo provides you with the FY 2007 End-of-Year Activity Report (see attached) for the Underground Storage Tanks 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 2007, our GPRA goals included: (1) completing 13,000 cleanups; (2) completing 30 cleanups in Indian Country; (3) increasing our significant operational compliance rate to 67 percent; and (4) decreasing newly reported confirmed releases to fewer than 10,000.

For FY 2007, we:

- Completed 13,862 cleanups;
- Completed 54 cleanups in Indian Country;
- Achieved 63 percent significant operational compliance; and
- Confirmed 7,570 new releases.

While we are below our GPRA goal for the significant operational compliance rate, some states targeted inspections at previously uninspected facilities in response to the Energy Policy Act which may account for lower compliance rates. Overall, these numbers indicate that the program is continuing to make incremental progress in preventing and cleaning up releases.

Attachments

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March 26, 2003

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 with 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 have 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.

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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 as 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.*

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UST Corrective Action Measures for End of Year FY 2007 (Cumulative as of September 30, 2007)

Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cumulative		Actions This Year	Cumulative		
ONE									
CT	10,849	21,079	37	2,534	2,471	39	1,710	824	113
MA	11,021	22,772	77	6,263	6,059	192	5,422	841	5,124
ME	3,199	12,501	86	2,347	2,305	89	2,262	85	490
NH	3,063	11,126	44	2,319	2,319	70	1,519	800	651
RI	1,627	7,201	23	1,309	1,309	25	1,031	278	26
VT	3,067	5,356	22	1,967	1,955	35	1,211	756	295
SUBTOTAL	32,826	80,035	289	16,739	16,418	450	13,155	3,584	6,699
TWO									
NJ	16,830	56,475	175	10,064	9,208	102	5,991	4,073	53
NY	28,897	86,261	603	25,591	25,562	965	22,904	2,687	1,318
PR	4,560	5,566	2	1,028	896	16	474	554	191
VI	144	278	0	22	15	0	6	16	14
SUBTOTAL	50,431	148,580	780	36,705	35,681	1,083	29,375	7,330	1,576
THREE									
DC	696	3,140	23	864	849	24	628	236	244
DE	1,467	6,929	62	2,399	2,283	81	2,178	221	412
MD	9,243	31,754	359	10,903	10,651	333	9,971	932	336
PA	24,677	61,356	249	14,420	13,837	706	10,811	3,609	28
VA	20,600	57,672	319	10,971	10,712	339	10,293	678	63
WV	5,696	19,255	71	3,059	2,880	152	2,025	1,034	10
SUBTOTAL	62,379	180,106	1,083	42,616	41,212	1,635	35,906	6,710	1,093

[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 2007 (Cumulative as of September 30, 2007)

Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cumulative		Actions This Year	Cumulative		
FOUR									
AL	18,885	29,196	135	11,194	10,914	211	9,661	1,533	381
FL	28,862	98,822	308	24,633	15,415	674	10,099	14,534	204
GA	30,049	45,973	342	11,685	11,320	540	9,493	2,192	12
KY	12,415	36,561	241	13,699	13,692	333	11,384	2,315	168
MS	8,782	22,483	189	6,815	6,709	208	6,510	305	123
NC	28,705	65,411	282	24,093	22,673	511	18,027	6,066	610
SC	11,981	32,106	168	9,019	8,480	292	5,865	3,154	99
TN	17,105	35,244	266	13,390	13,510	523	12,854	536	69
SUBTOTAL	156,784	365,796	1,931	114,528	102,713	3,292	83,893	30,635	1,666
FIVE									
IL	22,574	63,619	525	23,396	22,022	851	16,209	7,187	1,847
IN	13,840	36,240	230	8,637	8,109	541	6,028	2,609	264
MI	20,155	66,719	242	21,371	20,949	234	12,294	9,077	83
MN	14,532	28,070	165	10,020	9,894	308	9,090	930	576
OH	22,998	41,691	385	26,198	25,640	911	23,277	2,921	417
WI	13,725	65,775	109	18,578	18,241	428	15,970	2,608	389
SUBTOTAL	107,824	302,114	1,656	108,200	104,855	3,273	82,868	25,332	3,576

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Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cumulative		Actions This Year	Cumulative		
SIX									
AR	9,455	20,337	45	1,371	1,066	57	1,063	308	18
LA	12,601	31,294	176	3,286	3,286	193	2,094	1,192	804
NM	4,027	12,339	18	2,508	1,843	81	1,787	721	85
OK	11,102	25,307	129	4,504	4,504	139	3,991	513	143
TX	54,946	112,279	441	25,096	23,416	790	21,927	3,169	548
SUBTOTAL	92,131	201,556	809	36,765	34,115	1,260	30,862	5,903	1,598
SEVEN									
IA	7,372	22,505	26	5,869	5,556	161	4,310	1,559	0
KS	6,967	19,939	69	4,803	4,606	202	3,026	1,777	119
MO	10,267	29,118	73	6,297	6,039	97	5,051	1,246	370
NE	6,903	14,306	35	6,060	4,476	153	4,176	1,884	11
SUBTOTAL	31,509	85,868	203	23,029	20,677	613	16,563	6,466	500
EIGHT									
CO	7,949	21,204	153	6,895	6,849	229	6,053	842	43
MT	3,290	12,288	11	2,974	2,614	38	1,859	1,115	45
ND	2,163	7,031	11	825	814	13	802	23	4
SD	3,021	6,875	11	2,368	2,368	74	2,271	97	21
UT	4,024	12,852	90	4,341	4,278	80	3,886	455	3
WY	1,980	7,921	3	1,998	1,592	59	1,070	928	67
SUBTOTAL	22,427	68,171	279	19,401	18,515	493	15,941	3,460	183

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UST Corrective Action Measures for End of Year FY 2007 (Cumulative as of September 30, 2007)

Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cumulative		Actions This Year	Cumulative		
NINE									
AS	16	52	0	7	7	0	7	0	1
AZ	7,003	20,492	43	8,316	5,783	255	7,043	1,273	2
CA	37,498	124,074	210	45,177	45,177	990	31,855	13,322	0
CNMI	68	28	0	9	8	0	4	5	0
GU	267	424	1	136	136	1	112	24	0
HI	1,692	5,216	33	1,909	1,823	56	1,631	278	0
NV	3,669	6,871	5	2,425	2,424	19	2,233	192	52
SUBTOTAL	50,213	157,157	292	57,979	55,358	1,321	42,885	15,094	55
TEN									
AK	1,151	6,350	4	2,292	2,266	101	1,736	556	47
ID	3,302	9,813	14	1,378	1,347	23	1,228	150	12
OR	6,112	25,623	135	7,047	6,755	159	5,791	1,256	56
WA	10,112	35,715	77	6,321	5,998	105	4,375	1,946	39
SUBTOTAL	20,677	77,501	230	17,038	16,366	388	13,130	3,908	154

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UST Corrective Action Measures for End of Year FY 2007 (Cumulative as of September 30, 2007)

Region / State	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Backlog	Emergency Responses
			Actions This Year	Cumulative		Actions This Year	Cumulative		
REGIONAL CORRECTIVE ACTIONS FOR INDIAN COUNTRY									
REGION 1	8	5	0	0	0	0	0	0	0
REGION 2	165	25	0	4	2	1	1	3	2
REGION 3	0	0	0	0	0	0	0	0	0
REGION 4	68	59	3	15	13	1	5	10	0
REGION 5	435	998	5	214	207	4	144	70	0
REGION 6	314	229	4	52	52	3	45	7	1
REGION 7	82	97	0	20	15	1	9	11	0
REGION 8	527	1,927	1	439	411	18	289	150	5
REGION 9	703	1,261	2	219	169	18	150	69	0
REGION10	363	936	3	164	161	8	140	24	3
SUBTOTAL	2,665	5,537	18	1,127	1,030	54	783	344	11

	Number of Active Tanks	Number of Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanup Backlog	Emergency Responses
			Actions This Period	Cumulative		Actions This Period	Cumulative		
NATIONAL TOTAL	629,866	1,672,421	7,570	474,127	446,940	13,862	365,361	108,766	17,111

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UST Compliance Measures
for End-of-Year FY 2007 (as of 9/30/07)

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%	62%
ME	83%	60%	54%
MA	66%	54%	34%
NH	68%	67%	52%
*RI	88%	71%	68%
*VT	76%	75%	67%
SUBTOTAL	80%	61%	52%
TWO			
*NJ	23%	23%	19%
NY	74%	68%	57%
PR	88%	87%	83%
VI	90%	69%	60%
SUBTOTAL	58%	55%	47%
THREE			
DE	78%	81%	68%
DC	33%	33%	22%
MD	78%	83%	70%
PA	85%	79%	69%
VA	70%	65%	54%
WV	76%	71%	59%
SUBTOTAL	78%	74%	63%

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	89%	87%	80%
FL	88%	87%	85%
GA	86%	79%	75%
KY	57%	61%	41%
MS	81%	87%	76%
NC	73%	74%	62%
SC	85%	83%	74%
TN	90%	91%	85%
SUBTOTAL	82%	81%	74%
FIVE			
*IL	61%	56%	44%
IN	76%	84%	79%
MI	74%	45%	38%
MN	57%	65%	49%
OH	80%	69%	66%
*WI	81%	80%	68%
SUBTOTAL	71%	65%	56%
SIX			
AR	61%	69%	50%
LA	85%	80%	65%
NM	90%	87%	81%
OK	85%	79%	71%
TX	62%	61%	55%
SUBTOTAL	69%	68%	59%

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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, Illinois, New Jersey, Rhode Island, Vermont, and Wisconsin 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 2007 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 that the federal SOC requirements.

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

UST Compliance Measures
for End-of-Year FY 2007 (as of 9/30/07)

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	73%	69%	49%
KS	74%	89%	66%
MO	**DNA	**DNA	**DNA
NE	69%	49%	43%
SUBTOTAL	72%	69%	53%
EIGHT			
CO	89%	85%	77%
MT	93%	91%	86%
ND	82%	84%	73%
SD	63%	71%	48%
UT	80%	74%	65%
WY	91%	94%	85%
SUBTOTAL	84%	83%	73%
NINE			
AS	100%	100%	100%
AZ	83%	82%	82%
CA	74%	79%	73%
GU	59%	82%	65%
HI	98%	89%	87%
CNMI	100%	100%	100%
NV	92%	82%	79%
SUBTOTAL	77%	80%	75%

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	68%	79%	62%
ID	74%	61%	53%
OR	85%	84%	75%
WA	72%	54%	47%
SUBTOTAL	76%	65%	57%
INDIAN COUNTRY			
REGION 1	**DNA	**DNA	**DNA
REGION 2	**DNA	**DNA	**DNA
REGION 3	**N/A	**N/A	**N/A
REGION 4	81%	29%	19%
REGION 5	54%	40%	27%
REGION 6	76%	71%	61%
REGION 7	**DNA	**DNA	**DNA
REGION 8	95%	72%	71%
REGION 9	54%	49%	37%
REGION10	74%	54%	44%
SUBTOTAL	70%	55%	46%
NATIONAL TOTAL			
National Total	75%	71%	63%

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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, Illinois, New Jersey, Rhode Island, Vermont, and Wisconsin 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 2007 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 that 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 Cathodic Protection

- 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.

ILLINOIS

Release Detection: Testing

- Owner/operator must produce records within 30 minutes of arrival of inspector.

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.
    - Tank tightness must be performed on all single walled tanks.
    - 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.
    - 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 Cathodic Protection

- 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.

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WISCONSIN

Release Prevention: Operation and Maintenance of Cathodic Protection

- Require annual cathodic protection test.

Release Prevention: Spill Prevention

- Require USTs to be equipped with overfill prevention equipment that will operate as follows (NFPA 30-2.6.1.4 – 2000 and 2003 version):
    - Automatically shut off the flow of liquid into the tank when the tank is no more than 95% full;
    - Alert the transfer operator when the tank is no more than 90% full by restricting the flow of liquid into the tank or triggering the high-level alarm; and,
    - Other methods approved by the authority having jurisdiction.

Release Detection: Testing

- Require NFPA 30A09.2.1 (2000 and 2003 versions). Accurate daily inventory records shall be maintained and reconciled for all liquid fuel storage tanks for indication of possible leakage from tanks or piping. The records shall be kept on the premises or shall be made available to the authority having jurisdiction for the inspection within 24 hours of a written or verbal request. The records shall include, as a minimum and by product, daily reconciliation between sales, use, receipts, and inventory on hand. If there is more than one storage system serving an individual pump or dispensing device for any product, the reconciliation shall be maintained separately for each system.

Release Detection: Deferment

- No exclusion or deferment for "remote" emergency generator tanks.

Other

- Require annual permit to operate that includes verification of financial responsibility.

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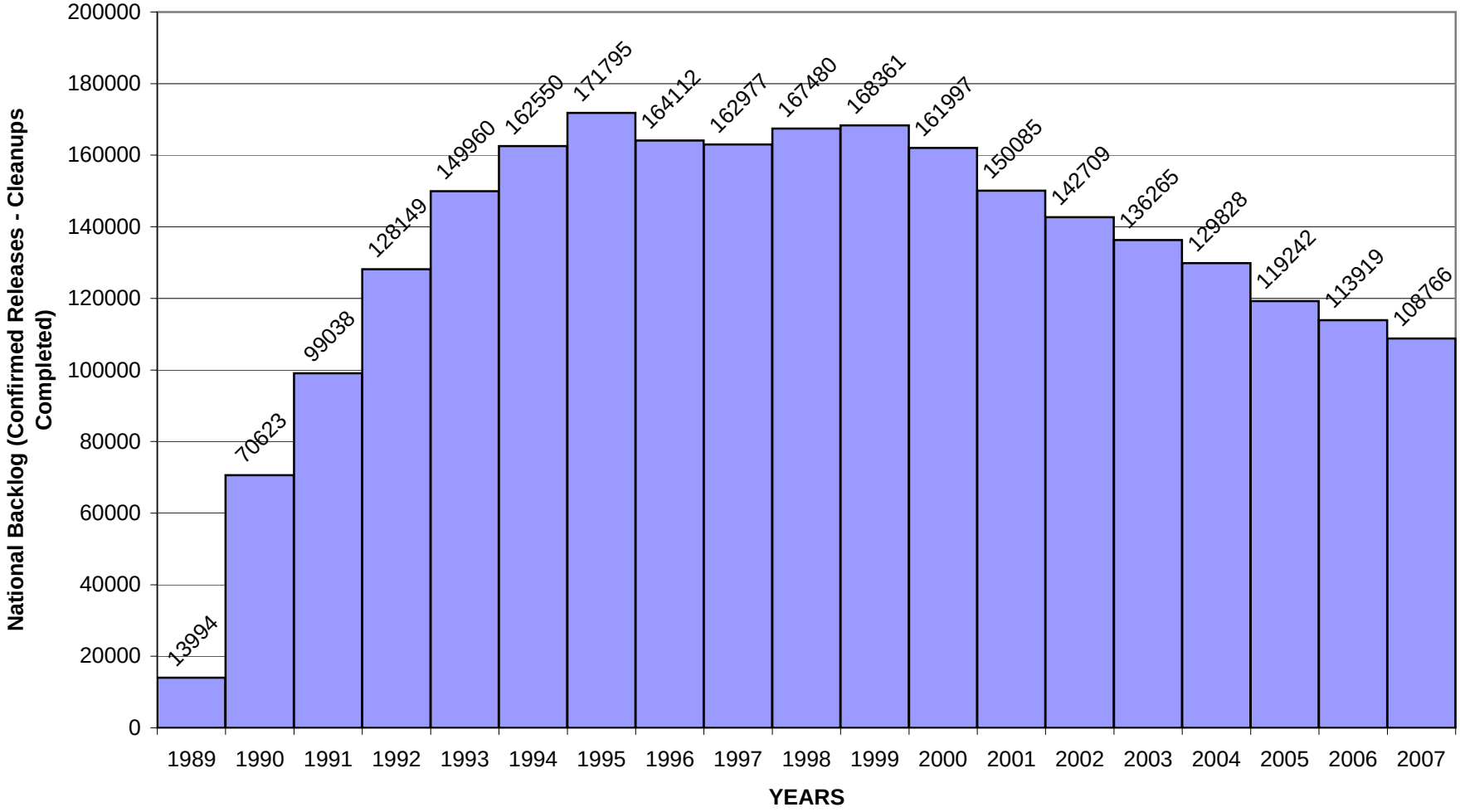
UST National Backlog:
FY 1989 Thru End-of-Year FY 2007



State Listing of Significant Operational Compliance Rates
FY 2007 End-of-Year Reporting

(from highest to lowest SOC)

State	Compliance Rate
AS	100%
CNMI	100%
HI	87%
MT	86%
TN	85%
WY	85%
FL	85%
PR	83%
AZ	82%
NM	81%
AL	80%
NV	79%
IN	79%
CO	77%
MS	76%
OR	75%
GA	75%
SC	74%
ND	73%
CA	73%
OK	71%
MD	70%
PA	69%
WI	68%
RI	68%
DE	68%
VT	67%
KS	66%
OH	66%

State	Compliance Rate
UT	65%
LA	65%
GU	65%
National Average	***63%***
NC	62%
CT	62%
AK	62%
VI	60%
WV	59%
NY	57%
TX	55%
VA	54%
ME	54%
ID	53%
NH	52%
AR	50%
MN	49%
IA	49%
SD	48%
WA	47%
IL	44%
NE	43%
KY	41%
MI	38%
MA	34%
DC	22%
NJ	19%
MO	**DNA*

**DNA= Data Not Available*

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State Listing of Cleanup Backlog Percentage*

FY 2007 End-of-Year Reporting

(from lowest to highest backlog %)

State	Cleanup Backlog
AS	<1%
ND	3%
ME	4%
TN	4%
SD	4%
MS	4%
VA	6%
NV	8%
MD	9%
DE	9%
MN	9%
UT	10%
NY	10%
ID	11%
OH	11%
OK	11%
CO	12%
TX	13%
MA	13%
AL	14%
WI	14%
HI	15%
AZ	15%
KY	17%
GU	18%
OR	18%
GA	19%
MO	20%
RI	21%

State	Cleanup Backlog
AR	22%
National Average	***23%***
AK	24%
PA	25%
NC	25%
IA	27%
DC	27%
NM	29%
CA	29%
IN	30%
IL	31%
WA	31%
NE	31%
CT	33%
WV	34%
NH	34%
SC	35%
LA	36%
KS	37%
MT	37%
VT	38%
NJ	40%
MI	42%
WY	46%
PR	54%
CNMI	56%
FL	59%
VI	73%

** Cleanup backlog is the percentage of releases not yet cleaned up.*

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