

## **Semiannual Report Of UST Performance Measures End Of Fiscal Year 2015 (October 1, 2014 – September 30, 2015)**

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### **Where does EPA get the performance data?**

Twice each year, EPA collects data from states and territories regarding underground storage tank (UST) performance measures and makes the data publicly available. EPA directly provides data on work in Indian country, since the Agency implements the program for those sites. These data include information such as the number of active and closed tanks, releases confirmed, cleanups initiated and completed, facilities in compliance with UST requirements, and inspections. EPA compiles the data and presents it in table format for all states, territories, and Indian country.

### **What are the UST performance measures?**

The most current definitions for the UST performance measures are available on EPA's website [www.epa.gov/ust/ust-performance-measures](http://www.epa.gov/ust/ust-performance-measures) under **Definitions**.

### **What is in the end of fiscal year (FY) 2015 report?**

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### **How does the UST program's performance compare with its goals?**

FY 2015 UST Program Performance	FY 2015 UST Program Goal
Exceeded the FY 2015 goal by completing 9,869 cleanups; exceeded the Indian country cleanup goal by completing 32 cleanups in Indian country	Complete 8,600 or more cleanups, including 30 or more in Indian country
Exceeded the FY 2015 goal by achieving a significant operational compliance rate of 72.6 percent	Achieve a significant operational compliance rate of 70.5 percent or higher
Exceeded the FY 2015 goal by reporting 6,830 newly-confirmed releases	Decrease newly-confirmed releases to fewer than 6,965
Exceeded the FY 2015 goal by reducing to 13.6 percent the percent of confirmed releases at UST facilities remaining to be cleaned up	Reduce to 14 percent or less the percent of confirmed releases at UST facilities remaining to be cleaned up

### **What other highlights are included in the end of FY 2015 report?**

- There are 565,956 active USTs (at approximately 204,000 sites) which are regulated by EPA's UST program
- Since the 1984 inception of the UST program, 1,823,543 USTs have been properly closed
- Of the 528,521 releases reported since the beginning of the UST program, 456,660 (or 86.4 percent) have been cleaned up, leaving 71,861 remaining to be cleaned up



- 94,287 on-site inspections at federally-regulated UST facilities were conducted between October 2014 and September 2015; of those:
  - 93,993 were conducted by states, territories, and third-party inspectors
  - 294 were conducted by EPA and credentialed tribal inspectors in Indian country

## How are EPA and its partners doing at reducing the backlog of UST releases?

Reducing the number of releases remaining to be cleaned up (also known as the backlog) remains a priority for the national UST program. The graphic on page 6 of this report shows that the national UST backlog of releases remaining to be cleaned up has been declining for more than a decade. The rate of releases confirmed has held steady since 2010 at approximately 6,000 to 7,000 releases reported each year; the cumulative number of confirmed releases is now over 528,000. Viewed together, these data points show the progress EPA, states, territories, tribes, and other UST partners are making in reducing the percent of confirmed releases at UST facilities pending cleanup completion.

Over the last few years, the percent of confirmed releases pending cleanup completion has declined from 18.8 percent in 2010 to 13.6 percent at end of FY 2015. Looking back several more years, the percent of confirmed releases pending cleanup completion was 26.4 percent in 2005.

Fiscal Year	Confirmed Releases		Cleanups Remaining	Percent Of Confirmed Releases Pending Cleanup Completion*
	Each Year	Cumulative		
2015	6,830	528,521	71,861	13.6%
2014	6,847	521,271	73,948	14.2%
2013	6,128	514,123	77,717	15.1%
2012	5,674	507,540	82,903	16.3%
2011	5,998	501,723	87,983	17.5%
2010	6,328	494,997	93,123	18.8%
↓	↓	↓	↓	↓
2005	7,421	452,041	119,242	26.4%

\*Divide cleanups remaining by cumulative confirmed releases

## Where can I find performance data from previous years?

EPA's website [www.epa.gov/ust/ust-performance-measures](http://www.epa.gov/ust/ust-performance-measures) provides the most current report, as well as historical reports beginning with FY 1988, the first year reports were developed. Reports are listed beginning with the most recent first.

**For more information**, contact Steven McNeely, EPA's Office of Underground Storage Tanks, at [mcneely.steven@epa.gov](mailto:mcneely.steven@epa.gov) or 703-603-7164.

**UST Corrective Action Measures for End of Year FY 2015 (Data through September 30, 2015)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>ONE</b>								
CT	6,220	26,791	103	3,134	3,109	66	2,263	871
MA	9,523	25,649	44	6,398	6,329	71	6,056	342
ME	2,643	13,509	39	2,765	2,760	65	2,739	26
NH	2,895	12,116	22	2,626	2,626	31	2,027	599
RI	1,492	8,647	14	1,389	1,389	15	1,234	155
VT	1,945	6,145	10	2,157	2,157	26	1,494	663
<b>Subtotal</b>	<b>24,718</b>	<b>92,857</b>	<b>232</b>	<b>18,469</b>	<b>18,370</b>	<b>274</b>	<b>15,813</b>	<b>2,656</b>
<b>TWO</b>								
NJ	13,182	58,650	1,881	15,117	13,897	1,003	10,778	4,339
NY	23,519	104,045	160	29,617	29,565	300	28,378	1,239
PR	4,494	5,789	4	1,072	838	3	502	570
VI	140	282	1	30	32	3	25	5
<b>Subtotal</b>	<b>41,335</b>	<b>168,766</b>	<b>2,046</b>	<b>45,836</b>	<b>44,332</b>	<b>1,309</b>	<b>39,683</b>	<b>6,153</b>
<b>THREE</b>								
DC	632	3,385	25	939	924	15	834	105
DE	1,183	7,433	41	2,787	2,738	54	2,694	93
MD	7,640	36,055	139	12,220	12,046	175	12,000	220
PA	22,720	66,173	161	16,734	16,656	410	14,820	1,914
VA	18,196	62,398	155	12,515	12,410	184	12,191	324
WV	4,522	20,966	45	3,586	3,498	90	2,915	671
<b>Subtotal</b>	<b>54,893</b>	<b>196,410</b>	<b>566</b>	<b>48,781</b>	<b>48,272</b>	<b>928</b>	<b>45,454</b>	<b>3,327</b>

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at <http://www2.epa.gov/sites/production/files/2015-03/documents/pmdefinitions.pdf>

**UST Corrective Action Measures for End of Year FY 2015 (Data through September 30, 2015)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>FOUR</b>								
AL	17,892	30,787	72	11,913	11,791	122	10,738	1,175
FL	22,342	111,826	149	26,987	18,611	560	15,700	11,287
GA	29,302	50,138	234	13,655	13,462	339	12,532	1,123
KY	9,840	40,330	201	16,546	16,524	271	15,702	844
MS	8,179	23,794	123	7,716	7,544	86	7,310	406
NC	25,368	70,127	206	25,985	23,455	333	21,618	4,367
SC	11,641	33,630	100	9,893	9,746	154	7,603	2,290
TN	16,389	40,377	132	14,965	14,965	207	14,682	283
<b>Subtotal</b>	<b>140,953</b>	<b>401,009</b>	<b>1,217</b>	<b>127,660</b>	<b>116,098</b>	<b>2,072</b>	<b>105,885</b>	<b>21,775</b>
<b>FIVE</b>								
IL	19,172	63,560	367	26,460	24,716	750	22,834	3,626
IN	13,397	42,666	171	9,824	9,783	347	8,143	1,681
MI	17,997	70,964	194	22,742	22,353	427	14,437	8,305
MN	11,709	34,043	116	11,413	11,358	191	11,108	305
OH	21,800	47,137	426	31,084	31,020	603	29,105	1,979
WI	14,284	68,623	107	19,442	19,162	115	18,400	1,042
<b>Subtotal</b>	<b>98,359</b>	<b>326,993</b>	<b>1,381</b>	<b>120,965</b>	<b>118,392</b>	<b>2,433</b>	<b>104,027</b>	<b>16,938</b>

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**UST Corrective Action Measures for End of Year FY 2015 (Data through September 30, 2015)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>SIX</b>								
AR	8,806	21,678	32	1,763	1,474	32	1,472	291
LA	10,875	35,583	124	5,121	5,121	183	4,293	828
NM	3,686	12,922	25	2,627	2,321	13	1,779	848
OK	9,979	28,027	80	5,170	5,167	90	4,801	369
TX	50,633	121,225	267	27,380	26,431	309	25,728	1,652
<b>Subtotal</b>	<b>83,979</b>	<b>219,435</b>	<b>528</b>	<b>42,061</b>	<b>40,514</b>	<b>627</b>	<b>38,073</b>	<b>3,988</b>
<b>SEVEN</b>								
IA	6,932	23,141	26	6,155	5,988	106	5,367	788
KS	6,572	21,116	33	5,193	5,091	79	3,878	1,315
MO	8,948	32,030	92	7,019	7,004	122	6,144	875
NE	6,497	15,136	63	6,468	5,472	133	5,195	1,273
<b>Subtotal</b>	<b>28,949</b>	<b>91,423</b>	<b>214</b>	<b>24,835</b>	<b>23,555</b>	<b>440</b>	<b>20,584</b>	<b>4,251</b>
<b>EIGHT</b>								
CO	7,289	23,170	137	8,205	7,841	149	7,569	636
MT	3,112	11,845	7	3,062	2,943	57	2,212	850
ND	2,216	7,563	2	877	860	2	837	40
SD	3,232	6,956	24	2,742	2,600	30	2,595	147
UT	3,659	13,914	60	4,891	4,845	94	4,555	336
WY	1,686	8,106	5	2,670	2,574	130	1,887	783
<b>Subtotal</b>	<b>21,194</b>	<b>71,554</b>	<b>235</b>	<b>22,447</b>	<b>21,663</b>	<b>462</b>	<b>19,655</b>	<b>2,792</b>

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at <http://www2.epa.gov/sites/production/files/2015-03/documents/pmdefinitions.pdf>

**UST Corrective Action Measures for End of Year FY 2015 (Data through September 30, 2015)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>NINE</b>								
AS	5	63	0	8	7	0	7	1
AZ	6,535	21,867	71	8,857	8,264	44	8,104	753
CA	36,844	131,773	106	44,134	42,400	1,007	39,416	4,718
GU	251	477	1	140	140	1	120	20
HI	1,543	5,559	27	2,103	2,057	18	1,961	142
MP	64	72	0	14	14	0	14	0
NV	3,765	7,557	11	2,535	2,535	11	2,385	150
<b>Subtotal</b>	<b>49,007</b>	<b>167,368</b>	<b>216</b>	<b>57,791</b>	<b>55,417</b>	<b>1,081</b>	<b>52,007</b>	<b>5,784</b>
<b>TEN</b>								
AK	1,002	6,736	19	2,419	2,385	39	2,098	321
ID	3,354	11,197	2	1,488	1,462	15	1,394	94
OR	5,566	26,509	53	7,477	7,304	83	6,630	847
WA	10,144	37,103	107	6,896	6,424	74	4,252	2,644
<b>Subtotal</b>	<b>20,066</b>	<b>81,545</b>	<b>181</b>	<b>18,280</b>	<b>17,575</b>	<b>211</b>	<b>14,374</b>	<b>3,906</b>

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at <http://www2.epa.gov/sites/production/files/2015-03/documents/pmdefinitions.pdf>

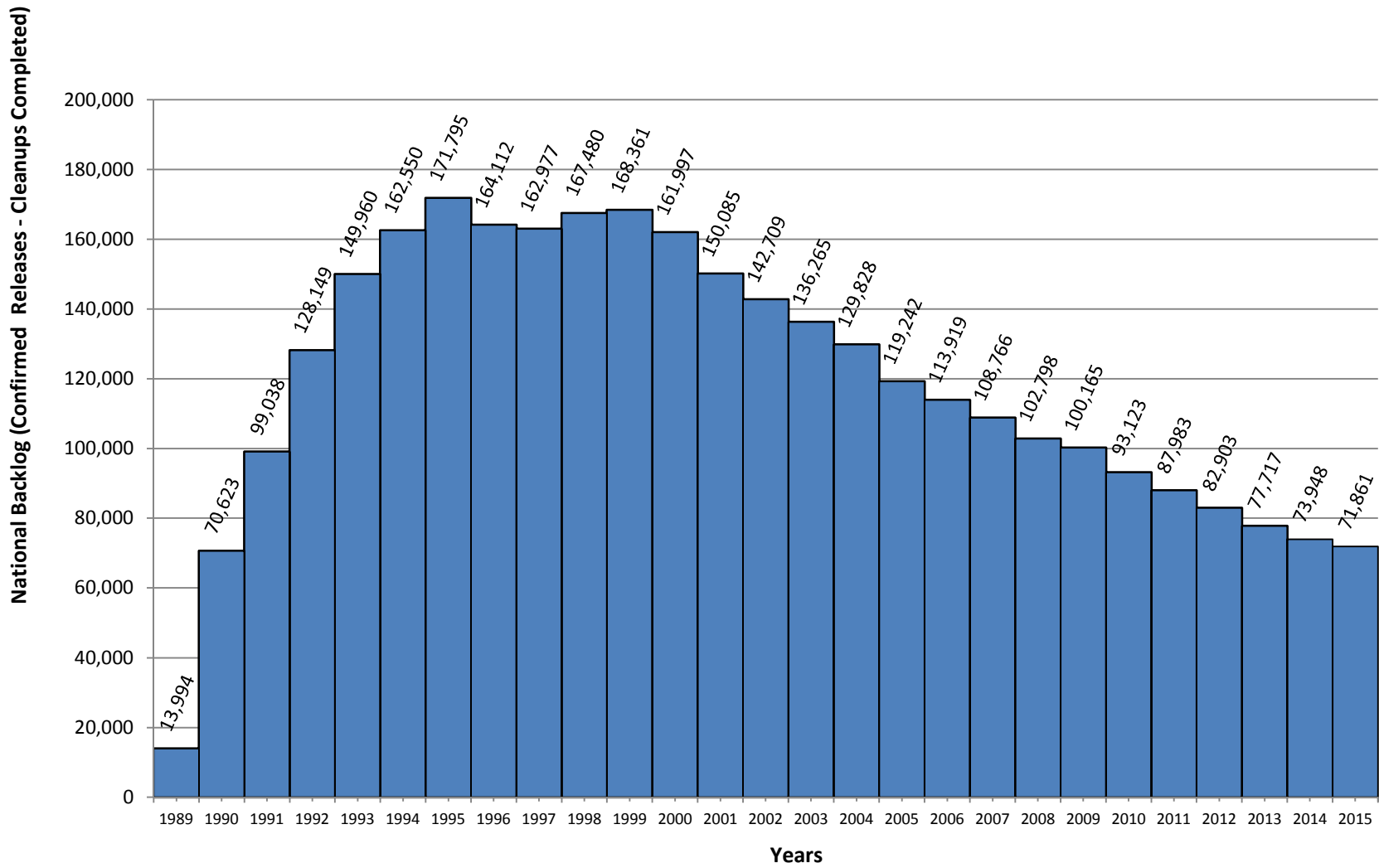
**UST Corrective Action Measures for End of Year FY 2015 (Data through September 30, 2015)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>REGIONAL CORRECTIVE ACTIONS FOR INDIAN COUNTRY</b>								
REGION 1	13	6	0	1	1	0	1	0
REGION 2	156	28	1	7	7	1	6	1
REGION 3	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	0
REGION 4	68	77	1	16	16	0	10	6
REGION 5	461	1,040	1	250	222	3	179	71
REGION 6	353	311	0	67	67	1	65	2
REGION 7	80	96	1	22	22	0	13	9
REGION 8	529	2,127	3	541	533	11	411	130
REGION 9	451	1,372	6	303	223	13	241	62
REGION 10	392	1,126	1	189	189	3	179	10
<b>SUBTOTAL</b>	<b>2,503</b>	<b>6,183</b>	<b>14</b>	<b>1,396</b>	<b>1,280</b>	<b>32</b>	<b>1,105</b>	<b>291</b>
	<b>Active Tanks</b>	<b>Closed Tanks</b>	<b>Confirmed Releases</b>		<b>Cleanups Initiated</b>	<b>Cleanups Completed</b>		<b>Cleanups Remaining</b>
			<b>Actions This Year</b>	<b>Cumulative</b>		<b>Actions This Year</b>	<b>Cumulative</b>	
<b>NATIONAL TOTAL</b>	<b>565,956</b>	<b>1,823,543</b>	<b>6,830</b>	<b>528,521</b>	<b>505,468</b>	<b>9,869</b>	<b>456,660</b>	<b>71,861</b>

Definitions of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at <http://www2.epa.gov/sites/production/files/2015-03/documents/pmdefinitions.pdf>

<sup>1</sup> N/A = As of September 30, 2015, EPA Region 3 did not have any federally recognized tribes.

**UST National Backlog:  
FY 1989 Through End of Year  
FY 2015**





**UST Compliance Measures  
for End of Year FY 2015 (October 1, 2014 - September 30, 2015)**

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
<b>ONE</b>			
CT <sup>1</sup>	80%	76%	69%
MA	92%	25%	23%
ME	82%	80%	77%
NH	62%	64%	57%
RI <sup>1</sup>	79%	83%	68%
VT <sup>1</sup>	84%	81%	75%
<b>SUBTOTAL</b>	<b>83%</b>	<b>56%</b>	<b>51%</b>
<b>TWO</b>			
NJ	94%	95%	91%
NY	87%	75%	71%
PR	86%	84%	84%
VI	91%	91%	83%
<b>SUBTOTAL</b>	<b>89%</b>	<b>83%</b>	<b>79%</b>
<b>THREE</b>			
DC	89%	86%	79%
DE	98%	99%	97%
MD	82%	89%	76%
PA	87%	83%	75%
VA	86%	77%	70%
WV	90%	89%	81%
<b>SUBTOTAL</b>	<b>86%</b>	<b>83%</b>	<b>74%</b>

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
<b>FOUR</b>			
AL	89%	76%	69%
FL	98%	75%	74%
GA	83%	77%	72%
KY	72%	76%	60%
MS	69%	63%	50%
NC	76%	72%	63%
SC	82%	81%	70%
TN	91%	89%	81%
<b>SUBTOTAL</b>	<b>84%</b>	<b>76%</b>	<b>69%</b>
<b>FIVE</b>			
IL <sup>1</sup>	80%	72%	66%
IN	88%	93%	85%
MI <sup>1</sup>	86%	68%	62%
MN	85%	86%	80%
OH	87%	70%	66%
WI <sup>1</sup>	92	87	82
<b>SUBTOTAL</b>	<b>86%</b>	<b>77%</b>	<b>72%</b>
<b>SIX</b>			
AR	74%	73%	60%
LA	83%	82%	73%
NM	75%	77%	63%
OK	80%	88%	75%
TX	96%	91%	89%
<b>SUBTOTAL</b>	<b>89%</b>	<b>87%</b>	<b>81%</b>

These compliance rates indicate the percent of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 10/1/14 through 9/30/15. According to EPA guidelines, states are allowed to report based on requirements more stringent than the federal SOC requirements. States identified with footnote<sup>1</sup> indicated they had done so, as described on pages 9 and 10. 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.

<sup>1</sup> States reporting based on requirements more stringent than the federal SOC requirements.

**UST Compliance Measures  
for End of Year FY 2015 (October 1, 2014 - September 30, 2015)**

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
<b>SEVEN</b>			
IA	81%	77%	65%
KS	52%	90%	49%
MO <sup>1</sup>	81%	94%	77%
NE <sup>1</sup>	81%	71%	64%
<b>SUBTOTAL</b>	<b>74%</b>	<b>84%</b>	<b>65%</b>
<b>EIGHT</b>			
CO	85%	85%	84%
MT	92%	89%	82%
ND	92%	92%	86%
SD	74%	81%	66%
UT	94%	90%	87%
WY	97%	98%	95%
<b>SUBTOTAL</b>	<b>87%</b>	<b>87%</b>	<b>82%</b>
<b>NINE</b>			
AS	100%	63%	63%
AZ	93%	90%	84%
CA	83%	76%	66%
GU	100%	94%	94%
HI	99%	96%	96%
MP	100%	89%	89%
NV	92%	85%	81%
<b>SUBTOTAL</b>	<b>86%</b>	<b>79%</b>	<b>71%</b>

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
<b>TEN</b>			
AK	80%	82%	72%
ID <sup>1</sup>	80%	87%	67%
OR	93%	91%	87%
WA	90%	85%	80%
<b>SUBTOTAL</b>	<b>88%</b>	<b>87%</b>	<b>79%</b>
<b>INDIAN COUNTRY</b>			
REGION 1	DNA <sup>2</sup>	DNA <sup>2</sup>	DNA <sup>2</sup>
REGION 2	DNA <sup>2</sup>	DNA <sup>2</sup>	DNA <sup>2</sup>
REGION 3	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>
REGION 4	88%	38%	38%
REGION 5	90%	85%	80%
REGION 6	97%	90%	87%
REGION 7	80%	30%	30%
REGION 8	84%	89%	78%
REGION 9	88%	85%	77%
REGION 10	93%	89%	84%
<b>SUBTOTAL</b>	<b>89%</b>	<b>84%</b>	<b>78%</b>
<b>NATIONAL TOTAL</b>			
<b>TOTAL</b>	<b>85.7%</b>	<b>79.8%</b>	<b>72.6%</b>

These compliance rates indicate the percentage of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 10/1/14 through 9/30/15. According to EPA guidelines, states are allowed to report based on requirements more stringent than the federal SOC requirements. States identified with footnote1 indicated they had done so, as described on pages 9 and 10. 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.

<sup>1</sup> States reporting based on requirements more stringent than the federal SOC requirements.

<sup>2</sup> DNA = Data Not Available.

<sup>3</sup> N/A = As of September 30, 2015, EPA Region 3 did not have any federally recognized tribes.

## **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.

### **IDAHO**

#### **Release Prevention: Operation and Maintenance of Cathodic Protection**

- Three 60-day rectifier inspection checks are required.
- Two three-year system checks are required for impressed current and galvanic.

#### **Release Detection: Testing**

- Records required for the past 12 months.

#### **Other**

- Percent of UST facilities in compliance with both release detection and release prevention also factors in financial responsibility and EPCRA requirements, such as operator training and secondary containment.

### **ILLINOIS**

#### **Release Detection: Testing**

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

### **MICHIGAN**

#### **Release Detection: Required Methods**

- Owners/operators must have inventory control plus another method of release detection.

### **MISSOURI**

#### **Release Prevention: Cathodic Protection**

- All metal components in contact with any electrolyte must be cathodically protected.

### **NEBRASKA**

#### **Release Prevention: Spill Protection**

- Owners/operators cannot have debris or water in the spill bucket.

#### **Release Prevention: Reporting**

- Owner/operator must submit monthly inventory monitoring reports to the state.

#### **Release Prevention: Temporarily Closed Tanks**

- Owner/operator must permanently close USTs that have been in temporary closed status for more than one year.

### **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 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.

## **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):
  - o Automatically shut off the flow of liquid into the tank when the tank is no more than 95% full;
  - o 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,
  - o 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.

**Inspection/Delivery Prohibition Actions  
for End of Year FY 2015 (October 1, 2014 - September 30, 2015)**

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
<b>ONE</b>		
CT	896	34
MA	880	0
ME	1,001	2
NH	352	6
RI	244	1
VT	332	0
<b>SUBTOTAL</b>	<b>3,705</b>	<b>43</b>
<b>TWO</b>		
NJ	1,302	148
NY	2,706	0
PR	288	0
VI	24	1
<b>SUBTOTAL</b>	<b>4,320</b>	<b>149</b>
<b>THREE</b>		
DC	66	0
DE	132	3
MD	975	8
PA	3,273	76
VA	2,076	1
WV	699	6
<b>SUBTOTAL</b>	<b>7,221</b>	<b>94</b>

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
<b>FOUR</b>		
AL	2,845	246
FL	5,045	0
GA	3,518	556
KY	2,096	122
MS	1,097	93
NC	3,598	210
SC	3,720	666
TN	2,738	224
<b>SUBTOTAL</b>	<b>24,657</b>	<b>2,117</b>
<b>FIVE</b>		
IL	3,300	727
IN	1,258	0
MI	2,657	323
MN	1,216	23
OH	2,438	0
WI	3,818	258
<b>SUBTOTAL</b>	<b>14,687</b>	<b>1,331</b>
<b>SIX</b>		
AR	1,254	57
LA	1,513	10
NM	550	9
OK	3,468	62
TX	4,640	655
<b>SUBTOTAL</b>	<b>11,425</b>	<b>793</b>

Not all states fully implement delivery prohibition at this time, and some states prohibit deliveries primarily for registration violations.

**Inspection/Delivery Prohibition Actions  
for End of Year FY 2015 (October 1, 2014 - September 30, 2015)**

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
<b>SEVEN</b>		
IA	2,816	31
KS	929	39
MO	1,629	0
NE	804	0
<b>SUBTOTAL</b>	<b>6,178</b>	<b>70</b>
<b>EIGHT</b>		
CO	1,186	19
MT	639	8
ND	321	0
SD	475	0
UT	1,004	24
WY	351	6
<b>SUBTOTAL</b>	<b>3,976</b>	<b>57</b>
<b>NINE</b>		
AS	8	0
AZ	575	17
CA	13,279	129
GU	47	0
HI	312	0
MP	16	0
NV	1,051	12
<b>SUBTOTAL</b>	<b>15,288</b>	<b>158</b>

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
<b>TEN</b>		
AK	146	25
ID	359	0
OR	518	24
WA	1,513	4
<b>SUBTOTAL</b>	<b>2,536</b>	<b>53</b>
<b>INDIAN COUNTRY</b>		
REGION 1	0	0
REGION 2	15	0
REGION 3	N/A <sup>1</sup>	N/A <sup>1</sup>
REGION 4	8	0
REGION 5	60	0
REGION 6	39	0
REGION 7	10	0
REGION 8	56	0
REGION 9	52	0
REGION 10	54	0
<b>SUBTOTAL</b>	<b>294</b>	<b>0</b>
<b>NATIONAL TOTAL</b>		
<b>TOTAL</b>	<b>94,287</b>	<b>4,865</b>

Not all states fully implement delivery prohibition at this time, and some states prohibit deliveries primarily for registration violations.

<sup>1</sup> N/A = As of September 30, 2015, EPA Region 3 did not have any federally recognized tribes.