

Semiannual Report Of UST Performance Measures End Of Fiscal Year 2017 (October 1, 2016 – September 30, 2017)

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 under Definitions.

What is in the end of fiscal year (FY) 2017 report?

	Page
UST Corrective Action Measures For End Of FY 2017	
Alphabetical By State Within Region	1
National Totals	5
UST National Backlog Graph	6
UST Compliance Measures For End Of FY 2017	7
States With More Stringent SOC Requirements	9
Inspection/Delivery Prohibition Actions For End Of FY 2017	11

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

FY 2017 UST Program Performance	FY 2017 UST Program Goal
Exceeded the FY 2017 goal by completing 8,775 cleanups; missed the Indian country cleanup goal, but completed 21 cleanups in Indian country	Complete 8,600 or more cleanups, including 26 or more in Indian country
Exceeded the FY 2017 goal by achieving a significant operational compliance rate of 71.6 percent	Achieve a significant operational compliance rate of 71.5 percent or higher
Exceeded the FY 2017 goal by reporting 5,678 newly-confirmed releases	Decrease newly-confirmed releases to fewer than 6,285
Missed the FY 2017 goal, but reduced to 12.7 percent the percent of confirmed releases at UST facilities remaining to be cleaned up	Reduce to 12 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 2017 report?

- There are 555,079 active USTs (at approximately 200,000 sites) which are regulated by EPA's UST program
- Since the 1984 inception of the UST program, 1,856,451 USTs have been properly closed

- 93,228 on-site inspections at federally-regulated UST facilities were conducted between October 2016 and September 2017; of those:
 - 92,904 were conducted by states, territories, and third-party inspectors
 - 324 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 since 2000.

For this reporting period, of the 538,193 releases reported since the beginning of the UST program, 469,898—or 87.3 percent—have been cleaned up. That means 68,295—or 12.7 percent of—confirmed releases at UST facilities remain to be cleaned up. Our data show EPA, states, territories, tribes, and other UST partners are making continued progress in reducing the percent of confirmed releases at UST facilities remaining to be cleaned up.

Where can I find performance data from previous years?

EPA's website www.epa.gov/ust/ust-performance-measures provides the most current report, as well as historical reports beginning with FY 1988, the first year EPA reported UST data. Reports are listed beginning with the most recent first.

For more information, contact Susan Burnell at burnell.susan@epa.gov or 202-564-0766 of EPA's Office of Underground Storage Tanks.

UST Corrective Action Measures for End-Of-Year FY 2017 (Data through September 30, 2017)

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
ONE								
CT	5,840	27,673	98	3,370	3,316	77	2,389	981
MA	8,767	26,756	95	6,566	6,536	108	6,025	541
ME	2,473	13,832	71	2,915	2,885	64	2,882	33
NH	2,713	12,565	26	2,679	2,679	25	2,078	601
RI	1,462	8,783	13	1,420	1,420	16	1,265	155
VT	1,833	6,347	8	2,171	2,169	44	1,550	621
Subtotal	23,088	95,956	311	19,121	19,005	334	16,189	2,932
TWO								
NJ	13,374	60,738	984	17,210	14,959	567	12,016	5,194
NY	22,260	108,023	218	29,953	29,904	309	28,993	960
PR ¹	4,482	5,813	1	1,075	842	2	519	556
VI ¹	140	282	2	32	34	1	26	6
Subtotal	40,256	174,856	1,205	48,270	45,739	879	41,554	6,716
THREE								
DC	605	3,436	11	958	943	10	864	94
DE	1,157	7,526	37	2,867	2,821	33	2,784	83
MD	7,358	36,624	156	12,481	12,307	148	12,276	205
PA	22,306	67,392	210	17,343	17,286	358	15,665	1,678
VA	18,074	63,127	114	12,412	12,317	148	12,134	278
WV	4,295	21,314	38	3,674	3,594	85	3,090	584
Subtotal	53,795	199,419	566	49,735	49,268	782	46,813	2,922

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

¹PR and VI were unable to report at the end of FY17. The FY17 data only include the values through mid-year reporting (October 1, 2016 through March 30, 2017).

UST Corrective Action Measures for End-Of-Year FY 2017 (Data through September 30, 2017)

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
FOUR								
AL	16,416	30,975	77	12,065	11,939	132	10,978	1,087
FL	22,554	112,667	152	27,241	20,817	873	17,230	10,011
GA	29,250	51,275	235	14,165	13,966	294	13,184	981
KY	9,546	40,914	172	16,938	16,926	247	16,248	690
MS	8,140	24,017	127	7,956	7,769	115	7,525	431
NC	24,599	71,233	202	26,422	23,810	457	22,556	3,866
SC	11,403	34,062	120	10,101	9,876	118	7,843	2,258
TN	16,161	41,129	150	15,287	15,287	200	15,093	194
Subtotal	138,069	406,272	1,235	130,175	120,390	2,436	110,657	19,518
FIVE								
IL	18,881	64,437	242	25,222	24,250	460	19,630	5,592
IN	13,305	43,287	139	10,078	9,528	182	8,611	1,467
MI	17,612	71,807	138	23,082	22,644	250	15,019	8,063
MN	12,664	33,576	123	11,710	11,623	142	11,394	316
OH	21,243	48,794	391	31,835	31,377	526	30,151	1,684
WI	13,584	70,303	48	19,541	19,347	134	18,646	895
Subtotal	97,289	332,204	1,081	121,468	118,769	1,694	103,451	18,017

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

UST Corrective Action Measures for End-Of-Year FY 2017 (Data through September 30, 2017)

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
SIX								
AR	8,655	21,939	28	1,814	1,540	31	1,536	278
LA	10,666	36,075	114	5,363	5,363	152	4,721	642
NM	3,600	13,048	13	2,652	2,353	17	1,817	835
OK	9,482	28,960	78	5,336	5,336	105	4,993	343
TX	50,103	123,543	285	27,953	27,111	405	26,519	1,434
Subtotal	82,506	223,565	518	43,118	41,703	710	39,586	3,532
SEVEN								
IA	6,581	23,715	30	6,215	6,076	110	5,593	622
KS	6,480	21,457	34	5,278	5,193	29	3,953	1,325
MO	8,796	32,615	93	7,204	7,185	148	6,436	768
NE	6,366	15,404	64	6,601	5,884	225	5,636	965
Subtotal	28,223	93,191	221	25,298	24,338	512	21,618	3,680
EIGHT								
CO	7,157	23,570	142	8,499	8,106	213	7,987	512
MT	3,192	11,921	25	3,083	2,960	83	2,345	738
ND	2,236	7,658	4	893	868	2	844	49
SD	3,060	7,192	20	2,790	2,645	41	2,674	116
UT	3,647	13,982	61	5,029	4,978	80	4,713	316
WY	1,643	8,230	14	2,688	2,663	42	2,009	679
Subtotal	20,935	72,553	266	22,982	22,220	461	20,572	2,410

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

UST Corrective Action Measures for End-Of-Year FY 2017 (Data through September 30, 2017)

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
NINE								
AS	4	64	0	8	7	0	7	1
AZ	6,184	22,537	54	8,993	8,319	147	8,331	662
CA	36,659	133,089	59	44,224	43,043	536	40,683	3,541
GU	237	493	2	142	142	0	120	22
HI	1,505	5,618	14	2,134	2,085	14	1,990	144
MP	64	72	0	15	15	0	14	1
NV	3,774	7,652	11	2,569	2,569	23	2,423	146
Subtotal	48,427	169,525	140	58,085	56,180	720	53,568	4,517
TEN								
AK	949	6,829	22	2,463	2,434	31	2,164	299
ID	3,402	11,424	6	1,512	1,486	28	1,450	62
OR	5,495	26,778	71	7,605	7,413	89	6,781	824
WA	10,011	37,523	26	6,949	6,562	78	4,346	2,603
Subtotal	19,857	82,554	125	18,529	17,895	226	14,741	3,788

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

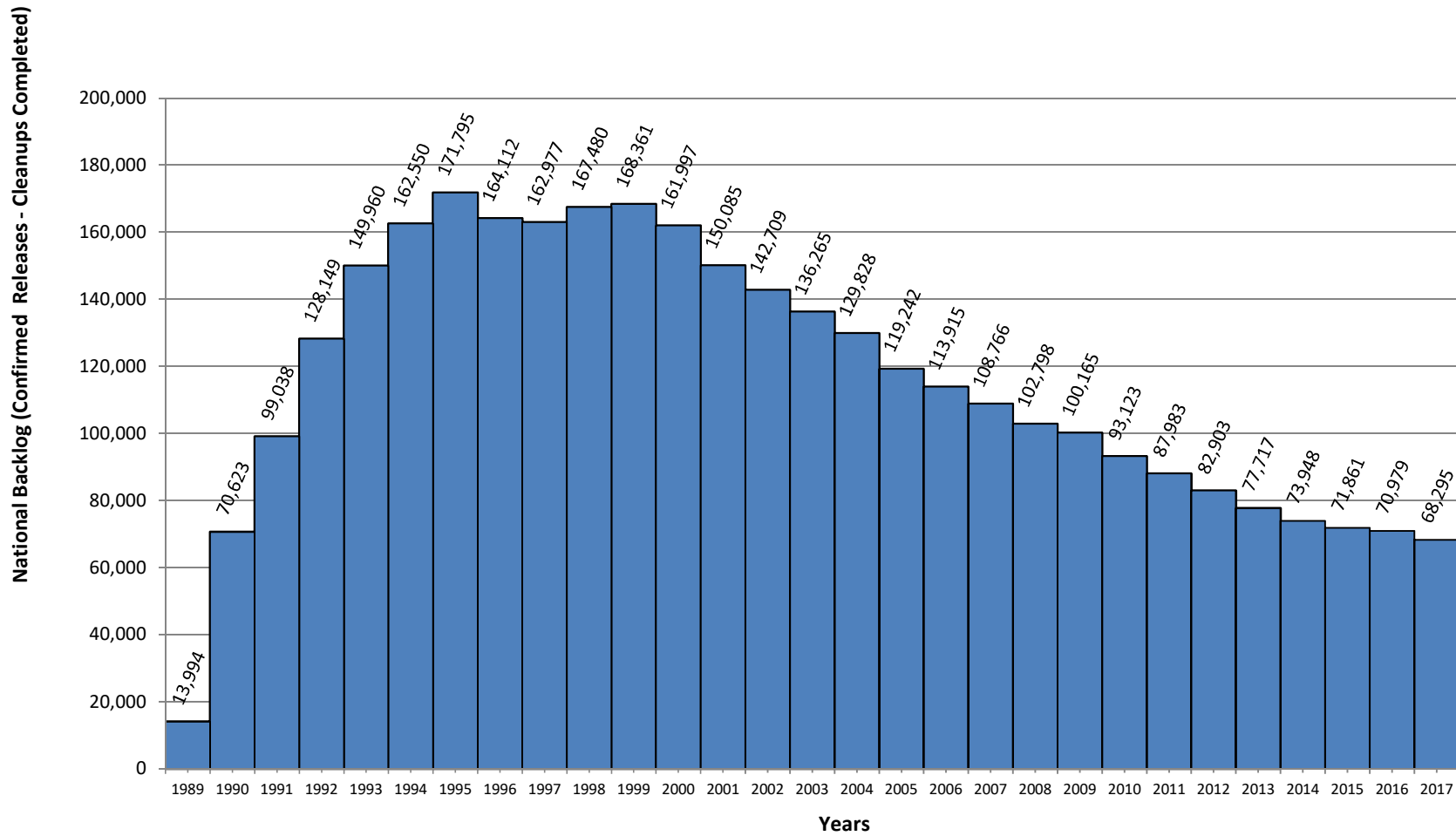
UST Corrective Action Measures for End-Of-Year FY 2017 (Data through September 30, 2017)

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
REGIONAL CORRECTIVE ACTIONS FOR INDIAN COUNTRY								
REGION 1	13	6	0	1	1	0	1	0
REGION 2	164	28	0	7	7	0	6	1
REGION 3	N/A ²	N/A ²	N/A ²	N/A ²	N/A ²	N/A ²	N/A ²	N/A ²
REGION 4	68	77	0	16	16	0	10	6
REGION 5	442	1,061	1	253	228	2	182	71
REGION 6	381	319	2	69	69	1	66	3
REGION 7	80	96	0	22	22	0	13	9
REGION 8	524	2,131	4	550	541	7	434	116
REGION 9	561	1,480	1	301	298	9	251	50
REGION 10	401	1,158	2	193	193	2	186	7
SUBTOTAL	2,634	6,356	10	1,412	1,375	21	1,149	263
NATIONAL TOTAL								
	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
NATIONAL TOTAL	555,079	1,856,451	5,678	538,193	516,882	8,775	469,898	68,295

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

² N/A = Not Applicable. There are no tribal USTs in EPA Region 3.

**UST National Backlog:
FY 1989 Through End-Of-Year
FY 2017**



**UST Compliance Measures for End-Of-Year FY 2017
(October 1, 2016 - September 30, 2017)**

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 ¹	92%	90%	86%
MA	75%	52%	45%
ME	87%	83%	69%
NH	59%	54%	36%
RI ¹	64%	50%	43%
VT ¹	87%	85%	83%
SUBTOTAL	79%	68%	60%
TWO			
NJ	96%	96%	93%
NY	88%	76%	71%
PR ²	73%	72%	72%
VI ²	96%	77%	74%
SUBTOTAL	91%	83%	79%
THREE			
DC	97%	92%	91%
DE	99%	99%	99%
MD	88%	92%	82%
PA	80%	81%	69%
VA	85%	76%	69%
WV	87%	84%	76%
SUBTOTAL	84%	82%	72%

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
FOUR			
AL	88%	77%	69%
FL	95%	80%	76%
GA	74%	67%	61%
KY	78%	81%	66%
MS	77%	71%	63%
NC	72%	65%	57%
SC	77%	78%	63%
TN	91%	87%	76%
SUBTOTAL	81%	74%	66%
FIVE			
IL ¹	77%	70%	63%
IN	90%	90%	88%
MI ¹	87%	69%	64%
MN	85%	84%	80%
OH	92%	73%	71%
WI ¹	86%	76%	70%
SUBTOTAL	86%	76%	71%
SIX			
AR	76%	76%	66%
LA	84%	82%	74%
NM	93%	92%	86%
OK	85%	69%	64%
TX	93%	92%	88%
SUBTOTAL	89%	86%	81%

These compliance rates indicate the percent of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 10/1/16 through 9/30/17. 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.

¹ States reporting based on requirements more stringent than the federal SOC requirements.

² PR and VI were unable to report at the end of FY17. The FY17 data only include the values through mid-year reporting (October 1, 2016 through March 30, 2017).

**UST Compliance Measures for End-Of-Year FY 2017
(October 1, 2016 - September 30, 2017)**

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%	71%	61%
KS	58%	89%	52%
MO ¹	83%	95%	80%
NE ¹	70%	77%	61%
SUBTOTAL	74%	84%	65%
EIGHT			
CO	83%	84%	81%
MT	95%	95%	91%
ND	91%	92%	86%
SD	78%	81%	69%
UT	90%	87%	79%
WY	95%	99%	94%
SUBTOTAL	87%	88%	82%
NINE			
AS	DNA ³	DNA ³	DNA ³
AZ	80%	74%	69%
CA	82%	73%	64%
GU	100%	100%	100%
HI	98%	92%	90%
MP	96%	96%	96%
NV	89%	84%	77%
SUBTOTAL	83%	75%	67%

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
TEN			
AK	82%	80%	75%
ID ¹	93%	84%	76%
OR	93%	92%	87%
WA	89%	87%	80%
SUBTOTAL	90%	88%	81%
INDIAN COUNTRY			
REGION 1	DNA ³	DNA ³	DNA ³
REGION 2	82%	82%	82%
REGION 3	N/A ⁴	N/A ⁴	N/A ⁴
REGION 4	100%	78%	78%
REGION 5	73%	64%	59%
REGION 6	95%	93%	88%
REGION 7	0%	0%	0%
REGION 8	67%	81%	60%
REGION 9	94%	79%	77%
REGION 10	84%	84%	75%
SUBTOTAL	83%	80%	72%
NATIONAL TOTAL			
TOTAL	84.4%	79.0%	71.6%

These compliance rates indicate the percentage of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 10/1/16 through 9/30/17. 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.

¹ States reporting based on requirements more stringent than the federal SOC requirements.

³ DNA = Data Not Available because no inspections were conducted within the last 12 months.

⁴ N/A = Not Applicable. There are no tribal USTs in EPA Region 3.

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: Cathodic Protection

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

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.

Release Detection: Monitoring and Testing

- Records required for the past 36 months.
- Inventory control is required for all tanks (single-walled and double-walled).
- 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.

- Single-walled USTs installed for a period of 30 years have to be tightness tested annually beginning in 2015.
- 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.
- Tightness testing of UST and piping interstitial spaces is required when a system has been installed for a period of 20 years, and every 2 years thereafter.
- 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):
 - 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.

**Inspection/Delivery Prohibition Actions
for End-Of-Year FY 2017 (October 1, 2016 - September 30, 2017)**

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
ONE		
CT	1,145	56
MA	553	0
ME	1,365	1
NH	367	42
RI	233	0
VT	365	2
SUBTOTAL	4,028	101
TWO		
NJ	1,546	257
NY	2,137	0
PR ¹	486	0
VI ¹	12	0
SUBTOTAL	4,181	257
THREE		
DC	86	0
DE	151	3
MD	1,021	11
PA	2,736	61
VA	1,862	5
WV	545	4
SUBTOTAL	6,401	84

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
FOUR		
AL	2,644	165
FL	5,215	0
GA	3,062	0
KY	2,087	80
MS	1,025	159
NC	3,160	251
SC	3,861	778
TN	2,149	40
SUBTOTAL	23,203	1,473
FIVE		
IL	3,341	799
IN	1,376	0
MI	2,590	116
MN	1,112	13
OH	2,706	0
WI	3,574	212
SUBTOTAL	14,699	1,140
SIX		
AR	1,430	71
LA	1,496	7
NM	682	22
OK	3,219	111
TX	6,034	658
SUBTOTAL	12,861	869

States use different approaches to delivery prohibition. For example, certain states issue a notice of intent before actually issuing a delivery prohibition (i.e., some states forgo delivery prohibition issuance for facilities that come into compliance). In addition, some states prohibit deliveries primarily for registration violations.

¹PR and VI were unable to report at the end of FY17. The FY17 data only include the values through mid-year reporting (October 1, 2016 through March 30, 2017).

**Inspection/Delivery Prohibition Actions
for End-Of-Year FY 2017 (October 1, 2016 - September 30, 2017)**

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
SEVEN		
IA	2,054	13
KS	1,096	8
MO	1,741	3
NE	1,068	1
SUBTOTAL	5,959	25
EIGHT		
CO	1,321	13
MT	399	11
ND	283	0
SD	408	0
UT	868	6
WY	335	1
SUBTOTAL	3,614	31
NINE		
AS	0	0
AZ	1,078	30
CA	13,841	227
GU	50	0
HI	157	0
MP	25	1
NV	588	2
SUBTOTAL	15,739	260

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
TEN		
AK	139	8
ID	362	0
OR	400	27
WA	1,318	0
SUBTOTAL	2,219	35
INDIAN COUNTRY		
REGION 1	0	0
REGION 2	17	0
REGION 3	N/A ²	N/A ²
REGION 4	9	0
REGION 5	64	1
REGION 6	40	0
REGION 7	2	0
REGION 8	72	0
REGION 9	62	0
REGION 10	58	0
SUBTOTAL	324	1
NATIONAL TOTAL		
TOTAL	93,228	4,276

States use different approaches to delivery prohibition. For example, certain states issue a notice of intent before actually issuing a delivery prohibition (i.e., some states forgo delivery prohibition issuance for facilities that come into compliance). In addition, some states prohibit deliveries primarily for registration violations.

²N/A = Not Applicable. There are no tribal USTs in EPA Region 3.