



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

DEC 15 2005

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

**MEMORANDUM**

SUBJECT: FY 2005 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", with a large circular flourish at the end.

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

This memo provides you with the FY2005 end-of-year activities report for the Underground Storage Tank Program.

As you know, for FY 2005 we established four national GPRA goals: (1) completing 14,500 cleanups, (2) completing 30 cleanups in Indian Country, (3) increasing our significant operational compliance rate to 65 percent, and (4) decreasing newly reported confirmed releases to fewer than 10,000. I am pleased to report that we have met all four of our national goals.

Through your hard work and the work of state tank officials we:

- Completed 14,583 cleanups in States and Territories
- Completed 53 cleanups in Indian Country
- Achieved operational compliance at 66 percent of all UST facilities
- Reported 7,421 confirmed releases

Your success this year has contributed to the long term success of our program. Since the beginning of our program, we have cleaned up almost 74 percent of all reported releases (332,799), and reduced our cleanup backlog to 119,240, an eight percent drop from last year.

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

## Attachments

cc: Tom Dunne, OSWER  
Barry Breen, OSWER  
Susan Bromm, OECA  
Walker Smith, OECA  
Dave Kling, OECA  
Michael Stahl, OECA  
Scott Sherman, OGC  
Susan Janowiak, OSWER/ARMS  
Howard Rubin, OSWER/ARMS  
Jessie Price , OSWER/ARMS  
Sue Priftis, OSWER/ARMS  
UST Regional Branch Chiefs 1-10  
UST Regional Program Managers 1-10

**Attachment 1**  
**UST Corrective Action Measures for End of Year FY2005 (as of September 30, 2005)**

Region/State	Active Tanks	Closed Tanks	Confirmed Releases	Cleanups Initiated	Cleanups Completed	Cleanup Backlog	Emergency Responses
<b>ONE</b>							
CT	11,871	19,868	2,465	2,415	1,596	869	111
MA	11,368	22,141	6,103	5,890	5,026	1,077	4,981
ME	3,359	12,222	2,215	2,156	2,075	140	415
NH	2,935	10,856	2,218	2,218	1,389	829	616
RI	1,691	7,111	1,238	1,238	978	260	26
VT	3,011	5,196	1,930	1,918	1,136	794	277
<b>SUBTOTAL</b>	<b>34,235</b>	<b>77,394</b>	<b>16,169</b>	<b>15,835</b>	<b>12,200</b>	<b>3,969</b>	<b>6,426</b>
<b>TWO</b>							
NJ	17,931	54,794	9,669	8,812	5,734	3,935	51
NY	29,925	81,216	20,442	20,022	18,442	2,000	427
PR	4,602	5,352	1,022	868	440	582	177
VI	134	278	22	14	2	20	14
<b>SUBTOTAL</b>	<b>52,592</b>	<b>141,640</b>	<b>31,155</b>	<b>29,716</b>	<b>24,618</b>	<b>6,537</b>	<b>669</b>
<b>THREE</b>							
DC	732	3,050	815	815	572	243	234
DE	1,598	6,423	2,284	2,228	2,010	274	402
MD	9,439	27,647	10,201	9,944	9,282	919	333
PA	25,545	59,824	13,861	13,440	9,798	4,063	28
VA	25,464	52,174	10,474	10,204	9,662	812	63
WV	6,033	18,618	2,909	2,706	1,751	1,158	9
<b>SUBTOTAL</b>	<b>68,811</b>	<b>167,736</b>	<b>40,544</b>	<b>39,337</b>	<b>33,075</b>	<b>7,469</b>	<b>1,069</b>
<b>FOUR</b>							
AL	18,021	28,631	10,884	10,755	9,317	1,567	315
FL	31,109	94,240	23,990	14,618	8,761	15,229	204
GA	30,320	44,369	11,023	10,654	8,373	2,650	12
KY	13,098	35,212	13,151	13,100	10,696	2,455	154
MS	8,713	21,758	6,540	6,355	6,224	316	121
NC	30,271	63,104	23,520	22,438	16,942	6,578	553
SC	12,137	31,521	8,698	8,239	5,325	3,373	96
TN	16,147	32,429	12,842	12,914	11,892	950	68
<b>SUBTOTAL</b>	<b>159,816</b>	<b>351,264</b>	<b>110,648</b>	<b>99,073</b>	<b>77,530</b>	<b>33,118</b>	<b>1,523</b>

<sup>1</sup> 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.

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**UST Corrective Action Measures for End of Year FY2005 (as of September 30, 2005)**

Region/State	Active Tanks	Closed Tanks	Confirmed Releases	Cleanups Initiated	Cleanups Completed	Cleanup Backlog	Emergency Responses
<b>FIVE</b>							
IL	23,062	62,074	22,410	21,211	14,540	7,870	1,798
IN	14,049	35,332	8,275	7,457	4,994	3,281	238
MI	20,730	65,137	20,822	20,314	11,740	9,082	84
MN	14,328	28,051	9,555	9,064	8,490	1,065	473
OH	24,025	42,427	23,559	23,028	20,300	3,259	417
WI	13,721	64,759	18,353	17,650	15,033	3,320	386
<b>SUBTOTAL</b>	<b>109,915</b>	<b>297,780</b>	<b>102,974</b>	<b>98,724</b>	<b>75,097</b>	<b>27,877</b>	<b>3,396</b>
<b>SIX</b>							
AR	9,749	19,909	1,294	988	948	346	14
LA	13,953	31,128	2,719	2,719	1,674	1,045	830
NM	4,098	12,232	2,471	1,786	1,633	838	82
OK	11,582	24,265	4,036	4,036	3,537	499	138
TX	57,219	109,535	24,301	21,689	20,120	4,181	518
<b>SUBTOTAL</b>	<b>96,601</b>	<b>197,069</b>	<b>34,821</b>	<b>31,218</b>	<b>27,912</b>	<b>6,909</b>	<b>1,582</b>
<b>SEVEN</b>							
IA	7,716	22,092	5,791	5,529	3,948	1,843	0
KS	7,236	19,529	4,616	4,379	2,632	1,984	117
MO	10,305	28,432	6,184	5,803	4,798	1,386	343
NE	6,999	14,084	5,951	4,089	3,776	2,175	10
<b>SUBTOTAL</b>	<b>32,256</b>	<b>84,137</b>	<b>22,542</b>	<b>19,800</b>	<b>15,154</b>	<b>7,388</b>	<b>470</b>
<b>EIGHT</b>							
CO	8,165	20,770	6,541	6,373	5,602	939	42
MT	3,311	12,158	2,898	2,123	1,785	1,113	43
ND	2,185	6,941	812	803	779	33	3
SD	2,980	6,761	2,347	2,344	2,147	200	21
UT	4,051	12,635	4,120	4,032	3,681	439	3
WY	2,055	7,771	1,989	1,490	924	1,065	63
<b>SUBTOTAL</b>	<b>22,747</b>	<b>67,036</b>	<b>18,707</b>	<b>17,165</b>	<b>14,918</b>	<b>3,789</b>	<b>175</b>

<sup>1</sup> 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.

**Attachment 1**  
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Region/State	Active Tanks	Closed Tanks	Confirmed Releases	Cleanups Initiated	Cleanups Completed	Cleanup Backlog	Emergency Responses
<b>NINE</b>							
AZ	8,194	20,064	8,191	5,682	5,942	2,249	2
CA	38,753	121,352	44,190	44,190	29,572	14,618	0
HI	1,783	5,013	1,840	1,741	1,504	336	0
NV	3,688	6,715	2,416	2,408	2,166	250	52
CNMI	77	21	9	8	2	7	0
GU	280	407	135	135	110	25	0
AS	16	52	7	7	6	1	1
<b>SUBTOTAL</b>	<b>52,791</b>	<b>153,624</b>	<b>56,788</b>	<b>54,171</b>	<b>39,302</b>	<b>17,486</b>	<b>55</b>
<b>TEN</b>							
AK	1,065	6,269	2,278	2,206	1,545	733	47
ID	3,498	9,541	1,345	1,314	1,184	161	12
OR	6,375	25,123	6,861	6,613	5,472	1,389	56
WA	10,397	34,959	6,142	5,779	4,115	2,027	37
<b>SUBTOTAL</b>	<b>21,335</b>	<b>75,892</b>	<b>16,626</b>	<b>15,912</b>	<b>12,316</b>	<b>4,310</b>	<b>152</b>
<b>REGIONAL CORRECTIVE ACTIONS FOR INDIAN COUNTRY</b>							
REGION 1	4	2	0	0	0	0	0
REGION 2	0	0	0	0	0	0	0
REGION 3	N/A	N/A	N/A	N/A	N/A	N/A	N/A
REGION 4	61	55	11	10	4	7	0
REGION 5	403	984	194	191	132	62	0
REGION 6	311	206	43	42	40	3	1
REGION 7	82	97	20	15	8	12	0
REGION 8	540	1,909	449	420	264	185	5
REGION 9	725	1,219	203	154	113	90	0
REGION 10	396	876	147	141	116	31	2
<b>SUBTOTAL</b>	<b>2,522</b>	<b>5,348</b>	<b>1,067</b>	<b>973</b>	<b>677</b>	<b>390</b>	<b>8</b>
	Active Tanks	Closed Tanks	Confirmed Releases	Cleanups Initiated	Cleanups Completed	Cleanup Backlog	Emergency Responses
<b>National Total</b>	<b>653,621</b>	<b>1,618,920</b>	<b>452,041</b>	<b>421,924</b>	<b>332,799</b>	<b>119,242</b>	<b>15,525</b>

<sup>1</sup> 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 Significant Operational Compliance Measures for End-of-Year FY 2005 (as of 9/30/05)

Region/State	% in Significant Operational Compliance with Release Prevention	% in Significant Operational Compliance with Release Detection	% of UST Facilities in SOC w/UST Release Detection and Release Prevention	Region/State	% in Significant Operational Compliance with Release Prevention	% in Significant Operational Compliance with Release Detection	% of UST Facilities in SOC w/UST Release Detection and Release Prevention
<b>ONE</b>				<b>FIVE</b>			
CT*	94%	72%	70%	IL	70%	60%	51%
ME	80%	69%	62%	IN	73%	78%	71%
MA	43%	40%	22%	MI	73%	47%	41%
NH	54%	45%	31%	MN	75%	78%	64%
RI*	64%	46%	37%	OH	83%	78%	75%
VT*	57%	46%	46%	WI	82%	79%	68%
SUBTOTAL	68%	55%	46%	SUBTOTAL	76%	69%	61%
<b>TWO</b>				<b>SIX</b>			
NJ	data not available	data not available	data not available	AR	66%	72%	56%
NY	83%	76%	70%	LA	data not available	data not available	data not available
PR	86%	86%	80%	NM	95%	92%	87%
VI	90%	69%	data not available	OK	95%	85%	84%
SUBTOTAL	83%	77%	71%	TX	74%	68%	65%
<b>THREE</b>				SUBTOTAL	77%	72%	68%
DC	80%	48%	44%	<b>SEVEN</b>			
DE	80%	80%	70%	IA	81%	85%	71%
MD	97%	97%	94%	KS	89%	83%	76%
PA	82%	71%	62%	MO	data not available	data not available	data not available
VA	68%	62%	51%	NE	71%	69%	58%
WV	79%	76%	66%	SUBTOTAL	80%	79%	69%
SUBTOTAL	79%	72%	63%	<b>EIGHT</b>			
<b>FOUR</b>				CO	76%	71%	63%
AL	88%	77%	77%	MT	94%	91%	87%
FL	88%	87%	85%	ND	73%	86%	65%
GA	85%	74%	70%	SD	67%	70%	64%
KY	62%	65%	52%	UT	62%	72%	52%
MS	81%	81%	80%	WY	91%	95%	89%
NC	62%	63%	52%	SUBTOTAL	76%	78%	67%
SC	84%	81%	72%				
TN	86%	86%	80%				
SUBTOTAL	79%	76%	71%				

\* States reporting based on requirements more stringent than the federal SOC requirements. See addendum to Attachment 2

## UST Significant Operational Compliance Measures for End-of-Year FY 2005 (as of 9/30/05)

Region/State	% in Significant Operational Compliance with Release Prevention	% in Significant Operational Compliance with Release Detection	% of UST Facilities in SOC w/UST Release Detection and Release Prevention	Region/State	% in Significant Operational Compliance with Release Prevention	% in Significant Operational Compliance with Release Detection	% of UST Facilities in SOC w/UST Release Detection and Release Prevention
NINE				<b>LD Compliance Measures for Indian Country</b>			
AZ	98%	92%	90%	REGION 1	N/A	N/A	N/A
CA	84%	87%	82%	REGION 2	data not available	data not available	data not available
HI	96%	83%	82%	REGION 3	N/A	N/A	N/A
NV	95%	92%	88%	REGION 4	76%	41%	35%
CNMI	100%	100%	100%	REGION 5	31%	17%	8%
GU	75%	96%	71%	REGION 6	55%	70%	40%
AS	50%	20%	17%	REGION 7	data not available	data not available	data not available
SUBTOTAL	87%	88%	84%	REGION 8	63%	84%	58%
TEN				REGION 9	60%	60%	47%
AK	83%	71%	63%	REGION 10	76%	23%	19%
ID	62%	53%	37%	SUBTOTAL	58%	53%	37%
OR	85%	74%	69%				
WA	74%	57%	44%				
SUBTOTAL	76%	62%	51%				
				<b>NATIONAL TOTAL</b>	<b>78%</b>	<b>73%</b>	<b>66%</b>

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These compliance rates indicate the percentage of recently-inspected facilities found to be in significant operational compliance with federal UST requirements. In September 2003, EPA sent guidance to states containing more detailed procedures and criteria they should use to determine the percentage of facilities in significant operational compliance. EPA prepared this guidance in close cooperation with states. States are allowed to report based on requirements more stringent than the federal SOC requirements and three states, Connecticut, Rhode Island, and Vermont, indicated they had done so. Please see the addendum on the next page for details on the more stringent requirements used by these states.

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\* States reporting based on requirements more stringent than the federal SOC requirements. See addendum to Attachment 2

## 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.

### 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 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



### Attachment 3

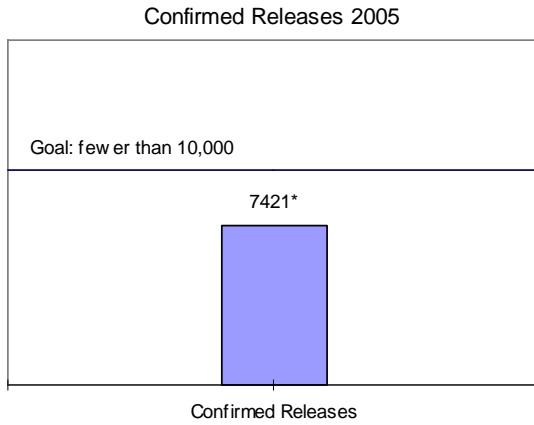
#### End-of-Year FY 2005 OUST GRPA Goals and Backlog Trend Analysis

This attachment provides an analysis of FY 2005 end-of-year GPRA program performance and an illustration of historical cleanup backlog trends. The attachment contains two charts:

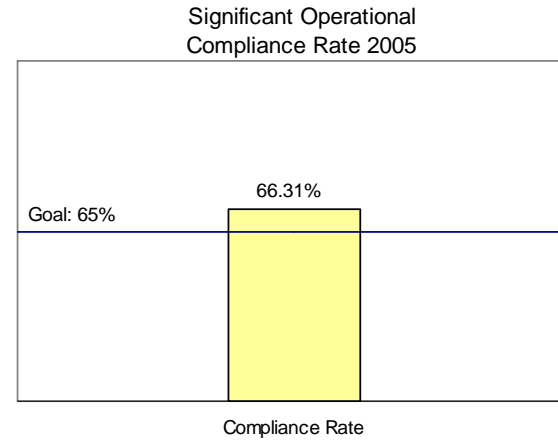
Chart 1: Comparison of GPRA Goals with FY 05 End of Year Results.

Chart 2: UST National Backlog: FY 1989 thru End of-Year FY 200

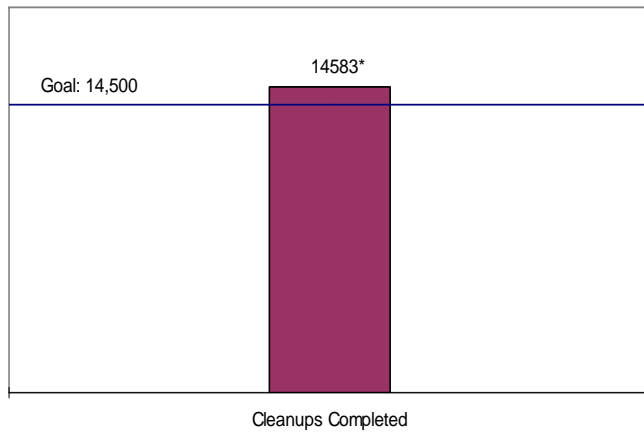
### Chart 1: Comparison of GPRA Goals with FY05 End of Year Results



\*Does not include corrections to data from previous reporting periods. In 2005, corrections total -2613 for Confirmed Releases

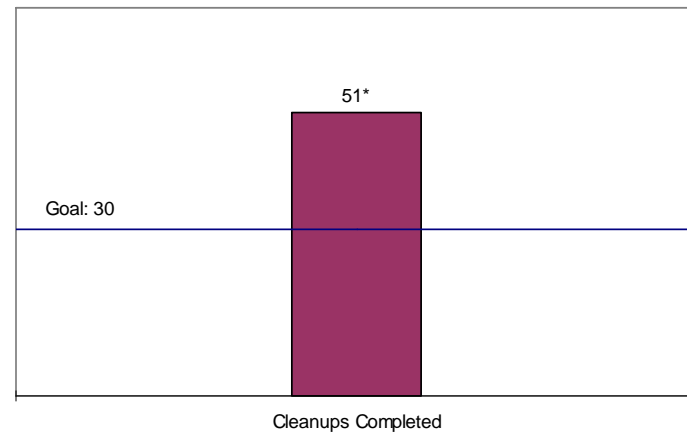


National Cleanups Completed 2005  
(Does not include Indian Country)



\*Does not include corrections to data from previous reporting periods. In 2005, corrections total 676 for Cleanups Completed.

Indian Country Cleanups Completed 2005



\* Does not include corrections to data from previous reporting periods. In 2005, corrections total 1 for Cleanups Completed in Indian Country.

**Chart 2: UST National Backlog:  
FY 1989 Thru End-of-Year FY 2005**

