

ARE WE CLOSER TO 1998?

**WHERE ARE WE WITH RESPECT TO
MEETING THE 1998 TECHNICAL STANDARDS**

**A PRELIMINARY STATE SURVEY
WITH
ESTIMATES BASED ON A SURVEY OF 17 STATES DATABASES OF
EARLY 1999**

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**ASTSWMO
The Association of State and Territorial Solid Waste Management Officials
444 North Capitol Street, N.W., Suite 315, Washington, D.C. 20001**

PURPOSE:

**TO DEVELOP TREND DATA FOR THE
TIMEFRAME 1989 THRU 1998 ON
TECHNICAL STANDARDS COMPLIANCE**

**AND
INDIVIDUALLY LOOKING AT:**

RELEASE DETECTION

SPILL PREVENTION

OVERFILL PROTECTION

CORROSION PROTECTION

DEFINITIONS:

SO THAT WE ARE ALL TRYING TO MEASURE THE SAME ITEMS AND RELATE THEM TO A COMMON DENOMINATOR, THE FOLLOWING TERMS WERE DEVELOPED:

REGISTERED TANKS - UST'S REQUIRING NOTIFICATION TO A STATE OR TO THE USEPA. THIS DOES NOT INCLUDE HEATING OIL, SMALL FARM OR RESIDENTIAL TANKS.

ACTIVE TANKS - ARE THOSE WHICH HAVE NOT BEEN PERMANENTLY CLOSED AND MAY INCLUDE TANKS THAT HAVE BEEN TEMPORARILY CLOSED.

REGISTERED TANKS IN COMPLIANCE - USTs THAT ARE IN COMPLIANCE WITH 1998 DEADLINE UPGRADE REQUIREMENTS POTENTIALLY INCLUDING USTs THAT ARE TEMPORARILY OUT OF SERVICE AND SCHEDULED FOR UPGRADING.

PETROLEUM TANKS - UST'S CONTAINING PETROLEUM AS DEFINED BY THE USEPA.

HAZARDOUS SUBSTANCE TANKS - UST'S CONTAINING CERCLA HAZARDOUS SUBSTANCE LIST PRODUCTS.

NOTE: THIS DATA IS TO BASED UPON AVAILABLE DATABASE INFORMATION, NOT INSPECTIONS, AND WILL INCLUDE DATA SUBMITTED ON NOTIFICATION FORMS THAT GENERALLY TRAILS BEHIND INFORMATION GATHERED FROM FIELD INSPECTIONS.

PARTICIPATING STATES:

| <u>REGION</u> | <u>STATE</u> | <u>REGION</u> | <u>STATE</u> |
|---------------|--------------|---------------|--------------|
| 1 | NH | 6 | LA |
| 3 | VA | 7 | MO |
| | WV | 8 | MT |
| 4 | AL | | ND |
| | GA | | WY |
| | SC | 9 | CA |
| 5 | MI | 10 | AK |
| | MN | | OR |
| | WI | | |

TOTAL STATES: 17

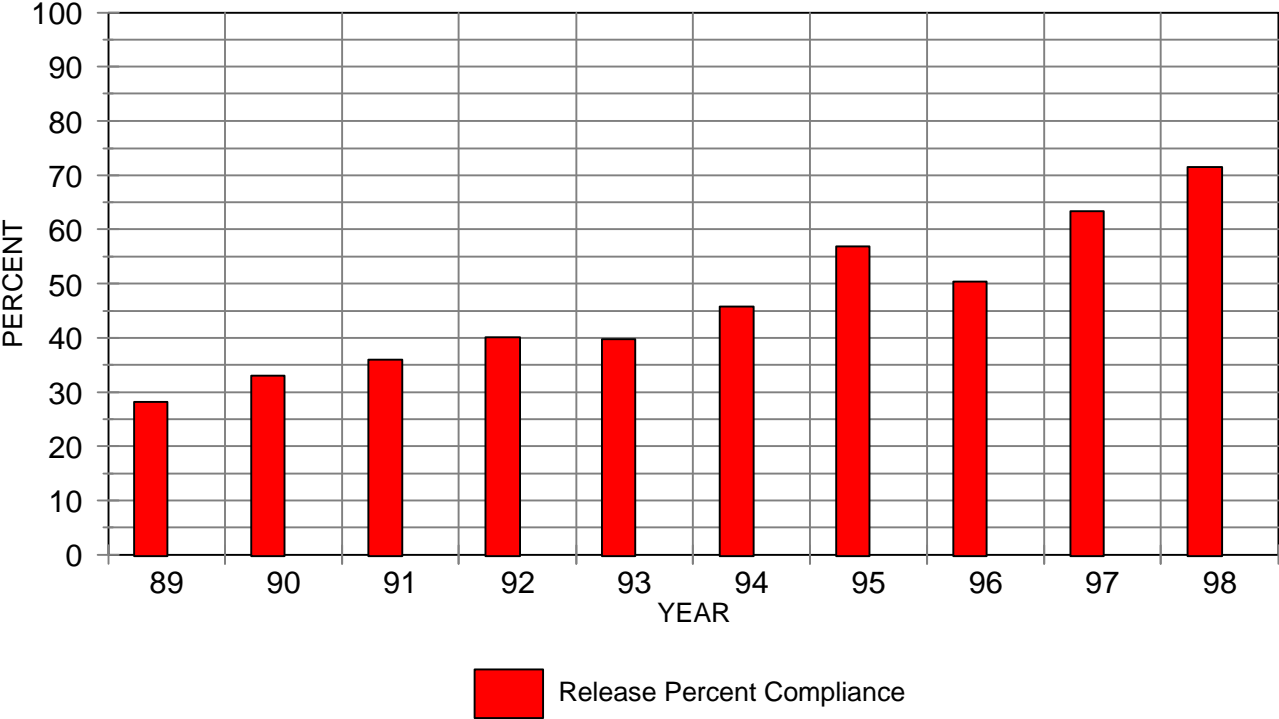
PROBLEMS ENCOUNTERED WITH THE DATA AND GENERAL COMMENTS:

- **ONLY 17 states were able to provide usable data for this survey**
- **No way to break down active tanks except by ratio.**
- **UST-DMS “Summary Statistics” does not have 1998 compliance totals without redundancy errors.**
- **We have always felt the compliance numbers from our database were extremely conservative. Additional compliance numbers based on field inspections conducted state staff demonstrate higher compliance rates.**
- **Data is based on notification information only. Many USTs have been closed or upgraded and not reported.**
- **Spill, overfill, corrosion were not tracked individually until 1998.**
- **Total number of registered tanks increased because of new notifications and closures of previously unregistered facilities, spurred by the 1998 deadline.**
- **Total number of registered tanks was affected by database QA/QC which resulted in the removal of registrations for unregulated USTs and multiple registrations for single UST systems.**
- **1996 was the first year hazardous substance USTs were identified separately from petroleum USTs .**
- **The ability to accurately track compliance with the 1998 requirements was established in 1996.**
- **Adjustment made to database numbers resulted in 1997 having figures lower than 1996.**
- **Active tanks includes temporary closed tanks which may or not include a substance.**

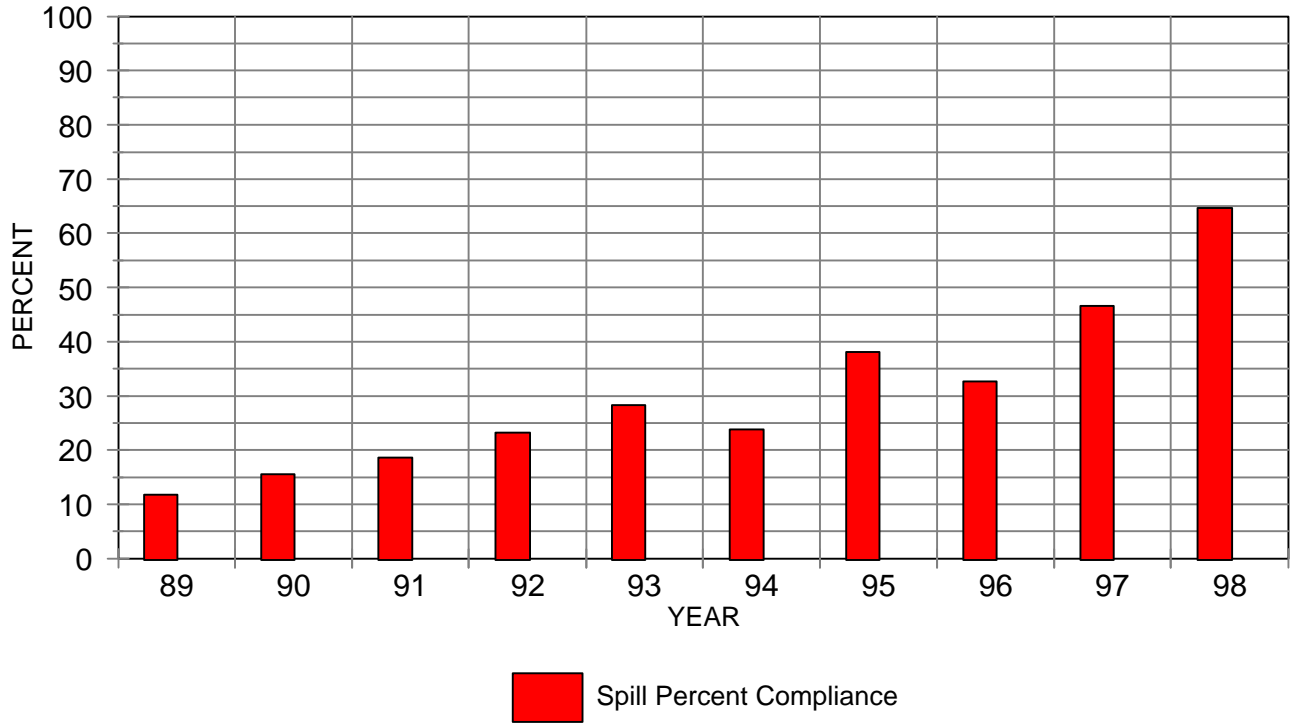
PROBLEMS ENCOUNTERED WITH THE DATA AND GENERAL COMMENTS (CONT.):

- The years 1989 through 1996 contain calculated information. We have about 2500 tanks which did not have a known "Date of Installation". These were lumped into the total count starting in 1989. To find the number of active tanks, "Date Closed" was used to determine the number closed tanks per year and this was subtracted from the total number of registered tanks while only looking at federally regulated tanks.**
- With some of the older data, it is unclear how accurate this field is. The number of petroleum tanks and hazardous substance tanks is impossible to distinguish. This information can change when someone changes the product in the tank.**
- North Dakota made a switch to the UST- Access database in 1997; there is a change in trend data in 1997 as a result. We were originally using the "Revelation" database program supplied by EPA.**
- 195 tanks not ready. These remaining tanks are state and federal government tanks that we expect to have a signed Memorandum of Agreement action within the next 30 days.**

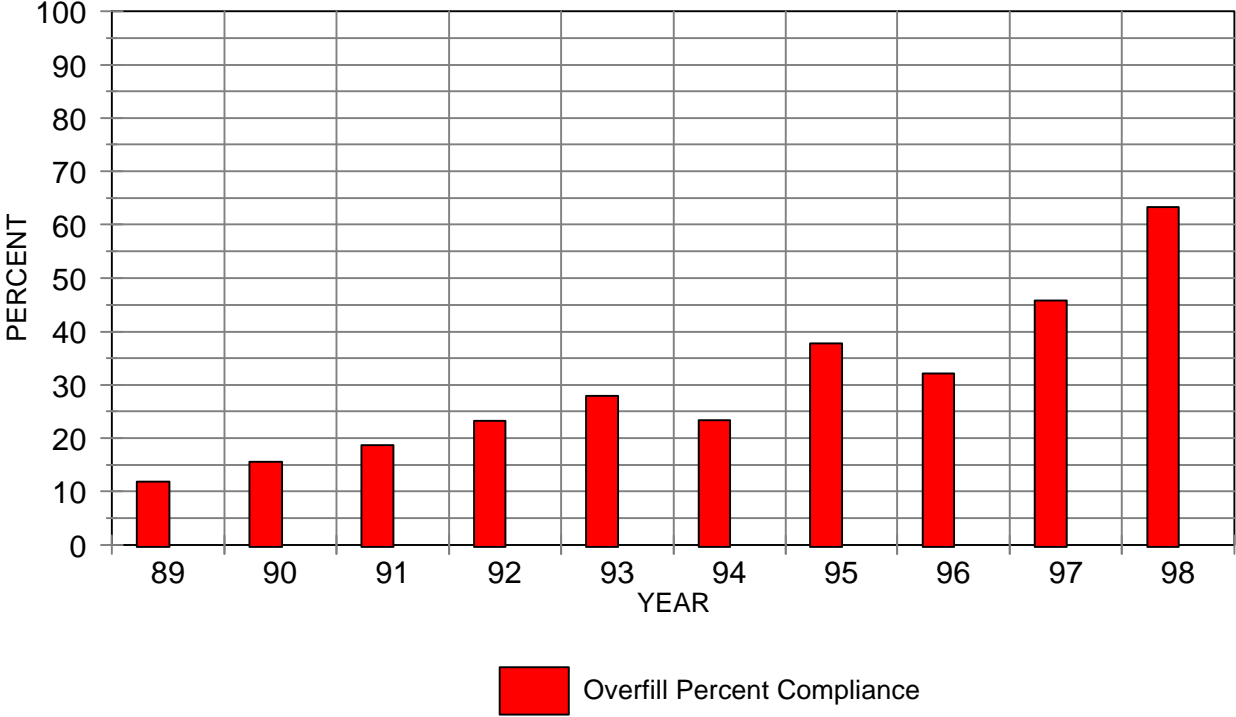
MEETING 1998 RELEASE DETECTION STANDARDS



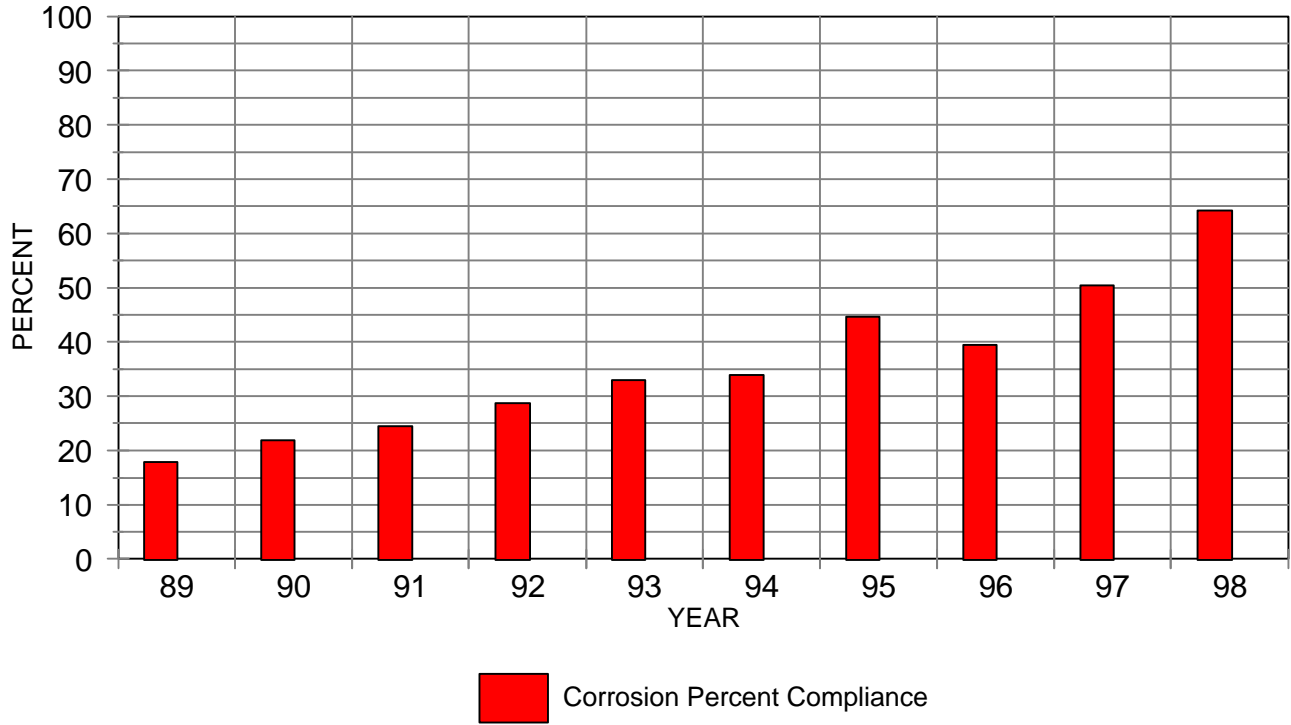
MEETING 1998 SPILL PROTECTION STANDARDS



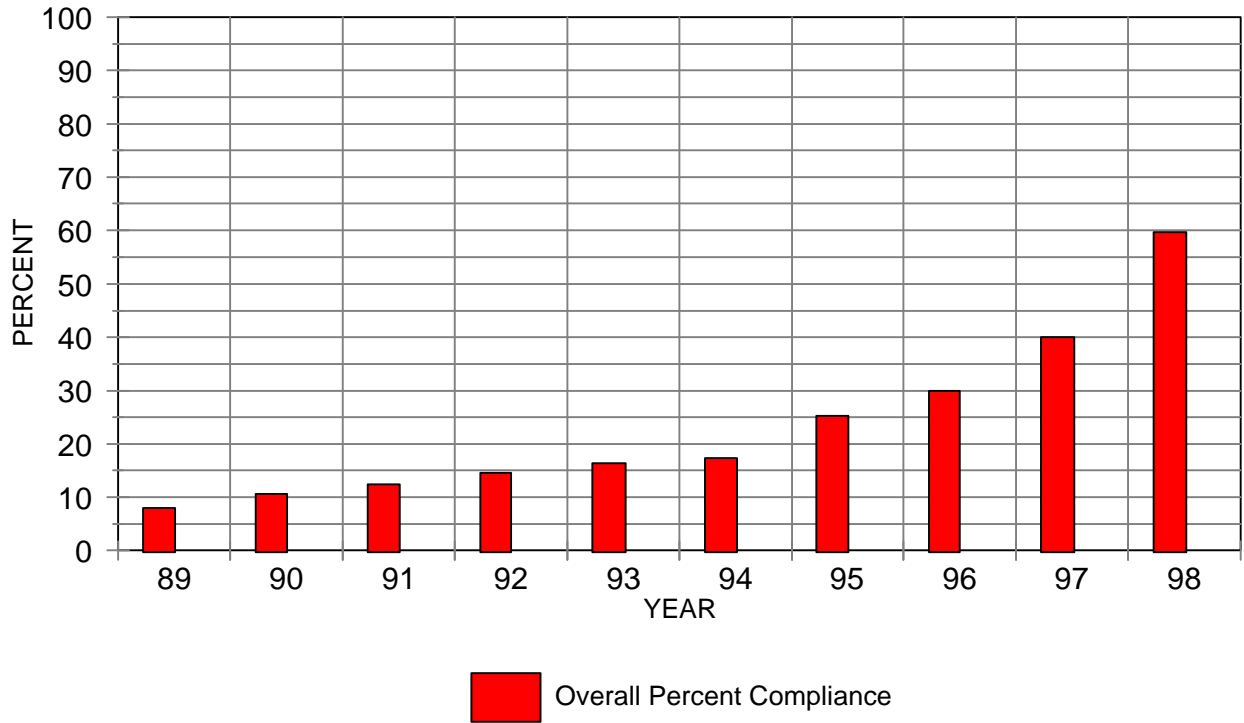
MEETING 1998 OVERFILL STANDARDS



MEETING 1998 CORROSION STANDARDS



MEETING 1998 OVERALL COMPLIANCE STANDARDS



**ESTIMATES BASED ON THE SURVEY OF 17 STATES DATABASES IN
EARLY 1999:**

- 59.7 % - OF THE EXISTING ACTIVE TANKS MEET THE 1998
TECHNICAL COMPLIANCE STANDARDS BASED UPON THE
PROVIDED DATA SET.**
- 71.5 % - MEET RELEASE DETECTION REQUIREMENTS.**
- 64.7 % - MEET SPILL PREVENTION REQUIREMENTS.**
- 63.3 % - MEET OVERFILL PROTECTION REQUIREMENTS.**
- 64.3 % - MEET CORROSION PROTECTION REQUIREMENTS**

PRELIMINARY FINDINGS

- 59.7 % OF THE EXISTING ACTIVE TANKS MEET THE 1998 TECHNICAL COMPLIANCE STANDARDS BASED UPON THE DATA SET.**
- THE 59.7% OVERALL COMPLIANCE RATE BASED ON THE 1998 DATA SET IS A 49.14% INCREASE OVER LAST YEARS RATE OF 40.0%**
- THE 1998 DEADLINE HAS OCCURRED. WHILE THERE IS AN OVERALL INCREASING TREND IN EACH INDIVIDUAL UPGRADE REQUIREMENT AND IN TOTAL COMPLIANCE, THE COMPLIANCE RATES DO NOT APPEAR TO BE APPROACHING 100% WITHIN THE NEXT YEAR.**
- WE WOULD LIKE TO HAVE YOUR DATA TO INCORPORATE INTO THIS TREND INFORMATION IF YOU ARE WILLING TO SHARE IT WITH US.**
- WE WOULD LIKE TO MAINTAIN REPRESENTATION FROM EACH OF THE USEPA REGIONS AND INCREASE OVERALL PARTICIPATION.**

IN CLOSING:

HAVE YOU SURVIVED

DECEMBER 22, 1998

AND BEYOND