

United States  
Environmental Protection  
Agency

Office of  
Solid Waste and  
Emergency Response

---



<b>DIRECTIVE NUMBER:</b>	9610.6
<b>TITLE:</b>	The UST Program Appraisal Strategy
<b>DATE:</b>	May 6, 1988
<b>ORIGINATING OFFICE:</b>	OSWER

---

**OSWER**

**OSWER**

**OSWER**

**DIRECTIVE**

**DIRECTIVE**

**DIRECTIVE**

---

## Table of Contents

I. INTRODUCTION .....	1
II. THE OUST APPROACH: ASSESSING AND IMPROVING PERFORMANCE .....	1
1. Taking Stock .....	1
2. Improving Performance .....	1
III. ROLES AND RESPONSIBILITIES .....	2
1. The State's Role .....	2
2. The Role Of EPA'S Regional Offices .....	2
3. The Role Of EPA Headquarters .....	4
IV. PROGRAM PRIORITIES FOR FY 89 .....	4
THE UST PROGRAM APPRAISAL PROCESS .....	5
APPENDIX A: STATE PERFORMANCE MEASURES .....	A-1
APPENDIX B: Regional Performance Measures .....	B-1
APPENDIX C: Headquarters Performance Measures .....	C-1
APPENDIX D: Reporting Requirements/SPMS .....	D-1

## **I. INTRODUCTION**

The purpose of this document is to explain the system of program appraisal, based on a franchise management approach that will be used by EPA's Office of Underground Storage Tanks (OUST). This document should clarify the franchise approach as it applies to program appraisal by:

- Describing the nature of the program appraisal process, and how it, works to lift the level of performance by all of us working to protect human health & the environment from potential or existing releases from USTs;
- Clarifying the roles and responsibilities of headquarters, Regions, and States;
- Defining clear performance goals and expectations by outlining national priority areas and listing the specific performance measures that will be used to help evaluate States, Regions, and Headquarters programs in FY 89. The performance measures are included in the appendices of this strategy.

## **II. THE OUST APPROACH: ASSESSING AND IMPROVING PERFORMANCE**

The goal of the program appraisal process is to ensure protection of human health and the environment from UST releases by helping to build strong and effective State and local programs. This process provides a systematic means for us (1) to take stock of our collective accomplishments and (2) to work together to raise the level of performance by States, Regions, and Headquarters. Through regular communication and feedback on issues, the process will focus on solving or anticipating issues such that the performance of all (States, Regions, and Headquarters) is improved.

### **1. Taking Stock**

The first job of program appraisal is to provide an accurate representation of what we have accomplished and how far we have to go to achieve our long range goals. It is a learning process that is designed to generate facts about current program results that will be useful to States and EPA.

These facts will provide a realistic program baseline from which we can build for success in the long run. Establishing a realistic baseline is critical given the wide range of program development currently, found in the UST community, and the tendency to begin with unrealistically high expectations for start-up programs.

Tracking progress over time is also essential for identifying areas where policies and programs are more and less successful. Less successful areas will call for corrections or new initiatives. In addition, periodic taking stock is necessary so that we can report to Congress and the public on how effectively their environmental and public health goals are being implemented.

### **2. Improving Performance**

States and EPA will constantly work together to identify ways to improve performance - by owners/operators, installers, clean-up contractors, State and local personnel, and by EPA Regional and Headquarters offices. States and Regions will work to identify successful technical and management practices at the State and local level and work with headquarters to make these practices available to other areas of the country. Each State will also work with its Regional office to identify performance improvement areas and assistance needs for its own program. Headquarters will support Regional efforts

and work with them to identify system-wide tools such as videos, technical guidance, or management systems.

### **III. ROLES AND RESPONSIBILITIES**

#### **1. The State's Role**

States have the lead role in field implementation of UST and LUST Programs and must balance State environmental priorities with national ones. States exercise discretion in how to organize and staff for program implementation, and choose how to best meet federal Subtitle I objectives tailored to State and local conditions.

As primary implementing agencies, States play a major role in the program appraisal process.

- Working with Regional offices, States determine goals and priorities for the State program which are reflected in grants and cooperative agreements.
- Through timely and accurate quarterly reporting and annual self-appraisals, States provide the raw facts for us to take stock of accomplishments.
- By making available information regarding successful efforts, States foster improvement throughout the system.
- States also work with Regions to identify areas to improve their program and needs for assistance from EPA.

Two major tools will be available to the States for taking stock of their own programs. First, States will have available from EPA data on national program progress which they can use as a point of reference for their own programs. Second, Regions will ask States to conduct a self-appraisal that will result in States completing a brief State accomplishments report designed to get the State's perspective on their accomplishments and needs.

- In what areas was the State most successful and what were the keys to success?
- Did the State meet expectations as outlined in grant and cooperative agreement workplans and performance measures?
- What challenges did the State face in implementing the program, and how did they address them?
- What areas are the State targeting for improvement in the coming year and how do they plan to achieve results?
- What assistance does the State need from EPA?

#### **2. The Role Of EPA'S Regional Offices**

EPA's Regional offices are the most important link in the program appraisal process. Key objectives for the Regions are:

1. to establish a good working relationship with States and develop expert knowledge of State performance and progress in key programmatic areas;
2. to work with States to identify their needs for improvement and assistance;
3. provide assistance to States; and
4. to work with headquarters to identify success stories and problems areas deserving of national attention.

Program appraisal will normally be linked to the ongoing process of negotiating and evaluating performance under grants and cooperative agreements, but will also occur through less formal communications, visits, and efforts at joint problem solving.

During the negotiation of grants and cooperative agreements, Regions and States will agree on performance goals and the means by which the Region will appraise the level of State performance throughout the year. A major element of this appraisal will normally be formal mid-and/or end-of-year reviews. These reviews should be documented in a **brief** written assessment of State accomplishments, needs, and possible performance improvement areas. Based on discussions with States regarding improvement areas, Regions will target services and resources to assist States in either problem diagnosis or developing solutions. Regional responses could include providing contractor assistance, assigning a Regional staff person on a temporary basis, arranging training, modifying a State workplan, or other creative approaches.

Regional offices will use a variety of tools to assist, in their assessment of State programs. The State performance measures in the appendix provide a useful checklist of program areas to examine. In addition, SPMS data and other quantitative quarterly reports contribute to the baseline of information. Regions will also review the timeliness and accuracy of reports, and oversee State progress in meeting commitments in grant and cooperative agreement workplans.

Regional offices outside of UST (including Grants, Planning and Management, Emergency Response, Regional Council and Financial Management) serve as experts in their functional areas in the State UST program appraisal process. UST Regional Coordinators coordinate with these other offices in their evaluations of UST State program performance. The financial management officer in the Region will be responsible for reviewing State program financial and fiscal accounting procedures.

Regions will also contribute to the appraisal process by conducting a self-appraisal leading to a brief Regional accomplishment report. This report is designed to provide a Regional perspective on program progress and needs in the Region. The report should be based on the Regional performance measures which will focus on:

- In what areas was the Region most successful in responding to State needs and assisting States in improving performance? What were the keys to this success?
- What major challenges did the Region face in carrying out its responsibilities, and how did they address them?
- What areas is the Region targeting for improving its performance in the coming year, and how do they plan to achieve results?
- What assistance and support does the Region need from headquarters?

The Regions can also use this opportunity to evaluate Headquarters performance. The measures included in appendix C list measures for Headquarters activities. The Regions should evaluate Headquarters performance according to the definitions of performance provided. These evaluations are to be used during Headquarter's annual review of the Region.

### **3. The Role Of EPA Headquarters**

Headquarters is responsible for supporting Regions and States in implementing the UST program. It issues and revises regulations, develops guidance, establishes national program priorities and policies with significant involvement and input by States and Regions. It provides tools and resources to State and Regional UST programs, and compiles and assesses national information. In the appraisal process, headquarters will work with Regions and States to clearly define agreed upon expectations for Regional performance, including criteria used to assess performance. These expectations and criteria are defined in The Agency Operating Guidance, OUST Grant and Cooperative Agreement Guidance, the Transition Strategy, and Appendix B of this document.

Headquarters will conduct annual reviews of each Region focusing on Appendix B Regional Performance Measures, and will provide feedback to help improve Regional performance. It will offer tools, such as contractor resources, training materials and data management systems to help States and local governments implement UST programs. Headquarters will use reported information to compile statistics Regions and States can use. They will also compile and disseminate information regarding successful Regional practices, particularly ways that Regions have been most successful in improving State performance.

Some issues may need to be explored in greater depth, particularly when issues arise which affect several Regions. To meet this need, Headquarters, with Regional assistance, may initiate detailed studies that focus on issues of concern. The need for these studies may arise from Regional requests for assistance or policy direction, information from quarterly reporting data, or constantly recurring operational issues. An example of a focused study is the cost recovery pilots project.

## **IV. PROGRAM PRIORITIES FOR FY 89**

The Agency Operating Guidance for FY 89 states the priority activities for UST programs. Appendix A, B, and C translate FY 89 priorities into specific performance measures for States, Regions, and Headquarters. Appendix D lists the State reporting requirements and SPMS measures.

- **STATE PROGRAM APPROVAL:** Develop State authorities and funding mechanisms, meet the "no less stringent federal objectives" as stated in the State Program Approval Handbook, and submit/approve complete applications for State program approval.
- **ADMINISTERING THE LUST TRUST FUND:** Negotiate and oversee Trust Fund cooperative agreements which increase emphasis on site work and oversight of responsible party clean-ups and decrease the emphasis on program development.
- **PROMOTE COMPLIANCE WITH REGULATIONS:** Offer training and technical assistance to States in order to develop State capabilities to implement effective State regulatory and clean-up programs. Provide education and information to the regulated community on their regulatory responsibilities.
- **TRANSITION STRATEGY:** Use existing State activities as a foundation for negotiating formal agreements with States with grants and cooperative agreements to begin implementing the federal regulations during the period after the final Federal regulations are promulgated and before State programs are approved. Work with States to help them develop technical and enforcement expertise as needed.

# **THE UST PROGRAM APPRAISAL PROCESS**

## **TAKING STOCK — IMPROVING PERFORMANCE**

### **State Roles**

- Work with Regions to determine goals and priorities for grants and cooperative agreements.
- Produce Quarterly Reports to define national program progress.
- Produce Self-Appraisals to give feedback on State accomplishments and needs.

### **Regional Roles**

- Evaluate performance of States under grants and cooperative agreements.
- Keep in contact with States to learn State programs.
- Perform mid- and/or end-of-year reviews of State programs.
- Produce a Brief Written Assessment which outlines State accomplishments needs and possible improvement areas.
- Target resources to State needs.
- Produce Self-Appraisals to give feedback on program progress and to evaluate Headquarters.

### **Headquarter Roles**

- Produce Tools for Regions and States to help improve performance in the UST program.
- Compile national statistics.
- Promote successful practices.

### **Other Regional Office Roles**

- Serve as experts in their functional areas.
- Financial Management Officer reviews State financial and fiscal accounting procedures.

## APPENDIX A: STATE PERFORMANCE MEASURES

### STATE PROGRAM APPROVAL

STATE ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
<p>1. Successfully meet all the requirements for State program approval.</p> <p>2. Develop final applications for State program approval, and submitting to EPA Regional offices.</p>	A. Has the State met the "no less stringent federal objectives" for State program approval as cited in the State Program Approval Handbook?	A. The State is developing/implementing authorities no less stringent than the Federal requirements.
	B. Does the State have adequate enforcement and compliance monitoring for State program approval? (i.e., legal authorities, comparable public participation procedures and staffing)	B. The State is developing/implementing the capabilities, policies and procedures, necessary for State program approval in the areas of enforcement, compliance monitoring, and public participation.
	C. Has the State submitted a final application for State program approval?	C. State is working with the Region to develop/implement a final application.

### COMPLIANCE ASSISTANCE, MONITORING AND ENFORCEMENT

STATE ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
<p>1. Promote compliance with the technical and financial responsibility regulatory requirements.</p> <p>Various means may be used to achieve the objective of compliance; for example:</p> <ul style="list-style-type: none"> <li>- Traditional enforcement: administrative orders, judicial orders, temporary or permanent restraining orders (with publicity of the actions).</li> <li>- Alternative compliance techniques: field citations, permit leverage, enforcement outreach, alternative cost recovery approaches, targeted inspections.</li> </ul>	A. Has the State developed and distributed outreach materials for the regulated community?	A. State has worked with the industry and industry trade associations to develop or has developed materials to distribute to owners/operators on regulations and tank management practices.
	B. Has the State been responsive to inquiries from the regulated community?	B. The State responds to the regulated community in a timely fashion. State identified areas where compliance is inadequate and developed innovative mechanisms to address these needs.
	C. Does the State have procedures in place for an effective compliance monitoring and enforcement program?	C. State is developing/implementing procedures for implementation of a compliance monitoring and enforcement program.

**CORRECTIVE ACTION**

STATE ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
<p>1. Encourage and oversee responsible party cleanups.</p> <p>2. Undertake state corrective action and remedial responses in a timely and appropriate fashion.</p>	<p>A. Has State set up an effective tracking system for overseeing Responsible party clean-ups?</p>	<p>A. State has set up an effective tracking system.</p>
	<p>B. Did the State initiate the use of innovative compliance techniques to encourage responsible party clean-ups?</p>	<p>B. State is developing/implementing innovative compliance techniques to encourage responsible party clean-ups.</p>
	<p>C. Has the State developed procedures for protecting human health and water supplies by providing for temporary relocation of residents or temporary alternate water supplies as needed?</p>	<p>C. The State is developing/implementing procedures for temporary relocation of residents and the provision of temporary water supplies.</p>
	<p>D. Has the State developed/implemented procedures for initiating long-term remediation of the ground water?</p>	<p>D. The State is developing/implementing procedures for initiating long-term remediation of the ground water.</p>

**COOPERATIVE AGREEMENTS**

STATE ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
<p>1. Successfully carry out all of the basic provisions set forth in cooperative agreements.</p>	<p>A. Is the State implementing its workplan and meeting its workplan schedule?</p>	<p>A. State has implemented a workplan that addresses all elements required under Trust Fund Guidance and is meeting all workplan schedules and commitments on time.</p>

## COST RECOVERY

STATE ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. Recover from liable owners or operators, the costs of undertaking a corrective action or enforcement action with respect to a release from an underground storage tank.	A. Does the State have the legal authority to carry out cost recovery actions?	A. States with cooperative agreements have necessary legal authority.
	B. Has the State developed cost recovery policies and procedures including: a written priority system for determining appropriate cost recovery sites; an accounting system to track site-related costs; a means of tracking and documenting cost recovery efforts?	B. States with cooperative agreements have cost recovery policy and procedures in place.

## 6. PROGRAM APPRAISAL ROLES

STATE ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. State maintains adequate records for the purposes of review. 2. State maintains a working automated data processing system to store notification information.	A. Does State have a functional data processing system which can produce the information requested by the Region and the public in a timely fashion?	A. State is developing/implementing a data processing system that is able to store, and produce information necessary for the development, implementation, and running of limited aspects of their UST program.
3. Produce aggregate tank notification reports for EPA on an annual basis.	B. Does the State report aggregate data on its tank universe that is accurate and timely?	B. State reporting data is timely, accurate, detailed and innovative. No corrections are required.

## APPENDIX B: Regional Performance Measures

### STATE PROGRAM APPROVAL

REGIONAL ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. Provide guidance and assistance to States in setting up their UST programs. 2. Assist States in developing applications for approval.	A. Has the region responded to requests from States to review and identify possible problems in State authorities capabilities and other requirements for a state UST program to meet the federal "no less stringent" requirements?	A. The Region has worked with States to jointly determine areas of improvement needed for State program approval.
	B. Has the Region responded to requests from States for help in developing funds and other mechanisms to help owners/operators meet the federal financial assurance requirements?	B. Region has responded to State requests for assistance in developing mechanisms to meet financial assurance requirements.

### COMPLIANCE ASSISTANCE, MONITORING AND ENFORCEMENT

REGIONAL ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. Assist States in establishing policies and procedures for promoting compliance among the regulated community with the technical, and financial responsibility requirements. 2. Identify the outreach needs of State UST programs.	A. Has the Region responded to requests and provided assistance in developing a State compliance and enforcement program?	A. Region has responded to State requests to jointly determine areas for compliance/enforcement program improvement.
	B. Has the Region disseminated successful compliance and enforcement procedures between States?	B. The Region has developed an understanding of alternative methods available to States in developing comprehensive compliance monitoring and enforcement programs and, is transferring this information to States.
	C. Has the Region identified State informational needs, communicated these needs to Headquarters, and distributed materials developed by Headquarters to the States?	C. Regional staff regularly meet with State and local officials to discuss outreach needs and how to respond to these needs. The Regions work to address these needs in a systematic way.
	D. Does the Region have a system to process notifications and provide compliance assistance as requested for UST systems on Indian lands?	D. The Region is developing/implementing a system to process UST notification and to provide compliance assistance requested for UST systems on Indian lands.

## CORRECTIVE ACTION

REGIONAL ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. Monitor State corrective actions and assist States in developing corrective action programs.	A. Is the Region disseminating information on innovative technologies and providing corrective action guidance as requested by the States?	A. The Region is actively working with the States to identify State corrective action needs.
	B. Is the Region knowledgeable of the types of State follow-up actions on sites under control?	B. The Region has developed/implemented a plan to obtain summary information on state clean-ups.

## COOPERATIVE AGREEMENTS

REGIONAL ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. Negotiate cooperative agreements in order to facilitate the early distribution of Trust Fund resources, the rapid development of State programs, and the initiation of cleanup and other corrective action and enforcement activities. 2. Oversee State use of the Trust Fund for corrective actions.	A. Has the Region worked with the States to expedite cooperative agreement negotiations?	A. The Region has successfully negotiated cooperative agreements and/or amendments for all the States in the Region.
	B. Has the Region worked with the States to (1) help them identify and solve problems in meeting the requirements of the cooperative agreements and (2) ensure Trust Fund monies are used in accordance with cooperative-agreement and grant regulations?	B. the Region maintains a continuous dialogue with the State to jointly identify problems and solutions. The Region educates the States on proper procedures for procurement, allowable costs, and other related activities covered by federal UST regulations.

## COST RECOVERY

REGIONAL ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. Assist States in designing and implementing cost recovery programs.	A. Has the Region communicated to other States within its Region and other Regional Offices, exemplary cost recovery approaches? (e.g., appropriate selection of cost recovery sites, tracking site related costs, documenting and tracking cost recovery efforts)	A. Region has identified States within the Region that need an example of exemplary cost recovery approaches and has communicated such examples to the States.

## TRANSITION STRATEGY

REGIONAL ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. Negotiate formal agreements with States to implement the federal regulations. Specific State activities may include: supervise responsible party cleanups; promote compliance with UST performance standards, corrective action, financial responsibility, and closure requirements.	A. Has the Region negotiated formal agreements to implement the Federal UST program during the transition period?	A. Region has negotiated formal agreements with all States with cooperative agreements in place.

**PROGRAM APPRAISAL ROLES**

REGIONAL ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
<p>1. Regions balance their oversight role with their service role. Activities in the process include performing mid-year reviews, developing targeted improvement projects based on State needs-assessments, and maintaining close communication with the States throughout the year.</p>	<p>A. Has the Region developed State-specific targeted improvement projects (TIPs) or targeted other resource based on State-needs assessments?</p>	<p>A. Region has worked in conjunction with State to determine State needs that could be satisfied through a targeted improvement project (TIP). Projects have been completed successfully and Region has submitted an evaluation of the outcome of each project, the methods used, and the lessons learned.</p>
	<p>B. Has the Region effectively serviced its States through reviews, all-state meetings and routine communications and meeting the needs expressed in the State self-evaluations?</p>	<p>B. The Region has reviewed all States at least once a year, held one all-State meeting each year, maintained routine communications, and addressed needs expressed in the State self-evaluation.</p>
	<p>C. Has the Region established a working relationship with the Regional Financial Mgmt Officer, Grants, Regional Counsel and other offices to assure that States have procurement, cost accounting, and Letter of Credit drawdown and other procedures that comply with federal requirements?</p>	<p>C. the Region has developed and implemented procedures for coordination with other Regional offices (Financial Mgmt Officer, Regional Council, Grants and other Offices) that will ensure that States have procurement, cost accounting, Letter of Credit drawdown and other procedures that comply with federal requirements.</p>
<p>2. Identify the training needs of State UST programs.</p>	<p>D. Has the Region identified State training needs, communicated these needs to Headquarters, and assisted the States in locating or developing appropriate training programs?</p>	<p>D. Regional staff regularly meet with State and local officials to discuss training needs and how to respond to these needs. The Regions assist States in locating and developing appropriate training programs.</p>
<p>3. Regions should assist states in developing and improving a working automated data processing system for each state within the Region.</p>	<p>E. Is the Region responding to requests from the state for assistance in developing, maintaining, and expanding an automated system?</p>	<p>E. Region has responded and identified data processing needs of states.</p>
	<p>F. Does the Region assist with periodic quality assurance checks to detect errors in data?</p>	<p>F. Region has assisted with quality assurance checks and provided training to the States as needed to produce accurate data.</p>

## APPENDIX C: Headquarters Performance Measures

### STATE PROGRAM APPROVAL

HEADQUARTERS ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. Provide guidance and support to Regions in the area of State Program Approval and promote consistency in the evaluation of applications.	A. Has Headquarters issued Guidance on how to meet State Program Approval Requirements?	A. Headquarters issues guidance that is timely, clearly written and responds to Regional needs in working with States.
	B. Is Headquarters responsive to questions and requests for assistance or issue resolution from Regions in the area of State Program Approval?	B. Headquarters is responsive to Regional questions and responds with a short working answer or by planning longer term guidance if necessary. Headquarters disseminates information on State program approval issues through an appendix to the OUST weekly on a regular basis.

### COMPLIANCE ASSISTANCE, MONITORING AND ENFORCEMENT

HEADQUARTERS ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. Prepare and distribute materials that help to improve the prevention program procedures of owners and operators.	A. Has Headquarters identified the informational needs of Regions and States and developed materials that can be distributed by States to owners/operators?	A. Headquarters identifies a need and develops a product that can be readily adapted for State use.
	B. Has Headquarters provided guidance on enforcement and compliance monitoring procedures and disseminated information on successful procedures in a timely manner.	B. Headquarters sponsors forums to disseminate information on successful compliance and enforcement techniques used by the States (e.g., through Regional coordinators meeting, Regional Conference calls, etc.).
	C. Is Headquarters responsive to requests from the Regions and States concerning enforcement issues?	C. Headquarters is responsive to Regional questions and responds with short working answers or by planning longer term guidance if necessary.

### CORRECTIVE ACTION

HEADQUARTERS ACTIVITIES	MEASURES	DEFINITION OF PERFORMANCE EXPECTATIONS
1. To provide guidance and support to the Regions in the area of corrective action.	A. Has Headquarters worked with other Headquarters Offices (Air, Water, etc.) to support the Region in developing a UST clean-up program.	A. Headquarters has coordinated areas of overlap (air-stripper, and NPDES permits) with other Headquarters program offices to expedite clean-ups in the field.
	B. Has Headquarters been responsive to questions and clarification requests for technical guidance from Regions in the area of corrective action?	B. Headquarters is responsive to Regional questions and responds with short working answers or by planning longer term guidance if necessary.

**TRANSITION STRATEGY**

<b>HEADQUARTERS ACTIVITIES</b>	<b>MEASURES</b>	<b>DEFINITION OF PERFORMANCE EXPECTATIONS</b>
1. Provide assistance to the Regions on specific issues that arise during the transition period to facilitate a smooth transition.	A. Has Headquarters provided clear guidance on the type of activities required by the Region during the transition?	A. Headquarters has provided clear guidance on the activities required by the Regions during the transition.
	B. Has Headquarters been responsive in addressing Regional needs during the transition?	B. Headquarters is responsive to regional questions and responds with short working answers or by planning longer term guidance of if necessary.

**PROGRAM APPRAISAL ROLES**

<b>HEADQUARTERS ACTIVITIES</b>	<b>MEASURES</b>	<b>DEFINITION OF PERFORMANCE EXPECTATIONS</b>
1. Headquarters evaluates Regional needs and responds quickly and satisfactorily to those needs.	A. Does headquarters respond to Regional needs discovered through the Regional Reviews, written inquiries and routine communications?	A. Headquarters works in conjunction with Region to identify Regional needs. Unique and important issues raised during the reviews and in Regional correspondence are recorded in the issue docket. Headquarters issues a letter to the region with a short working answer and where appropriate, specifies who will be working on specific issues and the time-frame for response.
	B. Is the Headquarters contact for the Region (the desk officer) being responsive to Regional requests?	B. Desk officer responds promptly and effectively to Regional requests.
	C. Is Headquarters developing guidance in a timely fashion, according to Regional requests and written inquiries?	C. Guidance anticipates Regional needs in working with States, is transmitted well in advance of application needs, and advances the spirit of franchising.
2. Identify the training needs of Regions.	D. Has Headquarters met with the Region to determine their training needs and assisted the Region in locating or developing appropriate training programs?	D. Headquarters has identified priority training needs of Regions and States and is working to address these needs in a systematic fashion. Headquarters has made its staff available, as requested by the Regions, by sending in-house experts or better information to Regions or other States to provide technical assistance.
3. Headquarters should work with the States to assist development of State notification data systems and enhancements.	E. Has Headquarters provided usable system guidance and training and developed data base enhancements as required to assist States in meeting their reporting requirements?	E. Headquarters responds promptly and helpfully to State and Regional requests for data processing assistance.

## APPENDIX D: Reporting Requirements/SPMS

### U.S. EPA OFFICE OF UNDERGROUND STORAGE TANKS QUARTERLY REGIONAL REPORT FORM

Region: \_\_\_\_\_ State: \_\_\_\_\_ FY: \_\_\_\_\_ Quarter: \_\_\_\_\_

#### ACTIVITIES REPORTING

	Cum. last + Qtr.	Actns. this + Qtr. (-)	Corr. prev. Qtrs. = Data	Cum. this Qtr.
1. Number of Site Investigations Completed				
2. Number of Emergency Responses Taken				
3. Number of Site Where Enforcement Actions Taken to Complete Clean-Up				
4. Number of Sites Where Cost Recovery Initiated				
<b>5. CLEAN-UPS STARTED</b>				
a. RP Lead				
b. State Lead with Trust Fund Money				
c. State Lead with NO Trust Fund Money				
<b>6. SITES UNDER CONTROL</b>				
a. RP Lead				
b. State Lead with Trust Fund Money				
c. State Lead with NO Trust Fund Money				
<b>7. CLEAN-UPS COMPLETED</b>				
a. RP Lead				
b. State Lead with Trust Fund Money				
c. State Lead with NO Trust Fund Money				

**U.S. EPA OFFICE OF UNDERGROUND STORAGE TANKS  
 QUARTERLY REGIONAL REPORT FORM**  
 State: \_\_\_\_\_ FY: \_\_\_\_\_ Quarter: \_\_\_\_\_

**8. EXCEPTION REPORT**      **[\*\*DRAFT\*\*]**

Please list activity for this quarter and corrections to previous quarters:

Action Code	Exception Code	Site Name	Amount
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**Exception Codes:**

- A - State plans to obligate over \$100,00 at a site
- B - State actually obligated over \$100,00 at a site (cumulative site expenses exceeded \$100,00 this quarter); also enter amount
- C - State plans to use innovative or experimental technology at the site
- D - State plans to provide permanent alternative water supply
- E - State plans to permanently relocate residents
- F - State reached/received a cost recovery settlement; also enter amount

**Action Codes:**

- N - Current Quarter Activity
- D - Correction to previously reported data; delete this site
- A - Correction to previously reported data; add this site

	Cum. last + Qtr.	Actns. this + Qtr. (- )	Corr. prev. Qtrs. = Data	Cum. this Qtr.

**9. FORECASTING TRUST FUND USE**

Number of Sites with Confirmed Releases Where				
a. O/O has been Identified				
b. O/O is Insolvent/Incapable of Conducting Timely Clean-Up (subset of number included in 9a)				
c. Search for Responsible Party Unsuccessful				

U.S. EPA OFFICE OF UNDERGROUND STORAGE TANKS  
 REGIONAL SPMS REPORTING FORM  
 State: \_\_\_\_\_ FY: \_\_\_\_\_ Quarter: \_\_\_\_\_

**STATE PROGRAM APPROVAL (UST-1)**

Does State have adequate legislative authority in place for developing an approvable UST program that addresses requirements for:

(a) Tank Design, Tank Maintenance and Corrective Action	-- Petroleum (Y/N)	
	-- Chemical (Y/N)	
(b) Financial Assurance	-- Petroleum (Y/N)	
	-- Chemical (Y/N)	
(c) Has State submitted a complete application for State Program Approval	-- Petroleum (Y/N)	
	-- Chemical (Y/N)	
(d) Does State have an Authorized Program	-- Petroleum (Y/N)	
	-- Chemical (Y/N)	

**CLEAN-UP OF LEAKING TANKS (UST-2)**

(a) Does State have LUST Trust Fund Co-operative Agreement that includes FY 89 money (Y/N)

(b) Does State have adequate authorities in place for carrying out LUST Trust Fund Activities in the areas of:

Corrective Action (Y/N)  
 Enforcement (Y/N)  
 Cost Recovery (Y/N)

Cum. last + Qtr.	Actns. this + Qtr. (-)	Corr. prev. Qtrs. = Data	Cum. this Qtr.
------------------------	------------------------------	-----------------------------------	----------------------

(c) Number of Site Clean-Ups initiated in response to Leaking USTs

RP Lead				
State Lead with Trust Money Fund				
State Lead with NO Trust Money Fund				

(d) Number of Sites brought under control

RP Lead				
State Lead with Trust Money Fund				
State Lead with NO Trust Money Fund				

<b>IMPLEMENTATION OF FEDERAL UST PREVENTION PROGRAM (UST-3)</b>	
Does State have a formal agreement to implement the Federal UST Program during the transition period (Y/N)	