

	<b>Statutory Deadline</b>	<b>Status of EPA Guidelines</b>	<b>Louisiana Actions</b>
<b>1. Financial Responsibility (FR) for manufacturers/installers</b>	Feb-07	Final grant guidelines issued January 22, 2007	LDEQ issued an official response to EPA regarding Financial Responsibility or Secondary Containment. A work group has been formed and is meeting to develop regulations that will meet these requirements
Or			
<b>Double-walled</b> equipment at all new installations & when equipment is replaced		Final grant guidelines issued November 15, 2006	LDEQ intends to meet or exceed requirements by January 1, 2009. Secondary Containment will be the option chosen with the possibility of incorporating some components of financial responsibility.
<b>2. Delivery Prohibition</b> -- States must identify USTs that are grossly out of compliance & prohibit delivery of fuel to those tanks	Aug-07	Final grant guidelines issued August 7, 2006	Regulations were adopted as rule and became effective on September 20, 2007. These regulations prohibit the delivery of regulated substances for UST systems that are discovered not to meet the required 1998 standards or are not compliant with spill prevention, overfill protection, release detection, corrosion protection, financial responsibility, or registration requirements in accordance with LAC 33:XI.
<b>3. Public Record</b> -- States must make info available on number, sources & causes of leaks; UST compliance; and number of equip failures	First report due Sept 2008; Must begin data gathering October 1, 2007	Final grant guidelines issued January 22, 2007	LDEQ issued its official response to EPA in regards to the public record requirements on September 28, 2007. In order to achieve the goals of the guidelines LDEQ has developed and begun using a data gathering form. The form is designed to allow USTD staff to collect the required information.

**4. Inspections** -- States must inspect any UST that has not been inspected since the 1998 upgrade deadline

Aug-07

Final grant guidelines issued April 24, 2007

LDEQ, LDEQ Contractors, and EPA inspectors completed compliance inspections of all USTs installed prior to December 22, 1998 by the August 8, 2007 deadline.

And

Must inspect USTs at least once every three years

Beginning August 2007

Planning meetings have been initiated to ensure that LDEQ will meet the needs and requirements of the new three year inspection cycle. It is expected that LDEQ will request the available 1 year extension to meet this requirement.

**5. Operator Training** -- EPA must issue guidelines that "specify training requirements" for 3 classes of employees

EPA guidelines issued August 8, 2007; States must implement by August 2009

Final grant guidelines issued August 8, 2007

Final Guidance issued August 8, 2007. LDEQ shall assemble a work group to ensure that the requirements are met and to implement an effective training program.

**6. Government Owned Tanks** -- State Compliance Report -- States must issue a report on the compliance status of government owned tanks

8-Aug-07

Final grant guidelines issued April 24, 2007

LDEQ, LDEQ Contractors, and EPA inspectors completed compliance inspections of all government owned and/or operated UST facilities by the August 8, 2007 deadline. LDEQ provided a report to EPA identifying and reporting compliance issues related to government owned and/or operated tanks in the state of Louisiana.