

STATE WATER RESOURCES CONTROL BOARD
RESOLUTION NO. 91-52

AUTHORIZATION TO ACCEPT FEDERAL FISCAL YEAR (FFY)
1991 FUNDS FROM THE FEDERAL TRUST FUND FOR LEAKING PETROLEUM
STORAGE TANKS (PETROLEUM TRUST FUND) AND THE RE-AWARD OF UNSPENT
FUNDS FROM PREVIOUS FISCAL YEARS

WHEREAS:

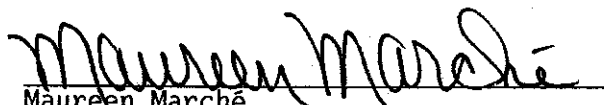
1. The U.S. Environmental Protection Agency (EPA), Region 9, is offering a \$3,240,000 Petroleum Trust Fund grant to the State Water Resources Control Board (State Board) for FFY 1991. In addition, \$4,390,344 will be re-awarded to California from unspent carryover.
2. To date over 19,000 leaking Underground Storage Tanks (UST) have been identified in California.
3. The Petroleum Trust Fund allotment will augment the State leaking UST cleanup program.
4. The State Board will enter into a signed State/EPA agreement on the UST program for FFY 1991 in order to receive Federal funds.

THEREFORE BE IT RESOLVED THAT THE STATE BOARD:

1. Authorizes the Executive Director or his designee to accept the Petroleum Trust Fund grant in an amount of up to \$7,630,344.
2. Authorizes the Executive Director, or his designee, to execute a revised UST Petroleum Trust Fund cooperative agreement with EPA, Region 9.

CERTIFICATION

The undersigned, Administrative Assistant to the Board, does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the State Water Resources Control Board held on June 20, 1991.


Maureen Marché
Administrative Assistant to the Board

COOPERATIVE AGREEMENT BETWEEN THE STATE WATER RESOURCES CONTROL BOARD
AND THE U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9
FOR USE OF THE PETROLEUM TRUST FUND

I. Background and General Statement of Purpose

The Leaking Underground Storage Tank Trust Fund (Trust Fund) was established on October 17, 1986 as Section 205 of the Superfund Amendments and Reauthorization Act (SARA). The Trust Fund was established to provide money for corrective action of petroleum releases from underground storage tanks (USTs), regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA), and not eligible for cleanup under Superfund. The Governor has designated the State Water Resources Control Board (State Board) to implement the Trust Fund for the State of California.

The Trust Fund may be used for the following activities:

- A. Set priorities for cleanup.
- B. Take enforcement action.
- C. Take corrective action (including response to emergencies, provision of alternative water supplies, and relocation of residents).
- D. Recover costs for cleanup.
- E. Ensure public participation.
- F. Require quality assurance.

In California, the U. S. Environmental Protection Agency (EPA), the State Board and other State, regional, and local entities are responsible for certain activities covered by the Trust Fund. These agencies and their broad responsibilities pertaining to the Trust Fund are as follows:

EPA:

As the agency responsible for implementing the federal UST program, EPA must develop corrective action regulations, approve State programs, and oversee use of the Trust Fund.

State Board and Regional Water Quality Control Boards (Regional Board):

The State Board protects ground and surface water quality and beneficial uses and oversees implementation of the UST law (Health and Safety Code, Chapter 6.7, Section 25180 et seq.). With regard to the specific activities covered by the Trust Fund, the State Board will provide guidance and technical assistance to the Regional Boards and local implementing agencies concerning exposure assessments and quality assurance. The State Board will also conduct cost recovery.

The Regional Boards develop and implement water quality control plans to protect ground and surface water quality and beneficial uses. With regard to the specific activities funded under the Trust Fund, the Regional Boards conduct corrective action, enforcement activities, quality assurance, and exposure assessments.

Other State Agencies:

The Department of Health Services (DHS) regulates hazardous waste management and establishes and enforces drinking water standards. With regard to the specific activities covered by the Trust Fund, DHS requires alternate water supplies, conducts corrective actions, exposure assessments, quality assurance, and undertakes enforcement actions.

The Office of Emergency Services (OES) coordinates response to emergencies not on State highways. With regard to the specific activities covered by the Trust Fund, OES conducts relocation of residents, and provides alternate water supplies.

The Air Resources Board (ARB) sets emission standards for air pollutants and regulates emissions from mobile sources and certifies vapor recovery systems at gasoline stations. With regard to the specific activities covered by the Trust Fund, ARB conducts corrective action, enforcement activities, quality assurance, and exposure assessments related to mobile sources.

The California Highway Patrol (CHP) responds to emergencies on State highways and roads, and enforces 49 CFR Parts 170-179, the U.S. Department of Transportation regulations on hazardous waste transport. With regard to the specific activities covered by the Trust Fund, the CHP conducts emergency response and enforcement activities.

Regional Agencies:

The Air Quality Districts (AQD) establish and enforce emission standards for pollutants from stationary sources and maintain a permit program for pollutants from stationary sources. With regard to the specific activities covered by the Trust Fund, the AQDs conduct enforcement activities, quality assurance, and exposure assessments.

Local Agencies:

All 58 California counties are responsible for implementing the UST law. With regard to the specific activities funded under the Trust Fund, the counties can conduct emergency response, corrective action, enforcement activities, cost recovery, temporary or permanent relocation of affected residents, provision of water supplies, quality assurance, and exposure assessments.

Forty-two California cities have enacted ordinances to implement the UST law within their boundaries. With regard to the specific activities funded under the Trust Fund, the cities have designated agencies, usually fire departments, to conduct emergency response and can oversee corrective action, enforcement activities, cost recovery, temporary or permanent relocation of affected residents, provision of water supplies, quality assurance, and exposure assessments.

The State Board anticipates that most of the cleanup and enforcement work using the Trust Fund will be accomplished by local agencies. The State and Regional Boards will provide administrative and technical support and enforcement authority, as needed.

The following eligibility criteria were established for local agencies to use the Trust Fund. To be eligible, the local implementing agency must:

- A. Have an active UST permitting program;

- B. Remit UST permit surcharge fees to the State;
- C. Be willing to comply with EPA regulations and program requirements including the project administration and reporting requirements.
- D. Be willing to coordinate with the responsible Regional Board on cleanup reporting, tracking, and supervision.

The State Board will maintain the independent administration of the Trust Fund agreement, both functionally and financially. Existing leak reporting, tracking, and cleanup procedure and systems activities will be modified to allow site-specific cost accounting for activities funded under the agreement. Activities conducted under this agreement are subject to the requirements of 40 CFR, Parts 7, 29, 31, 32, 33, 35, 280, and 281.

Corrective action taken under this agreement will be limited to leaks from underground petroleum storage tanks, regulated by Subtitle I of RCRA, and to unidentified petroleum leaks until they are shown not to be from Subtitle I UST systems. The Trust Fund will not be used for releases known to be from USTs containing nonpetroleum hazardous materials, hazardous waste tanks, or other tanks excluded under RCRA Section 9001. The Trust Fund will not be used for routine or random inspections.

A ten percent state match is required for grants received in the 1989 Federal Fiscal Year and for subsequent years. The State Board plans to meet the 10 percent matching requirement by using the in-kind services of its existing UST program for petroleum USTs.

The State Board anticipates that this agreement will be a dynamic document requiring periodic renegotiation when a significant change to the workplan is necessary. The EPA Regional Project Officer, in conjunction with the State Board, will determine when workplan changes are significant enough to warrant renegotiation. This agreement will also be periodically modified to incorporate additional funding and to revise the scope of the workplan. Minor changes will not require a formal renegotiation. To make minor changes, the State Board will contact the EPA Project Officer for approval, and changes will be confirmed in a letter from the State Board's Chief of the Division of Loans and Grants to the EPA Project Officer.

Allowable costs under this agreement include core program staff directly involved in Trust Fund program management and contractor support and associated indirect costs, calculated in accordance with OMB Circular A-87. Costs for core and technical staff, devoted exclusively to the corrective action and enforcement components of the program, will be charged to specific projects. Costs incurred before this cooperative agreement is signed by the accepting official will not be eligible expenditures for the Trust Fund money.

The State Board anticipates that selected local agencies will play major roles in implementing the work covered under this agreement. Any transfer of funds will occur by means of contracts detailing the performance activities expected of each agency. The State Board has prepared a model contract that will be modified to deal with varying local circumstances.

II. Certification of Authorities

In signing this Cooperative Agreement, as Executive Director of the State Water Resources Control Board, I certify that the State of California has the legal authority to conduct the activities committed to in this Agreement. The

Attorney General for the State of California submitted a concurrence of this certification which specified the legal authority relied upon.

III. Workplan Activities

The State Board will use the Trust Fund to conduct both core programs and site-specific activities. The core program tasks have been designated to yield products that can be used at many sites. This approach promotes efficient use of the Trust Fund and provides standard guidance for site cleanup.

Discussed below are the general activities covered under this agreement. Refer to Appendix A for a description of tasks and staff allotments for the cleanup and enforcement components of the State Board's UST program.

Activities which were completed under the FFY 1987 and 1988 Cooperative Agreement have been omitted from the below list of workplan commitments.

A. Tracking of Cleanup Cases

The State Board agrees to maintain a computer-based information system which meets the following objectives:

1. Establishes a statewide UST cleanup status database for tracking individual leaking UST cases to assist the State and Regional Boards in meeting the following obligations:
 - a. Prepare an annual UST program workplan,
 - b. Set priorities for sites to receive Trust Fund monies,
 - c. Prepare an annual report to the Legislature,
 - d. Monitor cleanup progress at UST cases being supervised by Regional Boards and local agencies, and
 - e. Respond to information inquiries.

The UST status database consists of standard information profiling the location, ownership, type and cleanup status of all UST sites within the State. The statewide database is comprised of the combined information stored in nine Regional Board databases and would be updated quarterly. Information flow is generally from local agency to the Regional Board and then to the State Board. This arrangement allows the State and Regional Boards to realize continued benefits from the existing good working relationship between Regional Boards and local agencies and involve only the formalization, standardization, and enhancement of existing communication lines.

2. Establishes a statewide site-specific UST fiscal database to assist the State and Regional Boards in meeting the following obligations:
 - a. Track expenditures of Trust Fund monies,
 - b. Disburse Trust Funds to local contract agencies,

- c. Bill tank owners for public funds expended for UST site cleanup, and
- d. Report to EPA on the utilization of UST funds.

The statewide UST fiscal database would consist of Trust Fund expenditure information. This information would reside exclusively at the State Board and would be updated monthly. The source of this information would be itemized invoices received directly from contracting local agencies.

- 3. Provides State Board management with quarterly UST program activity and status reports. These reports improve the quality and timeliness of the program workplan, while reducing the staff time required for its production.
- 4. Provides State Board staff with the capability to disburse Trust Funds to local contracting agencies, receive and process itemized invoices, and bill UST owners for public funds expended for site cleanup.
- 5. Provides an annual report to the Legislature, including current status information. This provides the Legislature and the public with a much more accurate picture of the leaking UST issue within California than current capabilities allow.
- 6. Provides quarterly progress reports and ad hoc exception reports to EPA. The reports must meet all requirements of EPA and be prepared with minimal State Board staff time.
- 7. Provides Regional Board staff and management with the capability to create management reports and to make ad hoc inquiries about the status of specific cases or sets of cases.
- 8. Provides Regional Board staff with the capability to track local agency UST cases with a minimal increase in permanent staff. At a minimum, Regional Boards must be able to generate status summaries for local agency cases within their jurisdiction and must be provided with a means to make inquiries about the status of local agency cases.

Output: Microcomputer applications programs installed at twelve Regional Board offices and the State Board office. Site-specific records on up to 6,700 cases at one time.

Status: Ongoing.

B. Contracts Management

The State Board will negotiate an interagency agreement with DHS transferring money from the department for expenditure by the local agencies for cleanup oversight. The State Board will also negotiate contracts with local agencies for overseeing part or all of the site-specific corrective action and enforcement aspects of the program.

The State Board agrees to include the following in all such local agency contracts:

1. An executed copy of this agreement.
2. A statement to the effect that the contractor agrees to comply with all applicable provisions of 40 CFR Parts 7, 25, 29, 31, 32, 33, and 35 and all general and special conditions of this agreement.

Output: Up to 25 contracts will be executed with local agencies.

Status: Sixteen contracts are in place.

C. Accounting and Cost Recovery

1. The State Board agrees to maintain a financial cost accounting system which meets the requirements of 40 CFR 30.510.
2. The State Board agrees to organize and maintain site-specific information on activities and costs where Trust Fund monies are used. Prior to making expenditures of Trust Fund monies for corrective and enforcement actions, a system must be in place to record these types of costs on a site-specific basis. All other costs that can be identified to a particular site should be charged accordingly. State contractors must bill costs on a site-specific basis, including corrective action costs, enforcement costs and, to the extent possible, management costs.
3. The State Board acknowledges that expenditures from the Trust Fund covering the cost of corrective or enforcement action constitute a liability of the owner/operator to the United States.

The State Board therefore agrees:

- a. That it will make reasonable efforts to recover these costs from liable owners/operators. In making such efforts, the State Board may consider equitable factors to the extent provided in Section 9003(h)(6)(B) and Section 9003(h)(11) of the Solid Waste Disposal Act, as amended;
 - b. That it will report within 30 days on any amounts received from the owner/operator, or agreed or adjudged to be owed by the owner/operator, as a recovered cost of site cleanup;
 - c. That to the extent the State Board is successful in recovering these costs, it may keep recovered funds provided the funds remain for use in the UST cleanup program.
 - d. That it will notify EPA within 30 days of amounts that an owner/operator has agreed are owed as a recovered cost and that before accepting payment of that debt, anything less than the amount agreed upon, the State Board will obtain EPA's approval or proceed in accordance with any additional guidance provided by EPA.
4. The State Board agrees to maintain or require its contractors to maintain supporting documentation and appropriate records in support of any future cost-recovery efforts. The State Board agrees to make these records available to the Federal Government, as needed, on a case-by-case basis.

Output: Accounting and cost recovery system and procedures.

Status: Completed.

D. Corrective Action and Enforcement

Activities related to corrective action and enforcement will be performed by local contracting agencies and Regional Boards.

1. Corrective Action

- a. The State Board will include the following or similar corrective action-related tasks in contract workplans:

Task 1. Confirm Leaks

The local contracting agency shall confirm all reported UST release cases within its jurisdiction, using its authority under Chapter 6.7 of the California Health and Safety Code.

Task 2. Preliminary Site Assessment

The local contracting agency shall perform a preliminary assessment of confirmed UST release sites to determine the extent of existing soil contamination. Ground water samples may also be taken and evaluated, if ground water is encountered during the course of the preliminary site assessment. Preliminary site assessment also includes overseeing the following work: (1) removal of the UST, (2) excavation of backfill and surrounding native soils, and (3) removal of any hazardous substance floating on ground water discovered during UST removal and soil excavation.

Task 3. Determination of Site Status

Based on data collected and analyzed during the preliminary site assessment, the local contracting agency shall make a determination as to whether: (1) the UST site has been adequately cleaned up by the responsible party through initial removal or remedial actions carried out during the preliminary site assessment, or (2) the UST site requires more extensive investigation and cleanup action. If additional site investigation and cleanup is indicated, the local contracting agency shall undertake the following tasks.

Task 4. Conduct Remedial Investigation and Develop Cleanup Alternatives

The local contracting agency shall oversee an investigation conducted by the responsible party to determine the hydrogeological characteristics

of the site, the lateral and vertical extent of contamination, the sensitivity of the site, and potential threat of exposure to humans, and prepare cleanup alternatives evaluating available remedial actions.

Task 5. Develop Corrective Action Plan

The local contracting agency shall oversee the development by the responsible party of a corrective action plan.

Task 6. Remedial Action

The local contracting agency shall oversee implementation by the responsible party of the remedial action identified in the corrective action plan.

Task 7. Post Remedial Action Monitoring

The local contracting agency shall oversee ongoing monitoring by the responsible party of sites where free product or dissolved product are left in place following cleanup and remedial action.

2. Enforcement

- a. California enacted an UST law in 1983 and amended that law in 1984, 1985, and 1986. This law requires local agencies to implement an UST regulatory program under Health and Safety Code Division 20, Chapter 6.7. Under Sections 25297 and 25299.5, the local agencies may refer UST leak cases to the Regional Boards and DHS to order corrective action using their antecedent authority. Also, the State Board has authority under the Porter Cologne Water Quality Control Act (Water Code) to take enforcement action (Such as ordering corrective action) on its own motion and to review enforcement decisions by Regional Boards on appeal. In addition, the local agencies have authority to order corrective action under the general police power and a variety of local ordinances covering hazardous materials management, fire, public safety and health.

The standard procedures of the Regional Boards for dealing with discharges of waste (including fuel leaks) are spelled out in Sections 13301-13306 of the Water Code. To summarize, the Regional Board may issue cease and desist or cleanup and abatement orders or may levy administrative fines on recalcitrant waste dischargers. They can also refer cases to the State Attorney General, federal or local District Attorney for civil or criminal prosecution.

- b. The State Board will include the following or similar enforcement related task in contract workplans:

Task 1. Identify and Notify Responsible Party

in cases where the tank owner cannot be readily identified, the local contracting agency shall conduct an investigation to identify the party responsible for the release. Such investigation shall, at a minimum, include a review of land title records at the County Recorder's Office. All cases for which a responsible party cannot be identified shall be reported to the State Board.

Prior to initiating work at a site, the local contracting agency shall notify each responsible party of their obligation to investigate and remedy UST releases and to reimburse the State Board or EPA for all direct and indirect costs incurred by the local contracting agency in conducting work under this contract, including any work conducted by a subcontractor.

E. Federal Reporting Requirements

The State Board agrees to provide reports as outlined in the "State Application Guidelines for Initial LUST Trust Fund Cooperative Agreements", dated March 27, 1987. These reports consist of:

1. Quarterly progress reports;
2. Exception reporting as needed; and
3. Financial Status Reports (SF-269).

The State Board further agrees to provide quarterly reports as follows:

1. Federal Cash Transactions Report (SF-272); and
2. All individual sites and the amounts where Trust Fund monies in excess of \$100,000 have been expended.

The State Board's Division of Loans and Grants developed a computerized leak tracking system to meet the requirements of the UST law [Health and Safety Code Section 25295(b)] for the annual report to the Legislature on UST leaks and to meet program management needs. The system provides the following types of information:

1. Quarterly progress reports listing:
 - a. Number of site investigations completed.
 - b. Number of emergency responses taken.
 - c. Total number of sites where cleanup actions are:
 - (1) Underway--by responsible parties;
 - (2) Completed--by responsible parties;
 - (3) Underway--by the State and/or its contractor; and
 - (4) Completed--by the State and/or its contractor.
 - d. Number of sites where enforcement actions have been taken to compel cleanup.
 - e. Number of sites where cost-recovery action has been

initiated.

- f. Amount of costs recovered.
 - g. Total expenditures to date.
2. Progress reports will also include a summary of Trust Fund monies spent in each of the following broad categories of activities:
- a. Site responses (emergency responses, site investigations, and cleanups);
 - b. Enforcement activities (including responsible party searches;
 - c. Cost recovery; and
 - d. Administrative and other costs.
3. Exception reports will be made by the State to keep EPA informed of unusual site remedies and uses of the Trust Fund. The State Board will notify the EPA Regional UST Coordinator when the State plans to:
- a. Spend Trust Fund monies in excess of \$100,000 at a single site;
 - b. Use innovative or experimental technology at a site;
 - c. Provide a permanent alternative water supply; or
 - d. Permanently relocate residents.
4. The above information to support program and fiscal reviews by EPA will include:
- a. Site location and description;
 - b. Results of site investigations (including identification of responsible parties);
 - c.
 - d. Results of any exposure assessments conducted;
 - e. Corrective action and other site-specific plans;
 - f. Documentation of responses taken and time frames;
 - g. Documentation of costs, identifying Trust Fund monies expended; and
 - h. Cost recovery efforts and costs recovered.

The State Board's Division of Administrative Services currently conforms to the reporting, accounting, and record keeping requirements of 40 CFR Part 31.

5. The State Board agrees to identify Letter of Credit drawdowns

under EPA's three major activity codes. The three codes are: "7"--General Support and Management, "E"--Site Cleanup Actions, and "4"--Enforcement. Procedures supplementing the EPA Letter of Credit Recipients Manual will be provided to clarify how the State requests funds under the activity codes.

F. Priorities for ranking UST leak cleanup cases.

The State Board has established four priorities for ranking cleanup sites. These priorities, contained in a policy adopted on July 16, 1987, are as follows:

1. Known ground water pollution by chemicals which cause cancer or reproductive toxicity. Drinking water or other beneficial uses are adversely affected.
2. Known ground water pollution by noncarcinogenic and nonteratogenic chemicals and beneficial uses are adversely affected.
3. Cases where chemicals are in the ground water and where beneficial uses are not presently affected, but may be in the future, without cleanup.
4. Soil contamination. No present ground water pollution but ground water quality is threatened without cleanup. The Regional Boards will not work on cases of soil contamination without present or potential ground water pollution.

Local contracting agencies will be responsible for ranking leak cases, according to these environmental criteria, and will assign highest priority for using Trust Funds to those sites which require prompt action.

IV. Administrative Requirements

This section summarizes the basic administrative requirements for a State cooperative agreement application. The regulations include:

1. Nondiscrimination in EPA Assistance Programs --- 40 CFR, Part 7; MBE/WBE goals and reporting --- Executive Orders 11625, 12138, 12432;
2. Intergovernmental Review --- 40 CFR, Part 29;
3. EPA's Uniform Administrative Regulations --- 40 CFR, Part 31;
4. Debarment and Suspension under EPA Assistance Programs --- 40 CFR, Part 32;
5. Drug Free certification;
6. New Assurances certification;
7. Single Audit, OMB Circular A-128 (Handled by Department of Finance, Attorney General and Controller);

8. OMB Circular A-87, Cost Principles for State and Local Governments (Handled by Accounting, and;
9. OMB Circular A-102 (Updated), Grants and Cooperative Agreements with State and Local Governments.

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8. OMB Circular A-87, Cost Principles for State and Local Governments (Handled by Accounting, and;
9. OMB Circular A-102 (Updated), Grants and Cooperative Agreements with State and Local Governments.

LEAKING UNDERGROUND STORAGE TANK TRUST FUND, FEDERAL FISCAL YEAR 1991

ACTIVITY	AMOUNT	STAFF 1/	OUTPUT	DATE	AGENCY
TASK 1: PROGRAM MANAGEMENT					
Execute and manage contracts with implementing local agencies (LIAs) for use of state and federal funds for UST site cleanup. Provide guidance and set policies regarding Local Oversight Program.	\$81,500	1.0	Up to 25 executed contracts Newsletter Quarterly Reports	August 1991 Quarterly See Footnote 2/	State Board
Present roundtables with Regional Boards and LIAs. Provide forum for discussion of administrative issues and present technical training.	\$16,300	0.2	Semiannually	January 1991 August 1991	State Board
Revise cost recovery process to incorporate AB 3560 changes. Bill responsible parties for costs incurred in oversight activities.	\$65,200	0.8	Each agency billed quarterly Recovery Summary	See Footnote 2/ Weekly	State Board
Process invoices from LIAs. Receive charges and review costs. Approve payment by Accounting Office.	\$57,050	0.7	7000 invoices processed quarterly	See Footnote 2/	State Board

Footnote 1/ The activities listed are funded only in part by the LUST Trust Fund. The remainder is provided by the State Underground Storage Tank Cleanup Fund. For example, contract management activities are performed by three people.

Footnote 2/ Quarterly Reports for the LUST Grant will be sent to EPA on January 31, 1991, April 30, 1991, July 31, 1991 and October 31, 1991.

LEAKING UNDERGROUND STORAGE TANK TRUST FUND, FEDERAL FISCAL YEAR 1991

ACTIVITY	AMOUNT	STAFF 1/	OUTPUT	DATE	AGENCY
Entry of invoice and site data on LUSTIS. Entry of cost recovery information.	\$57,050	0.7	7000 invoices entered	See Footnote 2/	State Board
Manage the LIA cleanup program. Meet with EPA to discuss program. Negotiate FFY 1992 LUST grant award and present to SWRCB. Prepare Ad Hoc Reports as requested by EPA.	\$16,300	0.2	Meetings with EPA Quarterly/Ad Hoc Reports Agenda Items and Cooperative Agreement	Semiannually See Footnote 2/ Within 45 days of guidance	State Board
TASK 2: TECHNICAL SERVICES					
Provide general technical assistance to LIAs on cleanup of leaking USTs. Provide guidance on setting up LIA programs and assist in recruiting and training staff.	\$73,350	0.9	Telephone calls Training Sessions	Ongoing	Regional Boards
Provide site-specific technical assistance on leaking UST cleanups. Review cases recommended for closure and issue closure letters.	\$692,750	8.5	Enforcement Orders Site Closure Letters	See Footnote 2/	Regional Boards
TOTAL FFY 1991 LUST FUND ACTIVITIES	\$1,059,500	13.0			

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Footnote 2/ Quarterly Reports for the LUST Grant will be sent to EPA on January 31, 1991, April 30, 1991, July 31, 1991 and October 31, 1991.