

SUPERB ADVISORY COMMITTEE

2017 Annual Report

Purpose

This report is submitted to the General Assembly and the Department of Health and Environmental Control (DHEC) in order to fulfill the requirements of Title 44, Chapter 2 of the 1976 South Carolina Code of Laws, as amended. Specifically, Section 44-2-150(G) of the State Underground Petroleum Environmental Response Bank (SUPERB) Act requires the SUPERB Advisory Committee (the Committee) to submit an annual report that addresses the financial status and viability of the SUPERB Account and the SUPERB Financial Responsibility Fund (SFRF), the number of sites successfully remediated, the number of sites remaining to be remediated, and any statutory or regulatory changes the Committee recommends. In addition, this report contains information regarding the current status of the underground storage tank (UST) population in South Carolina.

The SUPERB Accounts

Federal regulations (enacted in 1988) require UST owners or operators to demonstrate financial responsibility for corrective action and third party liability at \$1,000,000 per leak occurrence. The South Carolina General Assembly created the SUPERB Account in 1988 to assist UST owners and operators in meeting the corrective action portion of the federal financial responsibility requirements, and the SFRF was legislatively created in 1993 to assist owners and operators in meeting the third party liability requirement. UST owners and operators are responsible for a \$25,000 deductible per UST leak occurrence, and they remain liable for costs above \$1,000,000.

A $\frac{1}{2}$ cent environmental impact fee imposed on each gallon of petroleum entering the state funds the SUPERB Accounts. The Department of Revenue collects the fee under the authority of Section 12-28-2355. Impact fee revenue received during calendar year 2017 totaled \$20,644,853.04 and the total revenue received including impact fee revenue, tank fees, interest, and recovered funds totaled \$25,811,357.22(Table 1). SUPERB payments during calendar year 2017 totaled \$17,959,361.93. As of December 31, 2017, a total of \$20,920,883.74 in SUPERB funds was committed through current contracts for site rehabilitation activities leaving an available SUPERB balance of \$15,913,530.59 (Table 1). The cumulative expenditures since 1988 total \$452,685,711.18. Cumulative expenditures do not include committed funds.

Table 1. SUPERB Account information as of December 31, 2017

REVENUE	
Impact Fee Revenue	\$20,644,853.04
Tank Fee Revenue	\$4,445,707.80
Interest Received	\$471,575.03
Penalties received	\$36,219.97
Recovered funds	\$14,281.46
Court Fees and Fines	\$742.00
Settlements received	\$197,977.92
Total Revenue Received	\$25,811,357.22
Beginning Cash Balance	\$29,462,476.13
Total Available CY	\$55,273,833.35
EXPENDITURES	
Site Rehabilitation	\$16,683,713.11
Administrative Expenses	\$1,275,648.82
Total Expenditures	\$17,959,361.93
Transfers/Adjustments	\$480,057.09
Cash Balance	\$36,834,414.33
Commitments	\$20,920,883.74
Available for Commitment	\$15,913,530.59
Cumulative Spent since 1988	\$452,685,711.18

SUPERB Financial Responsibility Fund (SFRF)

DHEC is currently aware of three active third party claims or suits and actively participates in their resolution as allowed for in Section 44-2-40 of the SUPERB Act. One claim was resolved during the 2017 calendar year resulting in a payment against SUPERB in the amount of \$50,000. A total of \$1,340,476.02 has been spent for claims, legal fees, and appraisal activities since the creation of this fund in 1993. In July 2017, the balance of fund was less than one million dollars. According to Section 44-2-40, monthly transfers of \$100,000.00 from the SUPERB account shall occur when the Superb Financial Responsibility Fund becomes less than one million dollars, and the monthly transfer shall continue until the balance reaches two million dollars. Monthly transfers began in August 2017 and totaled \$500,000.00 by the end of the calendar year. As of December 31, 2017, the SFRF balance was \$1,478,972.30.

Financial Responsibility for the State Fund Deductible

The SUPERB Act requires that UST owners and operators demonstrate financial responsibility (FR) for \$25,000 per UST leak occurrence as the SUPERB Accounts provide the remaining required coverage. Allowable FR options include: self-insurance, environmental insurance,

guarantee, surety bond, letter of credit, trust fund, and several local government options. With a total of 4,072 facilities or responsible parties (owner/operator) that require proof of financial responsibility, the following is a breakdown of what is currently recorded. Fifty-three percent (53%) are covered by self-insurance, eighteen percent (18%) by environmental insurance, fifteen percent (15%) by guarantees,nine percent (9%) by letters of credit, two percent (2%) by local government options, two percent (2%) by surety bonds and trust funds, and the remaining one percent (1%) of facilities or responsible parties (owner/operator) are in violation of R.61-92 or are new owners required to submit FR.

Cleanup Progress

Since the inception of the program and through December 31, 2017, DHEC has confirmed a total of 10,133 UST releases. Of these, 7,863 or just over 77% have been closed. A total of 107 releases were closed in calendar year 2017; of these, 25 releases were closed under the regulatory program where no assessment activities were required, 59 releases were closed under the assessment program where some assessment activities were completed, and 23 releases were closed under an approved Corrective Action Plan for either Monitored Natural Attenuation or Active Corrective Action. SUPERB funds were expended on 54 of the 107 releases. The remaining 53 release closures aside from the 25 regulatory closures were comprised of 21 release closures under the \$25,000 deductible and 7 release closures where SUPERB funds could not be used to provide coverage (e.g., site could not be qualified or another financial mechanism was in place). Pay for Performance contracts, often referred to as active cleanups, can take more than five years to complete.In order to foster quicker cleanups, current specifications for active corrective action sites now require the site rehabilitation work to be completed within five years unless DHEC provides written approval to extend the duration of the contract. Significant contract modifications are currently being reviewed by the Office of General Counsel to enhance contract requirements which should result in a greater efficiency of producing more active cleanups.

At year's end, there were 2,270 open releases, of which 2,242 are eligible to receive SUPERB funds. Confirmed releases are ranked by DHEC for funding priority according to the risk each poses. The priority system is outlined in the SUPERB Fund Access Regulations (R.61-98). Appendix 1 of this report depicts the total number of SUPERB eligible releases by their risk category and Appendix 2 depicts this number by county. Appendix 3 depicts the number of cases, by risk category, where rehabilitation activity is being funded and the number where no funding is provided.

As of December 31, 2017, 134 releases were in active cleanup, 113 releases were in limited cleanup with free product removal activities being conducted, and 276 releases were being monitored as part of a formalized natural attenuation remedial plan. Assessment activities were being funded at another 1,385 sites. A total of 1,139 releases were receiving SUPERB funding at year's end. For the most part, site rehabilitation activities are funded by SUPERB or by the UST owner under the \$25,000 SUPERB deductible.

At year's end, fourteen (14) DHEC project manager positions were overseeing environmental assessment or cleanup efforts on 1,917 releases being worked with SUPERB funds or under the \$25,000 deductible. Over the 2017 calendar year, a total of five (5) project managers left the Corrective Action and Assessment Sections. In addition, one senior project manager was promoted to a manager and one manager retired. As a result, a total of 9 employees were hired in the Corrective Action and Assessment Sections. To help with the SUPERB work load, the UST program requested and has received permission to hire four (4) additional project managers. Currently, five (5) project manager vacancies are posted. Once at full staff, twenty (20) project managers will be providing oversight on the active UST releases. During the calendar year, approximately 30% of the project management staff left SUPERB program positions resulting in vacancies (Assessment or Corrective Action sections). The departures were mainly due to personal and promotional opportunities, both within and outside the UST Program. This considerable turnover of staff created delays in project work.

Quality Assurance Program Plan

The UST Program Quality Assurance Program Plan (QAPP) Revision 3.1 was approved by EPA and implemented in August 2016. The purpose of the QAPP is to ensure that all data produced and reported to the Department is scientifically valid, legally defensible, and of known and acceptable precision and accuracy. Between January 1, 2017 and December 31, 2017, 1,371 reviews of QAPP Addendums and Site-specific Work Plans were completed. Since implementation of the QAPP, UST Program staff has worked closely with contractors to facilitate the review process. Based on experience and feedback from contractors, the latest revision of the QAPP includes changes designed to streamline the process and improve efficiency of implementation. Once the annual contractor QA plan has been approved, the contractor is only required to submit a two-page work plan with a few attachments for each scope of work. As of December 31, 2017, the Department has received and approved 43 annual contractor QA plans. The UST is currently waiting on the submittal of 16 annual plans that are overdue. Four (4) contractors were removed from the ACQAP renewal process at their request since they no longer perform UST work in SC.

Underground Storage Tank Information

Since 1986, there have been 46,389 petroleum USTs registered with DHEC. Of those, 34,103 have been removed from the ground or properly closed in place. As of December 31, 2017, there were 11,340 operating USTs at 4,036 locations across the state owned by 2,085 individuals or companies.

EPA requires reporting on the percentage of UST facilities deemed to be in combined significant operational compliance with both the UST spill, overfill, and corrosion protection requirements and the UST leak detection requirements. At the end of the calendar year, DHEC reported that 65% of the 3,947 UST facilities inspected during 2017 met both the release prevention and release detection requirements and were in significant operational compliance (SOC). The SOC

rate is affected by many factors including; tank population, rate of inspections performed, tank owner compliance, inspector knowledge/efficiency and other factors. Beginning in December 2013, the SC UST Program moved from paper inspections to an electronic inspection program requiring inspectors to answer specific compliance questions, promoting a more consistent inspection process. The precision of capturing this information electronically has resulted in a more accurate determination of SOC by allowing for consistency between inspections conducted by different staff across the state. Additionally, the UST Program determines SOC by following a specific matrix of compliance measures provided by the EPA. A review of citations used to determine SOC issued since 2013 revealed that some citations included by the electronic inspection are not included in the EPA matrix. The electronic program has been updated to include only those citations that match the EPA matrix. The Program has reevaluated each inspection for the last two years and updated the SOC rate as deemed appropriate. Historically, SCDHEC rates have been as follows:

Table 2. Significant Operational Compliance

Calendar Year	SCDHEC
2017	65%
2016	63 %
2015	68 %
2014 *First full year of performing electronic inspections	73 %
2013	76 %
2012	77 %
2011	79 %
2010	77 %
2009	76 %
2008	72 %

Release Rate

For the 2017 reporting period, a total of 131 new releases were confirmed. 106 of these were forwarded to the assessment section and 25 were issued regulatory no further actions. Of the 131 confirmed releases, 114 releases were confirmed from currently in use tanks, of which 89 of these releases were forwarded to the assessment section for review and 25 were issued regulatory no further action decisions. Regulatory no further actions are issued when sampling results are reported above the reporting limit, but below the risk based screening level. To determine the release rate, the DHEC divides the number of confirmed releases from currently in use tanks (114), by the total number of currently in use tanks (11,340). Therefore, a release rate of 1% is calculated for 2017.

Table 3. Annual Release Rate

Year	Total Number of confirmed Releases from currently in use tanks (Releases Forwarded to Assessment / Releases closed via Regulatory NFA)	Release Rate
2008	119 (77 / 42)	119/11,933*100=1%
2009	116 (70 / 46)	116/11,836*100=0.98%
2010	97 (64 / 33)	97/11,850*100=0.82%
2011	70 (39 / 31)	70/11,782*100=0.59%
2012	82 (50 / 32)	82/11,792*100=0.69%
2013	87 (61 / 26)	87/11,749*100=0.74%
2014	61(53 / 8)	61/11,610*100=0.52%
2015	102 (75 / 27)	102/11,511*100=0.89%
2016	67 (43 / 24)	67/11,429*100=0.59%
2017	114 (89 / 25)	114/11,340*100=1%

Additional Tank Fee Information

An actuarial study of the SUPERB fund, completed in March 2007, listed the current liabilities of the fund at \$153 million and estimated future liabilities at \$373 million. The fund was projected to have a negative balance of \$32 million at the scheduled sunset date in 2026. The EPA voiced concerns about solvency of the SUPERB fund and in September of 2006, DHEC received official notice from EPA Region 4 that the SUPERB Fund was in danger of being declared insolvent. DHEC consulted with South Carolina Petroleum representatives and ultimately developed a funding solution with EPA Region 4, EPA Headquarters Office of Underground Storage Tanks, and the SUPERB Advisory Committee. In January 2009, Bill H. 3270 was introduced through industry-led efforts to address SUPERB solvency by amending Section 44-2-60 Code of Laws of South Carolina, relating to the registration of underground storage tanks so as to establish new annual renewal fees and to require that the additional revenue generated from the tank fee increases be deposited into the SUPERB account. Bill H.3270 was signed by the Governor and made effective on May 19, 2010. The EPA fully endorsed the funding solution incorporated in the 2010 legislation to address the solvency of SUPERB.

Beginning January 1, 2012, the amended SUPERB Act increased annual tank fees by \$100 each year over four years, ultimately reaching \$500 per tank, and maintains the fee at this level until an additional \$36 million is generated and deposited into the SUPERB account. When the SUPERB account is credited with the additional \$36 million, the annual tank fee will revert back to \$100 per tank the following January. DHEC will not be allowed to use any of the additional tank fee revenue for administration of the UST Program or for orphan sites as defined in 44-2-20(11). The additional monies began being collected following the June 1, 2012 billing cycle for tank fees. Table 4 below provides information on revenues collected and expenditures on a calendar year basis. The balance is derived by subtracting the revenues from the previous year's

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balance. Please note that expenditures listed in previous reports have been corrected. The fund for the additional tank fees was audited and discrepancies in expenditures were noted. Based on Section 44-52-60(A), no portion of the increases may be used by the Department for administration of the program or for orphan sites defined in Section 44-2-20(11). The audit determined that 64 sites from calendar years 2013 thru 2016 were declared as orphan sites and should not have been paid utilizing the additional tank fees. As a result of the audit findings, a total of \$446,452.44 was reallocated to the appropriate accounts. Audits of the additional tank fees will be performed on an annual basis and reported in the SAC report. Further study indicated that not all eligible reimbursements had been allocated with the appropriate funding codes during 2017. Funds totaling \$3,663,150.50 were reallocated to cover eligible site rehabilitation work that occurred during 2017. Please note that the funding reallocation occurred in February 2018 and will appear in the calendar year 2018 report. As a result of the legal settlement a total of \$197,977.92 was received and deposited in the SUPERB Account on July 3, 2017.

Table 4. Additional Tank Fee Revenues and Expenditures

Calendar Year	Fee Increase/Year	Fund Reallocation	Expenditures	Revenues	Balance*
					\$36,000,000.00
2012	\$100	\$0	\$0	\$1,135,120.00	\$34,864,880.00
2013	\$200	\$44,451.91	\$3,346,989.18	\$2,307,586.36	\$32,557,293.64
2014	\$300	\$28,957.92	\$3,407,967.84	\$3,384,491.61	\$29,172,802.03
2015	\$400 (A)	\$27,766.61	\$4,307,469.36	\$4,505,919.70	\$24,666,882.33
2015	Legal Settlement	\$0	\$0	\$1,350,554.62	\$23,316,327.71
2016	\$400 (A)	\$345,366.00	\$3,769,966.10	\$4,481,194.37	\$18,835,133.34
2016	LUST Trust Grant Addendum	\$0	\$0	\$192,470.00	\$18,642,663.34
2017	\$400 (A)	\$0	\$4,202,585.97	\$4,445,707.80	\$14,196,955.54
2017	Legal Settlement	\$0	\$0	\$197,977.92	\$13,998,977.62

*Remaining to be collected to reach \$36 million

(A) Maximum fee increase of \$400 per statute.

Legislative Information - Secondary Containment Requirement

After public and owner/operator input, the UST Control Regulation R.61-92, Part 280.25 was revised on May 27, 2016, to ensure that secondary containment requirements would apply to those existing single walled underground storage tank systems that are located within 100 feet of

an existing water supply well, a coastal zone critical area, or state navigable waters and meet one of the following conditions: the underground storage tank system has not been upgraded to meet the performance standards as required in Section 280.21 of the regulations or the underground storage tank system has failed to remain in substantial compliance based on the last three consecutive annual inspections. UST systems described in this Section shall meet the secondary containment requirements of Section 280.20(g) or the closure requirements under Subpart G of this Part (including applicable requirements for corrective action under Subpart F), no later than December 22, 2018. The requirements of Section 280.20 (g) shall also apply to any UST system determined to be described by Section 280.25 (a) after December 22, 2018. The substantial compliance status for the single-walled facilities located within the areas of concern will be reevaluated periodically to determine compliance with the requirements of Section 280.25.

Revisions to State UST Regulations, R. 61-92, Part 280

The Underground Storage Tank (UST) Management Division amended the SC UST Regulation R. 61-92, Part 280 in response to revisions to the Federal UST Regulations which became effective October 13, 2015. In preparation for the revisions, DHEC's goals were to foster collaboration with the regulated community and interested stakeholders, exhibit transparency in regulation development activities, and demonstrate accountability. DHEC hosted outreach meetings for stakeholders to provide an opportunity to share their ideas and concerns and arranged for these meeting to be available by webinar also. An informational forum was held May 16, 2016. The meeting was attended by approximately 50 UST facility owners and operators, members of the SUPERB Advisory Committee, South Carolina Petroleum Marketers Association, South Carolina Association of Convenience Stores, as well as equipment testing, repair, and installation companies. During the meeting, stakeholders were invited to participate in a regulation revision workgroup, which met on four occasions. A total of 26 individuals participated in the workgroup meetings. These workgroups were well received and many attendees expressed interest in continuing their involvement with DHEC.

In our continued efforts to include the regulated community in the regulation revision and compliance process, and in response to the regulation revision workgroup's interest in continuing their involvement with DHEC, another workgroup was held on April 24, 2017, to continue discussions regarding implementation of the regulation requirements. A review of the UST program's outreach plan and proposed activities to educate the regulated community of regulation revisions was reviewed and discussed. Workgroup members again expressed continued interest in working with DHEC program personnel.

On May 26, 2017, revisions to the SC UST Regulation R. 61-92, Part 280 became effective. Immediately following the revision date, the Division developed the following outreach initiatives:

- A tri-fold implementation brochure was developed and mailed out with all annual tank invoices to owners. This brochure is also being provided to owners/operators during regular compliance inspections as well as compliance and outreach activities.

- Information was posted on the DHEC website, to include forms revised or developed with input from the regulation revision workgroup.
- Inspection documents continue to be revised to include due dates for new requirements.
- Information outlining specific regulatory requirements and deadlines is provided to new owners at the time of permit issuance or ownership transfer.
- The operator training program was modified to incorporate new regulations for new operators. Operators trained prior to May 26, 2017, need only complete a supplemental training module that includes regulation updates. This operator training program is found on our website, free of charge.
- Newsletter articles have been drafted and will be published regarding the regulatory requirements.
- Developed standardized informational language that can be inserted in all outgoing correspondence, including E-mail, providing a link to our webpage where the regulation revision information and A/B operator supplemental training will be located.
- At the bottom of each Compliance Section member's email, information is provided to direct the regulated community to links to information on the webpage.

Electronic Inspections

In April 2013, DHEC began development of a custom electronic inspection program to be used to inspect all UST facilities in South Carolina. With implementation of this electronic system, DHEC has benefitted from paperless operations, improved data quality, and fewer man hours necessary to transfer data into the database. The system is designed to incorporate the existing regulatory requirements of the Agency for consistent citations and to enhance the reporting capabilities to the EPA, owners and operators. Most owners and operators now receive their inspection results via email at the time of inspection. This continues to benefit owners and operators by increasing the time available for them to return to compliance. Violations are documented thoroughly using the tablet camera and photos are stored electronically. Also, the ability to retrain owners and operators on site is reducing the burden to follow up for training. State wide deployment began in December of 2013, and 16,489 facility inspections have been performed to date using the tablets, with 3,947 conducted in 2017.

Continuous Improvement Action Plan

Following recommendation by the committee, the UST Management Division (the Division) has developed an Action Plan to maximize operational efficiencies, increase cleanup activities and SUPERB fund commitments, and improve consistency throughout the program while providing exemplary customer service. The Division expects measurable improvements over time and will summarize at year's end for the committee. Overall the Division has added 7 new full time positions and two hourly positions in last 6-12 months.

The Division has implemented several processes that should reveal operational efficiencies for

the UST program:

1. Revised Active Corrective Action (ACA) Option Letters that will provide clarity in the responsibilities of owners/operators as well as SUPERB fund allowance.
2. The declaration of an orphan site for dissolved corporations has been revised to allow the registered agent of that corporation to be notified of the Division's intent prior to making the final decision.
3. The monitored natural attenuation (MNA) process has been modified to issue one sampling directive for multiple events for that year, if deemed appropriate.
4. Pay-For-Performance (PFP) Contract Bid Specification language was revised and reviewed by the Office of General Counsel (OGC) to provide better contract management, so corrective action can be completed in a timely manner.
5. State-Lead contracts are being modified with the help of Office of General Counsel (OGC) to give the Division the flexibility to direct work to more than one contractor under the same state-lead contract if deemed necessary.

Additionally the Division has implemented several long term and short term initiatives to address site rehabilitation activities and fund commitments:

1. A process was developed to accelerate the number of aggressive fluid andvapor recovery (AFVR) events to be directed.
2. The Division established a voluntary "Blitz" program allowing project managers to be compensated for working extra hours to manage high risk sites for vacant staff positions.
3. The Division is also creating a path for the implementation and utilization of High Resolution Site Characterization profiling tools at UST release sites. This modern technology will provide better understanding of the nature and extent of the contamination at a release site and help reduce uncertainty in the corrective action process.
4. Senior staff members' job duties have been modified to assist with providing more in depth training of new staff and support with project management; revising technical templates and bid specifications; with the overall goal of program consistency and efficiency.
5. Five volunteer staff members from other areas of the bureau have been assisting with UST project review work.

The Division is establishing protocols and processes to provide consistency with the state-wide inspection and compliance program though:

1. The "Phase 4 Inspection" during the permitting process will now be a Compliance Assistance/Outreach inspection with the goal of providing education to the new owner/operator on the inspection and compliance process.
2. For all new UST owners/operators, compliance assistance visits will be performed by the central office staff effective April 1, 2018, unless the owner/operator has explicitly indicated that they do not want such a visit.
3. The Division has developed a form where an owner/operator with multiple facilities can identify all the facilities and corresponding financial responsibility mechanisms on one form.
4. The Division will implement a standardization of the inspection process to maintain consistency in the inspection process statewide
5. The Division is in the process of developing an owner/operator handbook to assist owners/operators meet the regulatory requirements.

Recommendations

Recommendations approved during the Monday, January 29, 2018 SAC meeting are:

1. The UST Management Division should commission an independent actuarial study of the SUPERB Account that would provide an update on fund solvency.
2. The SAC supports industry efforts to repeal the sunset date provision of the SUPERB Act through a proposed amendment to legislation.
3. The UST Management Division should include the Continuous Improvement Action Plan developed in 2018 as part of this report. The Action Plan is to maximize operational efficiencies, increase cleanup activities and SUPERB fund commitments, and improve consistency throughout the program while providing exemplary customer service with caution on the expectancy of results until the entire Action Plan is implemented and operational at its fullest extent.

Appendix 1

SUPERB Eligible Releases by Risk Category As of December 31, 2017

Risk Category	Open Releases						
	2017	2016	2015	2014	2013	2012	2011
1	154	148	136	134	152	160	177
2A	105	100	104	112	105	114	124
2B	713	731	747	772	797	818	876
3A	63	59	63	54	46	47	50
3B	758	752	770	784	818	879	915
4A	189	192	193	203	204	182	189
4B	116	116	123	121	128	134	132
5	144	119	129	109	122	137	136
Total	2,242	2,217	2,265	2,289	2,372	2,471	2,599

Risk Category Definitions:

Category 1 Emergency

Category 2A Threat to human health or environment is predicted to be less than 1 year

Category 2B Drinking well identified less than 1,000 feet away

Category 3A Threat to human health or the environment is predicted to be 1 to 2 years

Category 3B Release in shallow groundwater with migration expected

Category 4A Threat to human health or the environment is predicted to be greater than 2 years

Category 4B Release in shallow groundwater with minimal migration expected

Category 5 Data currently inconclusive

Appendix 2

SUPERB Eligible Releases by Risk Category and County as of December 31, 2017.

County	1	2A	2B	3A	3B	4A	4B	5	Total
Risk Category									
Abbeville	3	0	10	1	2	3	3	0	22
Aiken	2	1	13	2	11	2	1	3	35
Allendale	0	0	4	0	7	1	1	3	16
Anderson	3	1	15	0	47	7	1	8	82
Bamberg	0	1	9	0	3	1	1	0	15
Barnwell	1	2	9	2	3	0	0	0	17
Beaufort	3	2	9	2	16	0	0	0	32
Berkeley	1	0	14	1	21	0	2	3	42
Calhoun	0	0	1	0	4	0	1	1	7
Charleston	1	1	7	0	48	0	1	7	65
Cherokee	0	3	8	3	11	3	3	2	33
Chester	6	1	9	1	16	0	2	3	38
Chesterfield	2	3	6	0	7	0	2	2	22
Clarendon	7	3	28	1	12	0	2	3	56
Colleton	4	1	12	0	9	0	0	0	26
Darlington	1	0	19	0	20	1	6	3	50
Dillon	4	1	10	4	10	0	3	0	32
Dorchester	4	1	10	1	18	1	0	1	36
Edgefield	1	0	5	1	6	0	1	1	15
Fairfield	4	1	8	0	2	1	1	3	20
Florence	7	6	38	1	42	1	11	5	111
Georgetown	2	1	8	3	8	0	0	2	24
Greenville	8	6	34	5	65	42	16	28	204
Greenwood	3	1	20	1	8	7	3	0	43
Hampton	0	4	13	1	5	0	1	0	24
Horry	4	11	34	12	54	0	1	4	120
Jasper	2	4	18	1	5	2	0	0	32
Kershaw	2	3	8	1	8	3	0	6	31
Lancaster	1	2	21	4	15	7	10	0	60
Laurens	4	0	16	0	15	9	2	5	51
Lee	0	2	7	0	1	0	0	0	10
Lexington	5	2	34	3	29	6	6	4	89
Marion	1	0	21	0	15	0	0	1	38
Marlboro	3	3	12	0	12	1	1	0	32
McCormick	2	0	5	0	7	1	0	1	16
Newberry	4	2	14	0	13	4	4	4	45
Oconee	2	3	8	1	3	4	1	1	23
Orangeburg	7	4	31	0	32	0	2	1	77
Pickens	1	0	5	0	6	6	0	3	21
Richland	14	8	34	2	30	10	5	2	105
Saluda	3	0	2	0	9	0	0	0	14
Spartanburg	4	4	26	5	39	53	11	13	155
Sumter	6	4	33	0	16	0	2	5	66
Union	2	0	3	1	5	0	0	1	12
Williamsburg	4	7	19	2	13	1	0	3	49
York	16	6	39	1	28	12	8	3	113

Appendix 3

SUPERB Eligible Releases by Risk Category

Work Ongoing or Not Currently Working

As of December 31, 2017

Risk Category	Work Currently Ongoing With SUPERB Funds or under the \$25,000 Deductible¹	Not Currently Working Awaiting SUPERB Funding or under the \$25,000 Deductible
1	154	0
2A	100	5 ²
2B	658	55 ²
3A	59	4 ²
3B	679	79
4A	98	91
4B	50	66
5	114	30
Total	1912	330

In accordance with the SUPERB Site Rehabilitation and Fund Access Regulations R.61-98, Section II.B., UST releases, regardless of its time of occurrence, shall be classified accordingly:

¹SUPERB funds are available for the current scope of work and ongoing site rehabilitation activities (e.g., IGWA, Tier I, Tier II, AFVR, MNA, ACA) based on high priority or anticipation of a cleanup complete measure. Includes releases where the Owner/Operator is conducting activities under the deductible (includes a subset of 195 releases where the \$25,000 deductible has not been met).

²SUPERB funds are available for the next scope of work but currently no site rehabilitation work is funded (e.g., awaiting a decision from the owner/operator, between active scopes of work with new work pending process review and funding, ongoing enforcement actions, RP resolutions, etc.). This number may include the subset of 161 releases working strictly under the \$25,000 SUPERB deductible. However, all \$25,000 deductible sites are being actively worked or pursued to start work.