Reducing the LUST Backlog: The National Perspective

Current Status, Challenges, and Successes

505,900

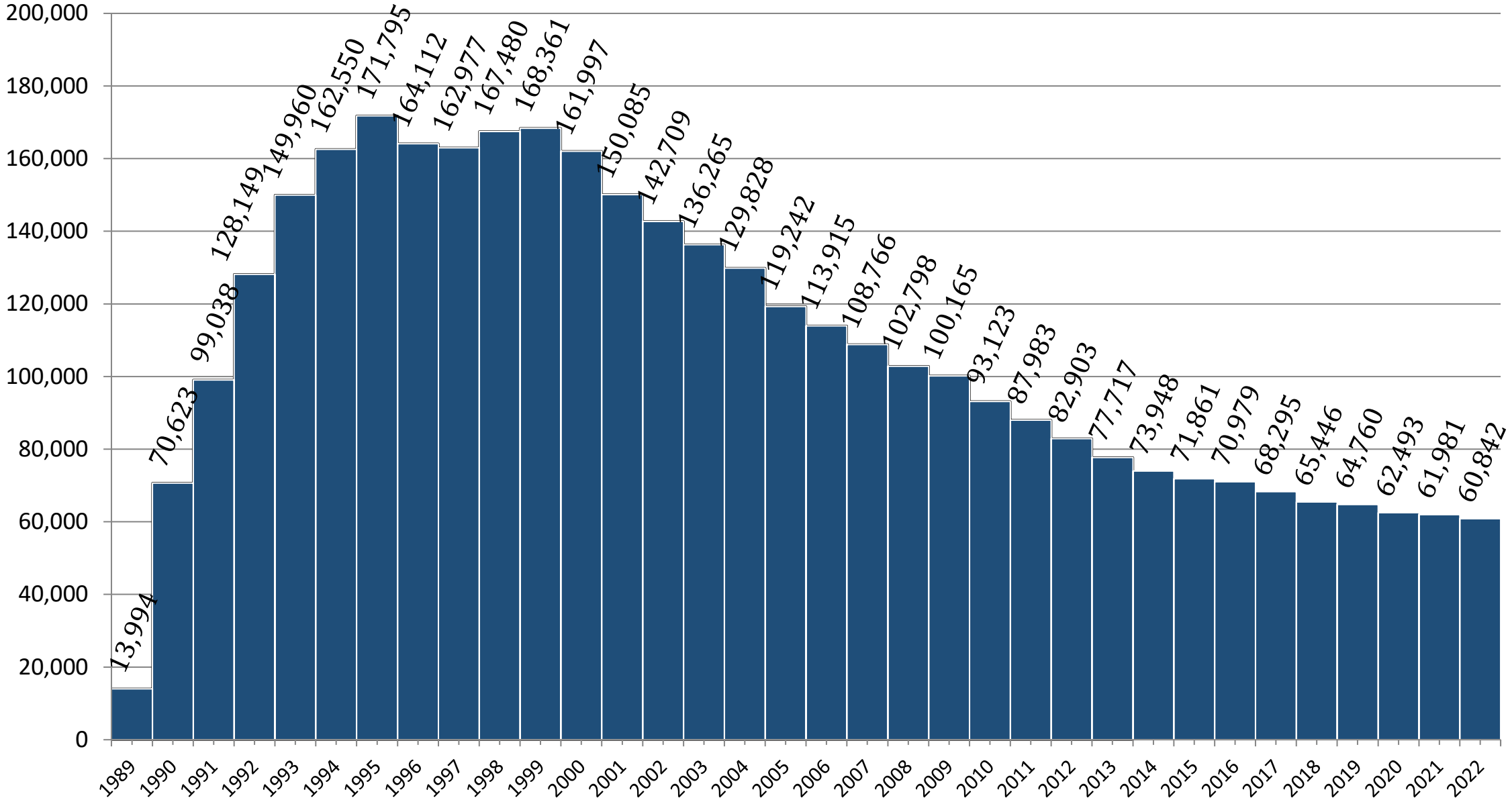Cleanups completed nationwide
as of March 2022

60, 800

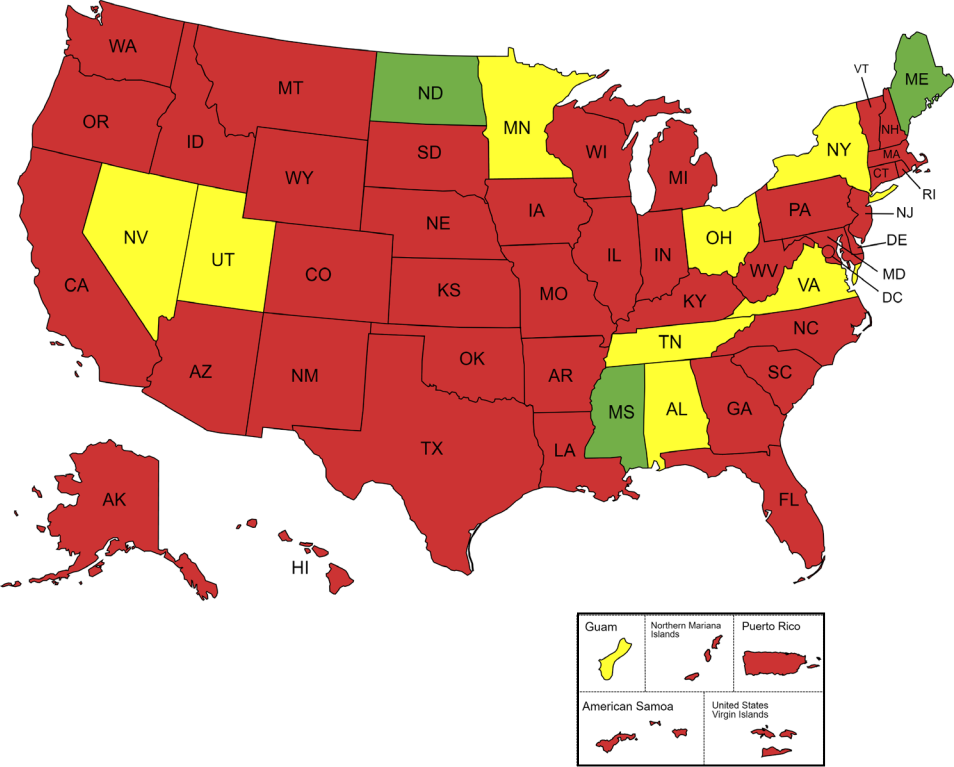LUST releases remain nationwide
as of March 2022
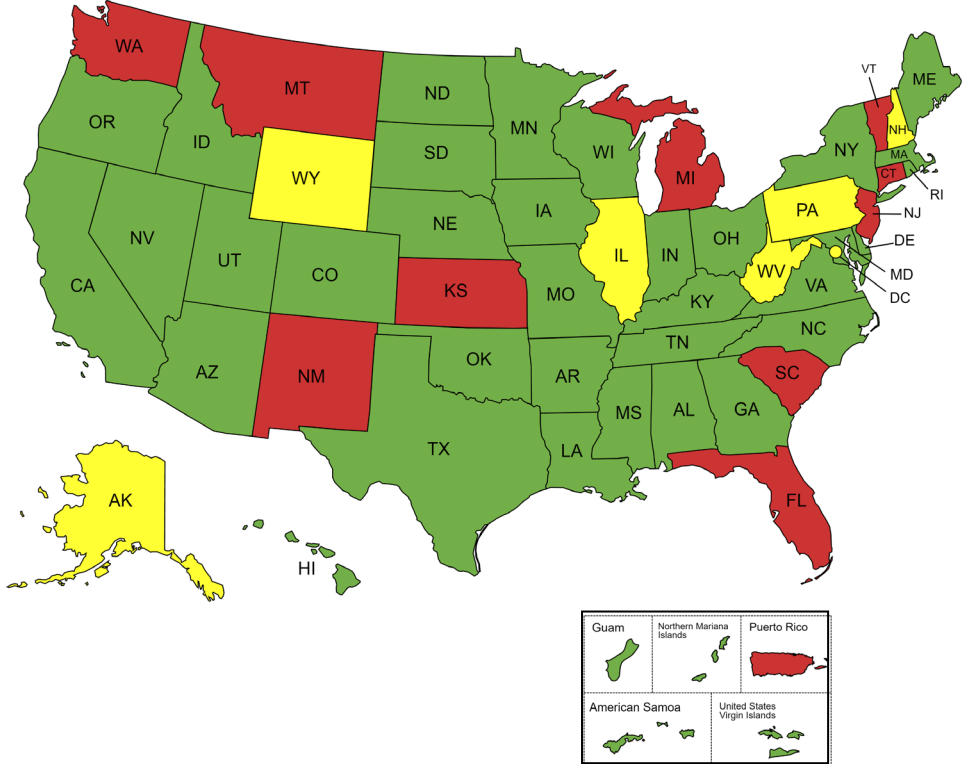
National LUST Backlog
FY1989 Through Mid-Year FY2022

National Backlog (Confirmed Releases - Cleanups Completed)

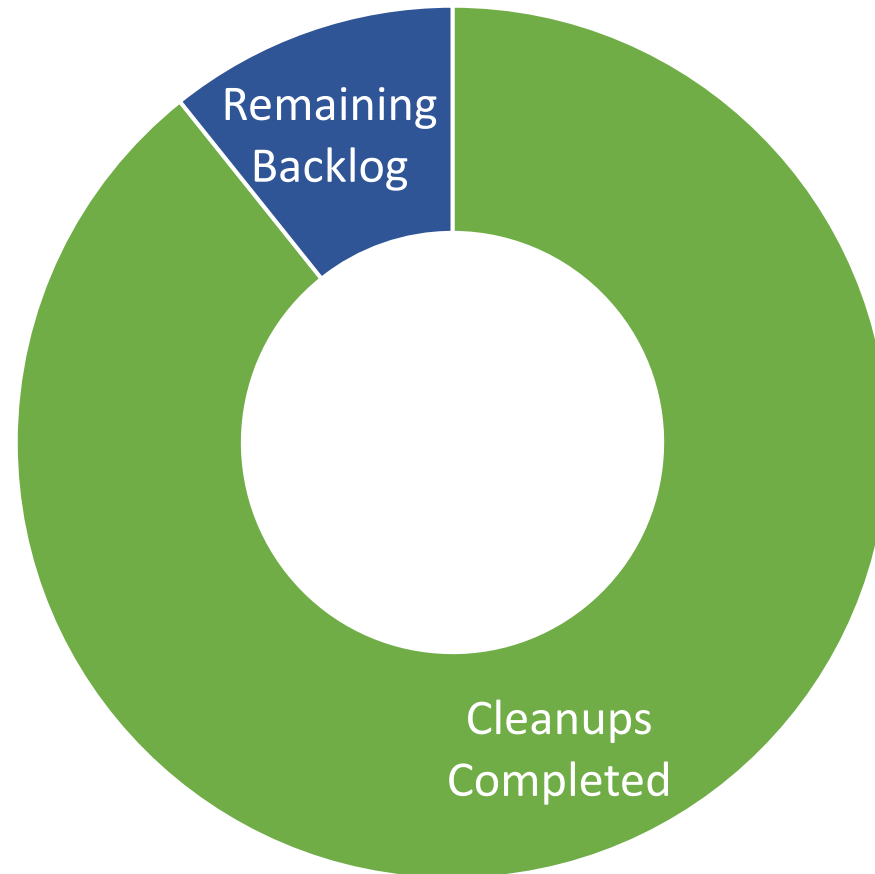| Year	Value
1989	13,994
1990	70,623
1991	99,038
1992	128,149
1993	149,960
1994	162,550
1995	171,795
1996	164,112
1997	162,977
1998	167,480
1999	168,361
2000	161,997
2001	150,085
2002	142,709
2003	136,265
2004	129,828
2005	119,242
2006	113,915
2007	108,766
2008	102,798
2009	100,165
2010	93,123
2011	87,983
2012	82,903
2013	77,717
2014	73,948
2015	71,861
2016	70,979
2017	68,295
2018	65,446
2019	64,760
2020	62,493
2021	61,981
2022	60,842

20 Years Of Progress

End of FY2001

End of FY2021

% Backlog Reduction

- ≤79%
- 80-89%
- 90-100%

With over **505,000** cleanups completed, almost **90%** of LUST releases have been cleaned up

Thank you to our state, tribal, territorial, and industry partners. Reaching this milestone was possible because of your dedication and commitment, and we look forward to continuing to work with you!

LUST Backlog Reduction Challenges

- The national LUST backlog continues to decrease, but the cleanup rate is slowing. Nationally, the program is completing fewer cleanups each year.

- Legacy sites can be complex and technically challenging.

- LUST sites with no viable RP are stalled and not moving forward.

- The population living near active LUST releases is more minority, low income, linguistically isolated, and less likely to have a high school education than the U.S. population as a whole.

Examples of Current Efforts & Successes

California

- Low-threat closure policy

- Stalled case initiative

Colorado

- More RBCA-oriented policies

- Waiving deductibles to the Remediation Fund in certain situations

- Conceptual planning technical approaches (treatment trains, combined remedies)

North Carolina

- Dedicated staff time for evaluations of low-risk sites

US EPA effort with Michigan & Illinois

Goal

- Use data analysis to understand subsets of open releases and identify potential strategies to reduce the LUST backlog

Approach

- Regular collaboration meetings between EPA and States with management support

- Discuss data, develop data tools, review analysis, and ask questions

- Identify corrective action targets

Focus on Michigan and Illinois

- Large contribution to national LUST backlog (#2 and #3 nationally)

- State and regional interest in improving understanding of characteristics of state LUST backlogs

Key Findings

Michigan

- Most open releases are > 20 years

- Corrective action for most open releases is stalled

- There are subsets of data with unknown risk ranking

Illinois

- Many sites have multiple open releases

- Many older releases pre-date current LUST guidance and regulations

- Many open releases have not started corrective action process

Understanding the universe of LUST sites through data analysis helps identify strategies to reduce the LUST backlog

Analyzing LUST Backlog

How to get started when you don't know where to start

- Identify key data categories of available data
    - Let the data drive the analysis and lead to strategies
- Use data tools to organize the data to find issues (e.g., excel, Qlik)
- Identify problem areas (buckets) and strategies to address them

- Develop a plan that has short-, medium-, and long-term goals

Getting Started: Key Questions to Ask

- What data elements do you have that you can rely on for analysis?
- Is the cleanup process clear, well-documented, and understood by all?
- What are the characteristics of the LUST backlog (e.g., age, geographic distribution, priority ranking)?
- What is the stage of cleanup? When was the last action?
- Is there a viable RP? Who is leading the cleanup?
- Is there financing for cleanup? Does the state have a fund for orphan sites?
- Other?

Analysis & Narrowing the Focus

- Useful to look at multiple factors (e.g., age and stage of cleanup)

- Cross cutting data to refine issue

- Sites with multiple releases, RPs with multiple releases

- What are the potential reasons for stalled cleanups? Ex:
  - fund closure or sites ineligible for the fund
  - lack of RPs
  - lower priority sites not addressed
  - lack of LUST enforcement
  - state review process challenges
  - limited capacity for state lead cleanups
  - access to the property

Key Takeaways & Successful Strategies

- Supportive management

- Commitment to sifting through data and general data cleanup

- Developing a plan with short-, medium-, and long-term goals and deliverables – important to get early and easy wins
  - Overall database updates – including data elements in new database where there were previously gaps
  - Support hiring for positions dedicated to program
  - Targeting sites with multiple releases – contacted RPs to review releases

Questions?