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Title: "Efficacy of Risk-Based Corrective Action (RBCA) for Cleaning Up Fuel
Releases from Leaking Federally-Regulated Underground Storage Tank
Systems"

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# ABSTRACT

The primary purpose of the underground storage tank (UST) regulations is
protection and clean up of groundwater resources used by millions of Americans
as the source of their drinking water.  Annual expenditures to clean up fuel
releases from leaking underground storage tank (LUST) systems are in excess of
$1.5 billion, a significant portion of which is derived from public funds.
Government programs have a responsibility to ensure that such funds are used
effectively and efficiently for their intended purpose. One of the UST program's
policy initiatives designed to promote more effective and efficient cleanups is
risk-based corrective action (RBCA), first launched in 1995. Yet, to date, program
impact of RBCA has not been systematically evaluated. This dissertation
examines whether RBCA has been effective in meeting expectations and,
whether these expectations have been met in a cost-efficient manner. With
regard to the question of effectiveness, evidence suggests that some states have
experienced an increase in the number of cleanups completed due to RBCA,
while other states have not. With regard to the question of efficiency, there is
some evidence that the cost-savings anticipated due to RBCA implementation
have not been realized in all states. Weaknesses in the data available for this
investigation point to the need for collection and reporting of more accurate and
applicable information to more quantitatively evaluate the impact of RBCA
specifically and environmental programs and policies more generally. Prior to
implementation of new policies, meaningful and measurable indicators of
performance should be identified and appropriate steps taken to ensure that they
are collected so that efficacy of a new program or policy can be accurately
evaluated. The findings of this investigation are a substantial improvement over
previous reviews of UST program reported in the literature and merit
consideration by policymakers.