



2019 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 ½ 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 2019 totaled \$20,214,748.59 and the total revenue received including impact fee revenue, additional tank fees, interest, and recovered funds totaled \$25,464,177.24 (Table 1). SUPERB expenditures during calendar year 2019 totaled \$30,043,770.47. As of December 31, 2019, a total of \$29,818,561.25 in SUPERB funds was committed through current contracts for site rehabilitation activities leaving an available SUPERB balance of \$5,228,006.10 (Table 1). The uncommitted balance reflects the amount in the South Carolina Enterprise Information System (SCEIS) system as of COB on December 31, 2019. For the calendar year 2019 thirteen revenue entries are reflected instead of twelve. This is because of the change of basis or data source from the legacy financial system to the current statewide SCEIS system. Moving forward the revenues collected information will be generated utilizing the SCEIS system. The cumulative expenditures since 1988 total \$505,159,952.59.

Table 1. SUPERB Account information as of December 31, 2018

REVENUE	
Impact Fee Revenue	\$20,214,748.59
Additional Tank Fee Revenue	\$4,354,831.97
Interest Revenue	\$847,623.52
Penalties received	\$46,973.16
Total Revenue Received	\$25,464,177.24
Beginning Cash Balance	\$39,623,984.58
Total Available CY	\$65,088,161.82
EXPENDITURES	
Site Rehabilitation	\$28,099,810.75
Administrative Expenses	\$1,943,959.72
Total Expenditures	\$30,043,770.47
Transfers	(\$2,176)
Cash Balance	\$35,046,567.35
Commitments	\$29,818,561.25
Available for Commitment	\$5,228,006.10
Cumulative Spent since 1988	\$505,159,952.59

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 (\$164,689) was resolved during the 2019 calendar year. A total of \$1,505,165.02 has been spent for claims, legal fees, and appraisal activities since the creation of this fund in 1993. There was no monthly transfer during the calendar year 2019. As of December 31, 2019, the SFRF balance was \$1,986,404.20.

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. Of the 4,070 facilities or tank owners/operators that require proof of financial responsibility, fifty-four percent (54%) are covered by self-insurance, seventeen percent (17%) 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, 2019, DHEC has confirmed a total of 10,371 UST releases. Of these, 8,085 or just over 78% have been closed. A total of 128 releases were closed in calendar year 2019; of these, 37 releases were closed under the regulatory program where no

assessment activities were required, 31 releases were closed under the assessment program where some assessment activities were completed, and 59 releases were closed under an approved Corrective Action Plan for either Monitored Natural Attenuation or Active Corrective Action. SUPERB funds were expended on 59 of the 128 releases. The remaining 69 release closures aside from the 37 regulatory closures were comprised of 23 release closures under the \$25,000 deductible and 9 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 have been 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 2,286 open releases, of which 2,270 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.

For SUPERB eligible releases as of December 31, 2019, 130 releases were in active cleanup, 91 releases were in limited cleanup with free product removal activities being conducted, and 244 releases were being monitored as part of a formalized natural attenuation remedial plan. Site rehabilitation activities were being conducted at another 1,585 releases. A majority of site rehabilitation activities are funded by SUPERB or by the UST owner under the \$25,000 SUPERB deductible.

Over the 2019 calendar year, a total of nine (9) project managers left the Corrective Action and Assessment Sections. As a result, in 2019, a total of 8 project managers were hired in the Corrective Action and Assessment Sections. As of December 31, 2019, there were two (2) project manager vacancies for the Assessment Section and two (2) vacancies for the Corrective Section which are anticipated to be filled in early 2020. Once at full staff, twenty-five (25) project managers will be providing oversight on the active UST releases.

Quality Assurance Program Plan

The UST Program Quality Assurance Program Plan (QAPP) Revision 3.1 was approved by the Environmental Protection Agency (EPA) and implemented in August 2016. The purpose of the QAPP is to ensure that all data produced and reported to the Division is scientifically valid, legally defensible, and of known and acceptable precision and accuracy. Between January 1, 2019 and December 31, 2019, 1,515 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, 2019, the Division has received and approved 46 annual contractor QA plans.

Underground Storage Tank Information

Since 1986, there have been 46,639 petroleum USTs registered with DHEC. Of those, 34,493 have been removed from the ground or properly closed in place. As of December 31, 2019, there were 11,191 operating USTs at 4,000 locations across the state owned by 2,024 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, overflow, and corrosion protection requirements and the UST leak detection requirements. At the end of the calendar year, DHEC reported that 64.60% of the 3,525 UST facilities inspected during 2019 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, and other factors. Beginning in December 2013, the SC UST Management Division 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. Historically, DHEC rates have been as follows:

Table 2. Significant Operational Compliance

Calendar Year	DHEC
2019	65%
2018	70%
2017	65%
2016	63 %
2015	68 %
2014 *First full year of performing electronic inspections	73 %
2013	76 %
2012	77 %
2011	79 %
2010	77 %

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 reduces the burden to follow up for training. State wide deployment began in December of 2013, and 23,392 facility

inspections have been performed to date using the tablets, with 3,525 conducted in 2019.

In an effort to continually improve on the electronic inspection program, DHEC utilized a one-time grant from the EPA to purchase seventeen (17) new Panasonic Toughpad tablets to replace those purchased in 2013. The new tablets were brought into service in December 2019 and are compatible with the new Windows 10 operating system and feature a number of enhancements that are beneficial when conducting the electronic inspections.

Release Rate

For the 2019 reporting period, a total of 124 new releases were confirmed. Eighty-seven (87) of these were forwarded to the assessment section and 37 were issued regulatory no further actions. Of the 124 confirmed releases 109 new releases were confirmed from facilities with currently in use tanks, of which 76 were forwarded to the assessment section for site rehabilitation activities and 33 were issued regulatory no further actions. Regulatory no further actions are issued when sampling results are below the risk based screening level. To determine the release rate, the DHEC divides the number of confirmed releases from currently in use tanks (109), by the total number of currently in use tanks (11,191). Therefore, a release rate of 0.97% is calculated for 2019.

Table 3. Annual Release Rate

Year	Total Number of confirmed Releases from facilities with currently in use tanks (Releases Forwarded to Assessment / Releases closed via Regulatory NFA)	Release Rate
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%
2018	98 (62/36)	98/11,273*100=0.87%
2019	109 (76/33)	109/11,191*100=0.97%

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 (44-2-60(A)) 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. The SUPERB Act also states monies that are received from the increase in tank fees, general appropriations, settlements, or other sources of funds including federal funds designated for cleanup are to be credited to 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. Collection of the additional tank fee monies began following the June 1, 2012 billing cycle for tank fees. The last additional tank fee monies were collected in the calendar year 2019. Henceforth, the annual renewal tank fees will revert back to \$100 per tank as \$40.186 million have been deposited in the SUPERB Account.

Table 4 on the next page provides information regarding revenues and expenditures on a calendar year basis. The balance is derived by subtracting the revenues from the previous year's balance.

Table 4. Additional Tank Fee Revenues and Expenditures

Calendar Year	Fee Increase/Year	Fund Reallocation	Expenditures	Revenues	Balance*
					\$36,000,000.00
2011				\$1,088,000.00	\$34,912,000.00
2012	\$100	\$0	\$0	\$1,135,120.00	\$33,776,880.00
	LUST Trust Grant			\$1,154,310.00	\$32,622,570.00
2013	\$200	\$44,451.91	\$3,346,989.18	\$2,307,586.36	\$30,314,983.64
	LUST Trust Grant			\$1,174,744.00	\$29,140,239.64
2014	\$300	\$28,957.92	\$3,407,967.84	\$3,384,491.61	\$25,755,748.03
	LUST Trust Grant			\$999,997.24	\$24,755,750.79
2015	\$400 (A)	\$27,766.61	\$4,307,469.36	\$4,505,919.70	\$20,249,831.09
	Legal Settlement	\$0	\$0	\$1,350,554.62	\$18,899,276.47
	LUST Trust Grant			\$1,000,000.00	\$17,899,276.47
2016	\$400 (A)	\$345,366.00	\$3,769,966.10	\$4,481,194.37	\$13,418,082.10
	LUST Trust Grant			\$1,000,000.00	\$12,418,082.10
	LUST Trust Grant Addendum	\$0	\$0	\$192,470.00	\$12,225,612.10
2017	\$400 (A)	\$0	\$4,202,585.97	\$4,445,707.80	\$7,779,904.30
	Legal Settlement	\$0	\$0	\$197,977.92	\$7,581,926.38
	LUST Trust Grant			\$1,000,000.00	\$6,581,926.38
2018	\$400 (A)	\$3,663,150.50	\$5,568,383.76	\$4,412,260.18	\$2,169,666.20
	LUST Trust Grant			\$1,000,000.00	\$1,169,666.20
2019	\$400 (A)			\$4,356,481.97	-\$3,186,815.77
	LUST Trust Grant			\$1,000,000.00	-\$4,186,815.77

*Remaining to be collected to reach \$36 million

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

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

The Underground Storage Tank (UST) Management Division (the Division) amended the SC UST Control Regulation R. 61-92, Part 280 on May 26, 2017 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.

The Division continued its efforts to include the regulated community during the regulation implementation and compliance process through quarterly industry workgroup meetings. The goal of these meetings are to create dialogue and develop a collaborative partnership with industry leaders in compliance operations while receiving feedback on implementation of the newly amended regulations. These meetings continue to be well attended and the workgroup will continue to meet quarterly in 2020.

The Division continues to develop outreach initiatives to assist tank owners/operators with the new regulatory requirements. Examples include:

1. A one-page regulation implementation guide was developed and mailed out to tank owners with the annual tank invoices. This implementation guide is also being provided to tank owners/operators during regular compliance inspections as well as compliance and outreach activities.
2. New information continues to be posted on the DHEC website, to include forms revised or developed, regulatory position papers, and regulation guidance documents.
3. Inspection documents continue to be revised to include due dates for new requirements.
4. Information outlining specific regulatory requirements and deadlines is provided to new owners at the time of permit issuance or ownership transfer.
5. 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.
6. Developed standardized informational language that can be inserted in all outgoing correspondence, providing links to the DHEC webpage of the newly amended regulation and A/B operator supplemental training.
7. At the bottom of each Compliance Section staff member's email, information is provided to direct the regulated community to links providing information on the webpage.

The Division continues efforts to inform the regulated community with a series of morning and afternoon regulatory workshops scheduled at eight different locations across the state in late 2019 and early 2020. Attendees are provided with an opportunity to complete the supplemental A/B operator training exam. Division staff also hosted a booth and conducted an information session at the Southeast Petro Show in Myrtle Beach in March 2019 and will do so again in March of 2020.

Continuous Improvement Action Plan

Following recommendation by the committee in 2018, the Division 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 continues to implement several processes that should reveal operational efficiencies for the UST program and expected measurable improvements over time. Additionally, the Division strives to implement initiatives that deliver consistent customer service and compliance assistance to tank owners and operators.

1. A process was developed to accelerate the number of aggressive fluid and vapor recovery (AFVR) events to be directed.
 - During calendar year 2019, directives for AFVR events were sent out on 214 owner/operator sites, of which 76 were for multiple AFVR events at a total commitment cost of

\$7,027,842.99. Upon review of the report, the next appropriate scope of work was directed. Project managers are continuing to review plans and reports as received giving priority to the free product sites within each priority classification.

2. The Division continues to utilize the voluntary "Blitz" program allowing project managers to be compensated for working extra hours to manage high risk sites for vacant staff positions.
 - The Division allowed staff to work overtime hours to address higher priority sites that were assigned to vacant positions and were inactive as a result of the vacancies. The UST Blitz program completed over 319 hours of work at over 193 sites from January 1, 2019 through December 31, 2019. During this same period, 63 directives were issued, \$2,176,857.68 was financially pre-approved and \$1,064,827.18 was paid out for site rehabilitation work.
3. A new process concerning release responsibility was initiated to determine correct signatures for site rehabilitation liability. Signatures on site rehabilitation invoices are verified to determine the signees association with the person or entity responsible for the UST release. The contractor and DHEC project manager are also copied on the correspondence. This process improves the documentation of liability paperwork for the Division to maintain the correct responsible party signing invoices for site rehabilitation work being funded by SUPERB.

Recommendations

1. The UST Management Division will orchestrate a mid-year conference call with committee members.
2. Remove all tables and information pertaining to additional tank fees from the SAC report starting in 2020.

Appendix 1

SUPERB Eligible Releases by Risk Category As of December 31, 2019

Risk Category	Open Releases								
	2019	2018	2017	2016	2015	2014	2013	2012	2011
1	181	174	154	148	136	134	152	160	177
2A	107	102	105	100	104	112	105	114	124
2B	666	682	713	731	747	772	797	818	876
3A	86	73	63	59	63	54	46	47	50
3B	797	788	758	752	770	784	818	879	915
4A	187	186	189	192	193	203	204	182	189
4B	111	116	116	116	123	121	128	134	132
5	135	139	144	119	129	109	122	137	136
Total	2,270	2,260	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, 2019.

County	Risk Category								Total
	1	2A	2B	3A	3B	4A	4B	5	
Abbeville	5	0	8	1	3	3	2	0	22
Aiken	3	1	12	2	10	3	1	6	38
Allendale	0	0	4	0	8	2	1	0	15
Anderson	5	1	14	1	44	7	2	9	83
Bamberg	0	1	8	0	3	0	0	1	13
Barnwell	1	2	6	2	5	0	0	0	16
Beaufort	1	2	7	4	13	0	0	0	27
Berkeley	0	0	16	2	22	0	2	3	45
Calhoun	1	0	1	0	4	0	10	0	6
Charleston	2	2	10	0	67	0	1	4	86
Cherokee	0	3	7	3	12	2	3	2	32
Chester	9	1	10	0	15	0	2	3	40
Chesterfield	3	2	7	0	6	0	2	1	21
Clarendon	12	3	27	0	8	0	2	2	54
Colleton	3	2	12	0	9	0	0	2	28
Darlington	0	0	18	0	25	1	5	2	51
Dillon	5	1	11	4	10	1	3	1	36
Dorchester	4	1	10	1	15	1	0	3	35
Edgefield	1	0	5	1	6	0	1	1	15
Fairfield	4	2	9	0	4	1	0	3	23
Florence	5	4	37	1	43	1	11	5	107
Georgetown	2	1	8	4	11	0	0	0	26
Greenville	9	6	31	11	81	36	17	24	215
Greenwood	2	1	16	1	10	8	3	3	45
Hampton	1	3	11	1	5	0	2	0	23
Horry	4	13	31	11	49	0	1	2	111
Jasper	1	6	16	1	4	1	2	0	31
Kershaw	3	2	6	0	10	2	0	4	27
Lancaster	4	1	21	4	14	6	7	2	59
Laurens	3	0	20	2	13	9	1	5	53
Lee	0	2	7	0	1	0	0	0	10
Lexington	10	2	25	6	34	6	5	4	92
Marion	2	1	15	1	17	2	0	0	38
Marlboro	3	2	11	0	13	1	1	0	31
McCormick	3	0	5	0	7	0	0	1	16
Newberry	4	3	16	3	11	3	4	3	47
Oconee	3	2	9	2	5	3	1	1	26
Orangeburg	4	4	32	0	33	0	2	1	76
Pickens	1	0	5	0	7	6	0	3	22
Richland	17	7	31	2	27	9	4	8	105
Saluda	3	0	2	0	10	0	0	0	15
Spartanburg	5	5	29	4	40	56	12	10	161
Sumter	8	6	27	7	15	2	3	4	72
Union	2	0	3	1	5	1	0	0	12
Williamsburg	6	6	16	2	12	1	0	1	44
York	17	6	35	1	29	13	8	2	111

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Appendix 3
SUPERB Eligible Releases by Risk Category
Work Ongoing or Not Currently Working
As of December 31, 2019

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	181	0
2A	106	1 ²
2B	647	19 ²
3A	83	3 ²
3B	767	30
4A	106	81
4B	51	60
5	109	26
Total	2050	220

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 222 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 3 releases working strictly under the \$25,000 SUPERB deductible. However, all \$25,000 deductible sites are being actively worked or pursued to start work.

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