



# **ADEQ's Underground Storage Tank Corrective Action Preapproval Program: Updates & Information**

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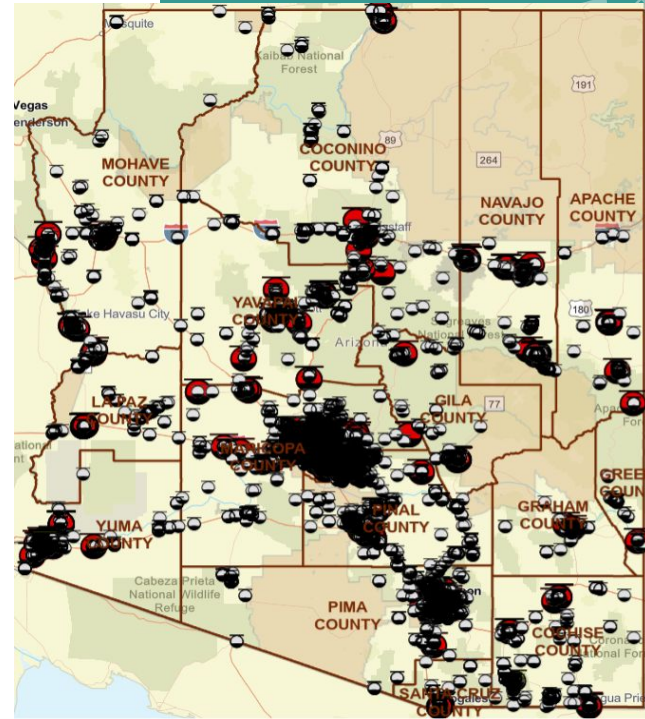
# Preapproval (PA) Funds Used Across AZ Communities

~ 200 active Leaking Underground Storage Tank cases statewide

~ 50% in the PA Program

## County Breakdown:

- Apache: 4 (50%)
- Cochise: 8 (0%)
- Coconino: 10 (60%)
- Gila: 4 (75%)
- Graham: 2 (100%)
- Greenlee: 1 (0%)
- La Paz: 4 (50%)
- Maricopa: 78 (51%)
- Mohave: 13 (69%)
- Navajo: 18 (50%)
- Pima: 23 (61%)
- Pinal: 8 (50%)
- Santa Cruz: 4 (75%)
- Yavapai: 18 (67%)
- Yuma: 14 (64%)



# PA Program - *Purpose & Misconceptions*

What it is/does:

- Financial assistance “safety net”
- Pre-approval of corrective actions and proposed costs required
- Reimbursement based (applicant must pay first)
- Facility-based funding - must address all contamination at the site
- Small owners prioritized for reimbursement each fiscal year

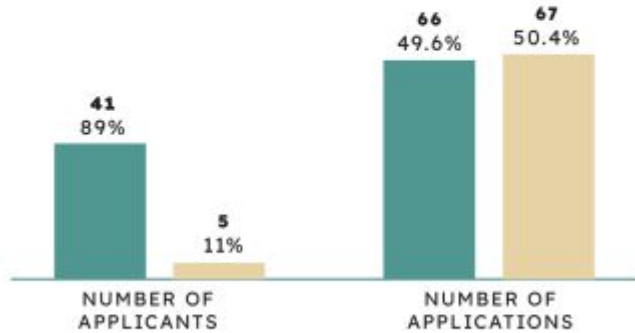
What it is/does **not**:

- Make every party “whole” for all corrective action costs
- A Financial Responsibility mechanism
- Replace regulatory corrective action requirements

# PA Program - Performance Summary

## UST PREAPPROVAL PROGRAM

Applicants and Applications End of FY2025/Start of FY2026  
(46 Applicants Total, 133 Applications Total)



SMALL OWNERS

OTHER OWNERS

<20 facilities Owned

20+ facilities Owned

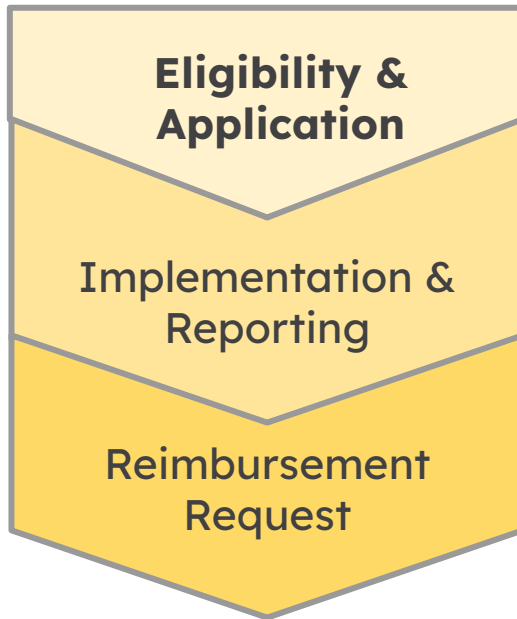
## UST PREAPPROVAL PROGRAM

Amount of Preapproved Funding Obligated End of FY2025/Start of FY2026



Data Source: ADEQ FY25 UST Revolving Fund Preapproval Process Annual Report ([https://static.azdeq.gov/ust/ust\\_report\\_2025.pdf](https://static.azdeq.gov/ust/ust_report_2025.pdf))

# The PA Program - Process



- Submit eligibility packet & financial responsibility information
- Continue pursuing insurance claim determination
- Develop application:
  - Detailed scope of work
  - Schedule
  - Cost estimate

## Important Considerations:

- Justify corrective actions as reasonable, necessary, cost-effective, & technically feasible (ARS § 49-1005)
- Application only identifies activities proposed to be reimbursed

# The PA Program - Process



Eligibility & Application

**Implementation &  
Reporting**

Reimbursement  
Request

- Applicant is responsible for ensuring pre-approved work is conducted by registered environmental professionals
- Corrective actions are to be documented in required regulatory reports

If scope cannot be implemented as pre-approved:

- Submit Change Notice
- Document differing site condition(s)

Determination reviews take time; remobilization may occur

# The PA Program - Process



Eligibility & Application

Implementation &  
Reporting

**Reimbursement  
Request**

Submit Reimbursement Request:

- Document completed work (meets PA scope, regulations, & industry standards)
  - *[Best Option]: Cite previously submitted regulatory reports*
  - [Alternative]: Provide supporting documentation (field logs, lab data, etc.)
- Provide proof of payment for claimed costs

# Avoiding Common Issues - Applications

- Clearly document corrective action objectives and justification (A.R.S. § 49-1005)
  - Don't jump to remedies without site evaluation
- Plan for contingencies; and define trigger criteria
  - Example: additional drilling based on field screening evidence
  - Use strategic planning & dynamic work strategies
- Avoid overly lengthy scopes
  - Don't extend beyond major regulatory milestones
  - Stay within subcontractor quote validity

**[Important]:** Applications identify potentially reimbursable costs only; pre-approved scopes do not determine regulatory requirements

# Avoiding Common Issues - Change Notices

- Confirm a Change Notice is appropriate (not a new application)
  - Example: Encountered unforeseen difficult lithology and need to change the drilling technology to achieve the pre-approved corrective action objection
  - Adding a scope element that was not part of the application (e.g. adding soil vapor sampling onto an approved scope for groundwater monitoring)
- Document changes in circumstance(s)
  - Provide detailed info to facilitate faster ADEQ review

# Avoiding Common Issues - Reimbursement Requests

- Link invoices to respective corrective actions
  - Cite regulatory report sections as available
  - Match invoice periods to work dates
  - Additional supporting documentation beyond cost sheet is allowed
- Reimburse eligible costs up to pre-approved line item amount
- Document contingency scope and triggering criteria
- Reimburse only completed corrective actions
  - Cannot reimburse reporting costs for unapproved reports
  - Field work for unapproved reports can be reimbursed if clearly documented

# PA Program - Resources

- PA Program webpages:  
[azdeq.gov/ust/preapproval-program](http://azdeq.gov/ust/preapproval-program)
- Authorizing Statutes: A.R.S. §§ 49-1051, 1053 - 1055

PA Program Questions?

[ustpreapproval@azdeq.gov](mailto:ustpreapproval@azdeq.gov)

General UST program Questions?

[askust@azdeq.gov](mailto:askust@azdeq.gov)

UST Revolving Fund PA  
Process Annual Report

