



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

By Email: hector.sanchez.pr@totalenergies.com

Hector I. Sanchez
HSE Manager
TotalEnergies Marketing Puerto Rico Corp.
PO Box 362916
San Juan, P.R. 00936

Subject: Underground Storage Tank(s) for: Total Gottlieb's Quickway
Located at: 2-3 Estate Constant, U.S. Virgin Islands 00802
Facility ID Number: 202024
ICIS Number: 3601545154

Dear Mr. Sanchez:

Please find enclosed a copy of an inspection report where Mr. Hiep Tran of the U.S. Environmental Protection Agency, Region 2 (EPA) conducted an Underground Storage Tank (UST) Inspection on June 14, 2023, in accordance with the Resource Conservation and Recovery Act and Hazardous and Solid Waste Amendments of 1984 ("HSWA"), 42 U.S.C. § 6901 *et seq.* (collectively referred to as "RCRA" or the "Act"). Total Gottlieb's Quickway owns and/or operates the Underground Storage Tank(s) located at the above-mentioned facility. A "facility" as that term is defined in 40 C.F.R. § 280 is subject to the requirements of RCRA Subtitle I regulations.

This letter should not be construed as a compliance determination by the EPA of Total Gottlieb's Quickway with the UST regulations. However, if areas of concern were identified, please begin rectifying them as soon as possible and make sure to keep records in accordance with the regulations.

Subsequently, my enforcement staff will review the information in our program records and from the inspection determine if further actions are necessary. Once any compliance issues are identified EPA will correspond with you in writing.

If any factual disputes are identified, or you have any questions, please contact Hiep Tran by email at: tran.hiep@epa.gov or by phone at 212-637-4280.

Thank you for your cooperation.

Sincerely,

GAETANO
LAVIGNA

Digitally signed by
GAETANO LAVIGNA
Date: 2023.08.07
14:04:04 -04'00'

Gaetano LaVigna, Senior Advisor
UST Compliance Team
Enforcement and Compliance Assurance Division
US EPA Region 2

Enclosure

cc: Jesus A. Martinez Rodriguez
HSE Compliance Specialist
TotalEnergies Marketing Puerto Rico Corp.
Millennium Park Plaza, #15 Calle 2, Suite 525
Guaynabo, P.R. 00968
Email: jesus.martinezrodriguez@totalenergies.com

Austin F. Callwood
Director of Environmental Protection
Department of Planning and Natural Resources
4611 Tutu Park Mall, Suite 300
St. Thomas, VI 00802
Email: austin.callwood@vi.gov



United States Environmental Protection Agency (EPA)

Region 2

290 Broadway

New York, NY 10007-1866

Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): Hiep Tran

DATE: 6/14/2023

SIC CODE:

ICIS #: 3601545154

I. Location of Tank(s) <input type="checkbox"/> Tribal Facility Name: <u>Total Gottlieb's Quickway</u> Street Address: <u>2-3 Estate Constant</u> City: <u>St. Thomas</u> State: <u>VI</u> Zip Code: <u>00802</u> County: _____ Phone Number: <u>340-690-1006</u> Email/Website: <u>markgottlieb@hotmail.com</u> Contact Person(s): <u>Mark Gottlieb</u>		II. Ownership of Tank(s) <input type="checkbox"/> same as location (I.) Owner Name: <u>Total Petroleum P.R. Corp.</u> Street Address: <u>P.O. 304509</u> City: <u>St. Thomas</u> State: <u>VI</u> Zip Code: <u>00803</u> County: _____ Phone Number: <u>787-397-8563</u> Email/Website: <u>jesus.martinezrodriguez@totalenergies.com</u> Contact Person(s): <u>Jesus A. Martinez Rodriguez</u> <i>HSB compliance</i>	
IIB. Operator of Tank(s) <input type="checkbox"/> same as location (I.) Contractor Name: <u>Mark Gottlieb</u> Street Address: _____ City: _____ State: _____ Zip Code: _____ County: _____ Phone Number: <u>340-690-1006</u> Fax Number: _____		IIC. Ownership of UST(s) at Other Facilities <input type="checkbox"/> Do you own UST(s) at other UST facilities? <u>Yes</u> / No If Yes, How many Facilities: <u>5 in USVI</u> How many USTs: _____	
III. Notification [§ 280.22 – Subpart B] <input type="checkbox"/> Notification to implementing agency; name: <u>USVI DPNR</u> State Facility ID #: <u>202024</u> Date Issued: <u>10/12/2020</u> Date Expires: <u>10/11/2022</u> Any change from previous Notification noted? (Owner/ Operator/ Substance stored/ Substance compatibility?) <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Describe: _____			
IV. Financial Responsibility [§ 280.93(a) – Subpart H] <u>CHUBB</u> <input type="checkbox"/> State Fund* <input type="checkbox"/> Private Insurance: Insurer/Policy # <u>T50473-3</u> <input type="checkbox"/> Guarantee <input type="checkbox"/> Surety Bond <input type="checkbox"/> Letter of Credit <u>Expiration 8/20/2024</u> <input type="checkbox"/> Local Government <input type="checkbox"/> Self Insured <input type="checkbox"/> Not Required (Federal & State government, hazardous substance USTs) *If NY State, then answer: Is there private insurance for third party bodily injury?			
V. Operator Training [§ 280.240 – Subpart J] Is there an individual trained for A and B operator classes? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Name of Class A Operator: <u>Natalie Malone 10/20/2020</u> Are all operators for class C trained? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Does owner have a list of designated operators currently trained at each facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Does owner have proof of operators training or retraining? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Notes: <u>18,33802</u> <u>- 64,94730</u>			

VI. Tank Information	Tank No.	1	2	3			
Tank presently in use		YES	→				
If not, date last used (see Section XII)		-	-	-			
If empty, verify 1" or less left (see Section XII)		-	-	-			
Capacity of Tank (gal)		10K	10K	10K			
Substance Stored		Reg	Propan	Diesel			
Compatibility Records Available?		-	-	-			
(Compatibility Demonstrated?)		-	-	-			
M/Y Tank installed/Upgraded		1998	1998	1998			
<u>Tank Construction:</u> Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted		Composite Poly	→				
Secondary Containment?		Single wall	→				
Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]		Yes	→				
Double Walled? Y/N		No	→				
If Yes, Last Monthly Check?		5/24/2023					
If No, Last Triennial Containment Integrity Test?		Fail	Fail	Passed			
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]		H/A	→				
Last Triennial Inspection?		1/16/2023	→				overfill alarm triggered in console but not on external alarm
<u>Special Configuration:</u>		-	-	-			
Compartmentalized, Manifolder,		-	-	-			
Field Constructed,		-	-	-			
Airport Hydrant System		-	-	-			
VII. Piping Information							
<u>Piping Type:</u> Pressure, Suction		Pressure					
<u>Piping Construction:</u> Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping		FRP DW					
<u>Under Dispenser Containment ("UDC")? Y/N</u> If Yes, installation date?		Yes	→				
Date of last visual inspection/periodic monitoring Part of Line RD? Y/N							
If above Y, UDC Double Walled? Y/N							
If DW, Last Monthly Check of Annular Space? If non-DW or no monthly check of DW, last 3-Yr Containment Integrity Test?		tested on 5/24/2023					All Failed

Section Continues to Page 3

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VII. Piping Information

(Continued)

Tank No.

1	2	3			
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Secondary Containment Sump Used for

Release Detection? Y/N

If Yes, Is Containment Sump Single/Double Walled? (SW/DW)

For SW, or DW w/o monthly check of annular space, last 3-YR integrity check/DW sumps with monthly monitoring - Last check of Annular space?

NO	→				
tested on 5/24/2023					
all Failed					

Tank and Piping Notes:

Tank No.

1	2	3			
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VIII. Corrosion

Protection (§ 280.31)

N/A

Integrity Assessment conducted prior to upgrade

Interior Lining

Interior lining inspected

Is lining sole protection? Y/N

Impressed Current

CP Test Records

60-day Rectifier inspection records

Sacrificial Anode:

CP Test Records

CP Notes: (Include notes of any Interior Lining inspection)

IX. Release Detection (§ 280.43-Subpart D)

N/A

Tank RD Methods

ATG

CGLD →

Interstitial Monitoring

Groundwater Monitoring*

Vapor Monitoring*

Inventory Control w/ TIT

Manual Tank Gauging

Manual Tank Gauging w/ TIT

SIR

12 Months Monitoring Records (§ 280.41(a), § 280.45(b))

Must Make Available Last 12 Months

For Compliance

Yes

*Site assessment/installation documentation?

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11/6/2020, 12/15/2021 and 1/16/2023
RD Equipment Last Tested?

1/16/2023	→				
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HOT 6/14/2023

IX. Release Detection

(Continued)

Tank RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

Viewer - Root TCS 450 ^{Received} → release detection records for 12 months plus

Tank No.	1	2	3			
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Pressurized & Non-Exempt Suction Piping
RD Methods N/A

Interstitial Monitoring						
Groundwater Monitoring*						
Vapor Monitoring*						
Other? (specify)	PLLD	→				

OR

Annual Line Tightness Test						
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AND

Installed? Y/N	YES	→				
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ALLD

Last Annual Test (§ 280.44(a))	1/16/2022	Failed				
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Diesel on 1/16/22

12 Months Monitoring Records (§ 280.41(b)(1)(ii))

*Site assessment/installation documentation?

11/06/2020

RD Equipment Last Tested?

Are under Dispenser Containments (UDC) Monitored?

via Visual Inspection

via Electronic Monitoring

Records of inspections available?

UDC Monitoring Notes: (Records of release: State the past 12 months monitoring records)

Piping RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

Rug/Pren = Received 12 months of records

Diesel = missing records October 2022 to April 2023 (7 months)

Per report 1/16/2023 = Diesel EUD was not working and diesel leak detection failed functionality test

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Init/Date 6/14/2023

X. Repairs [§ 280.33 – Subpart C]

N/A

- Repaired tanks and piping are tightness tested within 30 days of repair completion Y N Unknown
- CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system Y N Unknown
- Records of repairs are maintained Y N Unknown

“Overfill/Spill/Secondary Containment systems are tested/inspected within 30 days of repair”

XI. Temporary Closure [§ 280.70 – Subpart G]

N/A

- CP continues to be maintained Y N Unknown
- UST system contains product and release detection is performed Y N Unknown
- Cap and secure all lines, pumps, manways Y N Unknown

XII. Release History [§ 280.50 – Subpart E]

N/A

To your knowledge, are there any public or private Drinking Water Wells in the vicinity? Yes / No

- Evidence of release or spills at facility
- Evidence of release in the surrounding area to the facility Greater than 25 gallons (estimate) [§ 280.53]
- Releases reported to implementing agency; if so, date(s) _____
- Release confirmed; when and how _____
- Initial abatement measures and site characterization Free product removal
- Soil or ground water contamination Corrective action plan submitted
- Remediation ongoing Remediation completed, no further action; date(s) _____
- Unusual Operating Conditions
- Interstitial Monitoring alarms

Notes:

XIII. Walkthrough Inspections [§ 280.36 – Subpart C]

No Records

Owner and operators must conduct walkthrough inspections of the following:

- Must have monthly records Y N
- Spill Prevention Equipment – must be checked for damage, remove liquid or debris, and check fill cap. Y N
- DW spill prevention equipment with interstitial monitoring – must check for leak in interstitial area. Y N N/A
- Release detection equipment – must check to ensure operating with no alarms and review records of release detection testing. Y N
- Must have annually records Y N
- Containment sumps – must check for damage, leaks, remove liquid or debris. Y N
- DW sumps with interstitial monitoring – must be checked for leak in interstitial area. Y N N/A
- Hand held release detection equipment – must check tank gauge sticks or groundwater bailer. Y N

*** Owners and operators of UST system(s) must maintain records of operation and maintenance walkthrough inspections for one year.**

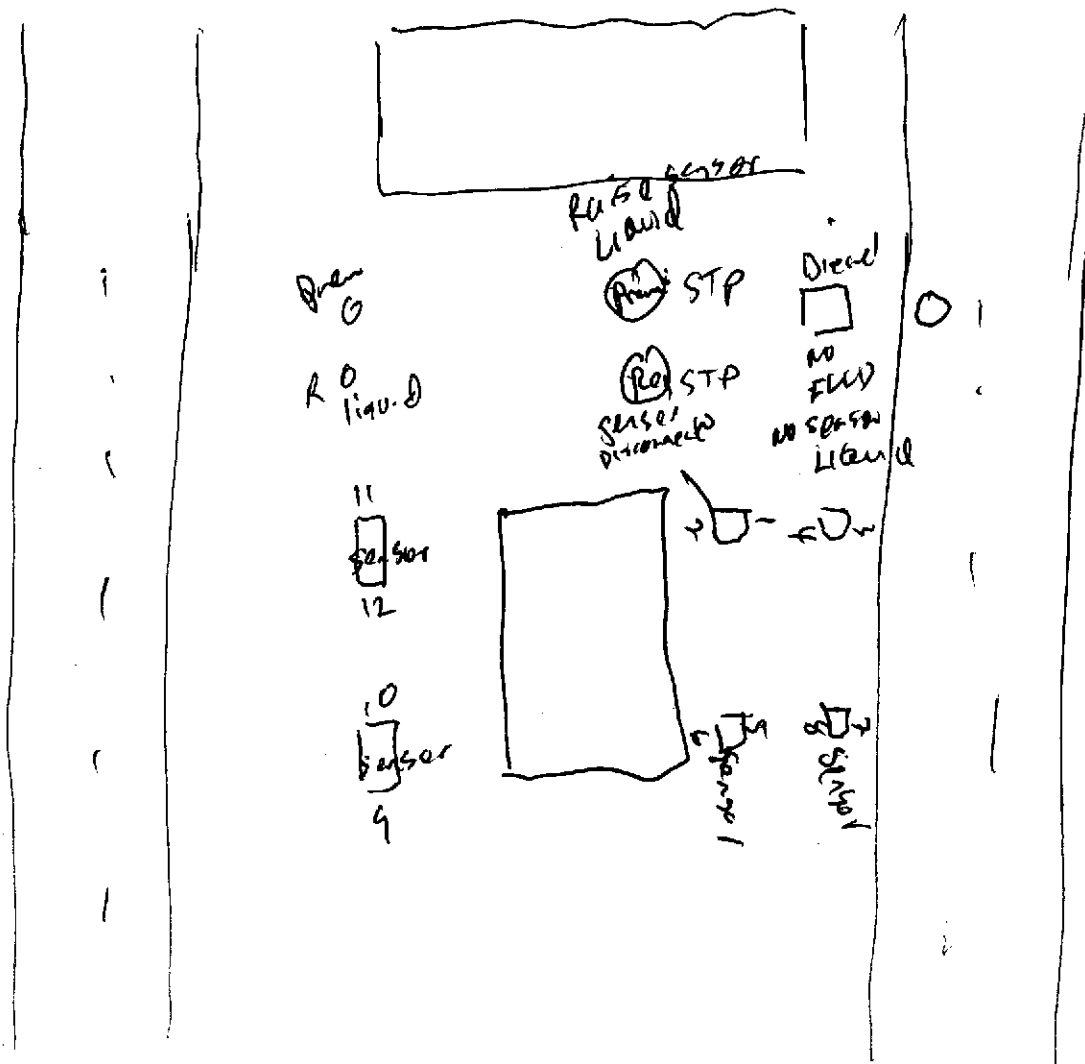
SITE DRAWING

DATE: 6/14/2023 TIME ON SITE: 12:30 pm TIME OFF SITE: 14:25

WEATHER: Partially cloudy / dry

ENVIRONMENTALLY SENSITIVE AREA: Y N

If "Yes", please describe:



Pictures

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702024

Init/Date HW 6/14/23



Facility Name Gottlieb's Quickway
 Address 2-3 Estate Constant
St. Thoms VI 00802
 UST Reg # 202024

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA)
 REGION 2 UST PROGRAM
 Underground Storage Tank Team
 New York, NY 10007-1866

Inspector Observation Report
Inspection of Underground Storage Tanks (USTs)

- No areas of concern observed at the conclusion of this inspection.
- The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Areas of Concern Observed:

Regulatory Citation	Area of Concern
§ 280.20(c)	Potential failure to use a spill prevention equipment
§ 280.35(a)(2)	Potential failure to periodically inspect overfill prevention equipment
§ 280.40(a)(3)	Potential failure to annually test release detection components
§ 280.41(b)(1)(i)(B)	Potential failure to have annual line tightness test or monthly monitoring of pressurized piping
§ 280.245(u)	Potential failure to maintain a list of designated operators

Actions Taken:

- Field Citation; # _____ Additional information required On-site request/Due date _____ operator/c

Comments/Recommendations:

280.36(u) - Potential failure to either conduct periodic walkthrough inspection every thirty days or to conduct annual walkthrough inspection.

280.41(b)(1)(i)(A) - Potential failure to equip pressurized piping with automatic line leak Detector.

Title of UST Owner/Operator Representative: OWNER

Name of UST Owner/Operator Representative:

MARK A. GOTTLIEB
 (Please print)

Mark A. Gottlieb
 (Signature)

Other Participants: (340) 690-1006

MAPAS@Hotmail.com

Name of EPA Inspector/representative:

Hiep Tran
 (Please print)

Hiep Tran
 (Signature)

(Credential Number)

Date of Inspection 6/14/23 Time 14:20 AM/PM

202024

Documents Not Available During the On-Site Inspection
Please Provide As Soon As Possible

Location: Gottlieb's Quickway Facility ID Number: 202024

- Tank Registration Certificate Expired
- Operator Training Records (Individuals training or retraining)
- Demonstrate Financial Responsibility
- Automatic Line Leak Detector Test Records – Annual
- Line Leak Test Records – Annual
- Evidence of Spill Prevention
- Evidence of Overfill Prevention
- Tank Release Detection Records Diesel
- Vapor Monitoring Records – Monthly (12 Most Recent Months)
- Under Dispenser Containment (Visual inspection or electronic monitoring)
- Site Assessment to Demonstrate Monitor Wells Properly Installed/Located
- Documentation of Compatibility for UST Systems
- Corrosion Protection Inspection Records
- Documentation of Periodic Walk-through Inspection
- Walkthrough Inspection Records – Monthly and Annually
- Other (specify) _____

Additional Recommendations:

- ① spill buckets failed in 5/24/23 Reg/Pre- fixed external
- ② testing overfill prevention equipment - no records alarms?
- ③ annual test of release detection components = no records for Diesel
- ④ line for diesel was bad from Sept 22 to May 2023
- ⑤ need to create a list of current operators
- ⑥ Diesel Leak Detector failed on 1/16/23 - corrective action?
- ⑦ no records for monthly and annual walk-through inspection checks

202024

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (areas of concern during the on-site inspection)?

Deficiencies observed: (Put an X for each observed deficiency)

Potential failure to complete or submit a notification, report, certification, or manifest

Potential failure to follow or develop a required management practice or procedure

Potential failure to maintain a record or failure to disclose a document

Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? Yes No

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? Yes No

If yes, what actions were taken? *locating operator training certificates
contractor helped with equipment*

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during Inspections? Yes No

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? Yes No

This report was reviewed and deemed complete by: Reviewer

Gaetano La Vigna

Signature

GAETANO LAVIGNA Digitally signed by GAETANO LAVIGNA
Date: 2023.08.07 14:03:28 -04'00'

Date

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Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)] <i>Reg Item Failed</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		<input type="checkbox"/> Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] <input type="checkbox"/> Alarm is operational. [280.20(c)(1)(ii)(B), 280.21(d)] <input checked="" type="checkbox"/> Alarm is audible or visible to delivery driver. [280.20(c)(1)(ii)(B), 280.21(d)] <i>NO</i> <i>for inspection on 1/10/23 - overb (alarm triggered in console but not on external alarm)</i>			
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]		<input checked="" type="checkbox"/>	
III b. Operation and Maintenance of Corrosion Protection	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]		<input checked="" type="checkbox"/>	
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]		<input checked="" type="checkbox"/>	
		<input type="checkbox"/> UST system (Choose one) <input type="checkbox"/> UST in operation <input type="checkbox"/> UST in temporary closure <input type="checkbox"/> CP System is properly operated and maintained <input type="checkbox"/> CP system is performing adequately based on results of testing. [280.31(b)]; - or - <input type="checkbox"/> CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			

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6/14/23

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?			
			N	A	Y	N
III b. Operation and Maintenance of Corrosion Protection (Continued)	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]			X	
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(iii)]			X	
IV. Tank and Piping Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]			X	
		<input type="checkbox"/> Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected. For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]: <input type="checkbox"/> Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)] <input type="checkbox"/> Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)] <input type="checkbox"/> Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)] For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: <input type="checkbox"/> Tank and piping meet new UST requirements [280.21(a)(1)] <input type="checkbox"/> Steel tank is internally lined. [280.21 (b)] <input type="checkbox"/> Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]				

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

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6/14/23

Release Detection Compliance Measures Matrix

Instructions - To Determine Compliance Status of Measures #1-7, Work Through the Worksheet "Commonly Used Release Detection Methods" Below.

Regulatory Subject Area	Measure #	SOC Measure/ Federal Citation	In Compliance?		
			N/A	Y	N
I. Release Detection Method Presence and Performance Requirements <i>Need to check FUD for Diesel</i>	1	Release detection method is present. [280.40(a)]		X	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		X	
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)]		(?)	
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)] <input type="checkbox"/> Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
II. Release Detection Testing <i>Diesel piping - missing records</i>	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]			X
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]		X	
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]		X	

Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
<input type="checkbox"/>			<p>A. Inventory Control with Tank Tightness Testing (T.T.T)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Inventory control is conducted properly. <input type="checkbox"/> T.T.T. performed as required (See "D" below). <input type="checkbox"/> Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)] <input type="checkbox"/> Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] <input type="checkbox"/> Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] <input type="checkbox"/> Water is monitored at least monthly. [280.43(a)(6)]

6/04/23

202024

Release Detection Compliance Measures Matrix

Worksheet (Continued) - Commonly Used Release Detection Methods			
Tank (Check box)	Pressurized Pipe (Check box)	Non-exempt Suction Pipe (Check box)	Release Detection Method
<input checked="" type="checkbox"/>			<p>B. Automatic Tank Gauge (ATG)</p> <ul style="list-style-type: none"> <input type="checkbox"/> ATG is set up properly. [280.40(a)(2)] <input checked="" type="checkbox"/> ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] <input type="checkbox"/> ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
<input type="checkbox"/>			<p>C. Manual Tank Gauging (MTG)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Tank size is appropriate for using MTG. [280.43(b)(5)] <input type="checkbox"/> Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.I. (See "D" below) <input type="checkbox"/> Method is being conducted correctly. [280.43(b)(4)] <input type="checkbox"/> No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] <input type="checkbox"/> Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>D. Tightness Testing (Safe Suction piping does not require testing)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] <input type="checkbox"/> Tightness testing is conducted within specified time frames for method: <ul style="list-style-type: none"> <input type="checkbox"/> Tanks - every 5 years [280.41(a)(1)] <input type="checkbox"/> Pressurized Piping - annually [280.41(b)(1)(ii)] <input type="checkbox"/> Non-exempt suction piping - every 3 years [280.41(b)(2)] <input type="checkbox"/> Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>E. Ground Water or Vapor Monitoring</p> <ul style="list-style-type: none"> <input type="checkbox"/> Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] <input type="checkbox"/> Vapor monitoring well is not affected by high ground water. [280.43(c)(3)] <input type="checkbox"/> Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] <input type="checkbox"/> Wells are properly designed and positioned. [280.43(c)(6), 280.43(f)(7)]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>F. Interstitial Monitoring</p> <ul style="list-style-type: none"> <input type="checkbox"/> Secondary containment can be used to detect a release [280.43(g)(1), 280.43(g)(2)] <input type="checkbox"/> Sensor properly positioned. [280.40(a)(2)]

202024 6/21/23

Release Detection Compliance Measures Matrix

Worksheet (Continued) - Commonly Used Release Detection Methods			
Tank (Choose one)	Pressurize Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>G. Automatic Line Leak Detector (ALLD) <input checked="" type="checkbox"/> ALLD is present and operational. [280.44(a)] <input checked="" type="checkbox"/> Annual function test of the ALLD has been conducted and records are available. [280.44(a)]</p> <p>II. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]</p> <p><input type="checkbox"/> The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or</p> <p><input type="checkbox"/> The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)]</p> <p><input type="checkbox"/> S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]</p>

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

6/14/23