



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

**By Email:** [Carrol.Theodore@trafigura.com](mailto:Carrol.Theodore@trafigura.com)

Mrs. Carrol Theodore  
Country Manager Retail/B2B  
PC Puerto Rico LLC D/B/A USVI Fuel Services  
8240 Subbase, P.O. Box 303740  
St. Thomas, U.S. Virgin Islands 00803

Subject: Underground Storage Tank(s) for: Puma Airport Service Station  
Located at: 9A Estate Constant, U.S. Virgin Islands 00802  
Facility ID Number: 202025  
ICIS Number: 3601550657

Dear Mrs. Theodore:

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 13, 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"). Puma Airport Service Station 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 Puma Airport Service Station 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](mailto: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: 2023.08.03  
16:38:39 -04'00'

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

Enclosure

cc: Eng. Brenda Toraño  
HSE Manager  
Puerto Rico Energy  
Box 11961  
San Juan, Puerto Rico 00922  
Email: [Brenda.Torano@energy-latam.com](mailto:Brenda.Torano@energy-latam.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](mailto: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: 6/13/23

SIC CODE:

ICIS #: 3601550657

|  |                             |  |                    |
|--|-----------------------------|--|--------------------|
| <b>I. Location of Tank(s)</b> <input type="checkbox"/> Tribal  |                             | <b>II. Ownership of Tank(s)</b> <input type="checkbox"/> same as location (I.)   |                    |
| Facility Name<br><u>Puma Airport Service Station</u>   |                             | Owner Name<br><u>PC Puerto Rico LLC DBA USVI Fuel Services</u>                   |                    |
| Street Address<br><u>GA Est. Constant</u>  |                             | Street Address<br><u>89 Sub Base</u>   |                    |
| City<br><u>St. Thomas</u>  | State<br><u>VI</u>          | City<br><u>St. Thomas</u>  | State<br><u>VI</u> |
| Zip Code<br><u>00802</u>   |                             | Zip Code<br><u>00802</u>   |                    |
| County<br><u>St. Thomas</u>  |                             | County<br><u>St. Thomas</u>  |                    |
| Phone Number<br><u>340-642-8116</u>  |                             | Phone Number:<br><u>HSE coordinator - 787-365-4100-cell</u>                      |                    |
| Email/Website<br><u>transcar-corp@yahoo.com</u>  |                             | Email/Website:<br><u>nadja.davila@energy-latem.com</u>                           |                    |
| Contact Person(s)<br><u>Ayatha LaPlace - operator</u>  |                             | Contact Person(s)<br><u>Nadja Davila @ pumaenergy.com</u>                        |                    |
| <b>III. Operator of Tank(s)</b> <input type="checkbox"/> same as location (I.)   |                             | <b>IIIC. Ownership of UST(s) at Other Facilities</b>                             |                    |
| Contractor Name<br><u>Ayatha La Place</u>  |                             | <input type="checkbox"/> Do you own UST(s) at other UST Facilities <u>Yes/No</u> |                    |
| Street Address<br><u>P.O. Box 305089</u>   |                             | If Yes, How many Facilities <u>8 in USVI</u>                                     |                    |
| City<br><u>St. Thomas</u>  | State<br><u>VI</u>          | How many USTs <u>22 in USVI</u>  |                    |
| Zip Code<br><u>00803</u>   | County<br><u>St. Thomas</u> |  |                    |
| Phone Number<br><u>340-642-8116</u>  | Fax Number                  |  |                    |
| <b>III. Notification</b> [§ 280.22 - Subpart B]  |                             |  |                    |
| <input type="checkbox"/> Notification to implementing agency; name <u>USVI DPR</u>   |                             |  |                    |
| State Facility ID # <u>202025</u>  |                             |  |                    |
| Date Issued: <u>8/22/22</u> Date Expires: <u>02/16/2024</u>  |                             |  |                    |
| Any change from previous Notification noted? (Owner/ Operator/ Substance stored/ Substance compatibility?) Y <input type="checkbox"/> N <input type="checkbox"/>             |                             |  |                    |
| If Yes, Describe: _____  |                             |  |                    |
| <b>IV. Financial Responsibility</b> [§ 280.93(a) - Subpart H] <u>CHUBB</u>   |                             |  |                    |
| <input type="checkbox"/> State Fund* <input type="checkbox"/> Private Insurance: Insurer/Policy # <u>TS0735</u>  |                             |  |                    |
| <input type="checkbox"/> Guarantee <input type="checkbox"/> Surety Bond <input type="checkbox"/> Letter of Credit <u>Expiration 3/11/2023 -&gt; 3/11/24</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?   |                             |  |                    |
| <b>V. Operator Training</b> [§ 280.240 - Subpart J]  |                             |  |                    |
| Is there an individual trained for A and B operator classes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>   |                             |  |                    |
| Name of Class A Operator <u>A/B - 7/17/2020 via EPA</u>  |                             |  |                    |
| Are all operators for class C trained? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>   |                             |  |                    |
| Does owner have a list of designated operators currently trained at each facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                       |                             |  |                    |
| Does owner have proof of operators training or retraining? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>   |                             |  |                    |
| Notes: <u>Nov 21, 2022 to April 25, 2023</u> <u>18.33801</u>   |                             |  |                    |
| <u>closed on</u> <u>opered on</u> <u>-64.95923</u>   |                             |  |                    |

#1 202025

| VI. Tank Information   | Tank No. | 1                | 2           |  |  |                 |  |
|--|----------|------------------|-------------|--|--|-----------------|--|
| Tank presently in use  |          | yes              | 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         |  |  |                 |  |
| Substance Stored   |          | Roq              | Pven        |  |  |                 |  |
| Compatibility Records Available?<br>(Compatibility Demonstrated?)  |          | -                | -           |  |  |                 |  |
| M/Y Tank installed/Upgraded  |          | 6/1993           | 6/1983      |  |  |                 |  |
| <u>Tank Construction:</u> Bare Steel, Sti-P3,<br>Retrofitted sacrificial anode, Impressed Current,<br>Composite, FRP, Interior lining, Vaulted |          | FRP<br>DW        | steel<br>DW |  |  |                 |  |
| Secondary Containment?   |          | DW               | DW          |  |  |                 |  |
| Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]  |          | yes              | yes         |  |  |                 |  |
| Double Walled? Y/N   |          | -                | -           |  |  | submitted       |  |
| If Yes, Last Monthly Check?  |          | -                | -           |  |  | 10/24/22 tested |  |
| If No, Last Triennial Containment Integrity Test?  |          | no records       |             |  |  | passed          |  |
| Overfill Prevention (specify type)<br>[§ 280.20(c)(1)(ii), § 280.21(d)]  |          | HLA<br>4/13/2021 |             |  |  |                 |  |
| Last Triennial Inspection?   |          | no records       |             |  |  | (OK)            |  |
| <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><br>Bare Steel, Sacrificial Anode, Impressed Current, Flex,<br>FRP, Double-walled (DW), Non-corrodible piping       |          | FRP<br>DW        |             |  |  |                 |  |
| <u>Under Dispenser Containment ("UDC")? Y/N</u><br>If Yes, installation date?  |          | yes              | yes         |  |  |                 |  |
| Date of last visual inspection/periodic monitoring   |          | April 2023       |             |  |  |                 |  |
| Part of Line RD? Y/N   |          |                  |             |  |  |                 |  |
| If above Y, UDC Double Walled? Y/N   |          | No               | →           |  |  |                 |  |
| If DW, Last Monthly Check of Annular Space?<br>If non-DW or no monthly check of DW, last 3-Yr<br>Containment Integrity Test?                   |          |                  |             |  |  |                 |  |

Section Continues to Page 3

202025

**VII. Piping Information**

(Continued)

|   |                |   |  |  |  |  |
|---|----------------|---|--|--|--|--|
| Tank No.  | 1              | 2 |  |  |  |  |
| Secondary Containment Sump Used for Release Detection? Y/N  | N <sup>o</sup> | → |  |  |  |  |
| 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? |                |   |  |  |  |  |

Tank and Piping Notes: *no data on printout*

|          |   |   |  |  |  |  |
|----------|---|---|--|--|--|--|
| Tank No. | 1 | 2 |  |  |  |  |
|----------|---|---|--|--|--|--|

**VIII. Corrosion**

**Protection (§ 280.31)**

N/A

Integrity Assessment conducted prior to upgrade

|                           |                                     |  |  |  |  |  |
|---------------------------|-------------------------------------|--|--|--|--|--|
| <u>Interior Lining</u>    | Interior lining inspected           |  |  |  |  |  |
|                           | Is lining sole protection? Y/N      |  |  |  |  |  |
| <u>Impressed Current</u>  | CP Test Records                     |  |  |  |  |  |
|                           | 60-day Rectifier inspection records |  |  |  |  |  |
|                           | CP Test Records                     |  |  |  |  |  |
| <u>Sacrificial Anode:</u> | CP Test Records                     |  |  |  |  |  |

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

*CP test records on 5/27/22 - No good  
 CP test records on 5/16/2019 = good  
 rectifier was not "on" during UST inspection*

*60-day Rectifier = 1/27/22  
 missing inspection 3/21-3/22/23  
 5/24/23*

**IX. Release Detection (§ 280.43-Subpart D)**

N/A

|                        |                            |       |  |  |  |  |
|------------------------|----------------------------|-------|--|--|--|--|
| <u>Tank RD Methods</u> | ATG                        | C7C1D |  |  |  |  |
|                        | Interstitial Monitoring    |       |  |  |  |  |
|                        | Groundwater Monitoring*    |       |  |  |  |  |
|                        | Vapor Monitoring*          |       |  |  |  |  |
|                        | Inventory Control w/ TTT   |       |  |  |  |  |
|                        | Manual Tank Gauging        |       |  |  |  |  |
|                        | Manual Tank Gauging w/ TTT |       |  |  |  |  |
|                        | SIR                        |       |  |  |  |  |

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

Must Make Available Last 12 Months

For Compliance *beginning 11/2022 to 3/2023*

\*Site assessment/installation documentation?

|   |   |  |  |  |  |
|---|---|--|--|--|--|
| — | — |  |  |  |  |
|---|---|--|--|--|--|

RD Equipment Last Tested?

|           |  |  |  |  |  |
|-----------|--|--|--|--|--|
| 9/21/2021 |  |  |  |  |  |
| 6/24/2022 |  |  |  |  |  |

Section Continues on Page 4

*902025*

**IX. Release Detection**

(Continued)

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

Closed from November 21, 2022 To April 25, 2023; Missing = 12/22 To 3/2023  
 Received records for = [Sept 2022, August 2022, July 2022, June 2022, April 2023, May 2023, November 2022, October 2022]

Tank No.

Pressurized & Non-Exempt Suction Piping  
 RD Methods  N/A

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

OR

|                            |  |  |  |  |  |  |
|----------------------------|--|--|--|--|--|--|
| Annual Line Tightness Test |  |  |  |  |  |  |
|----------------------------|--|--|--|--|--|--|

AND

|                |     |     |  |  |  |  |
|----------------|-----|-----|--|--|--|--|
| Installed? Y/N | Yes | Yes |  |  |  |  |
|----------------|-----|-----|--|--|--|--|

**ALLD**

|                                |  |  |  |  |  |  |
|--------------------------------|--|--|--|--|--|--|
| Last Annual Test (§ 280.44(a)) |  |  |  |  |  |  |
|--------------------------------|--|--|--|--|--|--|

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

\*Site assessment/installation documentation?

|  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|
|  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|

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)

Received = June 2022 to November 2022, May 2023 and April 2023  
 Missing = March 2023 ← To December 2022

202025

**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:

*walkthroughs - Sept 22 - 11/22 } checklist everything  
April 23 - 6/2023 }*

*tanks were emptied between Nov 2022 to April 2023(?)*

**XIII. Walkthrough Inspections** [§ 280.36 – Subpart C]

**Owner and operators must conduct walkthrough inspections of the following:**

- Must** have monthly records Y  N  *missing June 22, July 22, August 22*
- 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  *6/24/2022*
- 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.**

*41 202025*

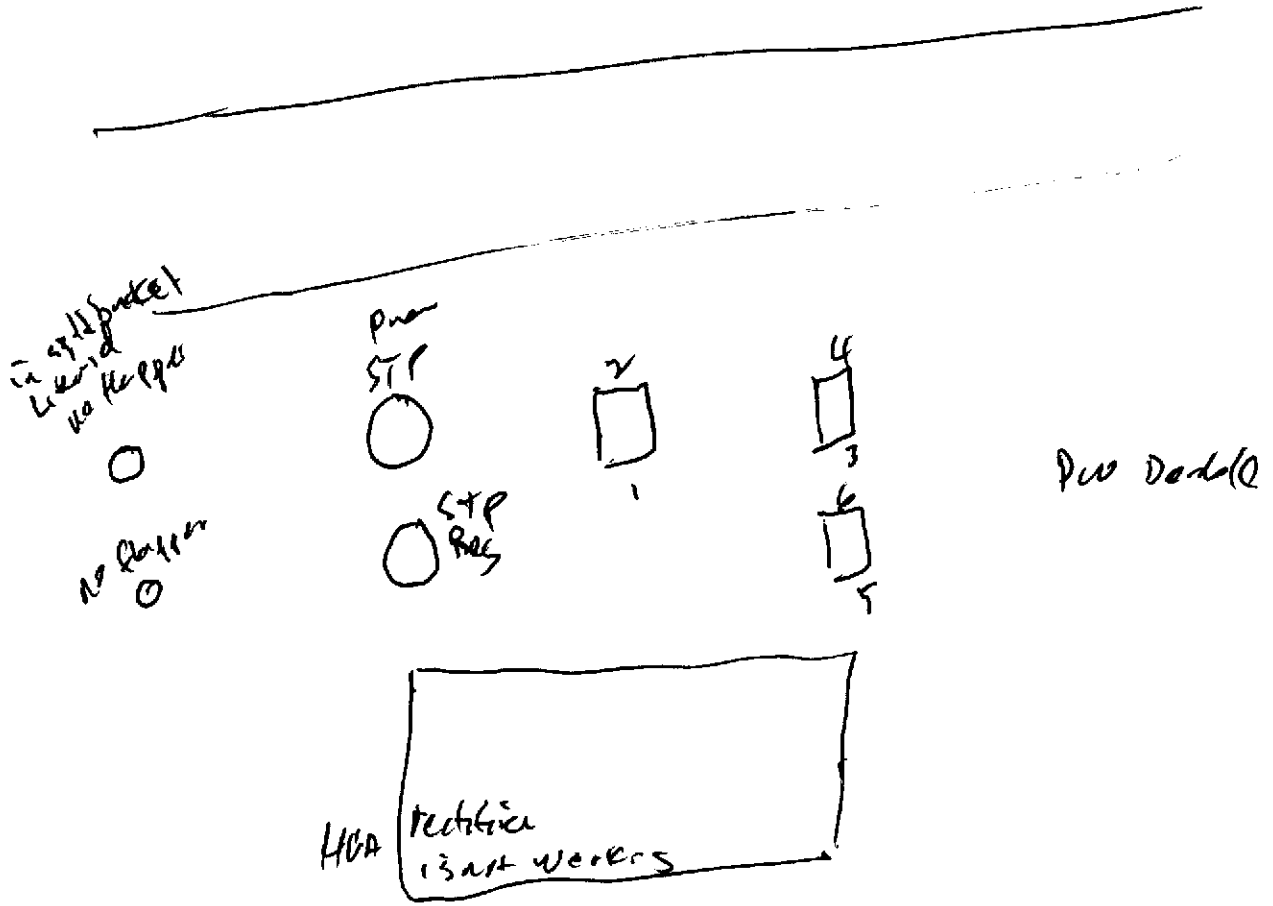
SITE DRAWING

DATE: 06/13/23 TIME ON SITE: 8:21 AM TIME OFF SITE: 10:55

WEATHER: Dry / partially cloudy

ENVIRONMENTALLY SENSITIVE AREA: Y  N

If "Yes", please describe:



the facility shut down everything from Nov. 22 to April 2023

no sensors in UBC  
ECCD sensors

no light

Pictures



Facility Name Puna Airport Service Station  
 Address 9A Est - Constant, St. Thomas VI  
 UST Reg # 202025

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  |
|---------------------|--|
| § 980.31(a)         | Potential failure to operate and maintain corrosion protection system continuously             |
| § 280.31(b)(1)      | Potential failure to ensure that cathodic protection system is tested every 3 years thereafter |
| § 280.31(c)         | Potential failure to inspect impressed current systems every 60 days.                          |
| § 280.35(a)(2)      | Potential failure to meet the requirement for periodic testing of spill prevention equipment.  |

Actions Taken:

Field Citation; # \_\_\_\_\_  Additional information required  On-site request/Due date \_\_\_\_\_

Comments/Recommendations: 280.35(a)(2) - Potential failure to periodically inspect overfill prevention equipment  
 280.40(a)(2) - Potential failure to annually test release detection components  
 280.36(a) - Potential failure to conduct periodic walkthrough inspection every 30 days  
 280.70(a) - Potential failure to continue operation and maintenance of release detection in a temporarily closed tank system.  
 280.24(a) - Potential failure to designate at least one CLASS A, class B operator.  
 280.24(b) - Potential failure to designate each individual who meets definition of

Title of UST Owner/Operator Representative: PSE Coordinator  
Puna  
 Name of UST Owner/Operator Representative:  
Nadja S. Devila  
 (Please print)  
[Signature]  
 (Signature)

Name of EPA Inspector/representative: class C operator  
Thip Tan  
 (Please print)  
[Signature]  
 (Signature)

Other Participants: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

(Credential Number) \_\_\_\_\_

Date of Inspection 6/13/23 Time 10:30 AM

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

Location: Puma Airport

Facility ID Number: 202025

- Tank Registration Certificate
- 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
- 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 — rectifier was "off" CP test records on 5/27/22
- Documentation of Periodic Walk-through Inspection
- Walkthrough Inspection Records – Monthly and Annually
- Other (specify) \_\_\_\_\_

Additional Recommendations: *\*Some records were submitted after UST inspection -*

- ① missing records for testing Cathodic protection every 3 years
- ② rectifier is not working - very little or no power
- ③ no records of readings every 60 days for rectifier
- ④ no records of triennial testing for spill prevention equipment, overfill prevention equipment
- ⑤ no records for annual testing of release detection components - sensors + probes + ATEs, etc.
- ⑥ missing records for monthly walkthrough inspection
- ⑦ release detection monitoring was not done while the tanks got product during the renovation - facility needs to confirm.
- ⑧ class A, class B, and C operator were not available - no records - ACCP proof of training
- ⑨ need to create a list of operators.
- ⑩ piping - pipes in the dispensers need jumper lines to continuously monitor the line,



Facility Name Puma Airport Service Station  
 Address 9A Est. Constant, St. Thomas, VI  
 UST Reg # 202025

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   |
|----------------------|---|
| § 250.245(a)         | Potential failure to maintain a list of designated operators  |
| § 250.41(b)(1)(i)(B) | Potential failure to monthly monitoring of pressurized piping or to have a manual fire tightness test |
| §                    |   |
| §                    |   |
| §                    |   |
| §                    |   |

Actions Taken:

Field Citation; # \_\_\_\_\_  Additional information required  On-site request/Due date \_\_\_\_\_

Comments/Recommendations:

Title of UST Owner/Operator Representative: HSE Coordinator  
 Name of UST Owner/Operator Representative: Puma  
Nage S. Devile  
 (Please print)  
Nage S. Devile  
 (Signature)

Name of EPA Inspector/representative:  
Hiep Tran  
 (Please print)  
Hiep Tran  
 (Signature)

Other Participants: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

(Credential Number)

Date of Inspection 6/13/23 Time 10:30 AM/PM

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

Location: Luma Airport

Facility ID Number: 202075

- Tank Registration Certificate
- 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
- 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 need to clean + properly product in the spill bucket  
premium

202075

**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? *contractors were onsite to assist + missing records were submitted after UST inspection - -*

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

Signature

Date

Gaetano La Vigna

GAETANO LAVIGNA Digitally signed by GAETANO LAVIGNA  
Date: 2023.08.03 16:38:05 -04'00'

### 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)]   |                | X |   |
| II. Overfill Prevention                                  | 2         | Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]<br><br><input type="checkbox"/> Automatic shutoff is operational (ie., device not tampered with or inoperable ) [280.20(c)(1)(ii)(A), 280.21(d)]<br><input checked="" type="checkbox"/> Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)]<br><input checked="" type="checkbox"/> Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)]<br><input type="checkbox"/> Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]   |                | X |   |
| 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)]   |                | X |   |
| 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)]  |                | X |   |
|  | 5         | Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]<br><br><input type="checkbox"/> UST system (Choose one)<br><input type="checkbox"/> UST in operation<br><input type="checkbox"/> UST in temporary closure<br><input checked="" type="checkbox"/> CP System is properly operated and maintained<br><input checked="" type="checkbox"/> CP system is performing adequately based on results of testing. [280.31(b)]; - or -<br><input checked="" 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. |                |   | X |

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### 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)(ii)]   | X              |   |   |
| IV. Tank and Piping Corrosion Protection                             | 8         | <p>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)]</p> <p><input type="checkbox"/> Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected.</p> <p>For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]:</p> <p><input type="checkbox"/> Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)]</p> <p><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)]</p> <p><input type="checkbox"/> Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)]</p> <p>For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: <input type="checkbox"/></p> <p>Tank and piping meet new UST requirements [280.21(a)(1)]</p> <p><input type="checkbox"/> Steel tank is internally lined. [280.21 (b)]</p> <p><input checked="" type="checkbox"/> Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]</p> |                |   | X |
|  |           |  |                |   |   |

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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### 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<br><i>need to check junger's</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)]<br><input type="checkbox"/> Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)] |                | X |   |
| II. Release Detection Testing  | 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<br>(Choose one)     | Pressurize<br>d Pipe<br>(Choose Two) | Non-exempt<br>Suction<br>Pipe<br>(Choose one) | Release Detection Method   |
|--------------------------|--------------------------------------|---|--|
| <input type="checkbox"/> |                                      |   | <p><b>A. Inventory Control with Tank Tightness Testing (T.T.T)</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Inventory control is conducted properly.</li> <li><input type="checkbox"/> T.T.T. performed as required (See "D" below).</li> <li><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)]</li> <li><input type="checkbox"/> Equipment is capable of 1/8-inch measurement. [280.43(a)(2)]</li> <li><input type="checkbox"/> Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)]</li> <li><input type="checkbox"/> Water is monitored at least monthly. [280.43(a)(6)]</li> </ul> |

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Release Detection Compliance Measures Matrix

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

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Release Detection Compliance Measures Matrix

| Worksheet (Continued) - Commonly Used Release Detection Methods |                                      |   |   |
|---|--------------------------------------|---|---|
| Tank<br>(Choose one)  | Pressurize<br>d Pipe<br>(Choose Two) | Non-exempt<br>Suction<br>Pipe<br>(Choose one) | Release Detection Method  |
| <input type="checkbox"/>  | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                      | <p><b>G. Automatic Line Leak Detector (ALLD)</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> ALLD is present and operational. [280.44(a)]</li> <li><input type="checkbox"/> Annual function test of the ALLD has been conducted and records are available. [280.44(a)]</li> </ul> <p><b>H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]</b></p> <ul style="list-style-type: none"> <li><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</li> <li><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)]</li> <li><input type="checkbox"/> S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) &amp; 280.43(h)]</li> </ul> |

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.

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