UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

By Email: 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 Pollyberg Service Station
Located at: 68, 69 and 70 Dronningens Gade, U.S. Virgin Islands 00802
Facility ID Number: 201014
ICIS Number: 3601550659

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 Pollyberg 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 Pollyberg 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 or by phone at 212-637-4280.

Thank you for your cooperation.

Sincerely,

GAETANO LAVIGNA
Digitally signed by GAETANO LAVIGNA
Date: 2023.08.07 16:45:42 -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

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:** 6/13/23

SIC CODE: **ICIS #:** 3601550659

I. Location of Tank(s) ☐ Tribal

Facility Name: Puma Pollyberg Service Station
Street Address: 68, 69 and 70 Drawningens Gade
City: St. Thomas State: VI Zip Code: 00802
County:
Phone Number / Email/Website: carrol.theodore@trafigura.com
Contact Person(s): Mrs. Carrol Theodore - Country Manager Retail
Agatha LaPlace

II. Ownership of Tank(s) ☐ same as location (I.)

Owner Name: PC Puerto Rico LLC DBA USVI Fuel Services
Street Address: 89 Sub Base
City: St. Thomas State: VI Zip Code: 00802
County:
Phone Number / Email/Website: Nadja.Davila@pumaenergy.com
787 - 365 - 4100
Contact Person(s): Nadja Davila - HSE

IIB. Operator of Tank(s) ☐ same as location (I.)

Contractor Name: Agatha La Place
Street Address: P.O. Box 305089
City: St. Thomas State: VI Zip Code: 00803 County:
Phone Number: 340 - 642 - 8116 Fax Number:

IIC. Ownership of UST(s) at Other Facilities

☐ Do you own UST(s) at other UST Facilities Yes / No

If Yes, How many Facilities 8 in USVI

How many USTs 22 in USVI

III. Notification [§ 280.22 – Subpart B]

☐ Notification to implementing agency; name USVI DPNR
State Facility ID # 2010 14
Date Issued: 8/22/22 Date Expires: 2/15/2024
Any change from previous Notification noted? (Owner/ Operator/ Substance stored/ Substance compatibility?) Y ☐ N ☐
If Yes, Describe:

IV. Financial Responsibility [§ 280.93(a) – Subpart H] CHUBB

☐ State Fund* ☐ Private Insurance: Insurer/Policy # IS DF 55
☐ Guarantee ☐ Surety Bond ☐ Letter of Credit Expiration 3/11/2024
☐ Local Government ☐ Self Insured ☐ **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? Yes ☑ No ☐
Name of Class A Operator Agatha La Place A/B operator
Are all operators for class C trained? Yes ☐ No ☑
Does owner have a list of designated operators currently trained at each facility? Yes ☐ No ☑
Does owner have proof of operators training or retraining? only A/B operator. Yes ☐ No ☑

Notes:
18.34280
-64.92528

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)	6K	6K				
Substance Stored	Reg	Prem				
Compatibility Records Available?	—	—				
(Compatibility Demonstrated?)	—	—				
M/Y Tank installed/Upgraded	2012	→				
Tank Construction: Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted	composite					
Secondary Containment?	DW					
Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]	Yes	→				
Double Walled? Y/N						
If Yes, Last Monthly Check?						
If No, Last Triennial Containment Integrity Test?	4/12/2021					
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]	HLA					
Last Triennial Inspection?	4/12/21					
Special Configuration:	Compart —					
Compartmentalized, Manifolded,	—	—				
Field Constructed,	—	—				
Airport Hydrant System	—	—				
VII. Piping Information *Piping Type:* Pressure, Suction	Pressure					
Piping Construction: Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping	—	—				
Under Dispenser Containment ("UDC")? Y/N	Yes	Yes				
If Yes, installation date?						
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?						

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Section Continues to Page 3

VII. Piping Information (Continued)

	Tank No.	1	2				
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?							

Tank and Piping Notes: not on printouts

	Tank No.	1	2				

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	CSLD ✓					
	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

***Site assessment/installation documentation?**	—	—				
4/12/21 **RD Equipment Last Tested?**						

x2 20014

Section Continues on Page 4

IX. Release Detection (Continued)

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

May 2023 Feb 2023 Oct 2022 June 2022 Veeder-Root TLS 350 R
April 2023 Jan 2023 Sept 2022 May 2022
March 2023 Dec 2022 August 2022 Rec. 12 months
Nov 22 July 2022

Tank No.	1	2				

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))	✓ PLLD	✓				

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)

0.2 May 2023 – May 2022
Premium = 0.1 gal/HR 1/2/23
Regular = 0.1 gal/HR 6/30/22

P sensors in the Sumps were not on the printout

Received the last 12 months -

201014

Init/Date AH 6/12/23 01/09/2020

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)
☐ **Releases reported to implementing agency; if so, date(s)**_____ [§ 280.53]
☐ 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:

walkthrough inspection checklist
7/20/22 — 12/20/22 — 5/15/23
1 — 1/20/23
9/16/22 — 2/22/23
10/14/22 — 7/20/23
11/14/22 — 11/20/23
missing August 22 June 2022

XIII. Walkthrough Inspections [§ 280.36 – Subpart C]

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 ☐ 6/23/2022

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 ☐ N/A

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

2018/4

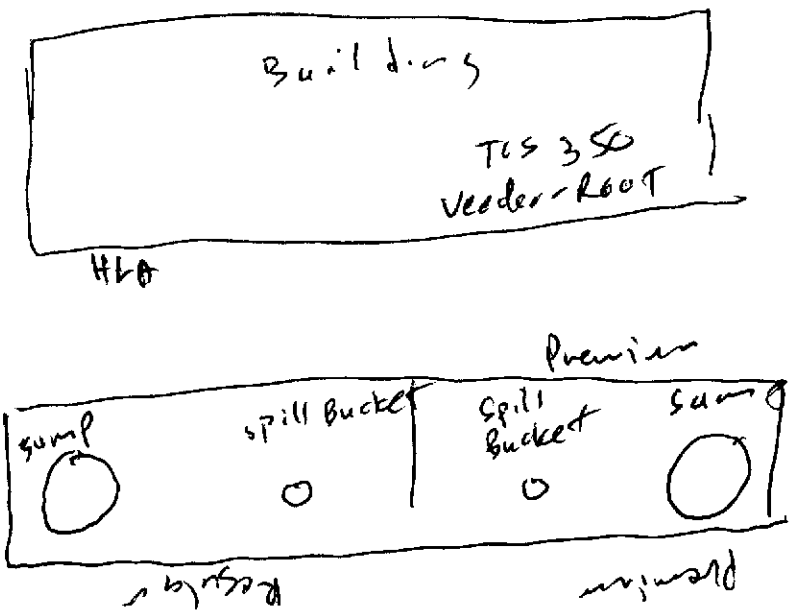
SITE DRAWING

DATE: 6/13/23 TIME ON SITE: 10:50 AM TIME OFF SITE: 12:00 pm

WEATHER: Partially Cloudy + Dry

ENVIRONMENTALLY SENSITIVE AREA: Y □ N □

If "Yes", please describe:



(1) Both spill buckets are with liquid

(2) Regular liquid was not at the lowest point

(3) Both sumps got liquid sensors

(4) Per contractor HLA was not working

(5) No jumpers in the dispensers

□ Pictures

Facility Name Puma Polyberg Service Station
Address 66, 69, and 70 Dronningens Gade St. Thomas, VI 00802
UST Reg # 201014

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 an overfill prevention system
§ 280.40(a)(3)	Potential failure to annually test release detection
§	components
§ 280.241(a)	Potential failure to designate at least one class A
§	operator and at least one class B operator
§ 280.241(b)	Potential failure to designate each individual who
§	meets definition of class C operator.
§ 280.245(a)	Potential failure to maintain a list of designated operators

Actions Taken:
☐ Field Citation; # _____ ☐ Additional Information required ☐ On-site request/Due date _____

Comments/Recommendations:
280.241(b)(1)(i)(B) - Potential failure to have annual line tightness test or monthly monitoring of pressurized pipins.

Title of UST Owner/Operator Representative: UST Coordinator

Name of UST Owner/Operator Representative: Puma
Nadja S. Davis
(Please print)
Nadja S. Davis
(Signature)

Other Participants: Agatha LaPlace

Name of EPA Inspector/representative:
Hipp Thorn
(Please print)
(Signature)

(Credential Number)

Date of Inspection 6/13/23 Time 11:50 AM/PM

4 2 201014

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

Location: Puma Pollybergs Facility ID Number: 201014

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

Additional Recommendations:

(1) Designate of class A and B operator - training certificate came from EPA rather than USVI DPNR requirements
(2) need to create a list of operators
(3) Overfill alarm is not alarm - no light or sound per contractor - need to FIX ASAP
(4) no record for annual test of release Detection components
(5) pipes at the dispensers need jumper(s) - to have proper monitoring
(6) remove and properly dispose liquid in the spill buckets
(7) liquid sensors in Reg Tank needs to relocate to the lowest point

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

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

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

X 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 on site to assist Records were emailed 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** Gaetano La Vigna

Signature GAETANO LAVIGNA Digitally signed by GAETANO LAVIGNA Date: 2023.08.07 16:45:04 -04'00'

Date _____

701014

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)]			X
		❑ Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] ❑ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)] ❑ Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)] ❑ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]			
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)]	X		
		❑ UST system (Choose one) ❑ UST in operation ❑ UST in temporary closure ❑ CP System is properly operated and maintained ❑ CP system is performing adequately based on results of testing. [280.31(b)]; - or - ❑ 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.			

2010/4
6/13/23

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)(ii)]	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		
		☐ 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)]: ☐ Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)] ☐ 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)] ☐ 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)]: ☐ Tank and piping meet new UST requirements [280.21(a)(1)] ☐ Steel tank is internally lined. [280.21 (b)] ☐ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

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.

201014 6.13.23

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	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)]		X	
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	X		
		❑ Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
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 (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
❑			**A. Inventory Control with Tank Tightness Testing (T.T.T)** ❑ Inventory control is conducted properly. ❑ T.T.T. performed as required (See "D" below). ❑ 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)] ❑ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] ❑ Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] ❑ Water is monitored at least monthly. [280.43(a)(6)]

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Release Detection Compliance Measures Matrix

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☑			**B. Automatic Tank Gauge (ATG)** ☑ ATG is set up properly. [280.40(a)(2)] ☑ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐ ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
☐			**C. Manual Tank Gauging (MTG)** ☐ Tank size is appropriate for using MTG. [280.43(b)(5)] ☐ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ☐ Method is being conducted correctly. [280.43(b)(4)] ☐ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
☐	☐	☐	**D. Tightness Testing** (Safe Suction piping does not require testing) ☐ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] ☐ Tightness testing is conducted within specified time frames for method: ☐ **Tanks** - every 5 years [280.41(a)(1)] ☐ **Pressurized Piping** - annually [280.41(b)(1)(ii)] ☐ **Non-exempt suction piping** - every 3 years [280.41(b)(2)] ☐ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
☐	☐	☐	**E. Ground Water or Vapor Monitoring** ☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐ Vapor monitoring well is not affected by high ground water. [280.43(e)(3)] ☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐ Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
☑ only	☑	☐	**F. Interstitial Monitoring** ☐ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] ☐ Sensor properly positioned. [280.40(a)(2)]

2 of 4

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
	☑		**G. Automatic Line Leak Detector (ALLD)** ☐ ALLD is present and operational. [280.44(a)] ☐ Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
☐	☐	☐	**H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]** ☐ 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 ☐ 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)] ☐ S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]

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.

7/01/04

6.13.23