

7-042250



United States Environmental Protection Agency (EPA)

Region 2

290 Broadway

New York, NY 10007-1866

Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): JEFF BLAIR

DATE: 05/19/21

SIC CODE:

ICIS #: 3601303197

I. Location of Tank(s) ☐ Tribal		II. Ownership of Tank(s) ☒ same as location (I.)	
Facility Name <u>SYRACUSE VA MEDICAL CENTER</u>		Owner Name	
Street Address <u>800 IRVING AVENUE</u>		Street Address	
City <u>SYRACUSE</u>	State <u>NY</u>	City	State
Zip Code <u>13210</u>		Zip Code	
County <u>ONONDAGA</u>		County	
Phone Number <u>(315) 425-4400</u>	Fax Number	Phone Number	Fax Number
Contact Person(s) <u>TIMOTHY NORTZ, ENVIRONMENTAL PROJECT SPECIALIST</u>		Contact Person(s)	
IIIB. Operator of Tank(s) ☒ same as location (I.)		IIIC. Ownership of UST(s) at Other Facilities	
Contractor Name		☒ Do you own UST(s) at other UST Facilities Yes No	
Street Address		If Yes, How many Facilities <u>12</u>	
City	State	How many USTs <u>?</u>	
Zip Code	County		
Phone Number	Fax Number		
III. Notification [§ 280.22 – Subpart B]			
☐ Notification to implementing agency; name <u>NY DEC</u>			
State Facility ID # <u>7-042250</u>			
Date Issued: <u>12/06/16</u> Date Expires: <u>12/02/21</u>			
Any change from previous Notification noted? (Owner/Operator/Substance stored/ Substance compatibility?) ☒ Yes ☒ No			
If Yes, Describe:			
IV. Financial Responsibility [§ 280.93(a) – Subpart H]			
☐ State Fund* ☐ Private Insurance: Insurer/Policy #			
☐ Guarantee ☐ Surety Bond ☐ Letter of Credit			
☐ 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 <u>DAVID DABROVICH</u>			
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? Yes ☒ No ☐			
Notes: <u>(EMAIL) TIMOTHY.NORTZ@VA.GOV</u>			

VI. Tank Information	Tank No.	0003	0005				
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)		15000 G	20000 G				
Substance Stored		Diesel	→				
Compatibility Records Available?		-	-				
(Compatibility Demonstrated?)		-	-				
M/Y Tank Installed /Upgraded		08/98	09/11				
<u>Tank Construction:</u> Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted		FRP	→				
Secondary Containment?		DOUBLE WALLED	→				
Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]		SPILL BUCKETS	→				
Double Walled? Y/ ☒ N							
If Yes, Last Monthly Check?							
If No, Last Triennial Containment Integrity Test?		No Record					
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]		HLA	→				
Last Triennial Inspection?		12/31/19	→				
<u>Special Configuration:</u>		-	-				
Compartmentalized, Manifolded,		-	-				
Field Constructed,		-	-				
Airport Hydrant System		-	-				
VII. Piping Information		SECTION	→				
<u>Piping Type:</u> Pressure, Suction							
<u>Piping Construction:</u>		DW	→				
Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping		STEEL	→				
<u>Under Dispenser Containment ("UDC")?</u> Y/N		N/A	→				
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?							

Section Continues to Page 3

VII. Piping Information

(Continued)

Tank No.

0003

0005

Secondary Containment Sump Used for

Release Detection? ☒ Y/NIf 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?

03/27/20 →

Tank and Piping Notes:

* NO RECORD OF HYDRO
TESTING PRIOR TO
10/31/19 DEADLINE

Tank No.

0003

0005

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
recordsSacrificial Anode:

CP Test Records

YES →

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

I REVIEWED PASSIVE CATHODIC
PROTECTION TEST RESULTS (TEST DATES - 12/23/16 + 12/31/19)

* TEST DATES EXCEED THE 3 YEAR REQUIRED PERIOD *

IX. Release Detection (§ 280.43-Subpart D)

N/A

Tank RD Methods

ATG

Interstitial Monitoring

YES →

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?

RD Equipment Last Tested?

12/31/19 →

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)

I REVIEWED TWELVE PREVIOUS MONTHS OF PASSING TANK
ELECTRONIC INTERSTITIAL RESULTS TANK MONITOR → VESSEL ROOT
"TLS-350"

Tank No.

0003 0005

Pressurized & Non-Exempt Suction Piping

RD Methods ☐ N/A

Interstitial Monitoring

YES →

Groundwater Monitoring*

Vapor Monitoring*

Other? (specify)

OR

Annual Line Tightness Test

AND

Installed? Y/N

ALLD

Last Annual Test (§ 280.44(a))

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

*Site assessment/installation documentation?

RD Equipment Last Tested?

12/31/19 →

Are under Dispenser Containments (UDC) Monitored?

N/A

via Visual Inspection

via Electronic Monitoring

Records of inspections available?

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

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

I REVIEWED TWELVE PREVIOUS MONTHS OF PASSING ELECTRONIC
INTERSTITIAL RESULTS (via VESSEL ROOT "TLS-350")

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: ☒

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 ☐

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

GPS BETWEEN USTs:

DATE: 05/19/21 TIME ON SITE: 10:30 AM TIME OFF SITE: 1:40 PM

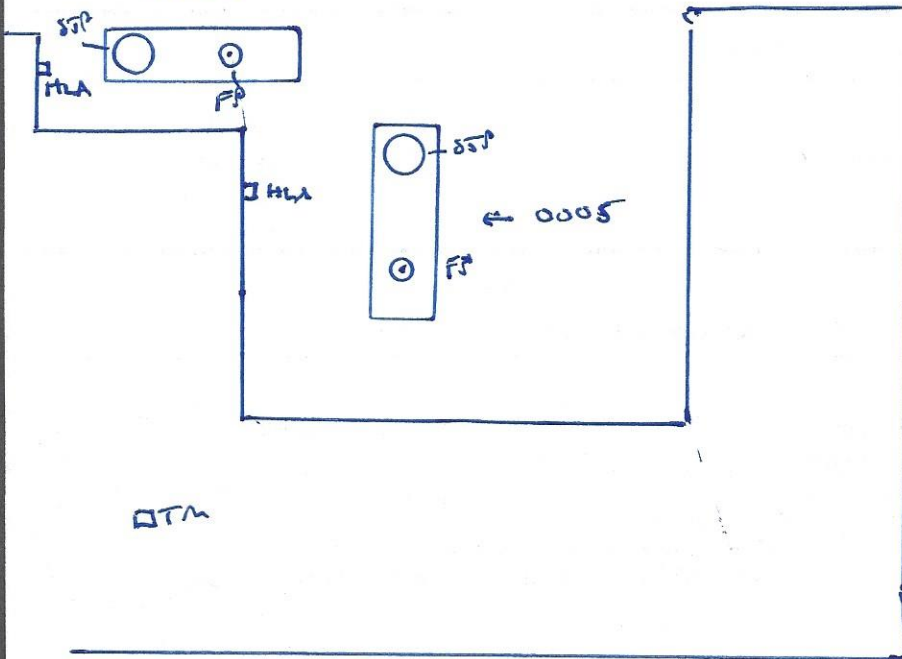
43.03883' N
-76.13964' W

WEATHER: 75° + SUNNY

ENVIRONMENTALLY SENSITIVE AREA: Y ☐ N ☒

If "Yes", please describe:

0003



PHOTOS

- 116 FP
- 117 FLAPPER VALVE
- 118 FP
- 119 FLAPPER VALVE
- 120 PAD
- 121 PAD
- 122 STP
- 123 STP
- 124 TANK MONITOR
- 125 UST REGISTRATION
- 126 C/A/B OP CERT
- 127 INT LOG (MAY-JUL 2020)

- 128 CP TEST 2016
- 129 INT LOG (SEP/OCT 2020)
- 130 WALKTHROUGH
- 131 (JUN 20)
- 132 (JUL 20)
- 133 (AUG 20)
- 134 (SEP 20)
- 135 (OCT 20)
- 136 (NOV 20)
- 137 (DEC 20)
- 138 (JAN 21)
- 139 ATG CERT 2017

140 SITE

☒ Pictures



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

SYRACUSE VA
Facility Name MEDICAL CENTER
Address 800 IRVING AVE SYRACUSE
UST Reg # 7-042280

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
§ 280.31(a)	POSSIBLE FAILURE TO OPERATE AND MAINTAIN CORROSION PROTECTION SYSTEM CONTINUOUSLY
§ 280.35(b)	POSSIBLE FAILURE TO MEET COMPLIANCE DEADLINES FOR PREVENTION, TESTING, AND INSPECTION OF UST PREVENTION EQUIPMENT
§ 280.35(c)(1)	POSSIBLE FAILURE TO MAINTAIN RECORDS OF TESTING OF SPILL PREVENTION EQUIPMENT
§	
§	

Actions Taken:

☐ Field Citation; # 7-042280 ☐ Additional information required ☐ On-site request/Due date 05/19/21

Comments/Recommendations:

- CATHODIC PROTECTION TEST RESULTS INDICATE EXCEEDED THE 3-YEAR REQUIREMENT (BY 8 TIMES)
- CONTAINMENT COMPS HYDROTESTED 03/27/20, AFTER 10/13/19 DEADLINE
- NO ON-SITE RECORDS OF SPILL BUCKET TESTING

Title of UST Owner/Operator Representative: EPS
Name of UST Owner/Operator Representative:
TIMOTHY A. NORE
(Please print)
[Signature]
(Signature)
Other Participants: LINDA DIGASPER
Andrew Byrne

Name of EPA Inspector/representative:
JEFFREY K BLAIR
(Please print)
[Signature]
(Signature)
1902013011B
(Credential Number)
Date of Inspection 05/19/21 Time 01:30 AM/PM PM

SYRACUSE VA

Location: MEDICAL CENTER

Facility ID Number: 7-042250

- o Tank Registration Certificate
- o Operator Training Records (Individuals training or retraining)
- o Demonstrate Financial Responsibility
- o Automatic Line Leak Detector Test Records – Annual
- o Line Leak Test Records – Annual
- o Evidence of Spill Prevention
- o 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
- o Walkthrough Inspection Records – Monthly and Annually
- o Other (specify) SPILL BUCKET TESTING DOCUMENTATION, PRE 10/13/13 TESTING OF SUMP HYDROTESTING

Additional Recommendations:

- CATHODIC PROTECTION TESTING RECORDS INDICATED PERIOD BETWEEN TEST DATES EXCEEDED 3-YEAR REQUIREMENT
- CONTAINMENT SUMPS TESTED 03/27/20 (SEE IF AN EVALUATION TEST WAS COMPLETED)
- FORWARD ANY SPILL BUCKET TEST RESULTS, OR HAVE SPILL BUCKETS TESTED AND FORWARD RESULTS

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet1) Did you observe deficiencies (areas of concern during the on-site inspection? **YES**

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** / No3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? **Yes** / No

If yes, what actions were taken?

**DOD SCHEDULED AND WILL CONTINUE TO
SEARCH FOR MISSING DOCUMENTS**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** / No5) 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

HIEP TRAN

Digitally signed by HIEP

TRAN

Date: 2021.06.15

13:39:55 -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)]		✓	
	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]		✓	
II. Overfill Prevention		☐ 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)]	✓		
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)]			✓
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]			✓
		☐ 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.			

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)]	✓		
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	✓		
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)]			✓
		☐ 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)]			

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.

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)]		✓	
	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)]		✓	
	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)] ☐ 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)]		✓	
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)]	✓		
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)]	✓		

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)]

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)]
☒	☐	☒	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)]

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
	☐		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.