



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

By Email: smultani@satrasinc.com

Satwinder Multani, Owner
Ocean Food & Fuel LLC
1200 Laurel Oak Road
Woorhees, NJ 08343

Subject: Underground Storage Tank(s) For: Ocean Food & Fuel LLC
Located at: 1235 Route 47, Dennisville, NJ 08214
Facility ID Number: NJ 026060
ICIS Number: 3601366219

Dear Mr. Multani:

Please find enclosed a copy of an inspection report(s) where a representative of the U.S. Environmental Protection Agency, Region 2 (EPA) conducted an Underground Storage Tank (UST) Inspection(s) on November 3, 2021 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"). Ocean Food & Fuel LLC owns and operates the Underground Storage Tank(s) located at the above-mentioned facility(s). 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 Ocean Food & Fuel LLC with the UST regulations. However, if areas of concerns 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 me, at 212-637-5036 or by email at Gutierrez.Claudia@epa.gov

Thank you for your cooperation.

Sincerely,

Claudia Gutierrez, Team Leader
UST Compliance Team
Enforcement and Compliance Assurance Division
US EPA Region 2

Enclosure

cc: michael.hollis@dep.nj.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): JEFF BLAIR

DATE: 11/03/21

SIC CODE:

ICIS #: 3601366219

I. Location of Tank(s) and II. Ownership of Tank(s)
Facility Name: OCEAN FOOD + FUEL LLC
Street Address: 1235 ROUTE 47
City: DENNIS TWP, NJ State: State Zip Code: 08214
County: CAPE MAY
Phone Number: (609) 922-4233
Contact Person(s): GURU SINGH, EMPLOYEE

IIIB. Operator of Tank(s) and IIIC. Ownership of UST(s) at Other Facilities
Contractor Name:
Street Address:
City: State: Zip Code: County:
Phone Number: Fax Number:
Do you own UST(s) at other UST Facilities? Yes/No
If Yes, How many Facilities? ?
How many USTs? ?

III. Notification [§ 280.22 - Subpart B]
Notification to implementing agency; name: NJ DEP
State Facility ID #: NJ 026060
Date Issued: 08/03/21 Date Expires: 08/30/22
Any change from previous Notification noted? (Owner/ Operator/ Substance stored/ Substance compatibility?) Y N X
If Yes, Describe:

IV. Financial Responsibility [§ 280.93(a) - Subpart H]
NO INSURANCE POLICY ON-SITE
State Fund*
Guarantee
Local Government
Surety Bond
Self Insured
Private Insurance: Insurer/Policy #
Letter of Credit
Not Required (Federal & State government, hazardous substance USTs)

V. Operator Training [§ 280.240 - Subpart J]
NO OPERATOR TRAINING DOCS ON-SITE
Is there an individual trained for A and B operator classes? Yes No
Name of Class A 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? Yes No

Notes: EMAIL: SMULTANI@SATRAS INC.COM

VI. Tank Information	Tank No.	E1	E2	E3			
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)		12000G	8000G	—————→			
Substance Stored		REG GAS	REG GAS	DIESEL			
Compatibility Records Available?		—	—	—			
(Compatibility Demonstrated?)		—	—	—			
M/Y Tank <u>Installed/Upgraded</u>		11/95	—————→				
<u>Tank Construction:</u> Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted		FRP	—————→				
Secondary Containment?		DOUBLE WALL	—————→				
Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]		SPILL BUCKETS	—————→				
Double Walled? <u>Y/N</u>							
If Yes, Last Monthly Check?							PREVIOUS TEST RECORDS NO LONGER ON-SITE
If No, Last Triennial Containment Integrity Test?		04/27/21	—————→				
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]		AUTO SHUTOFFS	—————→				PREVIOUS TEST RECORDS NO LONGER ON-SITE
Last Triennial Inspection?		04/27/21	—————→				
<u>Special Configuration:</u>		—	—	—			
Compartmentalized, Manifolder,		—	—	—			
Field Constructed,		—	—	—			
Airport Hydrant System		—	—	—			
VII. Piping Information		PRESSURE	—————→				
<u>Piping Type:</u> Pressure, Suction							
<u>Piping Construction:</u> Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping		DW FRP	—————→				
<u>Under Dispenser Containment ("UDC")? Y/N</u> If Yes, installation date?		YES	—————→				
Date of last visual inspection/periodic monitoring		11/95	—————→				
Part of Line RD? <u>Y/N</u>							
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?		04/27/21	—————→				PREVIOUS TEST RECORDS NO LONGER ON-SITE

Section Continues to Page 3

VII. Piping Information

(Continued)

Tank No.	E1	E2	E3			
Secondary Containment Sump Used for						
Release Detection? <input checked="" type="checkbox"/> Y <input type="checkbox"/> 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?	04/27/21					PREVIOUS TEST RESULTS NO LONGER ON-SITE
Tank and Piping Notes: TANKS MONITORED BY ATG, PIPING BY ANNUAL LEAK + LEAK DETECTOR TESTING						

VIII. Corrosion Protection (§ 280.31)

Tank No.	E1	E2	E3			
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						
<u>Sacrificial Anode:</u>						
CP Test Records						
CP Notes: (Include notes of any Interior Lining inspection) ✓						

IX. Release Detection (§ 280.43-Subpart D)

Tank RD Methods	E1	E2	E3			
ATG	YES					
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)) <i>Must Make Available Last 12 Months For Compliance</i>						
*Site assessment/installation documentation?	-	-	-			
RD Equipment Last Tested?	04/27/21					

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 PREVIOUS 12 MONTHS OF ATG RESULTS, FINDING:
 E1: 10/12 PASSING MONTHS (NO PASSING RESULTS FOR FEB OR AUG 2024)
 E2: 12/12 E3: 12/12

Tank No.	E1	E2	E3			
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Pressurized & Non-Exempt Suction Piping
 RD Methods N/A

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

OR Annual Line Tightness Test YES →

AND Installed? Y/N

ALLD Last Annual Test (§ 280.44(a)) YES — (02/04/24) →

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

*Site assessment/installation documentation? — — —

RD Equipment Last Tested? 02/04/24 →

Are under Dispenser Containments (UDC) Monitored? YES →

via Visual Inspection

via Electronic Monitoring

Records of inspections available? NO →

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

NO RECORDS

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

I REVIEWED PASSING LEAK DETECTOR + LINE TEST RESULTS
 (PASSED ON 02/04/24)

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
- Releases reported to implementing agency; if so, date(s) _____ Greater than 25 gallons (estimate) [§ 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 UTM UST81

DATE: 11/03/21 TIME ON SITE: 2:40 PM TIME OFF SITE: 4:05 PM

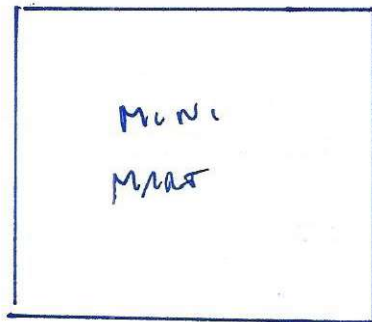
39.19325°N
-74.83285°W

WEATHER: 55°, SUNNY + WINDY

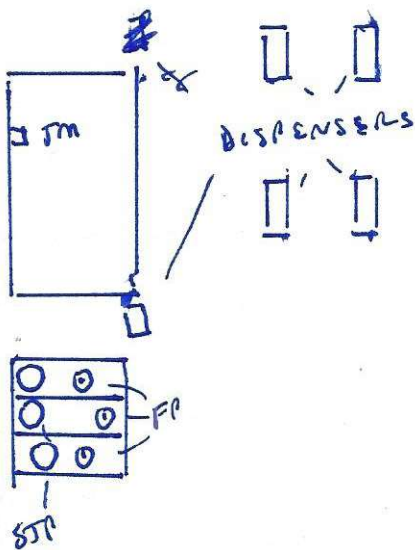
ENVIRONMENTALLY SENSITIVE AREA: Y N

If "Yes", please describe:

PHOTOS



- 169 FUEL PAD
- 170 FP DIE
- 171 STP ↓
- 172 FP REG
- 173 STP ↓
- 174 FP PRE
- 175 STP ↓
- 176 INSIDE AREA
- 177 |
- 178 |
- 179 |
- 180 |
- 181 TANK MONITOR
- 182 UST REG
- 183 INST OBS SHEET
- 184 |
- 185 SITE



PRD

Pictures



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

Facility Name OCEAN FOOD + FUEL LLC
 Address 1235 RTE 47 DENNIS TWP, NJ
 UST Reg # NJ 026060

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
§ 280.34 (b)(6)	POSSIBLE FAILURE TO MAINTAIN ANY DOCUMENTATION OF PERIODIC WALKTHROUGH INSPECTIONS
§ 280.34 (b)(9)	POSSIBLE FAILURE TO MAINTAIN ANY DOCUMENTATION OF OPERATOR TRAINING
§ 280.35 (b)	POSSIBLE FAILURE TO MEET COMPLIANCE DEADLINES FOR PREVENTION, TESTING, AND INSPECTION OF UST PREVENTION EQUIPMENT
§ 280.45 (b)	POSSIBLE FAILURE TO MAINTAIN EVERY RESULT OF MONITORING FOR RELEASE DETECTION FOR AT LEAST ONE YEAR
§ 280.93	POSSIBLE FAILURE TO FULLY COMPLY WITH FINANCIAL RESPONSIBILITY REQUIREMENTS

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

Comments/Recommendations:
 - NO WALKTHROUGH INSPECTION RESULTS ON-SITE
 - NO CLASS A, B, OR C OPERATOR TRAINING DOCUMENTATION ON-SITE
 - NO PRE COUPLING DOCUMENTATION OF HYDROTESTING SPILLS, SAMPLES, OR DISPENSERS, NOR ANY OVERFLOW PREVENTION (PRE COUPLING) EQUIPMENT TESTING
 - MISSING PASSING ATE TESTS FOR REGULAR TANK (FEB + AUG 2021)
 - NO FINANCIAL RESPONSIBILITY DOCUMENTS ON-SITE

Title of UST Owner/Operator Representative: EMPLOYEE
 Name of UST Owner/Operator Representative:
Georgette Singh
 (Please print)
[Signature]
 (Signature)

Name of EPA Inspector/representative:
JEFFREY K BLAIR
 (Please print)
Jeffrey K Blair
 (Signature)
19020130 NB
 (Credential Number)

Other Participants:

Date of Inspection 11/03/21 Time 4:05 AM/PM

OCEAN FOOD

Location: + FUEL LLC

Facility ID Number: NJ 026060

- 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) PRE 10/13/18 TEST RESULTS FOR SPILL BECKETS, SOW'S, DISPENSER AND OVERFILL PREVENTION

Additional Recommendations:

- SEND CLASS A, B + C OPERATOR TRAINING DOCS TO INSPECTOR OR
- SEND TANK INSURANCE POLICY TO INSPECTOR OR EPA
- IF FOUND, SEND PASSING ATE RESULTS FOR REGULAR TANK (FOR FEB 2021 AND AUG 2021)
- SEND LAST 12 MONTHS OF WALKTHROUGH INSPECTIONS TO INSPECTOR OR EPA (NOV 2020 - OCT 2021)
- IF FOUND, SEND HYDRO TEST RESULTS FOR ALL SOW'S, SPILL BECKETS, AND DISPENSERS, AND OVERFILL PREVENTION EQUIPMENT TEST RESULTS (FOR PRE 10/13/18)

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)? **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** / 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?

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

HIEP-TRAN	Digitally signed by
	HIEP-TRAN
	Date: 2021.12.20 13:25:45 -05'00'

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)]		✓	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)] <input checked="" 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 type="checkbox"/> Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)] <input type="checkbox"/> 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)] <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.	✓		

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	<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 checked="" 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.

030 7705N

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)] <input type="checkbox"/> 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
<input type="checkbox"/>			<p>A. Inventory Control with Tank Tightness Testing (T.I.T)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Inventory control is conducted properly. <input type="checkbox"/> T.I.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)]

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
<input type="checkbox"/>			<p>B. Automatic Tank Gauge (ATG)</p> <p><input checked="" type="checkbox"/> ATG is set up properly. [280.40(a)(2)]</p> <p><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"/></p> <p>ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]</p>
<input type="checkbox"/>			<p>C. Manual Tank Gauging (MTG)</p> <p><input type="checkbox"/> Tank size is appropriate for using MTG. [280.43(b)(5)]</p> <p><input type="checkbox"/> Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) <input type="checkbox"/></p> <p>Method is being conducted correctly. [280.43(b)(4)]</p> <p><input type="checkbox"/> No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] <input type="checkbox"/></p> <p>Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]</p>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>D. Tightness Testing (Safe Suction piping does not require testing)</p> <p><input checked="" 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)]</p> <p><input checked="" type="checkbox"/> Tightness testing is conducted within specified time frames for method:</p> <p><input type="checkbox"/> Tanks - every 5 years [280.41(a)(1)]</p> <p><input checked="" type="checkbox"/> Pressurized Piping - annually [280.41(b)(1)(ii)]</p> <p><input type="checkbox"/> Non-exempt suction piping - every 3 years [280.41(b)(2)]</p> <p><input type="checkbox"/> Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>E. Ground Water or Vapor Monitoring</p> <p><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"/></p> <p>Vapor monitoring well is not affected by high ground water. [280.43(e)(3)]</p> <p><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"/></p> <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>F. Interstitial Monitoring</p> <p><input type="checkbox"/> Secondary containment can be used to detect a release [280.43(g)(1), 280.43(g)(2)]</p> <p><input type="checkbox"/> Sensor properly positioned. [280.40(a)(2)]</p>

Release Detection Compliance Measures Matrix

Worksheet (Continued) - Commonly Used Release Detection Methods			
Tank (Choose one)	Pressurize d Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
<input type="checkbox"/>	<input checked="" type="checkbox"/>		<p>G. Automatic Line Leak Detector (ALLD)</p> <p><input checked="" type="checkbox"/> ALLD is present and operational. [280.44(a)]</p> <p><input checked="" type="checkbox"/> Annual function test of the ALLD has been conducted and records are available. [280.44(a)]</p> <p>H. 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.