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

By Email: smultani@satrajinc.com

Satwinder Multani, Owner
Latty & Amrita Petroleum, Inc.
303 White Horse Pike
Magnolia, NJ 08049

Subject: Underground Storage Tank(s) For: Latty & Amrita Petro, Inc.
Located At: 303 White Horse Pike, Magnolia, NJ 08049
Facility ID Number: NJ 023263
ICIS Number: 3601370953

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 December 10, 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". Latty & Amrita Petroleum, Inc. 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 Latty & Amrita Petroleum, Inc. 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 by email at: Gutierrez.Claudia@epa.gov or by phone at 212-637-5036.

Thank you for your cooperation.

Sincerely,

CLAUDIA GUTIERREZ
Digitally signed by CLAUDIA GUTIERREZ
Date: 2022.01.13 16:51:02 -05'00'

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

Enclosure

cc: michael.hollis@dep.nj.gov

NJ0232 63

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: 12/10/21

SIC CODE: ICIS #: 3601370953

I. Location of Tank(s) ☐ Tribal

Facility Name: LATTY + AMRITA PETRO INC.
Street Address: 303 WHITE HORSE PIKE
City: MAGNOLIA State: NJ Zip Code: 08049
County: CAMDEN
Phone Number: (856) 784-1074 Fax Number:
Contact Person(s): LATTY SINGH, MANAGER

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

Owner Name: LATTY + AMRITA PETROLEUM INC.
Street Address:
City: State: Zip Code:
County:
Phone Number: Fax Number:
Contact Person(s): SATWINDER MULTANI, OWNER

IIB. Operator of Tank(s) ☐ Same as ~~location (I.)~~ OWNER

Contractor Name:
Street Address:
City: State: Zip Code: County:
Phone Number: 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: 3

How many USTs: ?

III. Notification [§ 280.22 – Subpart B]

☐ Notification to implementing agency; name: NJDEP
State Facility ID #: NJ023263
Date Issued: 05/07/21 Date Expires: 06/30/22
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] NO TANK INSURANCE POLICY FOUND ON-SITE

☐ 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] NO OPERATOR TRAINING DOCUMENTS 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: RMULTANI@SATRAJ INC.COM

VI. Tank Information Tank No.	0001	0002	003A	003B		
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)	10,000G	20,000G	8000G	12000G		
Substance Stored	DIESEL	RSG GAS	OFF ROAD	PREMIUM		
Compatibility Records Available?	—	—	—	—		
(Compatibility Demonstrated?)	—	—	—	—		
M/Y Tank installed/Upgraded	04/94 →					
Tank Construction: 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? Y/N						
If Yes, Last Monthly Check?					* MEGA 10/13/18 DELIVERY *	
If No, Last Triennial Containment Integrity Test?	04/28/19 →					
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]	HLA →				* MEGA 10/13/18 DELIVERY	
Last Triennial Inspection?	05/07/20 →					
Special Configuration:	—	←		—		
Compartmentalized, Manifolded,	—	COMPARTMENT		—		
Field Constructed,	—	—	—	—		
Airport Hydrant System	—	—	—	—		
VII. Piping Information	PRESSURE →					
Piping Type: Pressure, Suction						
Piping Construction: Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping	DW FLEX →					
Under Dispenser Containment ("UDC")? Y/N	YES →					
If Yes, installation date?	04/94 →					
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?					* MEGA 10/13/18 DELIVERY	
If non-DW or no monthly check of DW, last 3-Yr Containment Integrity Test?	04/28/19 →					

Section Continues to Page 3

NJT0232683

VII. Piping Information (Continued)

Tank No.	0001	0002	003A	003B		
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?	04/28/19 →				* NFCR 10/13/18 DECLINE	

Tank and Piping Notes: TANKS MONITORED BY CSLD, PIPING BY ANNUAL LINE + LEAK DETECTOR TESTING

VIII. Corrosion Protection (§ 280.31)

Tank No.	0001	0002	003A	003B		
Integrity Assessment conducted prior to upgrade	N/A					
Interior Lining — Interior lining inspected						
Interior Lining — Is lining sole protection? Y/N						
Impressed Current — CP Test Records						
Impressed Current — 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)

Tank RD Methods	N/A					
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))
Must *Make Available Last 12 Months For Compliance*

***Site assessment/installation documentation?**	—	—	—	—		
RD Equipment Last Tested?	05/02/20 →				* NO CURRENT RESULTS	

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 12 PREVIOUS MONTHS OF PASSING CSLD RESULTS
TANK MONITORING CALIBRATED "EMC"

Tank No.	0001	0002	003A	003B		
Pressurized & Non-Exempt Suction Piping						
RD Methods ☐ N/A						
Interstitial Monitoring						
Groundwater Monitoring*						
Vapor Monitoring*						
Other? (specify)						
OR Annual Line Tightness Test	05/27/20 (T&S CLM) →					
AND Installed? (Y)N						
ALLD Last Annual Test (§ 280.44(a)	05/07/20 (T&S CLM) →					
12 Months Monitoring Records (§ 280.41(b)(1)(ii))						
***Site assessment/installation documentation?**	—	—	—	—		
RD Equipment Last Tested?	05/07/20 (T&S CLM) →					
Are under Dispenser Containments (UDC) Monitored?	NO RECORDS →					
via Visual Inspection						
via Electronic Monitoring						
Records of inspections available?						

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)
LATEST PASSING LEAK DETECTOR & LINE TESTS DATED 05/02/20
NO ON-SITE MONTHLY MONITORING OF PRESSURIZED PIPING

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] NS ON-SITE WALKTHROUGH DOCUMENTS

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.**

GPS NEAR USTS
39.93842' N
-75.08963' W

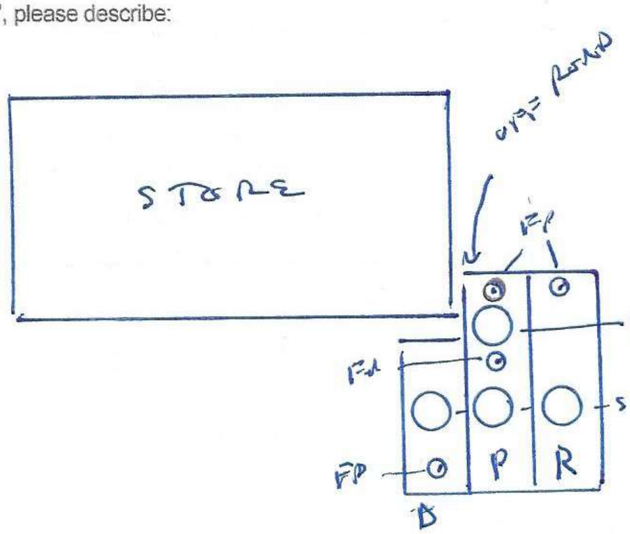
SITE DRAWING

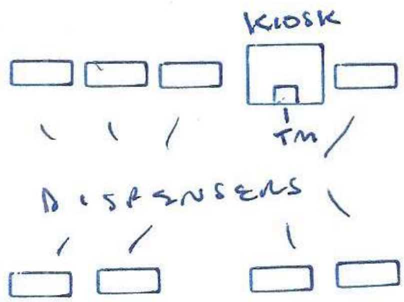
DATE: 12/13/21 TIME ON SITE: 9:50AM TIME OFF SITE: 10:15AM

WEATHER: 45° + SUNNY

ENVIRONMENTALLY SENSITIVE AREA: Y ☐ N ☑

If "Yes", please describe:





PHOTOS

283 FULL PAD
284 FP REG
285 STP
286 FP OFF ROAD DIESEL
287 STP
288 FP PRE
289 STP
290 FP DIESEL
291 STP
292 INSIDE DISP
293
294
295
296
297
298
299
300 TANK MONITOR
301 UST REGISTRATION
302 HYDRO TESTS
303
304
305
306 INSP OBS SHEET
307
308
309
310 SIGN

☑ Pictures

 Init/Date JKB 12/13/21 07/31/2019

LATTY + AMRITA

Facility Name PETRO INC.

Address 353 WHITE HORSE PIKE, MAGNOLIA

UST Reg # NJ 023263

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
§ 280.34(b)(c)	POSSIBLE FAILURE TO MAINTAIN ANY DOCUMENTATION OF
§	PERIODIC WALKTHROUGH INSPECTIONS
§ 280.34(b)(g)	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
§ 280.41(b)(1)(i)(B)	POSSIBLE FAILURE TO HAVE ANNUAL TIGHTNESS TEST OR MONTHLY
§	MONITORING OF PRESSURIZED PIPING

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

Comments/Recommendations:

- NO WALKTHROUGH INSPECTION RESULTS ON-SITE
- NO OPERATOR TRAINING DOCUMENTS ON-SITE
- NO RESULTS OF HYDROTESTING SPILL BUCKETS OR SUMPS, OR OVERFILL PREVENTION EQUIPMENT INSPECTIONS PRIOR TO 10/13/18 DEADLINE
- NO RECENT ANNUAL LINE TEST RESULTS (05/07/20)

Title of UST Owner/Operator Representative: MANAGER

Name of UST Owner/Operator Representative:

LATTY SINGH
(Please print)

Latty Singh
(Signature)

Other Participants: _____

Name of EPA Inspector/representative:

JEFFREY K BLAIR
(Please print)

Jeffrey K Blair
(Signature)

19020130 11B
(Credential Number)

Date of Inspection 12/10/21 Time 15:15 (AM/PM)

Init/Date JKB 12/10/21

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

LATTY + AMRITA

Location: PETRO INC Facility ID Number: NT 023263

- o Tank Registration Certificate
- ✓ Operator Training Records (Individuals training or retraining)
- o Demonstrate Financial Responsibility
- o Automatic Line Leak Detector Test Records – Annual
- ✓ 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
- ✓ Walkthrough Inspection Records – Monthly and Annually
- ✓ Other (specify) SPILL BUCKET TESTING, STP + DISPENSER SUMP TESTING, INSPECTION OF OVERFILL PREVENTION EQUIPMENT (PRIOR TO 10/13/18 DEADLINE)

Additional Recommendations:

- IF FOUND, PLEASE FORWARD MISSING DOCUMENTS TO INSPECTOR OR EPA

Init/Date JKB 12/10/21

Address 303 WHITE HORSE PIKE, MAGNOLIA

UST Reg # NJ 023263

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
§ 280.44(a)	POSSIBLE FAILURE TO ANNUALLY TEST LEAK DETECTOR
§ 280.45(b)(1)	POSSIBLE FAILURE TO MAINTAIN RESULTS OF ANNUAL OPERATION
§	TESTS OF RELEASE DETECTION COMPONENTS
§ 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 RECENT LEAK DETECTOR TEST RESULTS (05/07/20)
- NO RECENT ATG/COMPONENT ANNUAL TEST RESULT (05/07/20)
- NO TANK INSURANCE POLICY ON-SITE

Title of UST Owner/Operator Representative: MANAGER

Name of UST Owner/Operator Representative:

LATTY SINGH.
(Please print)

Latty S
(Signature)

Other Participants: _____

Name of EPA Inspector/representative:

JEFFREY K BLAIR
(Please print)

Jeffrey K Blair
(Signature)

1902013011B
(Credential Number)

Date of Inspection 12/10/21 Time 10:05 (AM)/PM

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

LATTY + AMRITA

Location: PETRO INC Facility ID Number: NJ 023263

- o Tank Registration Certificate
- o Operator Training Records (Individuals training or retraining)
- ✓ Demonstrate Financial Responsibility
- ✓ 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
- ✓ Other (specify) ANNUAL LLD/COMPONENT TEST RESULTS

Additional Recommendations:

- IF FOUND, PLEASE FORWARD TO INSPECTOR OR EPA

Init/Date JKB 12/10/21

NJ0232C3

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)

X 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?

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 HIEP TRAN Digitally signed by HIEP TRAN

Date Date: 2022.01.12 10:39:27 -05'00'

Init/Date JKB 12/13/21

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)]		✓	
		☐ 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)]

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)]

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.