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

By Email: smultani@satrajinc.com

Satwinder Multani, Owner
Multani & Sons LLC
1200 Laurel Oak Road, Suite 108
Voorhees, NJ 08043

Subject: Underground Storage Tank(s) For: Multani & Sons LLC
Located At: 249 Erial Road, Pine Hill, NJ 08021
Facility ID Number: NJ 024403
ICIS Number: 3601339425

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 September 16, 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". Multani & Sons 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 Multani & Sons 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
Digitally signed by CLAUDIA GUTIERREZ
Date: 2021.10.14 09:54:01 -04'00'

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

Enclosure

cc: michael.hollis@dep.nj.gov

NJ024403

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:** 09/16/21

SIC CODE: **ICIS #:** 3601339425

I. Location of Tank(s) ☐ Tribal

Facility Name: MULTANI + SONS LLC
Street Address: 249 ERIAL ROAD
City: PINE HILL, NJ State: Zip Code: 08021
County: CAMDEN
Phone Number: (856) 783-3186 Fax Number:
Contact Person(s): RAJBINDER SINGH, A/B OPERATOR

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

Owner Name: SATWINDER MULTANI
Street Address: 1200 LAUREL OAK RD SUITE 108
City: VOORHEES, State: NJ Zip Code: 08043
County: CAMDEN
Phone Number: ~~(856)~~ 258-6014 (609) 381-2687 Fax Number:
Contact Person(s): SATWINDER MULTANI, OWNER

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

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 JKB ~~3~~ ?

How many USTs JKB ~~13~~ ?

III. Notification [§ 280.22 – Subpart B]

☐ Notification to implementing agency; name NJDEP
State Facility ID # NJ 024403
Date Issued: 04/03/21 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] CRUM + FORSTER SPECIALTY INS CO

☐ State Fund* ☑ Private Insurance: Insurer/Policy # STP-409626, exp 8/9/22
☐ 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 RAJBINDER SINGH
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: ✓

VI. Tank Information Tank No.	0001	0002	0003			
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 →		12000G			
Substance Stored	DIESEL	PREGAS	REG UNL			
Compatibility Records Available?	—	—	—			
(Compatibility Demonstrated?)	—	—	—			
M/Y Tank installed/Upgraded	04/94 →		04/93			
Tank Construction: 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?	01/11/21 →			* NO PRE 10/13/18 INITIAL TEST RECORD		
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]	AUTO SHUTOFFS →					
Last Triennial Inspection?	01/11/21 →			* NO PRE 10/13/18 INITIAL TEST RECORD		
Special Configuration:	—	—	—	—		
Compartmentalized, Manifolded,	—	—	—	—		
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 FRP →					
Under Dispenser Containment ("UDC")? Y/N	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?	01/11/21 →				* NO PRE 10/13/18 INITIAL RECORD	

Section Continues to Page 3

NJ0244403

VII. Piping Information (Continued)

	Tank No.	0001	0002	0003			
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?		01/11/21 →			* NO PRE 10/13/18 INITIAL TEST RECORD		

Tank and Piping Notes: TANKS MONITORED BY ELECTRONIC INTERSTITIAL, PIPING BY ANNULAR LINE + LEAK DETECTOR TESTING

	Tank No.	0001	0002	0003			

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						
	Interstitial Monitoring	(3/12) →					
	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?		01/11/21 →					

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 8/12 PREVIOUS MONTHS OF PASSING ELECTRONIC INTERSTITIAL RESULTS (MISSING SEP → DEC 2020)

TANK MONITOR → VEEDER ROOT "TLS-350"

Tank No.	0001	0002	0003			

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 (01/11/21) →					

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

***Site assessment/installation documentation?**	—	—	—			
RD Equipment Last Tested?	01/11/21 →					
Are under Dispenser Containments (UDC) Monitored?	YES →					
via Visual Inspection	YES →					
via Electronic Monitoring	—	—	—			
Records of inspections available?	YES (8/12 previous months) →					

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

I REVIEWED 8/12 PREVIOUS MONTHS OF MANUAL INTERSTITIAL RESULTS (FROM WALKTHROUGH INSPECTIONS - MISSING SEP-DEC 2020)

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

I REVIEWED PASSING LINE + LEAK DETECTOR TEST RESULTS (TEST DATE → 01/11/21)

ALSO REVIEWED 8/12 PREVIOUS MONTHS OF PASSING MANUAL INTERSTITIAL SUMP RESULTS (MISSING SEP-DEC 2020)

Init/Date JKB 09/16/21

NJ024403

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: ✓ UPON WITNESSING INSPECTION, DISCOVERED SIGN INDICATING ENVIRONMENTAL INVESTIGATION + CLEANUP IN PROCESS

XIII. Walkthrough Inspections [§ 280.36 – Subpart C] (ONLY HAVE 8/12 PREVIOUS MONTHS MISSING SEP-DEC 2020)

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

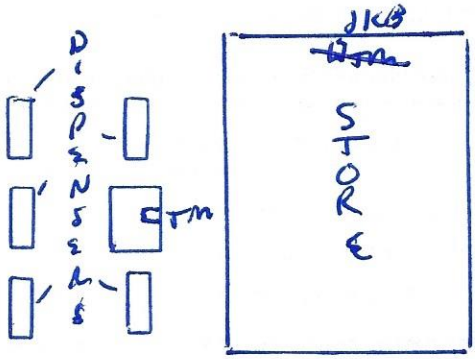
GPS ATOP USTs:
39.79154'N
-74.93870'W

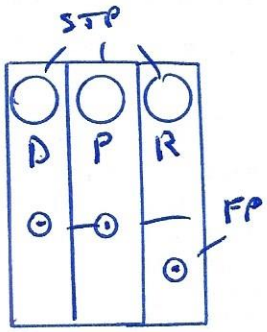
DATE: 09/16/21 TIME ON SITE: 9:55AM TIME OFF SITE: 10:30AM

WEATHER: 80° + SUNNY

ENVIRONMENTALLY SENSITIVE AREA: Y ☐ N ☑

If "Yes", please describe:





PHOTOS

227 FP DIS
228 STP
229 FP PRE
230 STP
231 FP REC
232 STP
233 FUEL PAD
234 INSIDE DISP
235
236
237
238
239 SENSOR (AT TOP OF DISPENSER BASIN)
240 TANK MONITOR
241 UST REGISTRATION
242 TANK INSURANCE POLICY
243
244 TEST RESULTS 2021
245 LINE/LEAK DET TESTS
246 LINE/LEAK DET TESTS
247
248 ANNUAL ATG TEST
249 HYDRO TESTS (DISP)
250 HYDRO TESTS (SBs, SUMPS)
251 OP TESTS
252 WALKTHROUGH INSPECTIONS
253 ELECT INT RESULTS
254 ISB OP CERT
255 CLASS C CERTS
256 ELECT INT (AUG 21)
257 INSP OBS SHEET
258
259 CLEANUP SIGN
260 SITE

☑ Pictures

Init/Date JKB 09/16/21

Facility Name	MULTANI + SONS LLC
Address	249 ERIAL RD, PINE HILL
UST Reg #	NJ 0241403

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
§ 280.35 (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
§	
§	

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

Comments/Recommendations:

- FOUND WALKTHROUGH INSPECTIONS FOR ONLY 8/12 PREVIOUS MONTHS (MISSING SEP-DEC 2020)
- NO INITIAL SPILL BUCKET, SUMP, DISPENSER OR OVERFILL PREVENTION TEST RESULTS (MISSING SEP-DEC 2020)
- FOUND PASSING TANK RELEASE DETECTION RESULTS FOR ONLY 8/12 PREVIOUS MONTHS

SENSOR IN DISPENSER 5/6 IS NOT LOCATED AT BOTTOM OF SPAN

Title of UST Owner/Operator Representative: A/B Operator

Name of UST Owner/Operator Representative:
Rajbinder Singh
(Please print)
(Signature)

Other Participants: _____

Name of EPA Inspector/representative:
JEFFREY K BLAIR
(Please print)
Jeffrey K Blair
(Signature)
19320130 NJB
(Credential Number)

Date of Inspection 09/16/21 Time 10:00 AM/PM

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

Location: MULTANI & SONS LLC Facility ID Number: NJ 024403

- ○ 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) INITIAL SPILL BUCKET, SUMP, DISPENSER + OVERFILL PREVENTION EQUIPMENT TESTING RESULTS

Additional Recommendations:

IF FOUND, PLEASE FORWARD TO INSPECTOR OR SFA

 Init/Date JKB 09/nc/21 07/31/2019

NJ 024403

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? WILL FORWARD 2020 BOOK THAT CONTAINS MISSING DATA

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** ~~HIEP TRAN~~ Digitally signed by HIEP TRAN Date: 2021.10.13 13:20:38 -04'00'

Signature _____

Date _____

Init/Date JKS 09/16/21

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.			

NT0244 03

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)]

WT 024423

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)]
☐ 8/12	☐	☐	**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.