Compliance Evaluation Inspection Report
Robert A. Roe Federal Building

200 Federal Plaza, Paterson, NJ 07505

December 10th, 2024

Written by:

X KEVIN DYER

Digitally signed by KEVIN DYER
DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=KEVIN DYER, 0.9.2342.19200300.100.1.1=68001003771302
Date: 2025.01.29 11:24:35 -05'00'
Adobe Acrobat version: 2024.005.20320

Enforcement Officer

ECAD-CAPSB-CAS USEPA R2

Approved by:

X KATHLEEN MALONE-BOGUSKY

Digitally signed by KATHLEEN MALONE-BOGUSKY
Date: 2025.01.29 11:46:07 -05'00'

Chief - Compliance Assurance Section

ECAD-CAPSB-CAS USEPA R2

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Compliance Evaluation Inspection

U.S. Environmental Protection Agency, Region 2
Enforcement and Compliance Assurance Division
290 Broadway, 21st floor
New York, New York 10007-1866

Locational Information

Facility Name: Robert A. Roe Federal Building
Facility Address: 200 Federal Plaza, Paterson, NJ, 07505
Latitude & Longitude: 40.91516806504296, -74.16990429976542

ICIS & other Program ID Codes, as appropriate

FRS: 110054850318
ICIS: 3601641475
Program: PI# 480914

Sector Information

Federal Facility: Yes
SIC: 9199 (General Government)
NAICS: 921190 (Personnel Offices, Government)

Environmental Sensitivity Information

Potential Flood-Prone Area: No (See Appendix B: FEMA Flood Map)
Sole Source Aquifer: No (See Appendix C: Sole Source Aquifer Map)
Potential EJ Concerns: Yes (See Appendix D: EJ SCREEN)

Inspection Information

Date of Inspection: December 10th, 2024
Inspector: Kevin Dyer

Facility Representative(s):

Name	Title	Phone	Email
Craig Mall	Chief Engineer at AB Facility Services contractor and Class A/B Operator		
John Elsea	Building Engineer and Class C Operator		
Doel Rivera	Building Manager		doel.rivera@gsa.gov

Corrections/Updates for EPA Databases: N/A

Table of Contents

1. INTRODUCTION

The Region 2 office of the Environmental Protection Agency (EPA) inspected this facility for a compliance evaluation inspection (CEI) under Subtitle I of the Resource Conservation and Recovery Act (RCRA-I) because of the statutory requirement to inspect underground storage tanks (USTs) every three years. EPA records indicate that the facility had not been inspected since September 2019 and thus, was due for another inspection. At this previous inspection, inspector Ron Lockwood found numerous deficiencies in the facility's operator training and walkthrough inspection records. Therefore, this inspection was conducted in part to examine the facility's progress in addressing its past regulatory shortcomings.

Inspector Kevin Dyer arrived at the facility at 11:34 AM where he was escorted through security and had his belongings x-rayed and examined. After going through security, he was met by John Elsea, the Building Engineer and Class C operator for the facility. Mr. Dyer presented his EPA credentials and explained that he was there to conduct an inspection of the facility's USTs under the statutory authority of RCRA-I. From there he was directed upstairs to where the facility's UST records were located.

The facility has one 1,000-gallon diesel UST, which was installed in March 1990. The UST is constructed of fiberglass reinforced plastic (FRP), is double walled (DW) and utilizes interstitial monitoring for release detection according to its New Jersey Department of Environmental Protection (NJDEP) registration. Its piping was also registered as DW FRP with interstitial monitoring for release detection in addition to being European "Safe" Suction, with correspondence with third-party contractor being provided as proof of the European suction system.

2. FACILITY TOUR

ATG and Emergency Generator Room

The inspection started with a review of the records where Inspector Kevin Dyer met with Doel Rivera, the Building Manager for the facility. Mr. Rivera explained that the facility was in the process of installing an audio-visual alarm for the day tank after an inspection from the NJDEP highlighted the concern. After reviewing the records, John Elsea directed inspector Kevin Dyer downstairs to the emergency generator room (Photo #1). On the wall immediately adjacent to the doorway to the room was a placard displaying the contact info for Mr. Elsea, the Class C operator for the facility as well as the local fire department (Photo #2). Inside the room, on the wall opposite the emergency generator, was the UST monitoring system for the facility, a Veeder-Root TLS-300C (Photo #3). The UST monitoring system displayed no error messages outside of a low paper message. Mr. Elsea explained that a water pipe burst around June or July 2024 that caused the loss of some release detection print-out records that were stored in the room. As a result, no release detection records exist for 2023 or prior, but 2024 records from before the incident were able to be re-printed. The diesel day tank was located along the wall between the UST monitoring system and the emergency generator (Photo #4).

It was while touring this room that Mr. Elsea stated that it is his understanding that the underground piping is not FRP, like the NJDEP registration claimed, but rather flex piping. He also claimed that there's no interstitial monitoring of the piping and that the piping is coated for cathodic protection. No records were made available to corroborate these claims, however.

Sumps and Fill Port

Mr. Elsea then led Inspector Dyer outside the facility to inspect the sumps and fill port. These were located about 30 feet to the west of the access driveway for the facility's underground parking garage along Ward Street. The area (Photo #5) consisted of a turbine sump, an access port for the UST's interstitial monitor, a fill port with a spill bucket, and a high-level alarm (HLA). There was also a second fill port located 6 or so feet closer to the street, which Mr. Elsea explained was from a previous UST system and was disused (Photo #6). The concrete around the sumps was highly deteriorated and cracked, which possibly left the sump vulnerable to flooding. The cracks were filled with a foam sealant, but the fix looked temporary. Mr. Elsea removed the sump lid and revealed the interior of the turbine sump, which was adequately free from debris and liquid (Photos #7 and #8). A liquid sensor was present within the sump but was located higher than recommended to get an early enough read on any leaks within the containment sump (Photo #9). Cross-referencing materials on non-metallic pipe identification, it appears the blue piping seen in the turbine sump (Photos #7 and #8) is APT Polytech XP FRP piping. This is a type of FRP piping, which contradicted what Mr. Elsea had said about the piping being flex pipe.

Two feet to the left of the turbine sump was an access port to the sensor within the tank interstice (Photo #5). The access port (Photo #10) had no debris or liquid inside, though cracking along the concrete basin looks to make the port susceptible to flooding. The high-level alarm, located just behind the turbine sump, was tested to be clearly visible and audible to those delivering fuel (Photo #11). The fuel port was located a couple feet to the right of the turbine sump (Photo #5). The interior of the fuel port contained a spill bucket that was free from debris but had an inch or two of liquid inside (Photo #12). From opening the fuel port cap and looking inside, it was also clear that a flapper valve was present (Photo #13).

3. RECORD REVIEW

UST Release Detection and Overfill Prevention Equipment Testing for Proper Operation

John Elsea and Doel Rivera provided Inspector Dyer with the testing records for their UST monitoring system, which included testing the UST system's release detection sensors (annular sensors) as well as the electronic overfill device (overfill alarm). *Accurate Tank Testing LLC* conducted these tests on 7/30/2021 (Photos #14-15), 8/3/2022 (Photos #16-17), 8/2/2023 (Photo #18-19), and 8/1/2024 (Photo #20-21). No concerns were noted during their testing of these devices. The flapper valve, a secondary overfill prevention device, was not tested.

Sump and Spill Bucket Integrity Testing

Hydrostatic testing of the spill bucket and containment sump were conducted by *Accurate Tank Testing LLC* on 7/22/2022 (Photos #22-23). Both containments passed the integrity testing.

UST Registration Certificate

The facility had a NJDEP UST registration certificate dated April 1st, 2024 (Photo #24).

Corrosion Protection Inspection Records

No corrosion protection inspection records were provided due to the tank being FRP. However, the facility provided no documentation confirming the tank being FRP.

Operator Training Records

Thomas Beere, chief operating engineer at the AFBS contracting agency, is listed as the A/B operator on NJ DEP registration paperwork but was replaced in that role by Craig Mall. NJ DEP documentation was transmitted on 1/15/2025 and confirms this change in A/B operator. On 1/15/2025 the facility also provided the Class A/B training certificate for Craig Mall that is signed and dated October 2019 (Photo #2A). The Class C operator training certificate for John Elsea was sent to the EPA on 1/15/2025 and included the trainer, date, and signatures of Mr. Elsea and Mr. Mall (Photo #2B). It is unknown if any other operators are active at this facility.

Monthly and Annual Walkthrough Inspection Records

In lieu of a traditional checklist, Mr. Elsea was recording his monthly walkthrough inspections in a handwritten logbook. These records were kept daily from November 2021 until December 2024. However, this logbook only included the date, the words “emergency equipment, generator and leak check” the tank content volume, and an “all okay” (Photo #25). Inspector Dyer informed Mr. Elsea that he was concerned about the lack of information provided in the logbook, particularly the lack of a list of each area checked and whether all spill and release detection equipment was being visually inspected. Inspector Dyer also told Mr. Elsea that he was concerned about the lack of an annual walkthrough inspection of the containment sump. Mr. Dyer informed Mr. Elsea that he would provide him with a copy of EPA’s own monthly inspection walkthrough checklist for his facility’s reference.

Additionally, inspector Dyer took concern with the logbook’s tank content volume. The tank content volume would go up or down on a given day without any provided context or reason given. This was especially concerning because Mr. Elsea had informed Mr. Dyer during the inspection that fuel deliveries were incredibly infrequent, and that the last delivery was ten years ago. Some examples of this in the last year included: 5/3/24 (788 gal to 778 gal), 6/6/24 (778 gal to 788 gal), 8/27/24 (788 gal to 758 gal), and 11/22/24 (758 gal to 741 gal).

Notably, EPA UST inspector Ronald Lockwood also documented concerns regarding this facility’s walkthrough inspection record keeping in his 2019 inspection report. Mr. Lockwood documented that “both Mr. Donnelly and Mr. Esea were aware of the monthly walkthrough requirement but didn’t know records were to be kept.”

Release Detection Records

Mr. Elsea provided UST Monitoring System printouts of their “System Status Reports” as their release detection records. These records included January, March, April, May, June, July, August, September, October, and November 2024. February 2024 was missing and, as noted before, Mr. Elsea claimed that a flood from a burst pipe destroyed paper records from prior to 2024. As such, not all 12 months of

records could be examined. The months that could be examined showed “all functions normal” (Photos #26-27). However, individual sensor statuses (i.e. annular sensors) could not be ascertained from these documents.

4. REGULATORY CONCERNS/PRELIMINARY FINDINGS

Based on observations made during the inspection and/or a review of records related to the inspection, the following regulatory concerns were identified under RCRA-I.

REGUALTORY, STATUTORY OR PERMIT REFERENCE	OBSERVATION
According to §280.36 (b), owners and operators must maintain records of the 30-day operation and maintenance walkthrough inspections for spill prevention and release detection equipment for one year. Records must include a list of each area checked, whether each area checked was acceptable or needed action taken, a description of actions taken to correct an issue, and delivery records if spill prevention equipment is checked less frequently than every 30 days due to infrequent deliveries.	In lieu of a traditional checklist, Mr. Elsea was recording his monthly walkthrough inspections in a handwritten logbook; however, this logbook only included the date, the words “emergency equipment, generator and leak check” the tank content volume, and an “all okay” (Photo #25).
According to §280.36 (a)(1)(ii), beginning October 13, 2018, owners or operators must conduct walkthrough inspections annually to check containment sumps and hand-held release detection equipment.	No annual walkthrough inspection records of the containment sump were provided at the time of the inspection.
As per 40 CFR 280.245(a), owners and operators of underground storage tank systems must maintain a list of designated operators, which, at a minimum, must (1) identify all current Class A, B, and C operators for the facility; and (2) include the names, Class of operator trained, date assumed duties, date each completed initial training, and any retraining.	No list of all designated facility operators was available at the time of the inspection.
According to 40 CFR 280.41(a)(1), petroleum tanks installed on or before April 11, 2016 must be monitored for releases at least every 30 days using release detection methods listed in 280.43(d) through (i) (e.g. automatic tank gauging, vapor or groundwater monitoring, interstitial monitoring, and statistical inventory reconciliation) except if complying with 40 CFR 280.41(a)(1)(i) or 280.41(a)(1)(ii).	No monthly tank release detection reports were provided for the last 12 months. Mr. Elsea provided “System Status Reports” printed from the tank monitoring system but did not provide “Sensor Status Reports” which contain more relevant sensor information.

5. SCREENING CONCERNS

A screening for other environmental, safety, and health aspects outside the scope of this inspection was conducted via the U.S. EPA Region 2 Inspector's Multi-Media Checklist. No concerns were noted.

6. ENVIRONMENTAL ASSISTANCE

To increase the Federal community's understanding and compliance with applicable environmental requirements, EPA, along with other Federal agencies, sponsor Fed Center, the Federal government's home for comprehensive environmental stewardship and compliance assistance information for Federal facility managers and their agencies. Fed Center can be accessed via the worldwide web at https://www.fedcenter.gov/.

Additional information concerning UST compliance can be found at the following sites:

- Must for UST Booklet
  https://www.epa.gov/ust/musts-usts

- EPA Resources for UST Owners and Operators
  https://www.epa.gov/ust/resources-ust-owners-and-operators

- Operating and Maintaining Underground Storage Tank Systems: Practical Help and Checklists
  https://www.epa.gov/ust/operating-and-maintaining-underground-storage-tank-systems-practical-help-and-checklists

Finally, to better prevent environmental issues down the line, the facility may want to consider, as a best management practice, repair of the concrete basin the sump lids are coupled to, which were cracked at the time of the inspection, to better prevent flooding within the sumps (Photo #5).

7. REQUESTED INFORMATION

Below are the documents and other relevant information that the EPA is requesting to complete this compliance evaluation. Once received, the information will be reviewed.

- Site planning documents/documentation identifying the tank and piping construction material as well as the presence or absence of double walls in the tank/piping.
- Documentation of whether piping is interstitially monitored.
- Visual confirmation that the liquid sensor in the containment sump was lowered to better detect any releases within the containment sump.

APPENDICIES:

A: Photographs

B: FEMA Flood Map

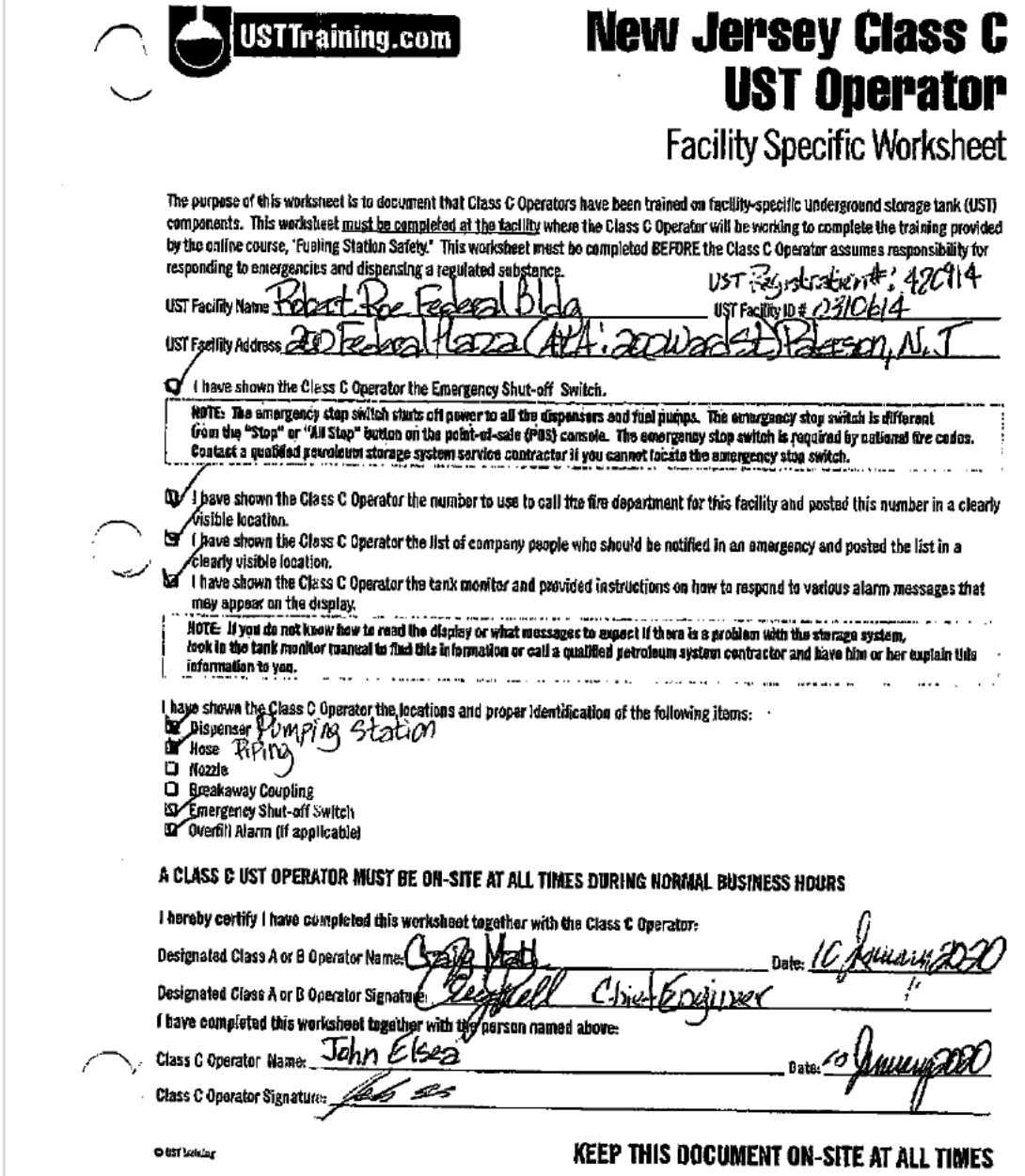
C: Sole Source Aquifer Map

D: EJ SCREEN

E: Example UST Walkthrough Inspection Checklist

A: Photographs

Photo 1 – Emergency Generator Room



USTTraining.com

New Jersey Class C UST Operator

Facility Specific Worksheet

The purpose of this worksheet is to document that Class C Operators have been trained on facility-specific underground storage tank (UST) components. This worksheet must be completed at the facility where the Class C Operator will be working to complete the training provided by the online course, 'Fueling Station Safety.' This worksheet must be completed BEFORE the Class C Operator assumes responsibility for responding to emergencies and dispensing a regulated substance.

UST Facility Name: Robert Roe Federal Bldg — UST Registration #: 420914 — UST Facility ID #: 0310614

UST Facility Address: 20 Federal Plaza (AKA: 20 Wadsworth St) Paterson, N.J

☑ I have shown the Class C Operator the Emergency Shut-off Switch.

NOTE: The emergency stop switch shuts off power to all the dispensers and fuel pumps. The emergency stop switch is different from the "Stop" or "All Stop" button on the point-of-sale (POS) console. The emergency stop switch is required by national fire codes. Contact a qualified petroleum storage system service contractor if you cannot locate the emergency stop switch.

☑ I have shown the Class C Operator the number to use to call the fire department for this facility and posted this number in a clearly visible location.

☑ I have shown the Class C Operator the list of company people who should be notified in an emergency and posted the list in a clearly visible location.

☑ I have shown the Class C Operator the tank monitor and provided instructions on how to respond to various alarm messages that may appear on the display.

NOTE: If you do not know how to read the display or what messages to expect if there is a problem with the storage system, look in the tank monitor manual to find this information or call a qualified petroleum system contractor and have him or her explain this information to you.

I have shown the Class C Operator the locations and proper identification of the following items:

☑ Dispenser Pumping Station
☑ Hose Piping
☐ Nozzle
☐ Breakaway Coupling
☑ Emergency Shut-off Switch
☑ Overfill Alarm (if applicable)

A CLASS C UST OPERATOR MUST BE ON-SITE AT ALL TIMES DURING NORMAL BUSINESS HOURS

I hereby certify I have completed this worksheet together with the Class C Operator:

Designated Class A or B Operator Name: Craig Mott — Date: 10 January 2020

Designated Class A or B Operator Signature: Chief Engineer

I have completed this worksheet together with the person named above:

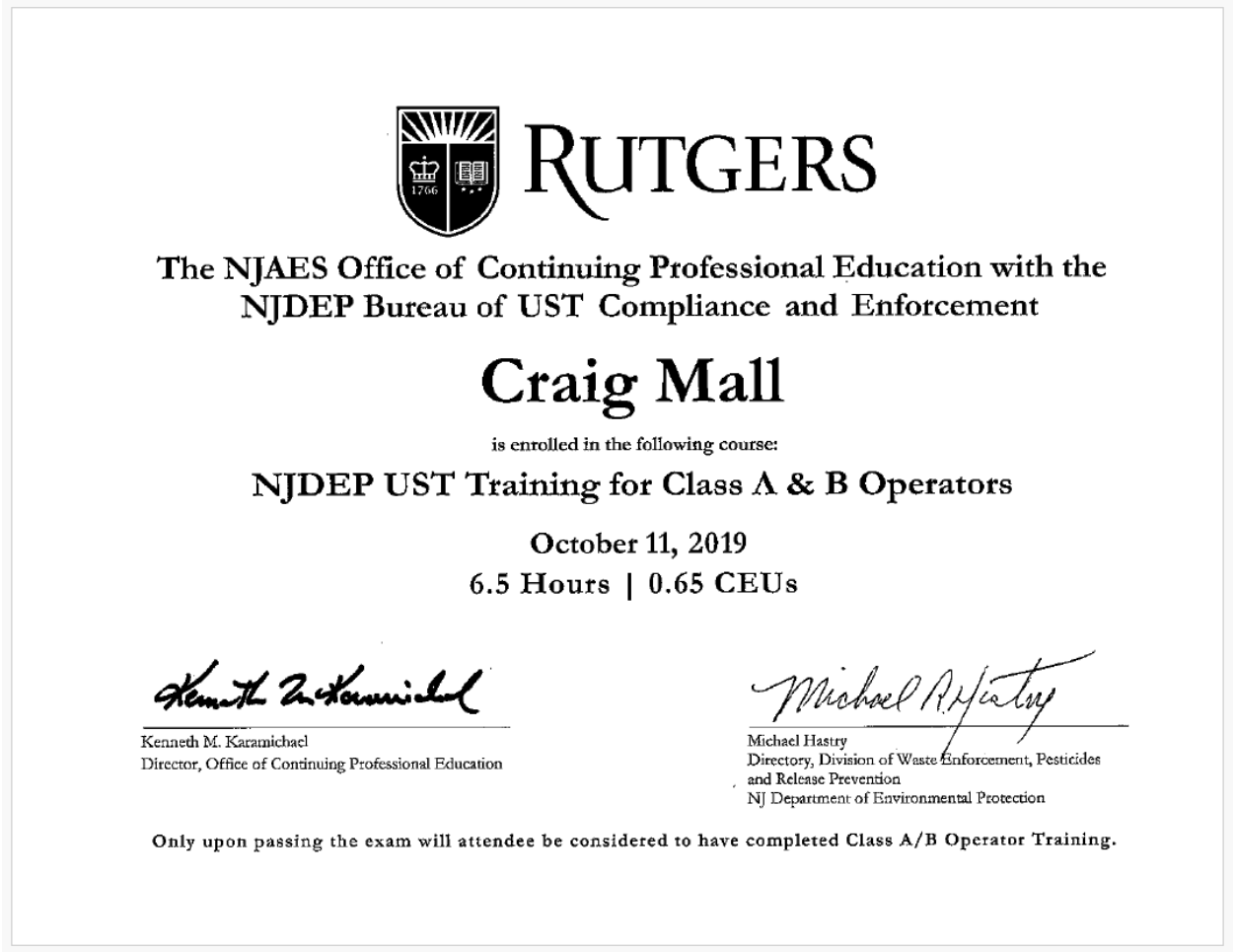
Class C Operator Name: John Elsea — Date: 10 January 2020

Class C Operator Signature:

© UST Training

KEEP THIS DOCUMENT ON-SITE AT ALL TIMES

Photo 2A – Class C Operator Training Certificate for John Elsea.



RUTGERS

The NJAES Office of Continuing Professional Education with the
NJDEP Bureau of UST Compliance and Enforcement

Craig Mall

is enrolled in the following course:

NJDEP UST Training for Class A & B Operators

October 11, 2019
6.5 Hours | 0.65 CEUs

Kenneth M. Karamichael
Director, Office of Continuing Professional Education

Michael Hastry
Directory, Division of Waste Enforcement, Pesticides
and Release Prevention
NJ Department of Environmental Protection

Only upon passing the exam will attendee be considered to have completed Class A/B Operator Training.

Photo #2B – Class A/B Operator Training certificate for Craig Mall

Photo 3 – Veeder Root TLS 300-C Automatic Tank Guage (ATG)

Photo 4 – Day tank (marked with ”DIESEL FUEL” sign)

Photo 5 – Exterior photograph of the sumps and access ports along Ward Street.

Photo 6 – Exterior photograph of the disused fill port for a previous UST.

Photo 7 – Interior photograph of the turbine sump.

Photo 8 – Another angle of the interior of the turbine sump.

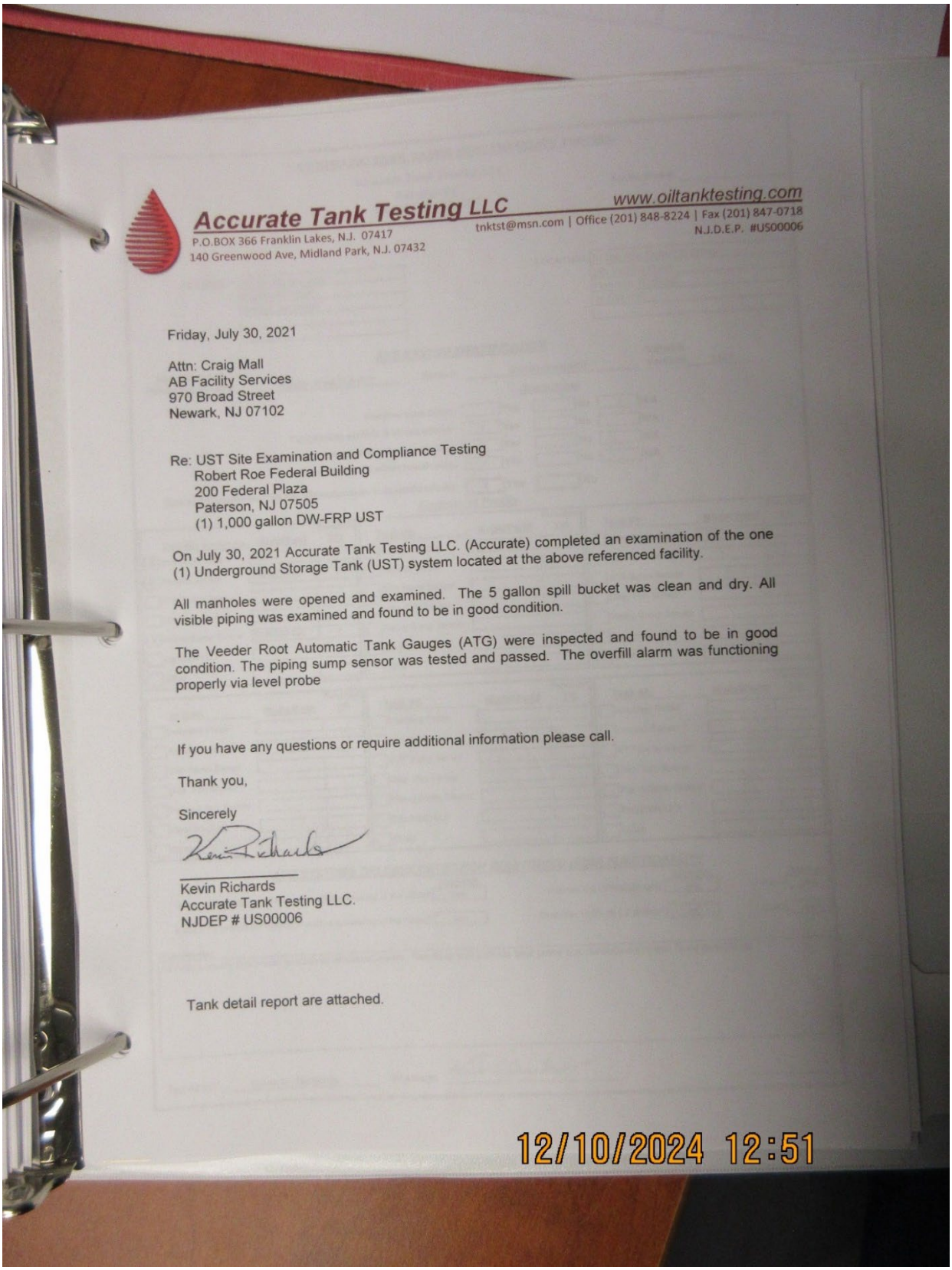
Photo 9 – Liquid sensor located 3+ inches from the bottom of the turbine sump.

Photo 10 – Annular space access port from above.

Photo 11 – High Level Alarm (HLA) seen from the front.

Photo 12 – Fuel port and spill bucket seen from above.

Photo 13 – Fuel port interior with flapper valve as seen from above.



Accurate Tank Testing LLC
P.O.BOX 366 Franklin Lakes, N.J. 07417
140 Greenwood Ave, Midland Park, N.J. 07432
www.oiltanktesting.com
tnktst@msn.com | Office (201) 848-8224 | Fax (201) 847-0718
N.J.D.E.P. #US00006

Friday, July 30, 2021

Attn: Craig Mall
AB Facility Services
970 Broad Street
Newark, NJ 07102

Re: UST Site Examination and Compliance Testing
Robert Roe Federal Building
200 Federal Plaza
Paterson, NJ 07505
(1) 1,000 gallon DW-FRP UST

On July 30, 2021 Accurate Tank Testing LLC. (Accurate) completed an examination of the one (1) Underground Storage Tank (UST) system located at the above referenced facility.

All manholes were opened and examined. The 5 gallon spill bucket was clean and dry. All visible piping was examined and found to be in good condition.

The Veeder Root Automatic Tank Gauges (ATG) were inspected and found to be in good condition. The piping sump sensor was tested and passed. The overfill alarm was functioning properly via level probe

.

If you have any questions or require additional information please call.

Thank you,

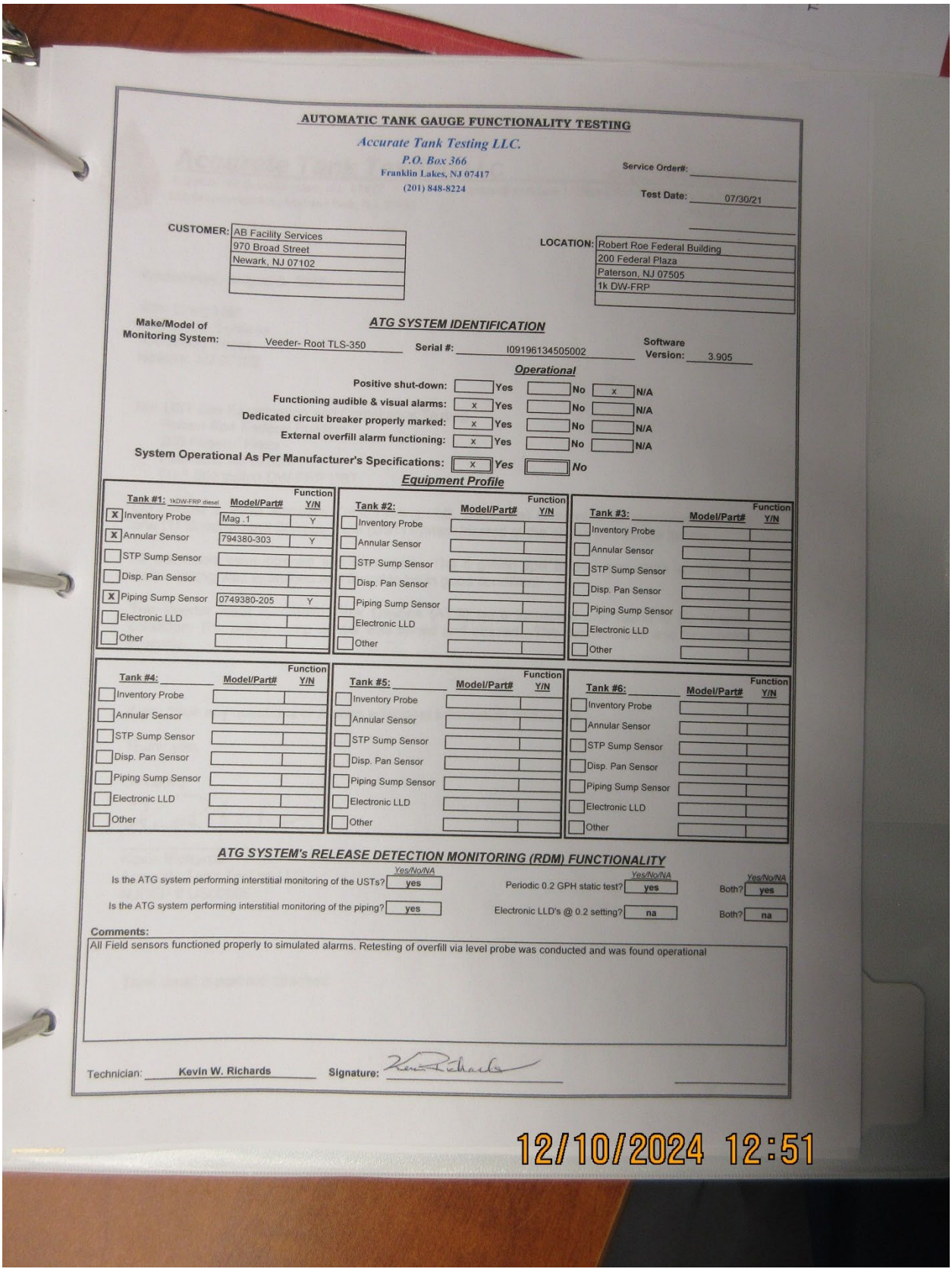
Sincerely

Kevin Richards
Accurate Tank Testing LLC.
NJDEP # US00006

Tank detail report are attached.

12/10/2024 12:51

Photo 14 – ATG, annular sensor, and electronic overfill test record for 2021 (Page 1).



AUTOMATIC TANK GAUGE FUNCTIONALITY TESTING

Accurate Tank Testing LLC.
P.O. Box 366
Franklin Lakes, NJ 07417
(201) 848-8224

Service Order#:
Test Date: 07/30/21

CUSTOMER: AB Facility Services, 970 Broad Street, Newark, NJ 07102

LOCATION: Robert Roe Federal Building, 200 Federal Plaza, Paterson, NJ 07505, 1k DW-FRP

ATG SYSTEM IDENTIFICATION

Make/Model of Monitoring System: Veeder- Root TLS-350 Serial #: I09196134505002 Software Version: 3.905

Operational

	Yes	No	N/A
Positive shut-down:			x
Functioning audible & visual alarms:	x		
Dedicated circuit breaker properly marked:	x		
External overfill alarm functioning:	x		
System Operational As Per Manufacturer's Specifications:	x		

Equipment Profile

Tank #1: 1kDW-FRP diesel	Model/Part#	Function Y/N
X Inventory Probe	Mag .1	Y
X Annular Sensor	794380-303	Y
STP Sump Sensor		
Disp. Pan Sensor		
X Piping Sump Sensor	0749380-205	Y
Electronic LLD		
Other		

Tank #2:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #3:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #4:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #5:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #6:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

ATG SYSTEM's RELEASE DETECTION MONITORING (RDM) FUNCTIONALITY

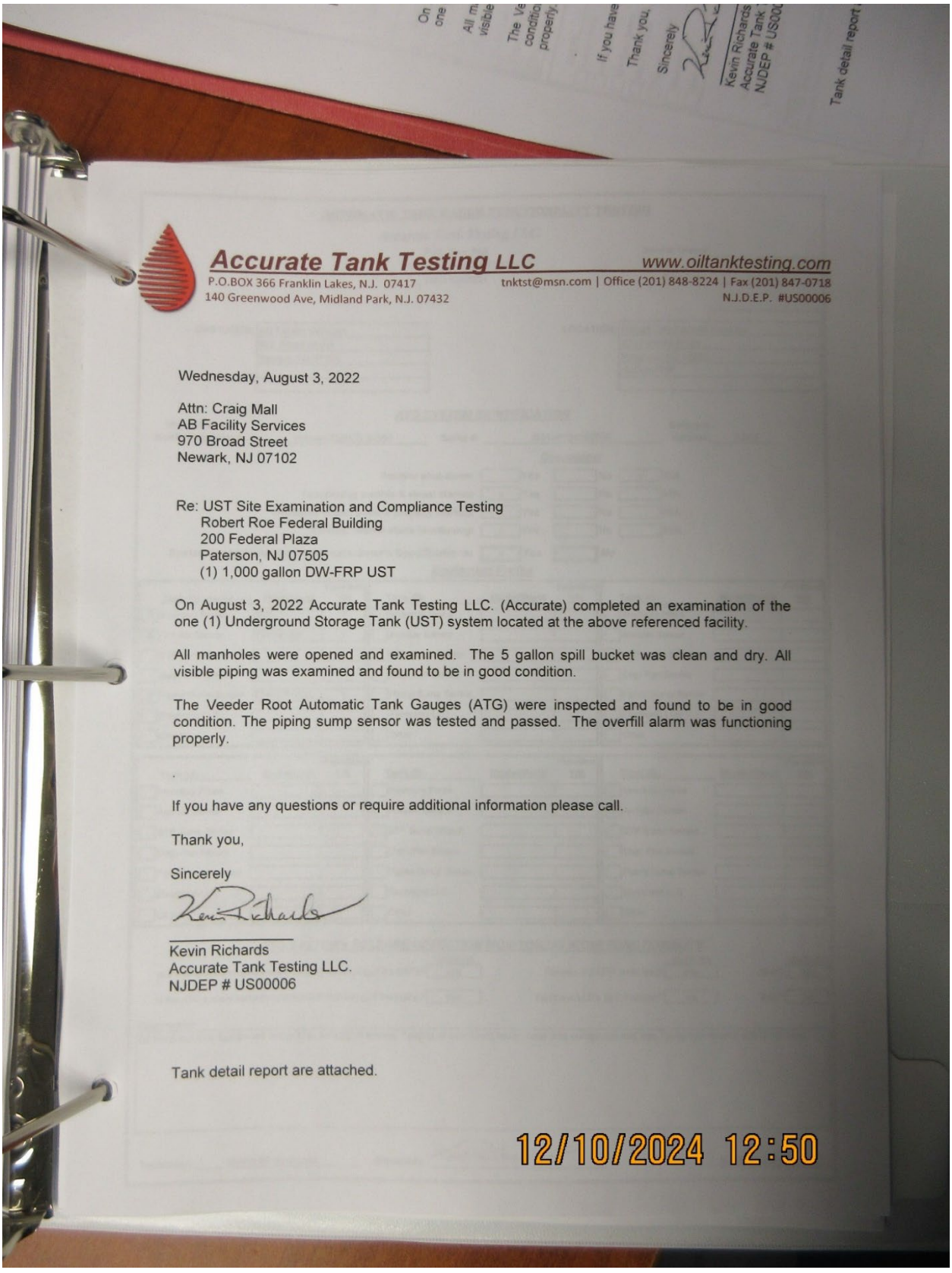
	Yes/No/NA		Yes/No/NA		Yes/No/NA
Is the ATG system performing interstitial monitoring of the USTs?	yes	Periodic 0.2 GPH static test?	yes	Both?	yes
Is the ATG system performing interstitial monitoring of the piping?	yes	Electronic LLD's @ 0.2 setting?	na	Both?	na

Comments:
All Field sensors functioned properly to simulated alarms. Retesting of overfill via level probe was conducted and was found operational

Technician: Kevin W. Richards Signature:

12/10/2024 12:51

Photo 15 – ATG, annular sensor, and electronic overfill test record for 2021 (Page 2).



Accurate Tank Testing LLC www.oiltanktesting.com

P.O.BOX 366 Franklin Lakes, N.J. 07417
140 Greenwood Ave, Midland Park, N.J. 07432

tnktst@msn.com | Office (201) 848-8224 | Fax (201) 847-0718
N.J.D.E.P. #US00006

Wednesday, August 3, 2022

Attn: Craig Mall
AB Facility Services
970 Broad Street
Newark, NJ 07102

Re: UST Site Examination and Compliance Testing
Robert Roe Federal Building
200 Federal Plaza
Paterson, NJ 07505
(1) 1,000 gallon DW-FRP UST

On August 3, 2022 Accurate Tank Testing LLC. (Accurate) completed an examination of the one (1) Underground Storage Tank (UST) system located at the above referenced facility.

All manholes were opened and examined. The 5 gallon spill bucket was clean and dry. All visible piping was examined and found to be in good condition.

The Veeder Root Automatic Tank Gauges (ATG) were inspected and found to be in good condition. The piping sump sensor was tested and passed. The overfill alarm was functioning properly.

If you have any questions or require additional information please call.

Thank you,

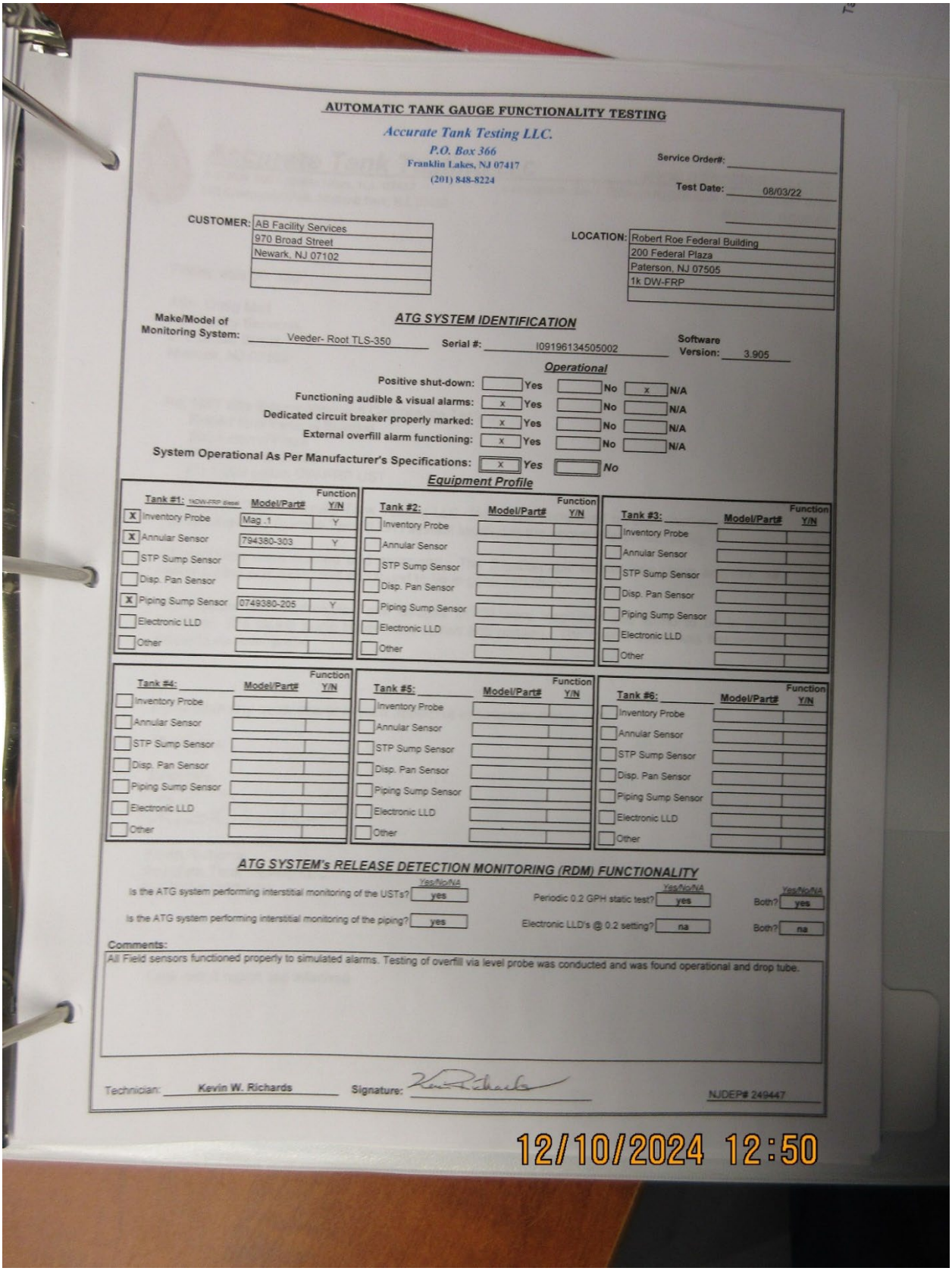
Sincerely

Kevin Richards
Accurate Tank Testing LLC.
NJDEP # US00006

Tank detail report are attached.

12/10/2024 12:50

Photo 16 – ATG, annular sensor, and electronic overfill test record for 2022 (Page 1).



AUTOMATIC TANK GAUGE FUNCTIONALITY TESTING

Accurate Tank Testing LLC.
P.O. Box 366
Franklin Lakes, NJ 07417
(201) 848-8224

Service Order#:
Test Date: 08/03/22

CUSTOMER: AB Facility Services, 970 Broad Street, Newark, NJ 07102

LOCATION: Robert Roe Federal Building, 200 Federal Plaza, Paterson, NJ 07505, 1k DW-FRP

ATG SYSTEM IDENTIFICATION

Make/Model of Monitoring System: Veeder- Root TLS-350 Serial #: I09196134505002 Software Version: 3.905

Operational

	Yes	No	N/A
Positive shut-down:			x
Functioning audible & visual alarms:	x		
Dedicated circuit breaker properly marked:	x		
External overfill alarm functioning:	x		
System Operational As Per Manufacturer's Specifications:	x		

Equipment Profile

Tank #1: 1KDW-FRP Diesel	Model/Part#	Function Y/N
X Inventory Probe	Mag 1	Y
X Annular Sensor	794380-303	Y
STP Sump Sensor		
Disp. Pan Sensor		
X Piping Sump Sensor	0749380-205	Y
Electronic LLD		
Other		

Tank #2:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #3:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #4:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #5:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #6:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

ATG SYSTEM's RELEASE DETECTION MONITORING (RDM) FUNCTIONALITY

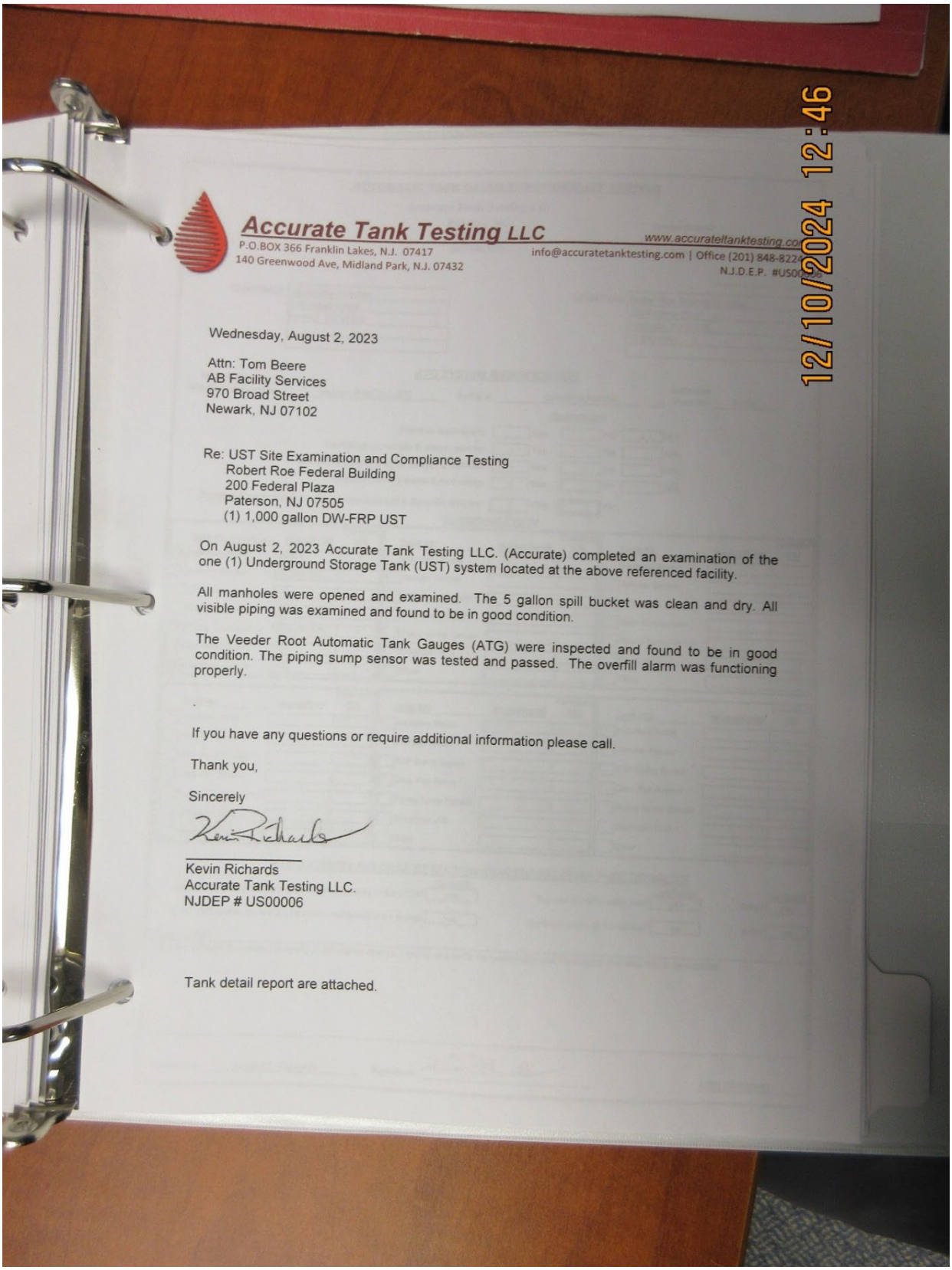
	Yes/No/NA		Yes/No/NA		Yes/No/NA
Is the ATG system performing interstitial monitoring of the USTs?	yes	Periodic 0.2 GPH static test?	yes	Both?	yes
Is the ATG system performing interstitial monitoring of the piping?	yes	Electronic LLD's @ 0.2 setting?	na	Both?	na

Comments:
All Field sensors functioned properly to simulated alarms. Testing of overfill via level probe was conducted and was found operational and drop tube.

Technician: Kevin W. Richards Signature: Kevin Richards NJDEP# 249447

12/10/2024 12:50

Photo 17 – ATG, annular sensor, and electronic overfill test record for 2022 (Page 2).



Accurate Tank Testing LLC

P.O.BOX 366 Franklin Lakes, N.J. 07417
140 Greenwood Ave, Midland Park, N.J. 07432

www.accuratetanktesting.com
info@accuratetanktesting.com | Office (201) 848-822
N.J.D.E.P. #US00

12/10/2024 12:46

Wednesday, August 2, 2023

Attn: Tom Beere
AB Facility Services
970 Broad Street
Newark, NJ 07102

Re: UST Site Examination and Compliance Testing
Robert Roe Federal Building
200 Federal Plaza
Paterson, NJ 07505
(1) 1,000 gallon DW-FRP UST

On August 2, 2023 Accurate Tank Testing LLC. (Accurate) completed an examination of the one (1) Underground Storage Tank (UST) system located at the above referenced facility.

All manholes were opened and examined. The 5 gallon spill bucket was clean and dry. All visible piping was examined and found to be in good condition.

The Veeder Root Automatic Tank Gauges (ATG) were inspected and found to be in good condition. The piping sump sensor was tested and passed. The overfill alarm was functioning properly.

If you have any questions or require additional information please call.

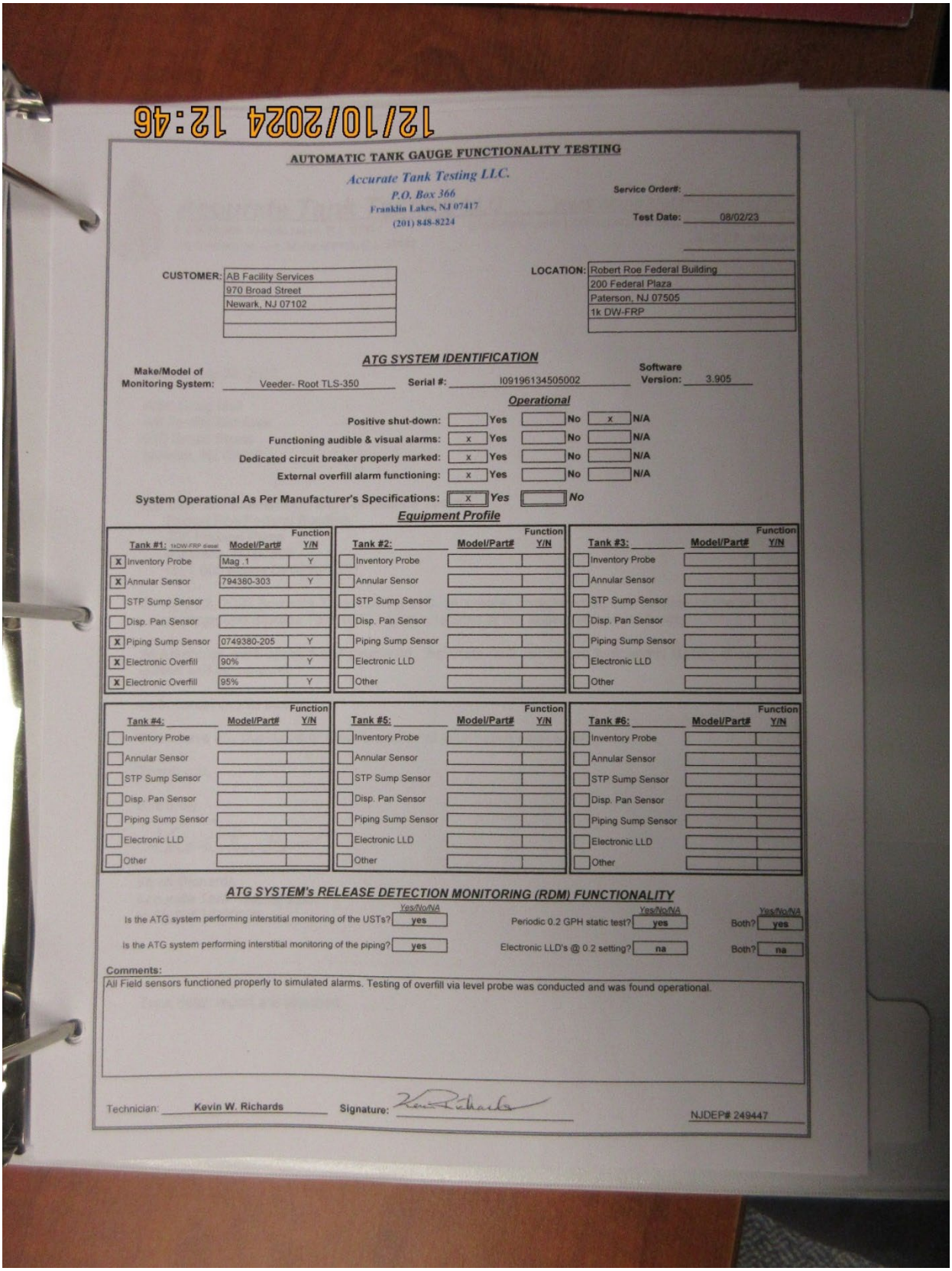
Thank you,

Sincerely

Kevin Richards
Accurate Tank Testing LLC.
NJDEP # US00006

Tank detail report are attached.

Photo 18 – ATG, annular sensor, and electronic overfill test record for 2023 (Page 1).



12/10/2024 12:46

AUTOMATIC TANK GAUGE FUNCTIONALITY TESTING

Accurate Tank Testing LLC.
P.O. Box 366
Franklin Lakes, NJ 07417
(201) 848-8224

Service Order#:
Test Date: 08/02/23

CUSTOMER: AB Facility Services, 970 Broad Street, Newark, NJ 07102

LOCATION: Robert Roe Federal Building, 200 Federal Plaza, Paterson, NJ 07505, 1k DW-FRP

ATG SYSTEM IDENTIFICATION

Make/Model of Monitoring System: Veeder- Root TLS-350 Serial #: I09196134505002 Software Version: 3.905

Operational

Positive shut-down:		Yes	No	x	N/A
Functioning audible & visual alarms:	x	Yes	No		N/A
Dedicated circuit breaker properly marked:	x	Yes	No		N/A
External overfill alarm functioning:	x	Yes	No		N/A
System Operational As Per Manufacturer's Specifications:	x	Yes	No		

Equipment Profile

Tank #1: 1kDW-FRP diesel	Model/Part#	Function Y/N
X Inventory Probe	Mag .1	Y
X Annular Sensor	794380-303	Y
STP Sump Sensor		
Disp. Pan Sensor		
X Piping Sump Sensor	0749380-205	Y
X Electronic Overfill	90%	Y
X Electronic Overfill	95%	Y

Tank #2:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #3:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #4:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #5:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #6:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

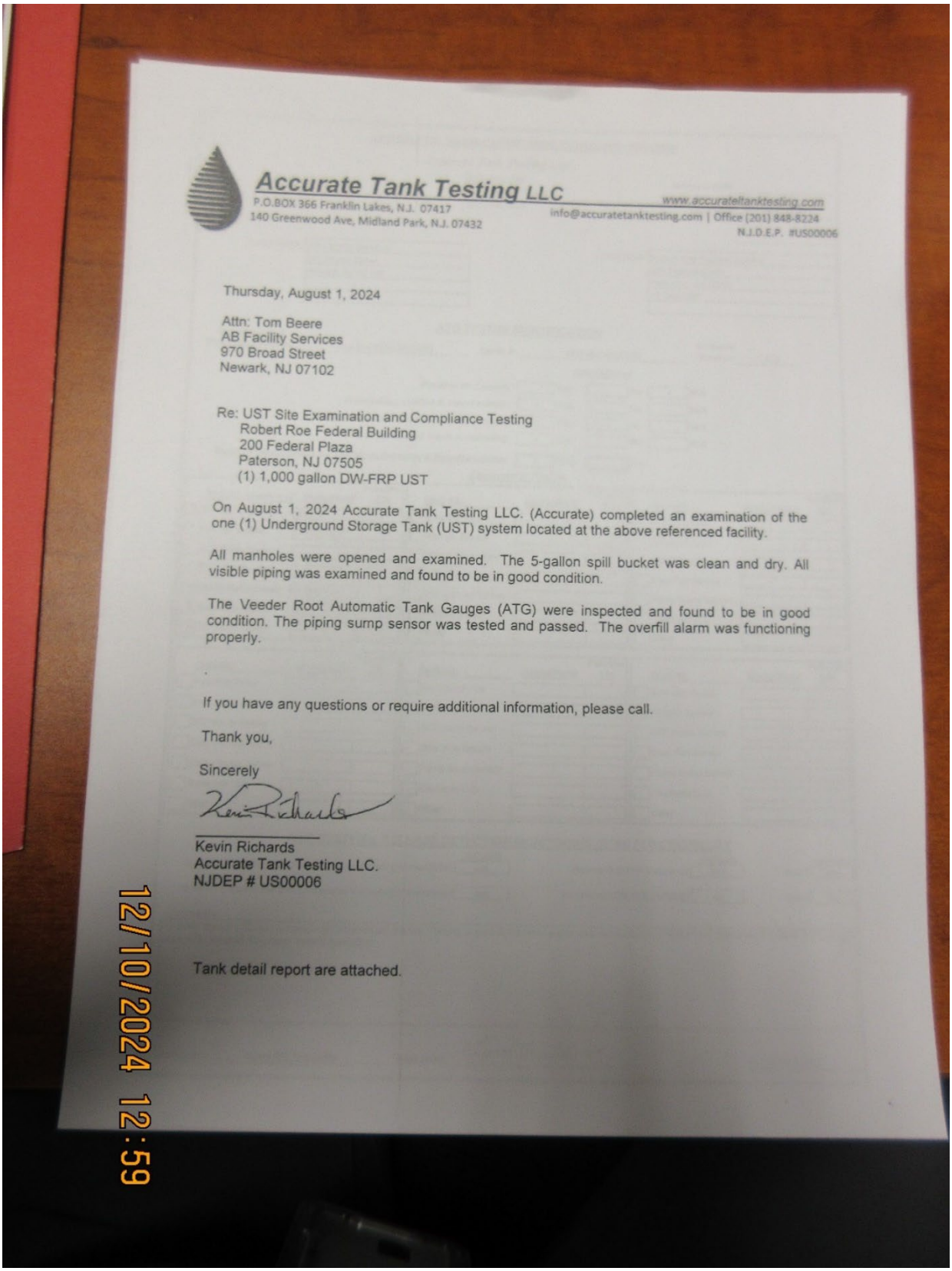
ATG SYSTEM's RELEASE DETECTION MONITORING (RDM) FUNCTIONALITY

	Yes/No/NA		Yes/No/NA		Yes/No/NA
Is the ATG system performing interstitial monitoring of the USTs?	yes	Periodic 0.2 GPH static test?	yes	Both?	yes
Is the ATG system performing interstitial monitoring of the piping?	yes	Electronic LLD's @ 0.2 setting?	na	Both?	na

Comments:
All Field sensors functioned properly to simulated alarms. Testing of overfill via level probe was conducted and was found operational.

Technician: Kevin W. Richards Signature: Kevin Richards NJDEP# 249447

Photo 19 – ATG, annular sensor, and electronic overfill test record for 2023 (Page 2).



Accurate Tank Testing LLC

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www.accuratetanktesting.com
info@accuratetanktesting.com | Office (201) 848-8224
N.J.D.E.P. #US00006

Thursday, August 1, 2024

Attn: Tom Beere
AB Facility Services
970 Broad Street
Newark, NJ 07102

Re: UST Site Examination and Compliance Testing
Robert Roe Federal Building
200 Federal Plaza
Paterson, NJ 07505
(1) 1,000 gallon DW-FRP UST

On August 1, 2024 Accurate Tank Testing LLC. (Accurate) completed an examination of the one (1) Underground Storage Tank (UST) system located at the above referenced facility.

All manholes were opened and examined. The 5-gallon spill bucket was clean and dry. All visible piping was examined and found to be in good condition.

The Veeder Root Automatic Tank Gauges (ATG) were inspected and found to be in good condition. The piping sump sensor was tested and passed. The overfill alarm was functioning properly.

If you have any questions or require additional information, please call.

Thank you,

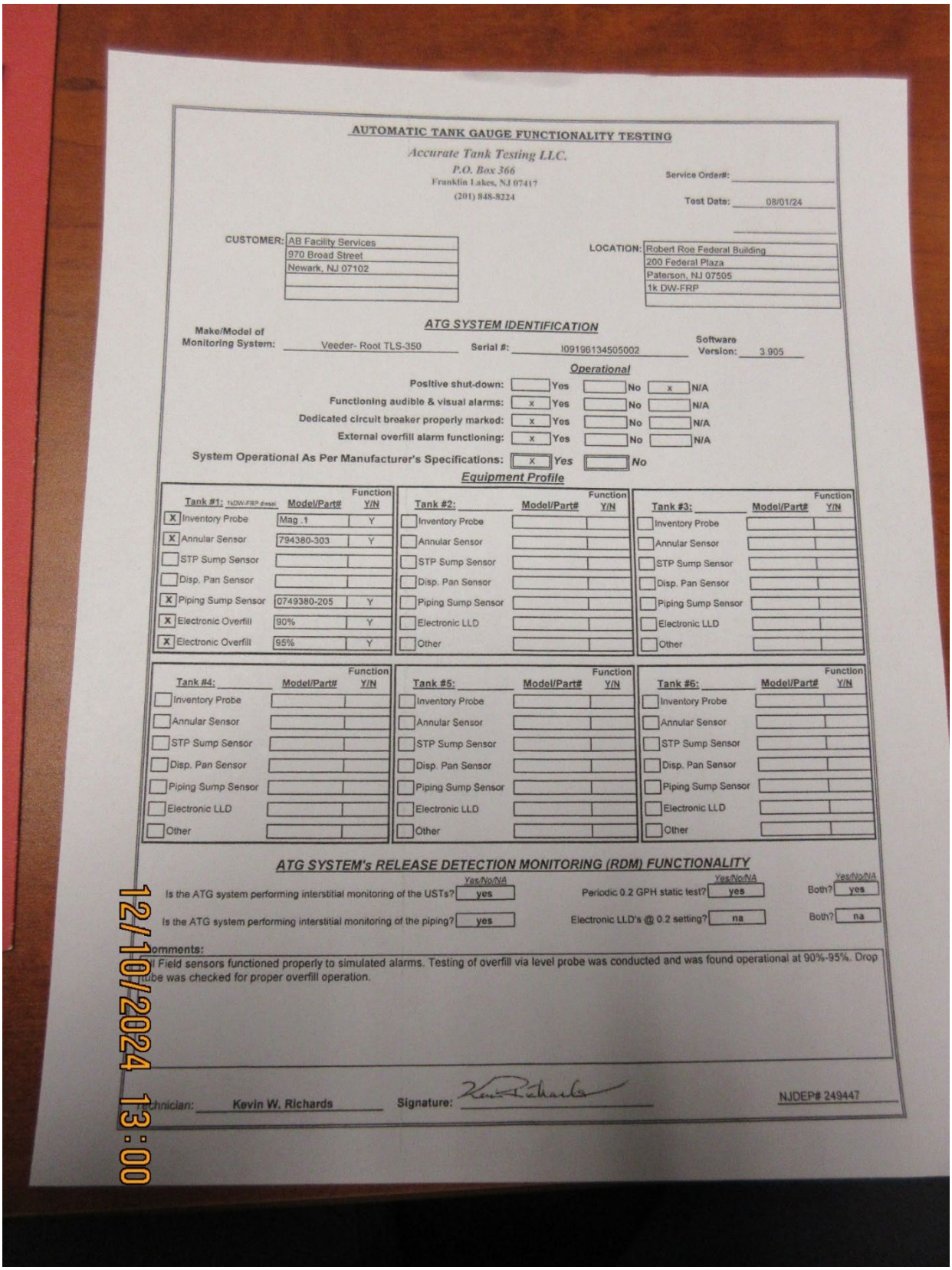
Sincerely

Kevin Richards
Accurate Tank Testing LLC.
NJDEP # US00006

Tank detail report are attached.

12/10/2024 12:59

Photo 20 – ATG, annular sensor, and electronic overfill test record for 2024 (Page 1).



AUTOMATIC TANK GAUGE FUNCTIONALITY TESTING

Accurate Tank Testing LLC.
P.O. Box 366
Franklin Lakes, NJ 07417
(201) 848-8224

Service Order#:
Test Date: 08/01/24

CUSTOMER: AB Facility Services, 970 Broad Street, Newark, NJ 07102

LOCATION: Robert Roe Federal Building, 200 Federal Plaza, Paterson, NJ 07505, 1k DW-FRP

ATG SYSTEM IDENTIFICATION

Make/Model of Monitoring System: Veeder- Root TLS-350 Serial #: I09196134505002 Software Version: 3.905

Operational

Positive shut-down:	Yes	No	x N/A
Functioning audible & visual alarms:	x Yes	No	N/A
Dedicated circuit breaker properly marked:	x Yes	No	N/A
External overfill alarm functioning:	x Yes	No	N/A
System Operational As Per Manufacturer's Specifications:	x Yes	No	

Equipment Profile

Tank #1: 1k DW-FRP diesel	Model/Part#	Function Y/N
X Inventory Probe	Mag .1	Y
X Annular Sensor	794380-303	Y
STP Sump Sensor		
Disp. Pan Sensor		
X Piping Sump Sensor	0749380-205	Y
X Electronic Overfill	90%	Y
X Electronic Overfill	95%	Y

Tank #2:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #3:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #4:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #5:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

Tank #6:	Model/Part#	Function Y/N
Inventory Probe		
Annular Sensor		
STP Sump Sensor		
Disp. Pan Sensor		
Piping Sump Sensor		
Electronic LLD		
Other		

ATG SYSTEM's RELEASE DETECTION MONITORING (RDM) FUNCTIONALITY

	Yes/No/NA		Yes/No/NA		Yes/No/NA
Is the ATG system performing interstitial monitoring of the USTs?	yes	Periodic 0.2 GPH static test?	yes	Both?	yes
Is the ATG system performing interstitial monitoring of the piping?	yes	Electronic LLD's @ 0.2 setting?	na	Both?	na

Comments:
Field sensors functioned properly to simulated alarms. Testing of overfill via level probe was conducted and was found operational at 90%-95%. Drop tube was checked for proper overfill operation.

Technician: Kevin W. Richards Signature: NJDEP# 249447

12/10/2024 13:00

Photo 21 – ATG, annular sensor, and electronic overfill test record for 2024 (Page 2).

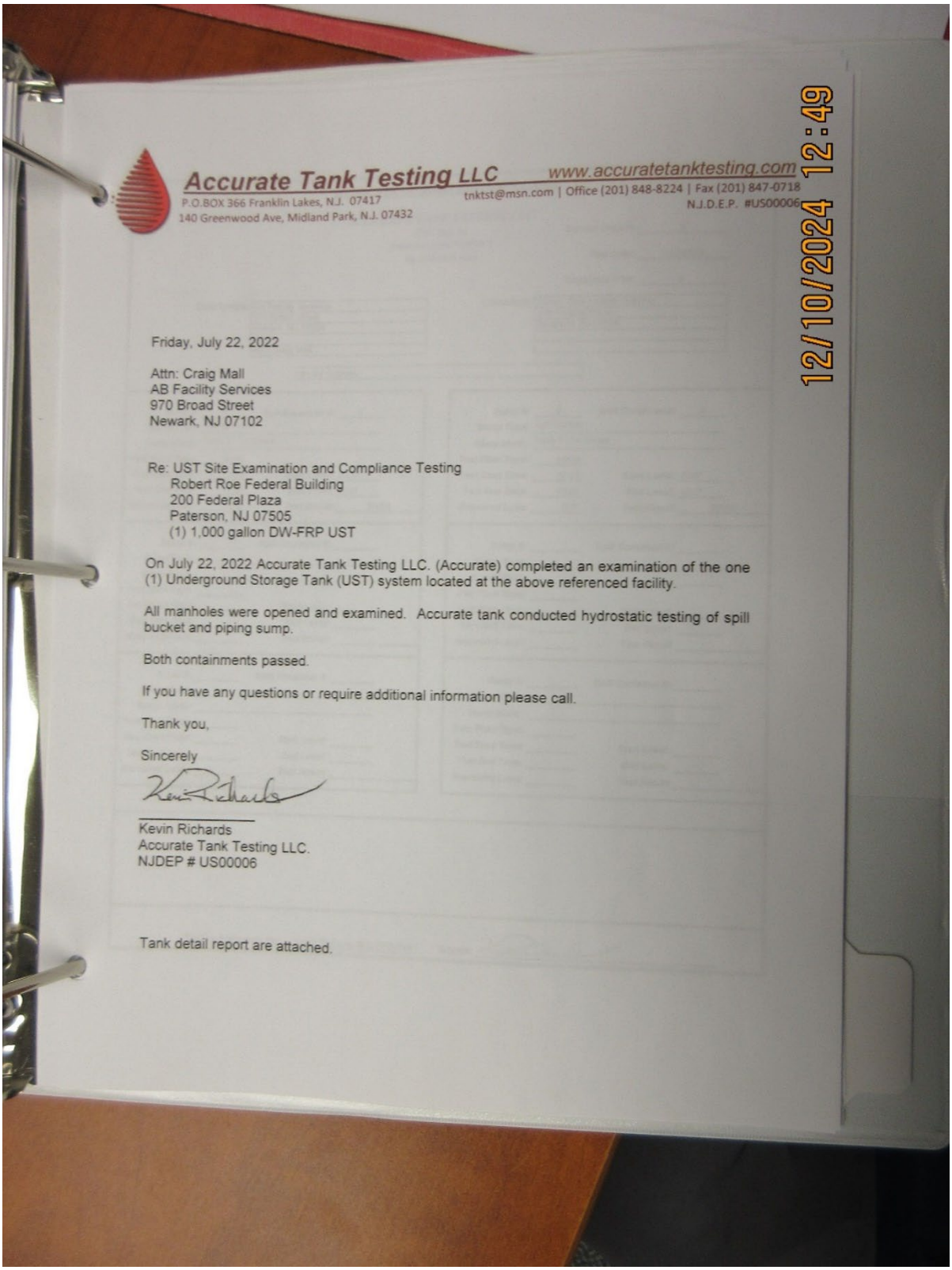
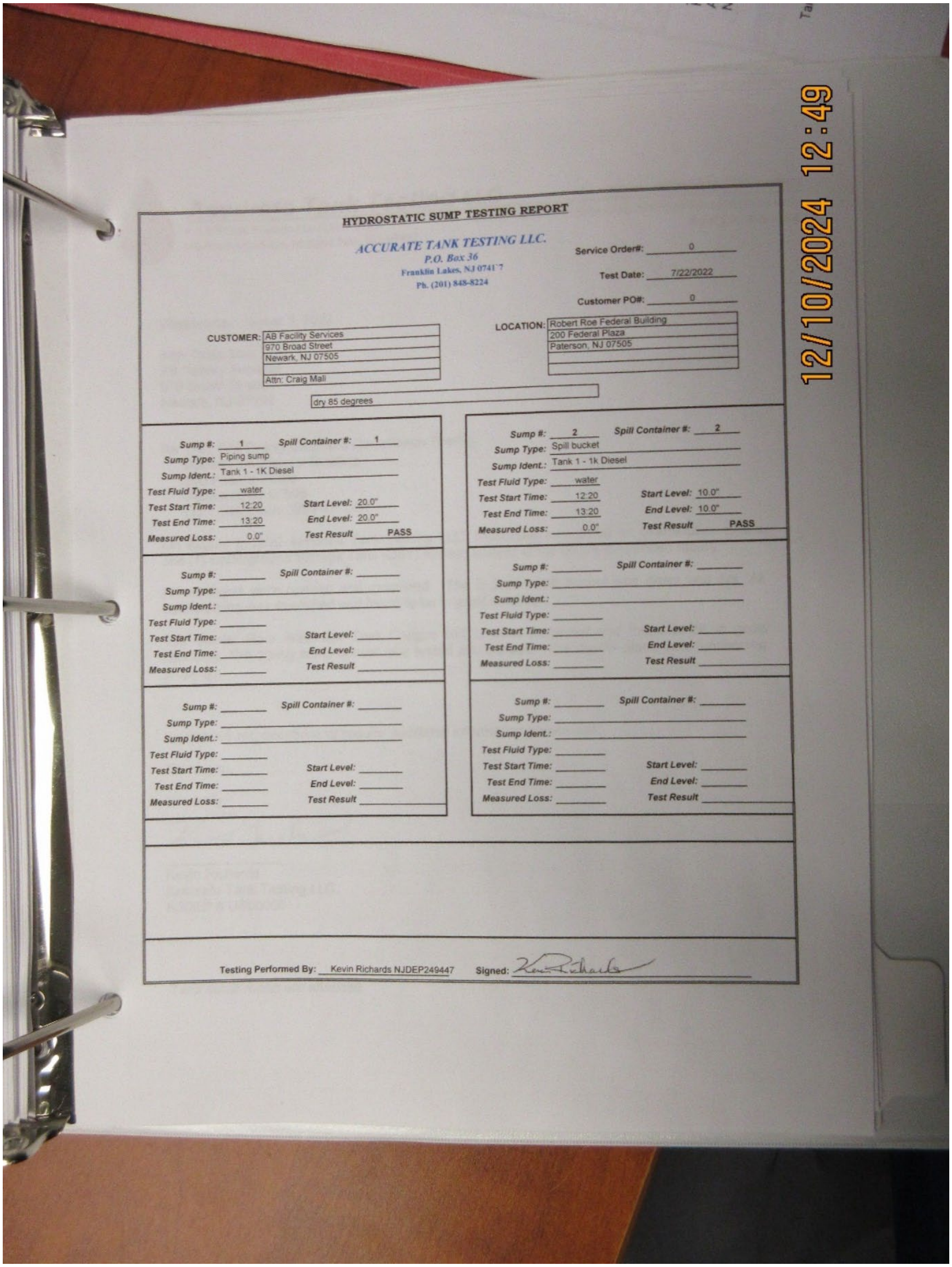


Photo 22 – Containment sump and spill bucket hydrostatic test for July 2022 (Page 1).



HYDROSTATIC SUMP TESTING REPORT

ACCURATE TANK TESTING LLC.
P.O. Box 36
Franklin Lakes, NJ 0741`7
Ph. (201) 848-8224

Service Order#: 0
Test Date: 7/22/2022
Customer PO#: 0

CUSTOMER: AB Facility Services
970 Broad Street
Newark, NJ 07505
Attn: Craig Mali

LOCATION: Robert Roe Federal Building
200 Federal Plaza
Paterson, NJ 07505

dry 85 degrees

Sump #: 1 Spill Container #: 1
Sump Type: Piping sump
Sump Ident.: Tank 1 - 1K Diesel
Test Fluid Type: water
Test Start Time: 12:20 Start Level: 20.0"
Test End Time: 13:20 End Level: 20.0"
Measured Loss: 0.0" Test Result PASS

Sump #: 2 Spill Container #: 2
Sump Type: Spill bucket
Sump Ident.: Tank 1 - 1k Diesel
Test Fluid Type: water
Test Start Time: 12:20 Start Level: 10.0"
Test End Time: 13:20 End Level: 10.0"
Measured Loss: 0.0" Test Result PASS

Sump #: Spill Container #:
Sump Type:
Sump Ident.:
Test Fluid Type:
Test Start Time: Start Level:
Test End Time: End Level:
Measured Loss: Test Result

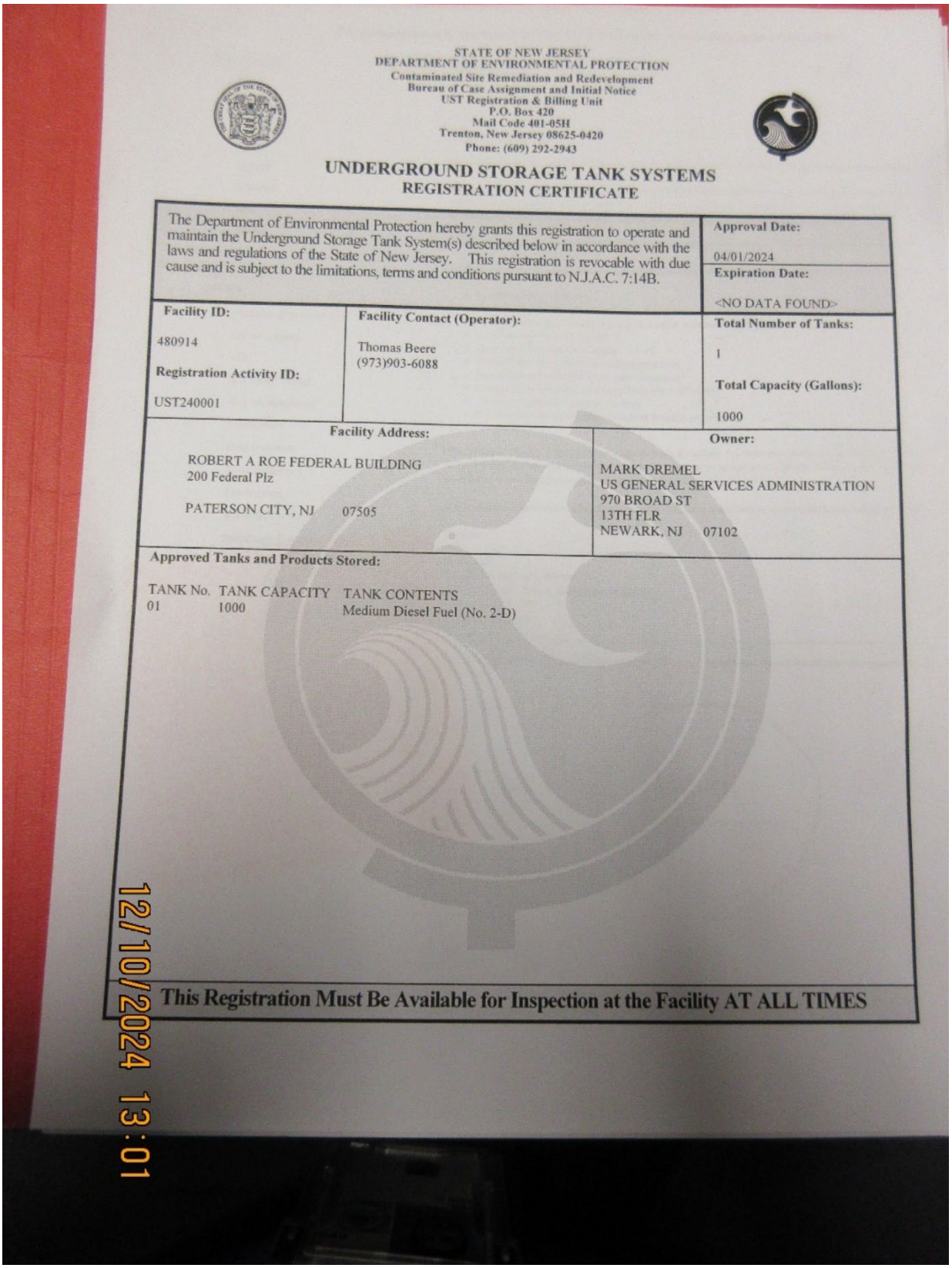
Sump #: Spill Container #:
Sump Type:
Sump Ident.:
Test Fluid Type:
Test Start Time: Start Level:
Test End Time: End Level:
Measured Loss: Test Result

Sump #: Spill Container #:
Sump Type:
Sump Ident.:
Test Fluid Type:
Test Start Time: Start Level:
Test End Time: End Level:
Measured Loss: Test Result

Sump #: Spill Container #:
Sump Type:
Sump Ident.:
Test Fluid Type:
Test Start Time: Start Level:
Test End Time: End Level:
Measured Loss: Test Result

Testing Performed By: Kevin Richards NJDEP249447 Signed: [signature]

Photo 23 – Containment sump and spill bucket hydrostatic test for July 2022 (Page 2).



STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Contaminated Site Remediation and Redevelopment
Bureau of Case Assignment and Initial Notice
UST Registration & Billing Unit
P.O. Box 420
Mail Code 401-05H
Trenton, New Jersey 08625-0420
Phone: (609) 292-2943

UNDERGROUND STORAGE TANK SYSTEMS
REGISTRATION CERTIFICATE

The Department of Environmental Protection hereby grants this registration to operate and maintain the Underground Storage Tank System(s) described below in accordance with the laws and regulations of the State of New Jersey. This registration is revocable with due cause and is subject to the limitations, terms and conditions pursuant to N.J.A.C. 7:14B.

Approval Date: 04/01/2024
Expiration Date: <NO DATA FOUND>

Facility ID: 480914
Registration Activity ID: UST240001

Facility Contact (Operator): Thomas Beere (973)903-6088

Total Number of Tanks: 1
Total Capacity (Gallons): 1000

Facility Address:
ROBERT A ROE FEDERAL BUILDING
200 Federal Plz
PATERSON CITY, NJ 07505

Owner:
MARK DREMEL
US GENERAL SERVICES ADMINISTRATION
970 BROAD ST
13TH FLR
NEWARK, NJ 07102

Approved Tanks and Products Stored:

TANK No.	TANK CAPACITY	TANK CONTENTS
01	1000	Medium Diesel Fuel (No. 2-D)

This Registration Must Be Available for Inspection at the Facility AT ALL TIMES

12/10/2024 13:01

Photo 24 – UST registration certificate from April 1st, 2024.

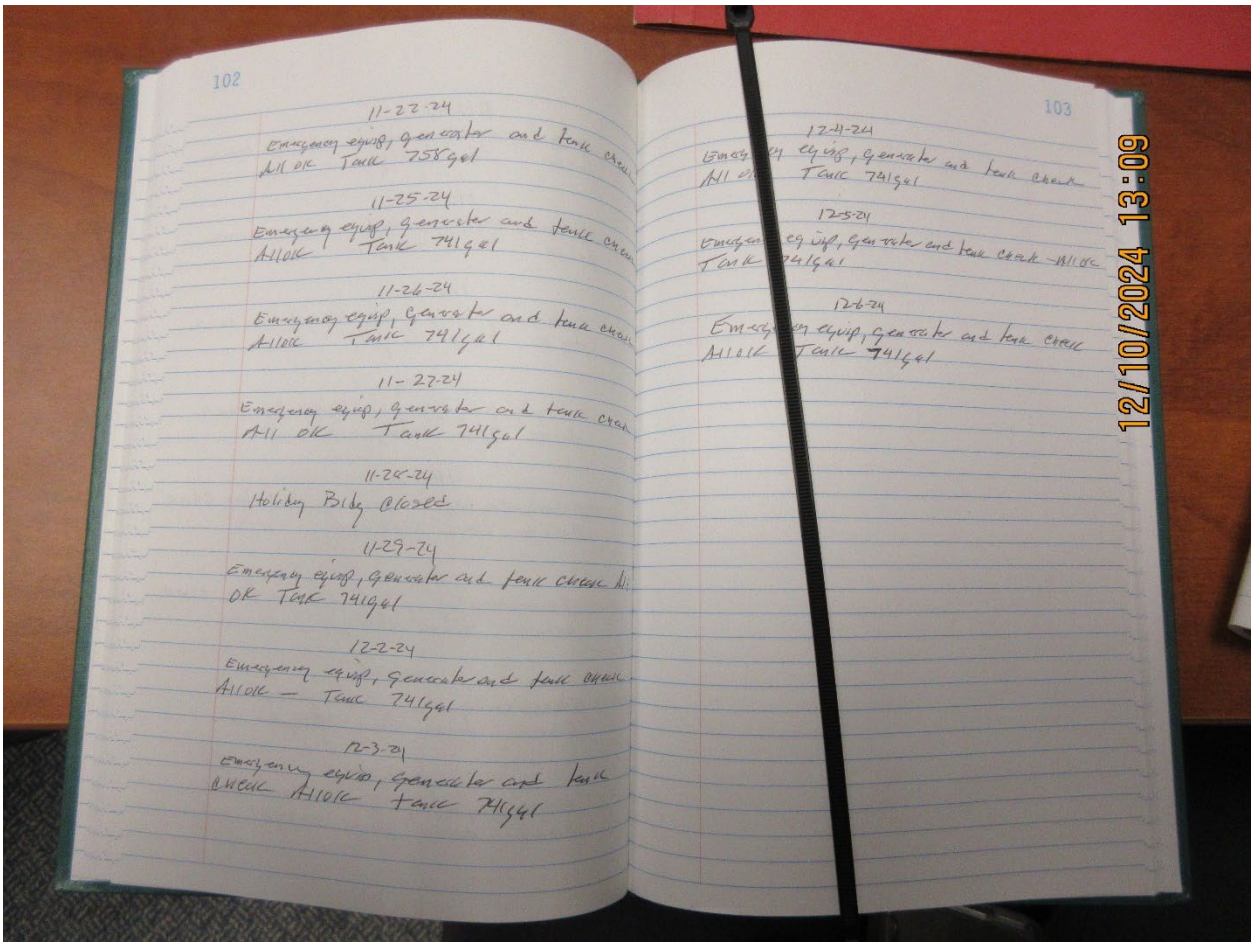


Photo 25 – Logbook of daily walkthrough inspections from 11/27/2024 until 12/6/2024.

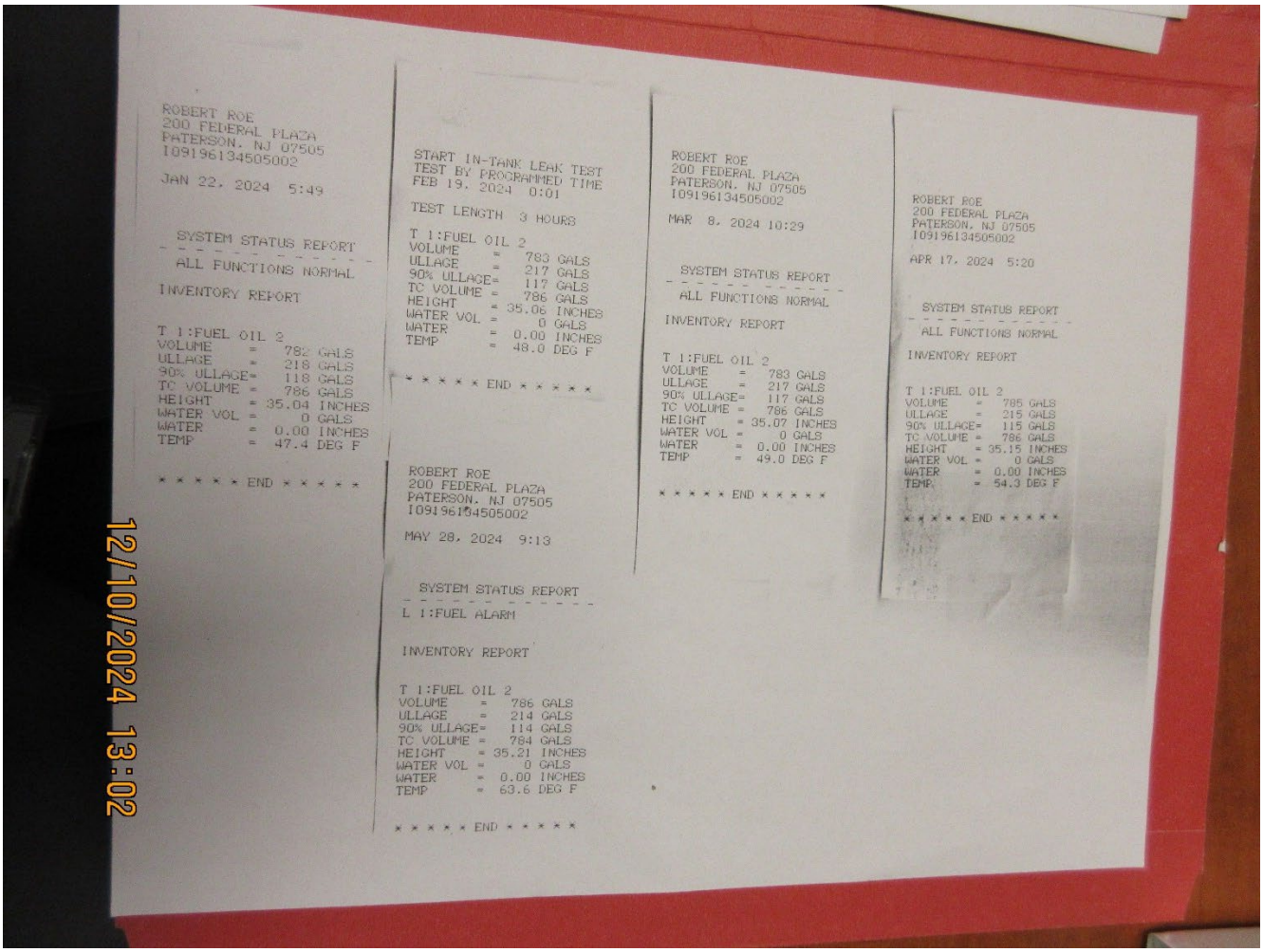


Photo 26 – System status reports from January - May 2024, and a February 2024 leak test.

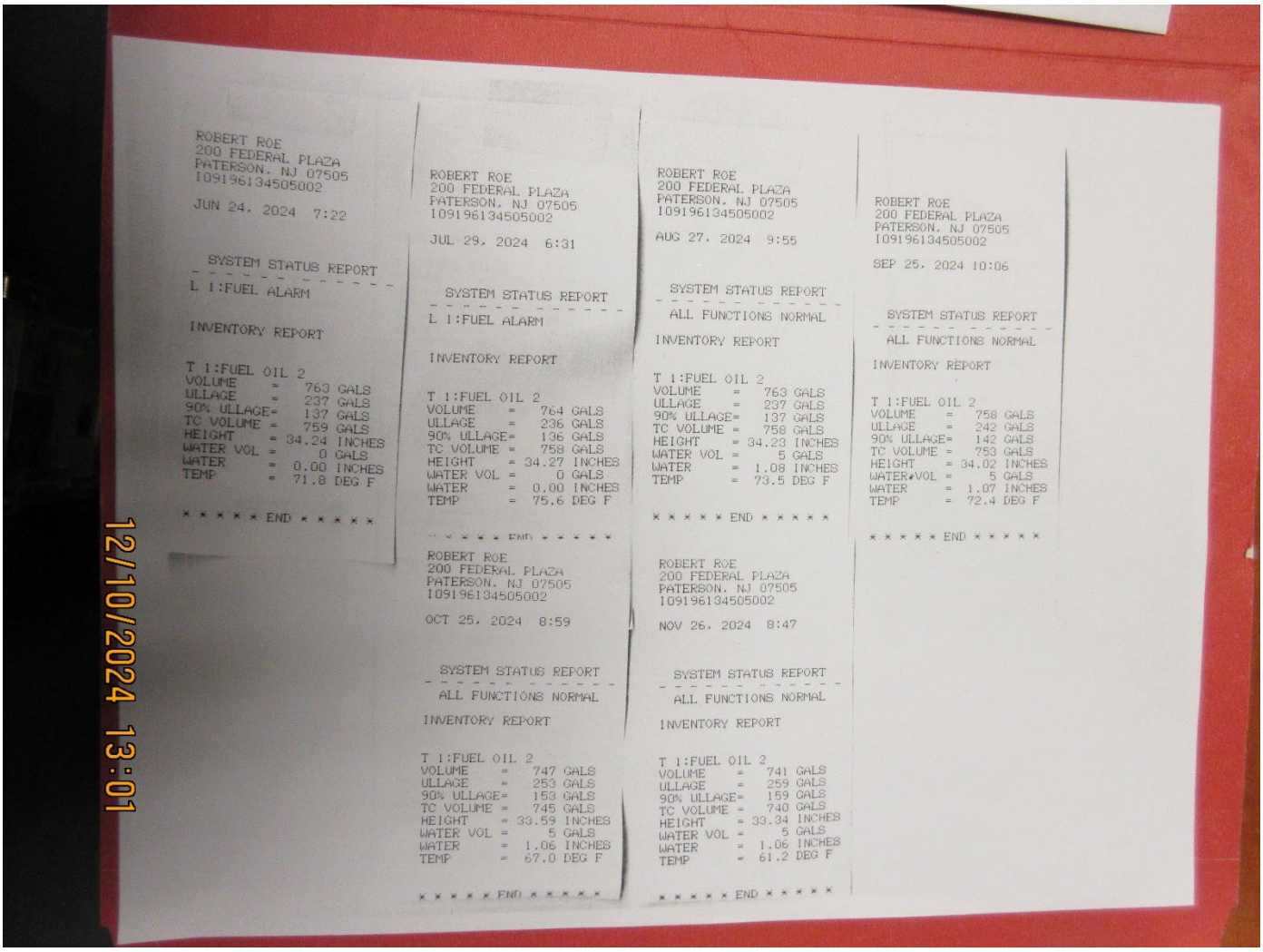
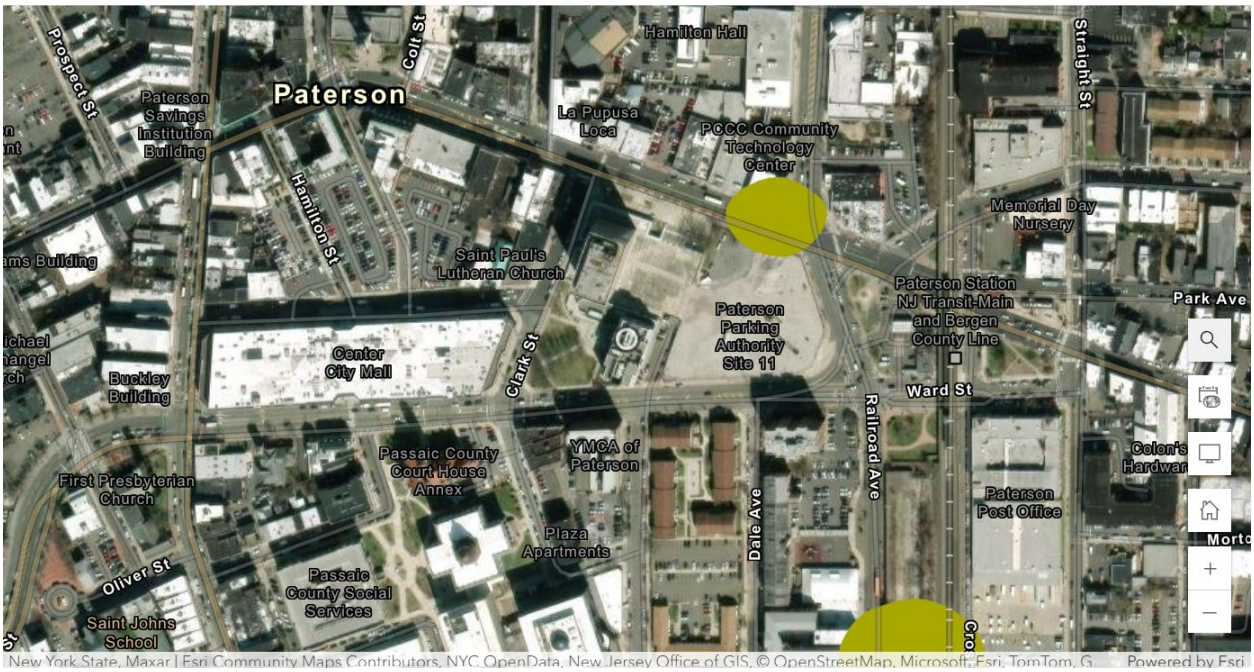
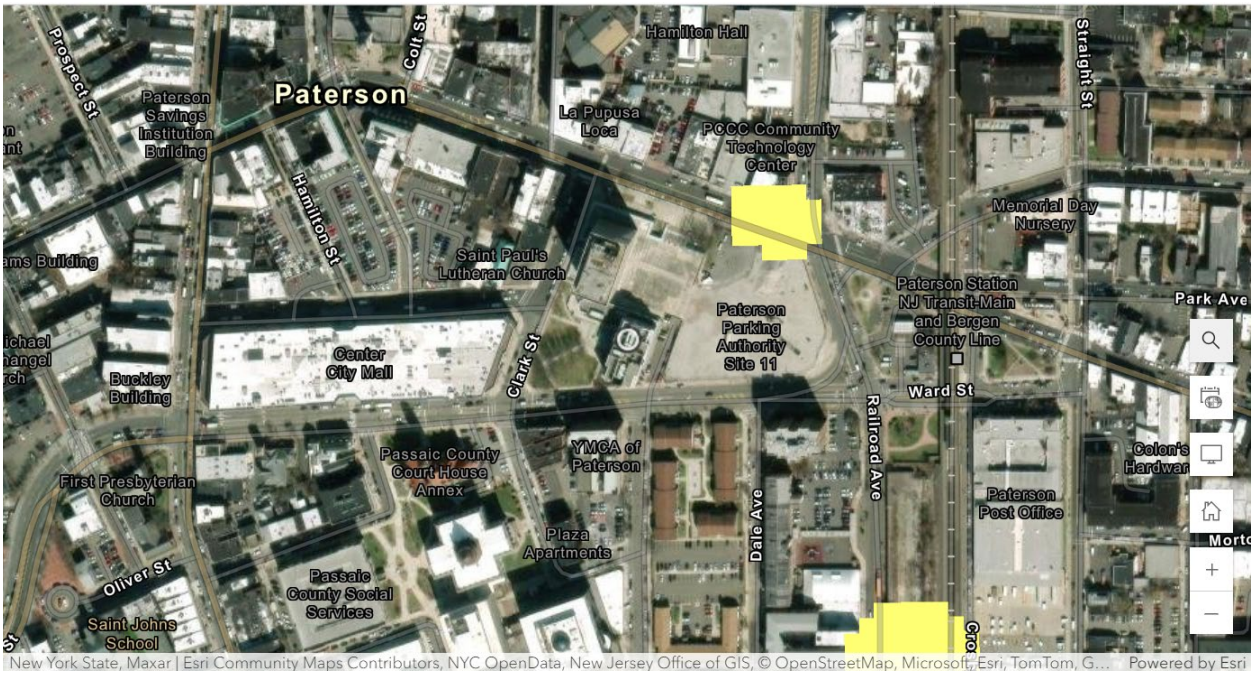


Photo 27 – System status reports from June - November 2024.

B: Federal Emergency Management Agency (FEMA) 100 Year Flood Zone and EPA's Region 2 Composite Flood Risk Layer



The facility is not located within a FEMA 100-year flood zone area.



The facility is not located within the EPA's Region 2 Composite Flood Risk layer.

C: Sole Source Aquifer Map

The facility is not located within a Sole Source Aquifer area.

EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

Robert A. Roe Fed Bldg

1 mile Ring Centered at 40.915167,-74.169903
Population: 67,848
Area in square miles: 3.14

LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	35%
Spanish	58%
Other Indo-European	6%
Total Non-English	65%

COMMUNITY INFORMATION

- Low income: 58 percent
- People of color: 95 percent
- Less than high school education: 28 percent
- Limited English households: 28 percent
- Unemployment: 10 percent
- Persons with disabilities: 9 percent
- Male: 48 percent
- Female: 52 percent
- 76 years — Average life expectancy
- $20,491 — Per capita income
- Number of households: 21,996
- Owner occupied: 15 percent

BREAKDOWN BY RACE

- White: 5%
- Black: 24%
- American Indian: 0%
- Asian: 5%
- Hawaiian/Pacific Islander: 0%
- Other race: 0%
- Two or more races: 1%
- Hispanic: 64%

BREAKDOWN BY AGE

From Ages 1 to 4	9%
From Ages 1 to 18	30%
From Ages 18 and up	70%
From Ages 65 and up	11%

LIMITED ENGLISH SPEAKING BREAKDOWN

Speak Spanish	94%
Speak Other Indo-European Languages	5%
Speak Asian-Pacific Island Languages	0%
Speak Other Languages	0%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race.
Source: U.S. Census Bureau, American Community Survey (ACS) 2018-2022. Life expectancy data comes from the Centers for Disease Control.

Report for 1 mile Ring Centered at 40.915167,-74.169903
Report produced January 29, 2025 using EJScreen Version 2.3

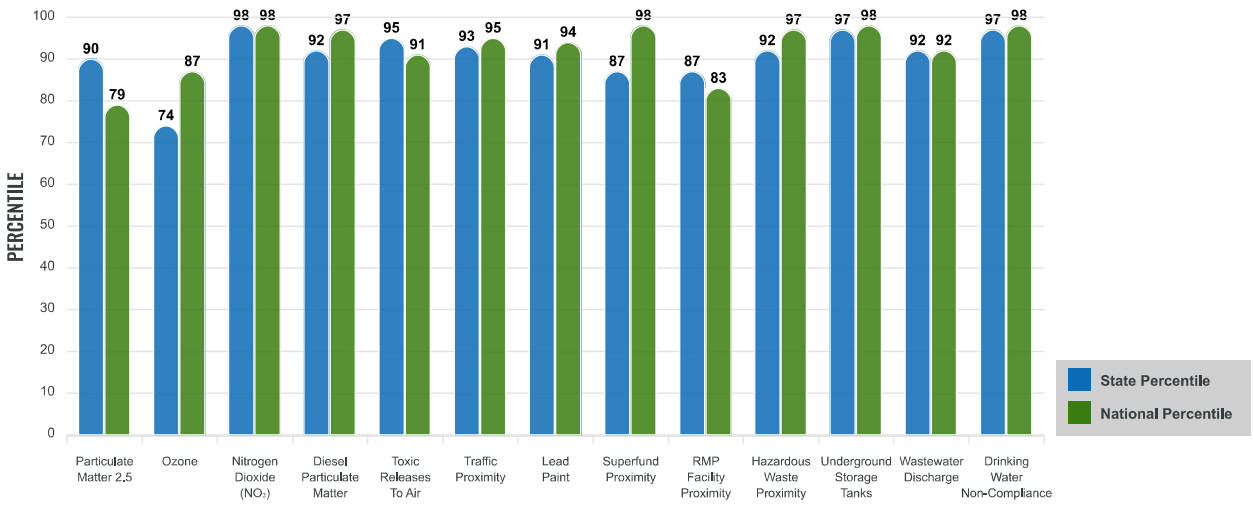
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the EJScreen website.

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

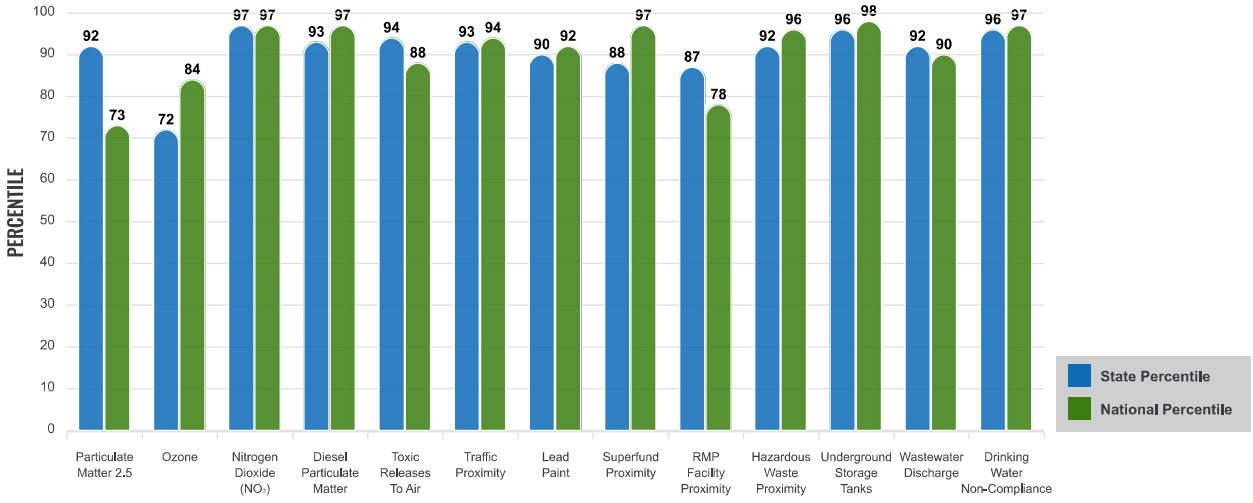
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low income, percent persons with disabilities, percent less than high school education, percent limited English speaking, and percent low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



Report for 1 mile Ring Centered at 40.915167,-74.169903

Report produced January 29, 2025 using EJScreen Version 2.3

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
ENVIRONMENTAL BURDEN INDICATORS					
Particulate Matter 2.5 ($\mu g/m^3$)	7.96	7.64	66	8.45	43
Ozone (ppb)	61	61.4	36	61.8	53
Nitrogen Dioxide (NO_2) (ppbv)	16	9	96	7.8	98
Diesel Particulate Matter ($\mu g/m^3$)	0.381	0.282	74	0.191	90
Toxic Releases to Air (toxicity-weighted concentration)	1,200	1,100	77	4,600	62
Traffic Proximity (daily traffic count/distance to road)	2,700,000	1,600,000	75	1,700,000	79
Lead Paint (% Pre-1960 Housing)	0.52	0.43	59	0.3	75
Superfund Proximity (site count/km distance)	1.2	1.6	58	0.39	92
RMP Facility Proximity (facility count/km distance)	0.28	0.38	57	0.57	50
Hazardous Waste Proximity (facility count/km distance)	8.7	5.9	71	3.5	88
Underground Storage Tanks (count/km^2)	54	15	94	3.6	99
Wastewater Discharge (toxicity-weighted concentration/m distance)	380	3400	67	700000	67
Drinking Water Non-Compliance (points)	3	2.7	79	2.2	88
SOCIOECONOMIC INDICATORS					
Demographic Index USA	2.85	N/A	N/A	1.34	93
Supplemental Demographic Index USA	2.6	N/A	N/A	1.64	91
Demographic Index State	3.02	1.29	95	N/A	N/A
Supplemental Demographic Index State	2.6	1.32	94	N/A	N/A
People of Color	95%	46%	91	40%	92
Low Income	58%	21%	93	30%	87
Unemployment Rate	10%	6%	79	6%	82
Limited English Speaking Households	28%	7%	93	5%	96
Less Than High School Education	28%	9%	93	11%	90
Under Age 5	9%	5%	83	5%	84
Over Age 64	11%	17%	30	18%	28

*Diesel particulate matter index is from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	1
Water Dischargers	34
Air Pollution	38
Brownfields	5
Toxic Release Inventory	12

Other community features within defined area:

Schools	35
Hospitals	2
Places of Worship	66

Other environmental data:

Air Non-attainment	Yes
Impaired Waters	Yes

Selected location contains American Indian Reservation Lands*	No
Selected location contains an EPA IRA disadvantaged community	Yes

Report for 1 mile Ring Centered at 40.915167,-74.169903

Report produced January 29, 2025 using EJScreen Version 2.3

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	19%	18%	66	20%	49
Heart Disease	6.1	5.2	83	5.8	58
Asthma	11.4	9.5	90	10.3	79
Cancer	4.2	6.5	9	6.4	11
Persons with Disabilities	8.9%	10.8%	42	13.7%	22

CLIMATE INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	14%	11%	80	12%	77
Wildfire Risk	0%	6%	0	14%	0

CRITICAL SERVICE GAPS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	19%	9%	85	13%	76
Lack of Health Insurance	21%	7%	93	9%	93
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access Burden	No	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Report for 1 mile Ring Centered at 40.915167,-74.169903

Report produced January 29, 2025 using EJScreen Version 2.3