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

**By Email:** freedomcityss@yahoo.com

Duane Brannigan, Owner
Freedom City SS
P.O. Box 2565
Frederiksted, USVI 00841

Subject: Underground Storage Tank(s) for: Freedom City Service Station LLC
Located At: 49-51 Estate Concordia, Frederiksted, USVI 00840
Facility ID Number: 101001
ICIS Number: 3601410603

Dear Mr. Brannigan:

Please find enclosed a copy of an inspection report(s) where Mr. Hiep Tran of the U.S. Environmental Protection Agency, Region 2 (EPA) conducted an Underground Storage Tank (UST) Inspection(s) on April 11, 2022, 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". Mr. Duane Brannigan owns and/or 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 Freedom City Service Station 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 Hiep Tran by email at: tran.hiep@epa.gov or by phone at 212-637-4280.

Thank you for your cooperation.

Sincerely,

Claudia Gutierrez

Digitally signed by Claudia Gutierrez
Date: 2022.05.25 15:55:16 -04'00'

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

Enclosure

cc: Austin F. Callwood
Director of Environmental Protection
Department of Planning and Natural Resources
4611 Tutu Park Mall, Suite 300
St. Thomas, VI 00802
austin.callwood@vi.gov

**United States Environmental Protection Agency (EPA)**
**Region 2**
**290 Broadway**
**New York, NY 10007-1866**

# Underground Storage Tank (UST) Inspection Form

**INSPECTOR NAME(S):** Hiep Tran **DATE:** 4/4/2022

**SIC CODE:** **ICIS #:** 3601410603

## I. Location of Tank(s) ☐ Tribal

Facility Name: Freedom City + Deli
Street Address: 89-51 Estate Concordia
City: Frederiksted State: VI Zip Code: 00840
County:
Phone Number: 340-332-3842 Email/Website:
Contact Person(s): Duane Brannigan

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

Owner Name: Duane Brannigan
Street Address: P.O. Box 2965
City: Frederiksted State: VI Zip Code: 00841
County:
Email/Website: Freedomcityss@yahoo.com
Phone Number: 340-332-3842
Contact Person(s): Duane Brannigan

## 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 NA

How many USTs NA

## III. Notification [§ 280.22 – Subpart B] No registration on-site - Received via Email

☐ Notification to implementing agency; name DPNR
State Facility ID # 0101001
Date Issued: 4/18/2020 Date Expires: 4/17/2022
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 insurance on-site - Received via email

☐ State Fund* ☐ Private Insurance: Insurer/Policy # IRON TX 11157 - Ironshore
☐ Guarantee ☐ Surety Bond ☐ Letter of Credit Expiration: 5.7.2022
☐ 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 Duane Brannigan 2/9/2021 (Date after 10/13/2018)
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? Just A/B operator only Yes ☐ No ☐

**Notes:** Lat = 17.700623
Long = -64.865197

| VI. Tank Information Tank No. | 1 | 2 | 3 | | | |
|---|---|---|---|---|---|---|
| Tank presently in use | Yes | Yes | Yes | | | |
| If not, date last used (see Section XII) | — | — | — | | | |
| If empty, verify 1" or less left (see Section XII) | — | — | — | | | |
| Capacity of Tank (gal) | 10K | 10K | 6K | | | |
| Substance Stored | Premium | Reg | Diesel | | | |
| Compatibility Records Available? | — | — | — | | | |
| (Compatibility Demonstrated?) | | | | | | |
| M/Y Tank installed/Upgraded | 8/15/1992 | → | → | | | |
| *Tank Construction:* Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted | FRP | → | → | | | |
| Secondary Containment? | DW | → | → | | | |
| Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)] | Yes | Yes | Yes | | | |
| Double Walled? Y/N | — | — | — | | | |
| If Yes, Last Monthly Check? | — | — | — | | | |
| If No, Last Triennial Containment Integrity Test? | No Records | → | → | | | |
| Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)] | Flapper<br>HLA | →<br>→ | → | | | |
| Last Triennial Inspection? | No records | → | → | | | |
| *Special Configuration:* | NA | → | → | | | |
| Compartmentalized, Manifolded, | | | | | | |
| Field Constructed, | | | | | | |
| Airport Hydrant System | | | | | | |
| **VII. Piping Information** *Piping Type:* Pressure, Suction | pressure | → | → | | | |
| *Piping Construction:* Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping | FRP<br>DW | → | → | | | |
| *Under Dispenser Containment ("UDC")? Y/N* | Yes | → | → | | | |
| If Yes, installation date? | — | — | — | | | |
| Date of last visual inspection/periodic monitoring | — | — | — | | | |
| Part of Line RD? Y/N | 1 | | | | | |
| If above Y, UDC Double Walled? Y/N | — | — | — | | | |
| If DW, Last Monthly Check of Annular Space? | — | — | — | | | |
| If non-DW or no monthly check of DW, last 3-Yr Containment Integrity Test? | — | — | — | | | |

**Section Continues to Page 3**

## VII. Piping Information (Continued)

| Tank No. | 1 | 2 | 3 | | | |
|---|---|---|---|---|---|---|
| Secondary Containment Sump Used for Release Detection? Y/N | Yes | Yes | Yes | | | |
| 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? | No records → | | | | | |

**Tank and Piping Notes:**

Liquid sensors for Premium and Diesel were not at the lowest Point
no records to show that containment sumps were tested every 3 years

| Tank No. | 1 | 2 | 3 | | | |
|---|---|---|---|---|---|---|

## 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 | CSLD ✓ | ✓ → ✓ | | | | |
| | 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?** | NA → | | | | | |
| **RD Equipment Last Tested?** | No records → | | | | | |

**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)

printouts from veeder TLS 450 = 12 months

| Tank No. | 1 | 2 | 3 | | | |
|---|---|---|---|---|---|---|
| *Pressurized & Non-Exempt Suction Piping* | | | | | | |
| *RD Methods* ☐ N/A | | | | | | |
| Interstitial Monitoring | ✓ | ✓ | ✓ | | | |
| Groundwater Monitoring* | | | | | | |
| Vapor Monitoring* | | | | | | |
| Other? (specify) | | | | | | |
| OR Annual Line Tightness Test | NA | → | | | | |
| AND Installed? Y/N | Yes | → | | | | |
| **ALLD** Last Annual Test (§ 280.44(a)) | no records | → | | | | |
| - | Electrical / leak Detector ✓ | | | | | |
| *12 Months Monitoring Records (§ 280.41(b)(1)(ii))* | | | | | | |
| ***Site assessment/installation documentation?** | NA | → | | | | |
| **RD Equipment Last Tested?** | no records | → | | | | |
| Are under Dispenser Containments (UDC) Monitored? | | | | | | |
| via Visual Inspection | | | | | | |
| via Electronic Monitoring | | | | | | |
| Records of inspections available? | | | | | | |

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

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

12 months Liquid sensor - no records
Diesel and Premium sensors were not at the lowest point



Init/Date AUT 4/11/2022

## 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:**

HLA

## XIII. Walkthrough Inspections [§ 280.36 – Subpart C]

**Owner and operators must conduct walkthrough inspections of the following:**

***Must*** have monthly records Y ☐ N ☒

Spill Prevention Equipment – must be checked for damage, remove liquid or debris, and check fill cap. Y ☐ N ☒

DW spill prevention equipment with interstitial monitoring – must check for leak in interstitial area. Y ☐ N ☐ N/A ☒

Release detection equipment – must check to ensure operating with no alarms and review records of release detection testing. Y ☐ N ☒

***Must*** have annually records Y ☐ N ☒

Containment sumps – must check for damage, leaks, remove liquid or debris. Y ☐ N ☒

DW sumps with interstitial monitoring – must be checked for leak in interstitial area. Y ☐ N ☐ N/A ☐

Hand held release detection equipment – must check tank gauge sticks or groundwater bailer. Y ☐ N ☐ N/A ☒

*** Owners and operators of UST system(s) must maintain records of operation and maintenance walkthrough inspections for one year.**

# SITE DRAWING

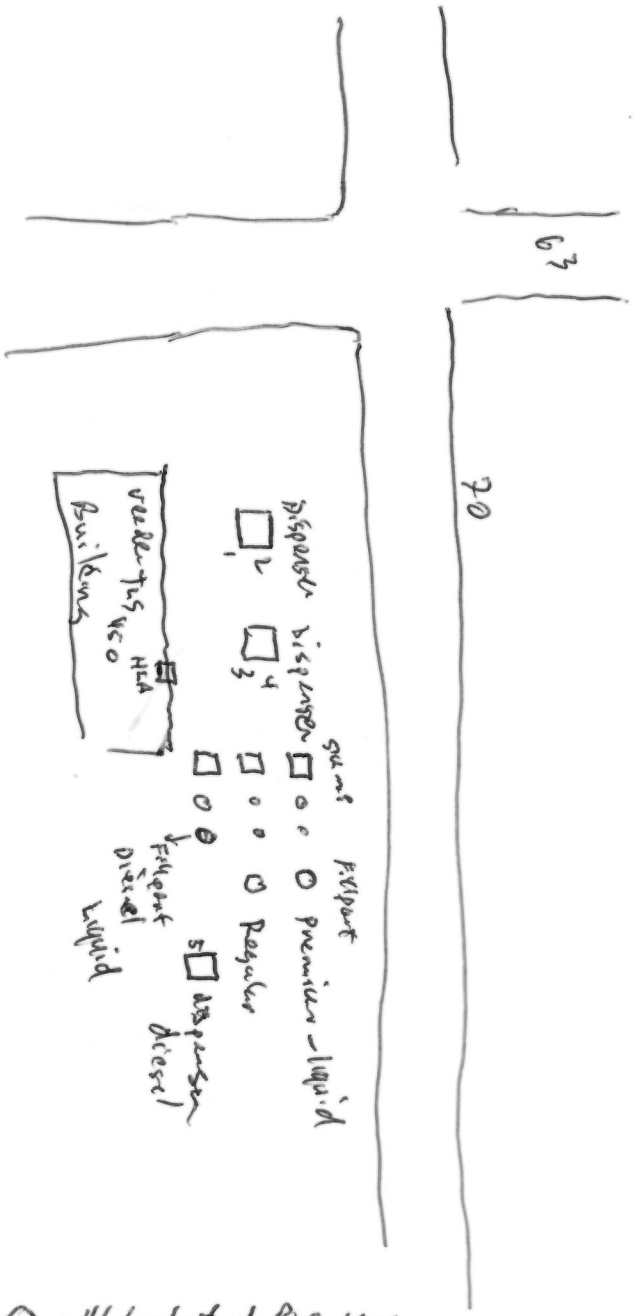
DATE: 4/11/2022 TIME ON SITE: 9:45 Am TIME OFF SITE: 12:41 pm

WEATHER: Sunny + dry

Lat = 17.700623
Long = -64.865197

ENVIRONMENTALLY SENSITIVE AREA: Y □ N □

If "Yes", please describe:




(0) Premium sump = Liquid sensor was not at the lowest point

(1) Diesel sump = liquid sensor was not at the lowest point

(3) Lid covers - need to be painted
Diesel = OK - Yellow
Premium = OK - Red
Regular = OK - Green

(4) spill bucket of Premium + Deesel Grade liquid

2018

□ Pictures

Facility Name Freedom City + DOI

Address 49-51 Estate Concordia, Frederiksted, VI

UST Reg # 0101001

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 |
|---|---|
| § 280.93 | Potential failure to comply with Financial responsibility requirements |
| § 280.35(a)(1) | Potential failure to meet the requirements for periodic testing of spill prevention equipment |
| § | and containment sumps. |
| § 280.35(a)(2) | Potential failure to properly and periodically inspect overfill prevention equipment |
| § 280.41(b)(1)(i)(B) | Potential failure to have annual line tightness test or monthly monitoring of pressurized piping |
| § 280.34(b)(2) | Potential failure to maintain any documentation of compliance with release detection |
| § 280.36(a) | Potential failure to conduct periodic walkthrough inspection every thirty |
| § | days and to conduct annual walkthrough inspection. |

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

Comments/Recommendations:

280.40(a)(3) - Potential failure annually test release detection components
280.44(a) - Potential failure annually test leak detectors (functionality test)
280.243(a) = Potential failure to ensure class A/B operator meets training requirements in 280.242 by initial deadline of October 13, 2018.
280.241(b) = Potential failure to designate each individual who meets definition of class (operator
280.245(a) = Potential failure to maintain a list of designated operators

Title of UST Owner/Operator Representative: Owner

Name of UST Owner/Operator Representative:
Duane Brannigan
(Please print)

(Signature)

Other Participants: _____

Name of EPA Inspector/representative:
Hiep Tran
(Please print)

(Signature)

(Credential Number)

Date of Inspection 4/11/2022 Time 12:35 AM/PM



Init/Date HT 4/11/2022

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

Location: Freedom City + Deli 44-51 Estate Carcordia Frederiksted, VI

Facility ID Number: 0101001

- ✓ Tank Registration Certificate
- ✓ Operator Training Records (Individuals training or retraining) ● class C operator training + maintain a list of training for All operators.
- ✓ Demonstrate Financial Responsibility
- ✓ Automatic Line Leak Detector Test Records – Annual functionality Test Annual
- o Line Leak Test Records – Annual
- ✓ Evidence of Spill Prevention – Last triennial containment integrity test
- ✓ Evidence of Overfill Prevention – Last triennial Inspection
- 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
- ✓ Documentation of Periodic Walk-through Inspection
- ✓ Walkthrough Inspection Records – Monthly and Annually
- o Other (specify) _____

**Additional Recommendations**:

1- Records of lines on TLS #50
2- liquid sensors need to be at the lowest point - Premium + Diesel
3- water (liquid) need to be removed in the spill bucket of Premium/Diesel
4 - No designated class C operator
5- annual test of Release detection components



Init/Date 4/11/2020 HT

**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?

Deficiencies observed: (Put an **X** for each observed deficiency)

___ 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? owner attempted to find lines data on TK5 450. owner is going to locate the records and email/picking before Friday

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**

**is report was reviewed and deemed complete by: Reviewer**

**Signature** Claudia Gutierrez Digitally signed by Claudia Gutierrez Date: 2022.05.25 15:55:44 -04'00'

**Date** _____

# 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)] | | X | |
| II. Overfill Prevention | 2 | Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)] | | X | |
| | | ☑ Automatic shutoff is operational (ie., device not tampered with or inoperable ) [280.20(c)(1)(ii)(A), 280.21(d)]<br>☐ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)]<br>☑ Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)]<br>☐ 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)] | X | | |
| 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)] | X | | |
| | | ☐ UST system (Choose one)<br>☐ UST in operation<br>☐ UST in temporary closure<br>☐ CP System is properly operated and maintained<br>☐ CP system is performing adequately based on results of testing. [280.31(b)]; - or -<br>☐ 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)] | X | | |
| 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)] | X | | |
| | | ❑ Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected.<br><br>For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]:<br><br>❑ Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)]<br><br>❑ 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)]<br><br>❑ Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)]<br><br>For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: ❑<br><br>Tank and piping meet new UST requirements [280.21(a)(1)]<br><br>❑ Steel tank is internally lined. [280.21 (b)]<br><br>❑ 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)] lines (??) | | | |
| | 3 | Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)] lines (??) | | | |
| | 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)**<br>❑ Inventory control is conducted properly.<br>❑ T.T.T. performed as required (See "D" below).<br>❑ 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)]<br>❑ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)]<br>❑ Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)]<br>❑ 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)**<br>☑ ATG is set up properly. [280.40(a)(2)]<br>☑ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ❑<br>ATG is checking portion of tank that routinely contains product. [280.40(a)(1)] |
| ❑ | | | **C. Manual Tank Gauging (MTG)**<br>❑ Tank size is appropriate for using MTG. [280.43(b)(5)]<br>❑ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ❑<br>Method is being conducted correctly. [280.43(b)(4)]<br>❑ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] ❑<br>Equipment is capable of 1/8-inch measurement. [280.43(b)(3)] |
| ❑ | ❑ | ❑ | **D. Tightness Testing** (Safe Suction piping does not require testing)<br>❑ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)]<br>❑ Tightness testing is conducted within specified time frames for method:<br>❑ **Tanks** - every 5 years [280.41(a)(1)]<br>❑ **Pressurized Piping** - annually [280.41(b)(1)(ii)]<br>❑ **Non-exempt suction piping** - every 3 years [280.41(b)(2)]<br>❑ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)] |
| ❑ | ❑ | ❑ | **E. Ground Water or Vapor Monitoring**<br>❑ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ❑<br>Vapor monitoring well is not affected by high ground water. [280.43(e)(3)]<br>❑ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ❑<br>Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)] |
| ❑ | ☑ | ❑ | **F. Interstitial Monitoring** sensors were not at the lowest point<br>❑ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)]<br>❑ 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)**<br>☑ ALLD is present and operational. [280.44(a)]<br>NO ☐ 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.)]**<br>☐ 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 checking with owner to determine a method for the time<br>☐ 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)]<br>☐ 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.**