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

By Email: Carrol.Theodore@trafigura.com

Mrs. Carrol Theodore
Country Manager Retail/B2B
PC Puerto Rico LLC D/B/A USVI Fuel Services
8240 Subbase, P.O. Box 303740
St. Thomas, U.S. Virgin Islands 00803

Subject: Underground Storage Tank(s) for: Puma Veteran's Drive Service Station
Located at: 1 Estate Demerara, St. Thomas, U.S. Virgin Islands 00802
Facility ID Number: 201018
ICIS Number: 3601545283

Dear Mrs. Theodore:

Please find enclosed a copy of an inspection report where Mr. Hiep Tran of the U.S. Environmental Protection Agency, Region 2 (EPA) conducted an Underground Storage Tank (UST) Inspection on June 12, 2023, 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"). Puma Veteran's Drive Service Station owns and/or operates the Underground Storage Tank(s) located at the above-mentioned facility. 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 Puma Veteran's Drive Service Station 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,

GAETANO LAVIGNA
Digitally signed by GAETANO LAVIGNA
Date: 2023.08.03 08:17:40 -04'00'

Gaetano LaVigna, Senior Advisor
UST Compliance Team
Enforcement and Compliance Assurance Division
US EPA Region 2

Enclosure

cc: Eng. Brenda Toraño
HSE Manager
Puerto Rico Energy
Box 11961
San Juan, Puerto Rico 00922
Email: Brenda.Torano@energy-latam.com

Austin F. Callwood
Director of Environmental Protection
Department of Planning and Natural Resources
4611 Tutu Park Mall, Suite 300
St. Thomas, VI 00802
Email: 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: 6/12/2023

SIC CODE: ICIS #: 3601545283

I. Location of Tank(s) □ Tribal	II. Ownership of Tank(s) □ same as location (I.)
Facility Name: Puma Veteran's Drive Service Station	Owner Name: PC Puerto Rico LLC DBA USVI Fuel Services
Street Address: 1 Estate Demerara	Street Address: 89 Sub Base
City: St. Thomas State: VI Zip Code: 00802	City: St. Thomas State: VI Zip Code: 00802
County:	County: nadja.davila@pumaenergy.com
Phone Number: Email/Website:	Phone Number: 787-365-4100 Email/Website:
Contact Person(s): Mr. Leo Sibilly - 340-643-1215	Contact Person(s): Nadja Davila

IIB. Operator of Tank(s) □ same as location (I.)	IIC. Ownership of UST(s) at Other Facilities
Contractor Name: Leo R. Sibilly II	□ Do you own UST(s) at other UST Facilities (Yes) / No
Street Address: 35A Est. Elizabeth	If Yes, How many Facilities: 8 in USVI
City: St. Thomas State: VI Zip Code: 00804 County:	How many USTs: 22 in USVI
Phone Number: 340-643-1215 Fax Number:	

III. Notification [§ 280.22 – Subpart B]

□ Notification to implementing agency; name: USVI DPNR
State Facility ID #: 201018
Date Issued: 2022 Date Expires: 2024
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]

□ State Fund* □ Private Insurance: Insurer/Policy #: TS 0735
□ 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 ☑ No copy in folder for proof.
Name of Class A Operator: Anthony Fleming	
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: 2:30pm Lat = 18.33920
1 Long = -64.94175

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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)	Reg	Prem	Diesel			
Substance Stored	12K	12K	6K			
Compatibility Records Available?						
(Compatibility Demonstrated?)						
M/Y Tank installed/Upgraded	12/12	→	→			
Tank Construction: Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted	DW Permatank					
Secondary Containment?	DW	→	→			
Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]	Spill bucket		→			
Double Walled? Y/N	DW	→	→	tested on 6/22/22		
If Yes, Last Monthly Check?				Submitted via email		
If No, Last Triennial Containment Integrity Test?	N/A	→	→	on 6/27/23		
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]	HLA no light, sound only					
Last Triennial Inspection?						
Special Configuration:	—	—	—			
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	DW Nupi Semi-Rigid					
Under Dispenser Containment ("UDC")? Y/N	Yes	→	→			
If Yes, installation date?	12/12					
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?	6/23/2022	→	→			

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Section Continues to Page 3

VII. Piping Information (Continued)

Tank No.	1	2	3			
Secondary Containment Sump Used for Release Detection? Y/N	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?	tested 6/23/2022	→	→			

Tank and Piping Notes: Premium and Regular were not working - see printout

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	X →	✓			
	Interstitial Monitoring	✓	X	✓			
-	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*

Premium = No method of Release Detection As of 6/12/23 see printout.

***Site assessment/installation documentation?**	NA	—				
RD Equipment Last Tested? tested on 6/23/22 - submitted on 6/22/23 via email.	NO	→				

3 201018

KVT

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)

May 2023 Feb 23 Nov 22 August 22 Premium: TLS 350
April 2023 Jan 23 Oct 22 July 22 CSLD was not working
March 2022 Dec 22 Sept 22 June 22 Per console since June 6, 2023

Tank No.	1	2	3			

Pressurized & Non-Exempt Suction Piping RD Methods ☐ N/A

	PLLD					
Interstitial Monitoring	Liquid sensor					
Groundwater Monitoring*						
Vapor Monitoring*						
Other? (specify)						

OR	Annual Line Tightness Test						
AND	Installed? Y/N	ELLD	→	→			
ALLD	Last Annual Test (§ 280.44(a))	ELLD 0.20					

tested on 6/22/22 - submitted via email on 6.27.23

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

***Site assessment/installation documentation?**	– 4/13/2021	–	–			
RD Equipment Last Tested?	6/23/22	→	→			
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)

tested on 6/23/22

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

May 2023 – June 2022 – PLLD Liquid sensor

12 months ⇒ 0.2 gal/HR = Regular OK
0.1 gal/HR = 3.31.23, 9.26.22

June 22 to July 22 = 0.2 gal/HR = Diesel
0.1 gal/HR = 03.23.23, 5/20/22

June 23 to July 22 = 0.2 gal/HR = Premium
0.1 gal/HR = 3.28.23 and 9.22.22

20018

SITE DRAWING

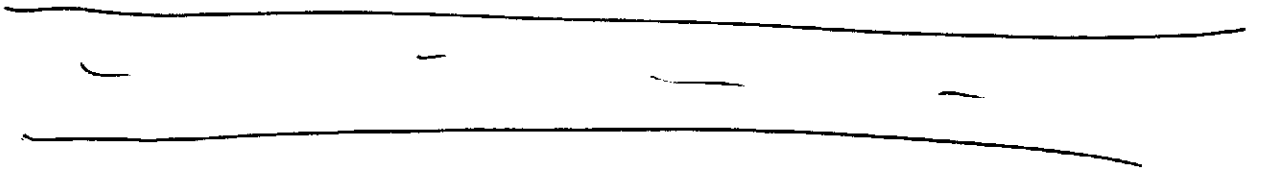
DATE: 6/12/2023 TIME ON SITE: 2:30 pm TIME OFF SITE: 16:35

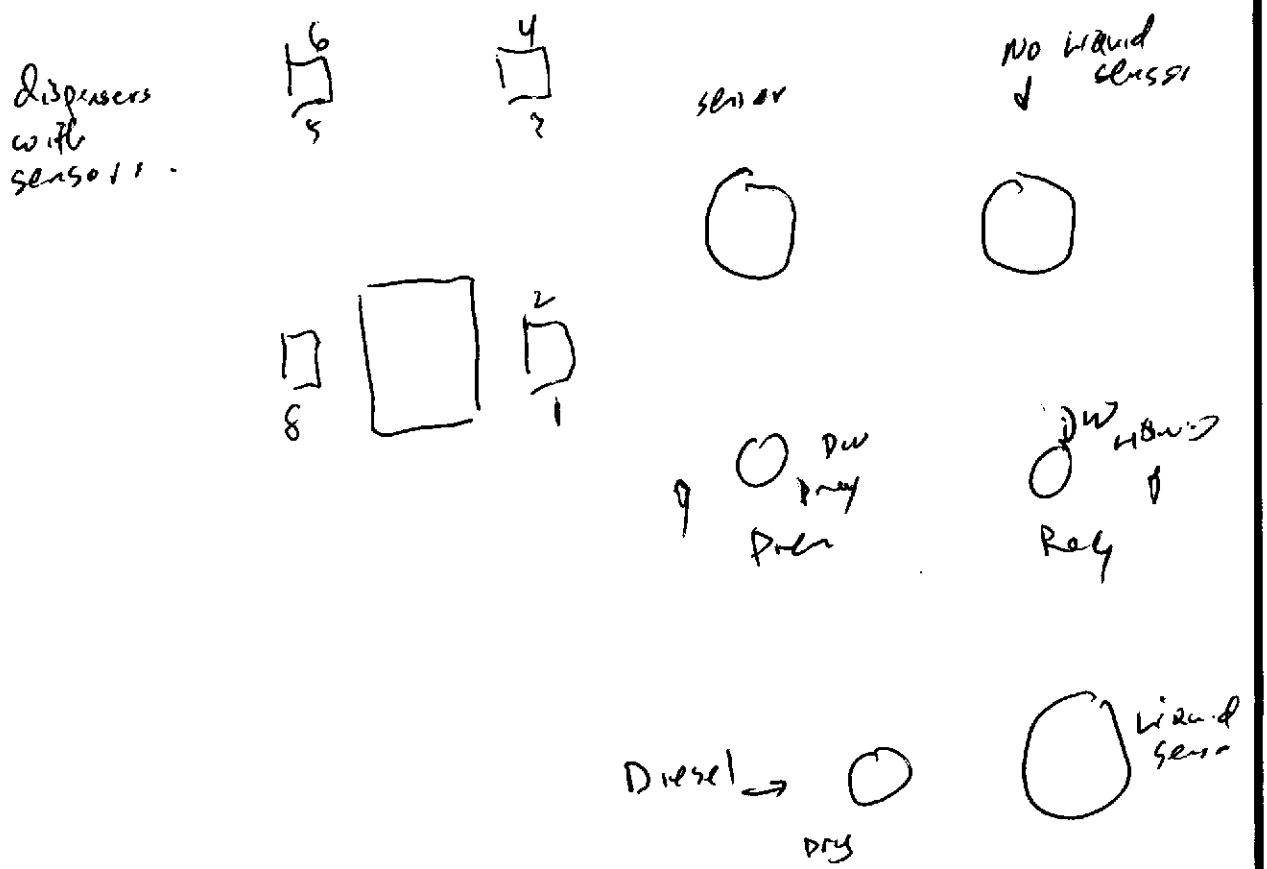
WEATHER: Partially cloudy / Dry

ENVIRONMENTALLY SENSITIVE AREA: Y ☐ N ☐

If "Yes", please describe:

Lat = 18.38920
Long = -64.94175





☐ Pictures

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:

Jan 2023 – May 31, 2023 – completed every month ? Recently(?)

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 □ 6/7/22 – submitted on 6.27.23 via email

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.**

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Init/Date HVT 6/12/18

Facility Name Puma Veteran's Drive Service Station
Address 1 Estate Demerara St. Thomas, VI 00802
UST Reg # 201018

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
§ 280.35(a)(i)	Potential to meet the requirements for periodic testing
§	of spill prevention equipment or containment sumps
§ 280.35(a)(2)	Potential to periodically inspect overfill prevention
§	equipment
§ 280.36(a)	Potential to either conduct periodic walkthrough inspection
§	every thirty days or to conduct annual walkthrough
§	inspection.
§ 280.40(a)(2)	Potential failure to annually test release detection components.

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

Comments/Recommendations:

280.41(a) - Potential failure to monitor tanks every 30 days, if appropriate. → Premium was not working

280.41(b)(1)(i)(3) - Potential failure to monitoring of pressurized piping

280.241(b) - Potential failure to designate each individual who meets definition of Class C operator

280.245(a) - Potential failure to maintain a list of designated operators

Title of UST Owner/Operator Representative: Fuel ASL Coordinator

Name of UST Owner/Operator Representative:
Dayle S. DaVila
(Please print)
Dayle S. DaVila
(Signature)

Other Participants:

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

(Credential Number)

Date of Inspection 6/12/23 Time 16:30 AM/PM

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

Location: Puma Veteran's Drive Facility ID Number: 201018

- o Tank Registration Certificate
- o Operator Training Records (Individuals training or retraining) operator Class C
- o Demonstrate Financial Responsibility
- o Automatic Line Leak Detector Test Records – Annual
- o Line Leak Test Records – Annual
- o Evidence of Spill Prevention
- o Evidence of Overfill Prevention
- o Tank Release Detection Records
- o Vapor Monitoring Records – Monthly (12 Most Recent Months)
- o Under Dispenser Containment (Visual inspection or electronic monitoring)
- o Site Assessment to Demonstrate Monitor Wells Properly Installed/Located
- o Documentation of Compatibility for UST Systems
- o Corrosion Protection Inspection Records
- o Documentation of Periodic Walk-through Inspection
- o Walkthrough Inspection Records – Monthly and Annually
- o Other (specify) _____

Additional Recommendations: Some records were submitted after UST inspection.

- no Regular liquid sensors
- No monitoring method for Premium tank
- no records for triennial testing of spill bucket, containment sumps
- no triennial inspection of overfill prevention - no record
- no monthly walkthrough inspection records - before January 2023
- no record of annual walkthrough inspection
- no annual test of release detection components - ATG, sensors and probes, etc.
- no designated Class C operator
- no list of operators
- Received monthly walkthrough inspection from 1/26/23 to 5/31/23 - Done monthly(?)

Init/Date NOT 6/12/23

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

___ 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? contractor attempted to figure out the release Detection method for Premium tank

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** Gaetano La Vigna

Signature GAETANO LAVIGNA Digitally signed by GAETANO LAVIGNA Date: 2023.08.03 08:17:08 -04'00'

Date _____

701018

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Init/Date MT 6/12/23

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)]			
		☑ 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)]	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)]	X		
	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)			
		☐ UST in operation			
		☐ UST in temporary closure			
		☐ CP System is properly operated and maintained			
		☐ CP system is performing adequately based on results of testing. [280.31(b)]; - or -			
		☐ CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			

Release 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)] Pressurized tank			X
	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)]			X
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)] need to verify pipings			X
	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)]		X	
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)]	X		
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)]	X		

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)]

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6/12/23

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)]	X		
	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. 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.

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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(c)(6), 280.43(f)(7)] ❑ Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
☑	☑	❑	**F. Interstitial Monitoring** Premium tank is no and Reg sump sensor is no ❑ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] ❑ Sensor properly positioned. [280.40(a)(2)]

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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.

201018

6/12/23