



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 Smith Bay Service Station
Located at: 33 Frydendahl, St. Thomas, US Virgin Islands 00802
Facility ID Number: 201016
ICIS Number: 3601549967

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 13, 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 Smith Bay 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 Smith Bay 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: 2023.08.02
14:59:53 -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: 6/13/2023

SIC CODE:

ICIS #: 3601549967

I. Location of Tank(s) <input type="checkbox"/> Tribal	II. Ownership of Tank(s) <input type="checkbox"/> same as location (I.)
Facility Name <u>Puma Smith Bay Service Station</u>	Owner Name <u>PC Puerto Rico LLC DBA USVI Fuel Services</u>
Street Address <u>33 Frydensdahl</u>	Street Address <u>89 Sub Base</u>
City State Zip Code <u>St. Thomas VI 00802</u>	City State Zip Code <u>St. Thomas VI 00802</u>
County <u>carrol.theodore@tratiguna.com</u>	County <u>ndja.davita@energy-lotama.com</u>
Phone Number Email/Website <u>787-365-4100-1111</u>	Phone Number Email/Website <u>Ms. Nadja Davita - HSE coordinator</u>
Contact Person(s) <u>Ms. Carrol-theodore - Country Manager Retail</u>	Contact Person(s) <u>Ms. Nadja Davita - HSE coordinator</u>

II.B. Operator of Tank(s) <input type="checkbox"/> same as location (I.)	II.C. Ownership of UST(s) at Other Facilities
Contractor Name <u>Acatha + Emanuel LaPlace</u>	<input type="checkbox"/> Do you own UST(s) at other UST Facilities <u>Yes</u> / No
Street Address	If Yes, How many Facilities <u>8 in USVI</u>
City State Zip Code County	How many USTs <u>22 in USVI</u>
Phone Number Fax Number <u>340-774-9678</u>	

III. Notification [§ 280.22 – Subpart B]

Notification to implementing agency; name USVI DANR

State Facility ID # 201016

Date Issued: 8/22/22 Date Expires: ~1/15/2024

Any change from previous Notification noted? (Owner/ Operator/ Substance stored/ Substance compatibility?) Yes No

If Yes, Describe: _____

IV. Financial Responsibility [§ 280.93(a) – Subpart H] CHUBB

State Fund* Private Insurance: Insurer/Policy # TS 0735

Guarantee Surety Bond Letter of Credit exp. date - 3/11/2023

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 Acatha LaPlace - 3/17/2020

Are all operators for class C trained? Emanuel LaPlace 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? only A/B operators Yes No

Notes:
Lot = 18.345859
Long. = -64.876257

VI. Tank Information	Tank No.	1	2	3				
Tank presently in use		Y	Y	Y				
If not, date last used (see Section XII)		-	-	-				
If empty, verify 1" or less left (see Section XII)		-	-	-				
Capacity of Tank (gal)		200	Pre	Diesel				
Substance Stored		SK	SK	6K				
Compatibility Records Available?		-	-	-				
(Compatibility Demonstrated?)		-	-	-				
M/Y Tank installed/Upgraded		1987	→	→				
<u>Tank Construction:</u> Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted		Steel	→					
Secondary Containment?		NW	→					
Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]		Y	→					
Double Walled? Y/N								
If Yes, Last Monthly Check?								
If No, Last Triennial Containment Integrity Test?		6/29/2022	→	→				
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]		4/15/2021	→					
Last Triennial Inspection?		Flapper valves →						
		Failed on 6/20/2022						
<u>Special Configuration:</u>		-	-	-				
Compartmentalized, Manifolder,								
Field Constructed,								
Airport Hydrant System								
VII. Piping Information								
<u>Piping Type:</u> Pressure, Suction		Pressure	→					
<u>Piping Construction:</u>								
Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping								
<u>Under Dispenser Containment ("UDC")? Y/N</u> If Yes, installation date?		Y	→					
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?								

Section Continues to Page 3

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VII. Piping Information

(Continued)

Tank No.

1	~	3				
---	---	---	--	--	--	--

Secondary Containment Sump Used for

Release Detection? Y/N

no	→					
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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?

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Tank and Piping Notes:

Tank No.

1	~	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

no Records

--	--	--	--	--	--	--

60-day Rectifier inspection records

no Records

--	--	--	--	--	--	--

Sacrificial Anode:

CP Test Records

--	--	--	--	--	--	--

CP Notes: (Include notes of any Interior Lining inspection)

CP test Records during UST inspection - missing last 2 inspection - c. } see email on 6.27.23
 Rectifier - missing readings for the rectifier

IX. Release Detection (§ 280.43-Subpart D)

N/A

Tank RD Methods

ATG

(call)

→

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Interstitial Monitoring

--	--	--	--	--	--	--

Groundwater Monitoring*

--	--	--	--	--	--	--

Vapor Monitoring*

--	--	--	--	--	--	--

Inventory Control w/ TTT

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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

OK

*Site assessment/installation documentation?

-	-	-				
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RD Equipment Last Tested? 4/15/21

6/24/22 submitted on 6/27/23

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to 2

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 2023 Nov 2022 Aug 2022 vceder TLS 350 R
 April 2023 Jan 2023 Oct 2022 July 2022 May 2022
 March 2023 Dec 2022 Sept 2022 June 2022

Tank No.

Pressurized & Non-Exempt Suction Piping

RD Methods N/A

Interstitial Monitoring	NO gauging →				
Groundwater Monitoring*					
Vapor Monitoring*					
Other? (specify)					

OR

Annual Line Tightness Test					
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AND

Installed? Y/N	Yes	Yes			
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ALLD

Last Annual Test (§ 280.44(a))	EWI →				
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12 Months Monitoring Records (§ 280.41(b)(1)(ii))
 4/15/2021 + 6/24/22

*Site assessment/installation documentation?

-	-	-			
---	---	---	--	--	--

RD Equipment Last Tested?

No Records					
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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)

0.2 gal/HR = Franklin Infectious System, = Rec last 12 months
 Prem = 0.1 gal/HR on 1/28/23, July 28, 22 Diesel = 0.1 gal/HR
 Reg = 0.1 gal/HR on 3/25/23, Sept. 2022 on 1/26/23 and 7/26/22

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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) _____ [§ 280.53]
- 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: Received walkthrough inspection checklists = Sept 16, 22; October 14, 2022;
January 14, 2023; February 14, 2023, March 7, 2023, April 23, 2023
Nov 14, 2022; December 19, 2022

XIII. Walkthrough Inspections [§ 280.36 – Subpart C]

Owner and operators must conduct walkthrough inspections of the following: June 2022 May 2023

- Must have monthly records Y N missing records July 2022 August 2022
- 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 6/24/22 submitted 6/22/23
- 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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SITE DRAWING

DATE: 6/13/23 TIME ON SITE: 1 pm TIME OFF SITE: 14:25 pm

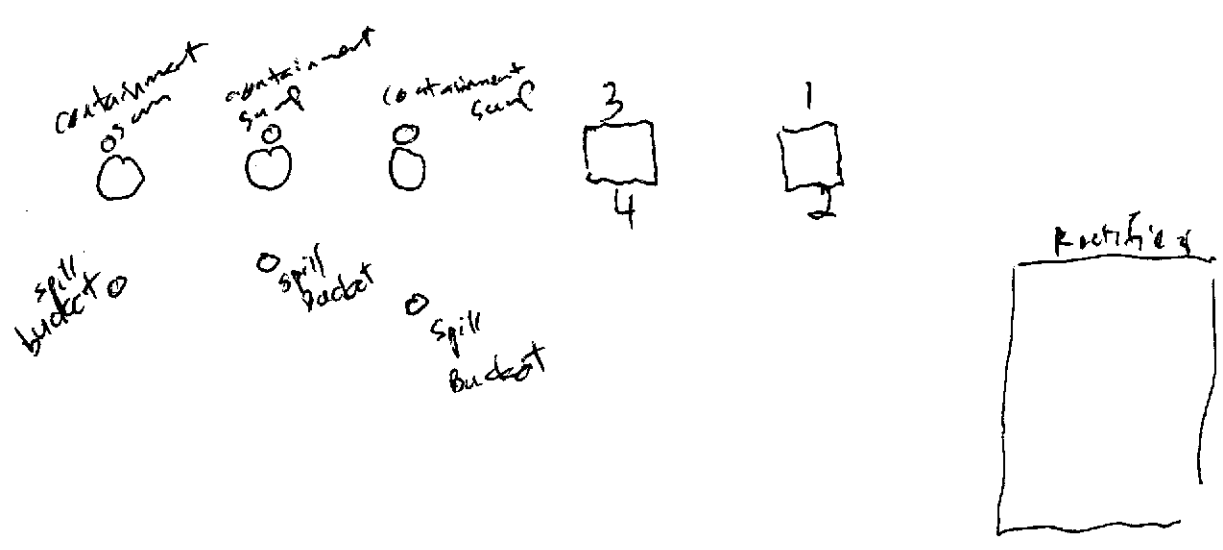
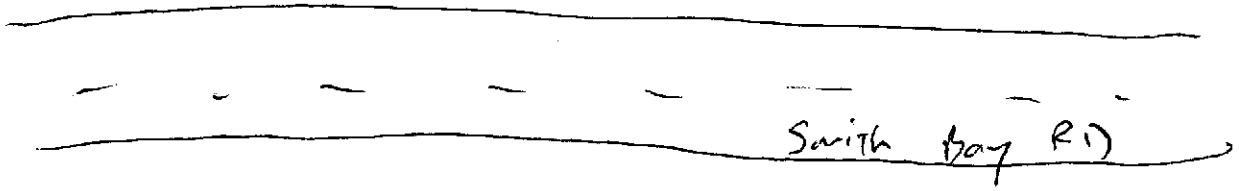
WEATHER: Partially Cloudy / Dry / Hot

ENVIRONMENTALLY SENSITIVE AREA: Y N

If "Yes", please describe:

18.345699

- 64.876257



① no sensor (liquid) in sumps
② flopper valves as overflow
③ ELLD

Veeder-Root
TCS 350 R

Building

Pictures

201016



THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA)
 REGION 2 UST PROGRAM
 Underground Storage Tank Team
 New York, NY 10007-1866

Facility Name Puma Smith Bay Service Station
 Address 33 Frydenhahl, St. Thomas, VI
 UST Reg # 201 026

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)(2)	potential failure to properly and periodically inspect overflow prevention equipment
§ 280.40(c)(3)	Potential failure to annually test release detection components
§ 280.41(b)(1)(B)	potential failure to monitor monthly of pressurized piping or to have annual line tightness test
§ 280.241(a)	Potential failure to designate at least one class A and at least one class B operator.
§ 280.241(b)	Potential failure to designate each individual who meets definitions of class C operator.

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

Comments/Recommendations:
 280.245(a) - Potential failure to maintain a list of designated operators
 280.31(b)(1) - potential to ensure that cathodic protection system is tested every 3 years thereafter.
 280.31(c) - Potential failure to inspect impressed current system every 60 days
 280.36(a) - Potential failure to either conduct periodic walk-throughs inspection every 30 days or to conduct annual walk-throughs

Title of UST Owner/Operator Representative: HSC Coldwell
 Name of UST Owner/Operator Representative: Puma
Nadia S. Davila
 (Please print)
Nadia S. Davila
 (Signature)
 Other Participants: Carol Theodore

Name of EPA Inspector/representative: inspector
Hien Tran
 (Please print)
Hien Tran
 (Signature)
 (Credential Number)
 Date of Inspection 6/13/23 Time 14:20 AM/PM

#3

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

Location: Puma - Smith Bay

Facility ID Number: 201016

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

Additional Recommendations: * Some Records were submitted after UST inspection

- ① no records for triennial inspection of overfill prevention equipment
- ② no records for annual test of release detection components
AIG, etc.
- ③ class A + B operator took training from EPA rather than the requirements from USVI DPNR - UST training ^{proof of}
- ④ NO designated class C operator + training
- ⑤ no record of maintain a list of operators.
- ⑥ no record for testing cathodic protection system every 3 years
- ⑦ NO record that The rectifier was read every 60 days
- ⑧ overfill prevention equipment - last inspection was on 6/24/2022.
- ⑨ missing records for monthly walkthrough inspection Failed on 6/24/2022
#3

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

Potential failure to follow or develop a required management practice or procedure

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 was onsite to assist with opening equipment. HSE coordinator emailed missing documents*

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during Inspections? Yes / No

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? Yes / No

This report was reviewed and deemed complete by: Reviewer

Signature

Date

Gaetano La Vigna

GAETANO LAVIGNA Digitally signed by GAETANO LAVIGNA
Date: 2023.08.02 14:59:16 -0400

701016

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
		<input checked="" type="checkbox"/> Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] <i>Failed on 6/24/2022 y - know r</i> <input type="checkbox"/> Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)] <input type="checkbox"/> Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)] <input type="checkbox"/> 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)] <input checked="" type="checkbox"/> UST system (Choose one) <input checked="" type="checkbox"/> UST in operation <input type="checkbox"/> UST in temporary closure <input checked="" type="checkbox"/> CP System is properly operated and maintained <input type="checkbox"/> CP system is performing adequately based on results of testing. [280.31(b)]; - or - <input checked="" type="checkbox"/> 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.		X	

X 3

2010/6
6/13/2022

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?			
			N/A	Y	N	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	<p>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)]</p> <p><input type="checkbox"/> Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected.</p> <p>For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]:</p> <p><input type="checkbox"/> Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)]</p> <p><input type="checkbox"/> 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)]</p> <p><input type="checkbox"/> Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)]</p> <p>For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: <input type="checkbox"/></p> <p>Tank and piping meet new UST requirements [280.21(a)(1)]</p> <p><input type="checkbox"/> Steel tank is internally lined. [280.21 (b)]</p> <p><input checked="" type="checkbox"/> Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]</p>				/

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.

701016
6/13/2023

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?	
			Y	N
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]	✓	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [280.40(a)(1)]	✓	
	3	Release detection system meets the performance standards at 280.43 or 280.44. [280.40(a)(3)]	✓	
	4	Implementing agency has been notified of suspected release as required. [280.40(b)] <input type="checkbox"/> 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
<input type="checkbox"/>			<p>A. Inventory Control with Tank Tightness Testing (T.T.T)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Inventory control is conducted properly. <input type="checkbox"/> T.T.T performed as required (See "D" below). <input type="checkbox"/> 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)] <input type="checkbox"/> Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] <input type="checkbox"/> Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] <input type="checkbox"/> Water is monitored at least monthly. [280.43(a)(6)]

*6/13/2023
201016*

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
<input checked="" type="checkbox"/>			<p>B. Automatic Tank Gauge (ATG)</p> <ul style="list-style-type: none"> <input type="checkbox"/> ATG is set up properly. [280.40(a)(2)] <input type="checkbox"/> ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] <input type="checkbox"/> <p>ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]</p>
<input type="checkbox"/>			<p>C. Manual Tank Gauging (MTG)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Tank size is appropriate for using MTG. [280.43(b)(5)] <p>Method is being conducted correctly. [280.43(b)(4)]</p> <ul style="list-style-type: none"> <input type="checkbox"/> No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] <input type="checkbox"/> <p>Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>D. Tightness Testing (Safe Suction piping does not require testing)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] <input type="checkbox"/> Tightness testing is conducted within specified time frames for method: <ul style="list-style-type: none"> <input type="checkbox"/> Tanks - every 5 years [280.41(a)(1)] <input type="checkbox"/> Pressurized Piping - annually [280.41(b)(1)(ii)] <input type="checkbox"/> Non-exempt suction piping - every 3 years [280.41(b)(2)] <input type="checkbox"/> Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>E. Ground Water or Vapor Monitoring</p> <ul style="list-style-type: none"> <input type="checkbox"/> Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] <input type="checkbox"/> <p>Vapor monitoring well is not affected by high ground water. [280.43(e)(3)]</p> <ul style="list-style-type: none"> <input type="checkbox"/> Site assessment has been done for vapor or ground water monitoring. [280.43(c)(6), 280.43(f)(7)] <input type="checkbox"/> <p>Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>F. Interstitial Monitoring</p> <ul style="list-style-type: none"> <input type="checkbox"/> Secondary containment can be used to detect a release [280.43(g)(1), 280.43(g)(2)] <input type="checkbox"/> Sensor properly positioned. [280.40(a)(2)]

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Release Detection Compliance Measures Matrix

Worksheet (Continued) - Commonly Used Release Detection Methods			
Tank (Choose one)	Pressurize d Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
<input type="checkbox"/>	<input checked="" type="checkbox"/>		<p>G. Automatic Line Leak Detector (ALLD)</p> <p><input type="checkbox"/> ALLD is present and operational. [280.44(a)]</p> <p><input type="checkbox"/> Annual function test of the ALLD has been conducted and records are available. [280.44(a)]</p> <p>H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]</p> <p><input type="checkbox"/> 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</p> <p><input type="checkbox"/> 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)]</p> <p><input type="checkbox"/> S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]</p>

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.

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