



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 Yacht Haven Grande
Located at: 5304 Yacht Haven Grande, Suite 100, St. Thomas, U.S. Virgin Islands 00802
Facility ID Number: 201043
ICIS Number: 3601543872

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 14, 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 Yacht Haven Grande 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 Yacht Haven Grande with the UST regulations. However, if areas of concern 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
12:13:33 -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: 6/14/2023

SIC CODE:

ICIS#: 3601543872

<p>I. Location of Tank(s) <input type="checkbox"/> Tribal</p> <p>Facility Name <u>Yacht Haven Grande</u></p> <p>Street Address <u>5304 Yacht Haven Grande, Suite 100</u></p> <p>City State Zip Code <u>St. Thomas</u> <u>VI</u> <u>00802</u></p> <p>County <u>St. Thomas</u></p> <p>Phone Number Email/Website <u>340-642-5644 - cell</u></p> <p>Contact Person(s) <u>Phil Blake - Marina General Manager</u></p>	<p>II. Ownership of Tank(s) <input type="checkbox"/> same as location (I.)</p> <p>Owner Name <u>Yacht Haven Grande USVI LLC</u></p> <p>Street Address <u>5304 Yacht Haven Grande, Suite 100</u></p> <p>City State Zip Code <u>St. Thomas</u> <u>VI</u> <u>00802</u></p> <p>County <u>St. Thomas</u></p> <p>Phone Number Email/Website <u>340-774-9500 / 954-960-3973</u></p> <p>Contact Person(s) <u>Phil Blake - Marina General Manager</u></p>
<p>II.B. Operator of Tank(s) <input checked="" type="checkbox"/> same as location (I.)</p> <p>Contractor Name _____</p> <p>Street Address _____</p> <p>City State Zip Code County _____</p> <p>Phone Number Fax Number _____</p>	<p>II.C. Ownership of UST(s) at Other Facilities</p> <p><input type="checkbox"/> Do you own UST(s) at other UST Facilities Yes / No</p> <p>If Yes, How many Facilities _____</p> <p>How many USTs _____</p>
<p>III. Notification [§ 280.22 – Subpart B]</p> <p><input type="checkbox"/> Notification to implementing agency; name <u>USVI DPA</u></p> <p>State Facility ID # <u>TFL-STT-006</u></p> <p>Date Issued: _____ Date Expires: <u>2021</u></p> <p>Any change from previous Notification noted? (Owner/ Operator/ Substance stored/ Substance compatibility?) <input checked="" type="checkbox"/> N <input type="checkbox"/> Y</p> <p>If Yes, Describe: _____</p>	
<p>IV. Financial Responsibility [§ 280.93(a) – Subpart H]</p> <p><input type="checkbox"/> State Fund* <input type="checkbox"/> Private Insurance: Insurer/Policy # <u>USL 01881221</u></p> <p><input type="checkbox"/> Guarantee <input type="checkbox"/> Surety Bond <input type="checkbox"/> Letter of Credit <u>Expiration 8/26/2024</u></p> <p><input type="checkbox"/> Local Government <input type="checkbox"/> Self Insured <input type="checkbox"/> Not Required (Federal & State government, hazardous substance USTs)</p> <p>*If NY State, then answer: Is there private insurance for third party bodily injury?</p>	
<p>V. Operator Training [§ 280.240 – Subpart J]</p> <p>Is there an individual trained for A and B operator classes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Name of Class A Operator <u>Phil Blake - 04/19/2020</u></p> <p>Are all operators for class C trained? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Does owner have a list of designated operators currently trained at each facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Does owner have proof of operators training or retraining? <u>only A/B operators</u> Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Notes: <u>Lat = 18.335402 The tank is being used to store used oil.</u> <u>Long = -64.919041</u></p>	

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VI. Tank Information	Tank No.	1					
Tank presently in use		YES					
If not, date last used (see Section XII)		-					
If empty, verify 1" or less left (see Section XII)		-					
Capacity of Tank (gal)		6000 gal					
Substance Stored		USED OIL					
Compatibility Records Available?		-					
(Compatibility Demonstrated?)		-					
M/Y Tank installed/Upgraded		2007					
<u>Tank Construction:</u> Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted		COMPOSITE STEEL clad with fiberglass					
Secondary Containment?		DW					
Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]		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)]		UNKNOWN NO EVIDENCE					
Last Triennial Inspection?		NO RECORDS					
<u>Special Configuration:</u>		-					
Compartmentalized, Manifolder,		-					
Field Constructed,		-					
Airport Hydrant System		-					
VII. Piping Information		-					
<u>Piping Type:</u> Pressure, Suction		-					
<u>Piping Construction:</u> Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping		FRANKLIN 2" APT-XR Flexible Mar. in Piping DW					
<u>Under Dispenser Containment ("UDC")? Y/N</u> If Yes, installation date?		-					
Date of last visual inspection/periodic monitoring		-					
Part of Line RD? Y/N		-					
If above Y, UDC Double Walled? Y/N		-					
If DW, Last Monthly Check of Annular Space?		-					
If non-DW or no monthly check of DW, last 3-Yr Containment Integrity Test?		-					

Section Continues to Page 3

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VII. Piping Information

(Continued)

Tank No.	1					
Secondary Containment Sump Used for Release Detection? Y/N	—					
If Yes, Is Containment Sump Single/Double Walled? (SW/DW)	—					
For SW, or DW w/o monthly check of annular space, last 3-YR integrity check/DW sumps with monthly monitoring - Last check of Annular space?	—					

Tank and Piping Notes: *HA Gensors*

Tank No.						
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VIII. Corrosion Protection (§ 280.31)

Integrity Assessment conducted prior to upgrade						
<u>Interior Lining</u>	Interior lining inspected					
	Is lining sole protection? Y/N					
<u>Impressed Current</u>	CP Test Records					
	60-day Rectifier inspection records					
	CP Test Records					
<u>Sacrificial Anode:</u>	CP Test Records					

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

IX. Release Detection (§ 280.43-Subpart D)

N/A

<u>Tank RD Methods</u> <i>Vulder-root TUS 350R</i>	ATG					
	Interstitial Monitoring	<i>NO</i>				
	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?

<i>NA</i>					
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RD Equipment Last Tested?

<i>no record</i>					
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Section Continues on Page 4

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IX. Release Detection

(Continued)

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

Vendor - poor TCS 350 R - no record / not working
 The tank had 1,671 gallon of used oil as of 6/21/2023 - sticking readings.

Tank No.

1

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

Interstitial Monitoring	NO					
Groundwater Monitoring*	↓					
Vapor Monitoring*						
Other? (specify)						
OR		Annual Line Tightness Test				
AND	Installed? Y/N	-				
ALLD	Last Annual Test (§ 280.44(a))	-				

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

*Site assessment/installation documentation?

-

RD Equipment Last Tested?

no

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)

no

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) _____
- 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: Per Mr. Phil Blake - the used oil UST has been periodically pumped out to empty by used oil authorized disposal contractor on the following dates: 3/29/23, 2/15/23, 1/15/23, 6/8/22, 2/18/22 and 1/24/22

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

* 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: 6/14/23 TIME ON SITE: 9 Am TIME OFF SITE: 10:10 pm

WEATHER: Dry / Partly cloudy /

ENVIRONMENTALLY SENSITIVE AREA: Y N
If "Yes", please describe:

Edward Wilmet Blyden Blvd.

spill bucket
○

○
sump
liquid
no sensor

Vecell - ROOT TUS 350 R

Building

Lat = 18.335402
Long = -64.919041

Quantity
see D?
5 gallons

Pictures



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

Facility Name YACHT Haven Grande
 Address 5304 YACHT Haven Grande, Suite 100
 UST Reg # St. Thomas, VI 00802

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
§ 280.46(c)(2)	Potential failure to operate and maintain release detection method and annually test components
§ 280.46(a)	Potential failure to monitor tanks every 30 days
§ 280.34(b)(7)	Potential failure to maintain any documentation of compliance with release detection
§ 280.36(a)	Potential failure to either conduct periodic walkthrough inspection every 30 days.
§ 280.93	Potential failure to comply with financial responsibility requirements

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

Comments/Recommendations:
 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.
 * 280.93 - obtained after inspection for FR.

Title of UST Owner/Operator Representative: General Manager Name of EPA Inspector/representative: _____

Name of UST Owner/Operator Representative: Charles Irons (Please print)
[Signature] (Signature)

Name of EPA Inspector/representative: Greg Tracy (Please print)
[Signature] (Signature)

Other Participants: Paul James

(Credential Number) _____

Date of Inspection 6/14/23 Time 9:38 (AM/PM)

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

Location: Yacht Haven Grande

Facility ID Number: TFL-STT-006

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

Additional Recommendations:

- (1) veeder-root TUS 350R - NO good, not functional
- (2) Tank was not monitored for release detection (monthly)
- (3) No evidence of financial responsibility -
- (4) containment snap had liquid - please remove and properly dispose it.
- (5) Designation each individual who meets the definition of class C operator at the UST facility -
- (6) create a list of designated class A, class B, and class C operator.

YH6

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (areas of concern during the on-site inspection)? **Yes**

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

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? *the facility is going to work with their contractor to correct the problems.*

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 12:14:06 -04'00'

Date

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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)] <i>not tested</i>	X			X
	2	Overflow prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)] <input type="checkbox"/> Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] <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)]	X			
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 type="checkbox"/> UST system (Choose one) <input type="checkbox"/> UST in operation <input type="checkbox"/> UST in temporary closure <input 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 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		

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Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?	
			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	
		<input type="checkbox"/> 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)]: <input type="checkbox"/> Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)] <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)] <input type="checkbox"/> 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)]: <input type="checkbox"/> Tank and piping meet new UST requirements [280.21(a)(1)] <input type="checkbox"/> Steel tank is internally lined. [280.21 (b)] <input type="checkbox"/> 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

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
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]		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)]		X
	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)]	N/A	
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 secondary 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
<input type="checkbox"/>			<p>A. Inventory Control with Tank Tightness Testing (T.T.1)</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)]

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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
<input 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)] <ul style="list-style-type: none"> <input type="checkbox"/> Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.I.T. (See "D" below) <input type="checkbox"/> Method is being conducted correctly. [280.43(b)(4)] <input type="checkbox"/> No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] <input type="checkbox"/> Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
<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"/> Vapor monitoring well is not affected by high ground water. [280.43(e)(3)] <input type="checkbox"/> Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] <input type="checkbox"/> Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
<input checked="" 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)] <p><i>NOT WORKING on or before AST inspection</i></p>

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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 type="checkbox"/>		<p>G. Automatic Line Leak Detector (ALLD)</p> <ul style="list-style-type: none"> <input type="checkbox"/> ALLD is present and operational. [280.44(a)] <input type="checkbox"/> Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>II. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]</p> <ul style="list-style-type: none"> <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 <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)] <input type="checkbox"/> 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.