



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

By Email: [smultani@satrajinc.com](mailto:smultani@satrajinc.com)

Satwinder Multani, Owner  
Ocean Food & Fuel LLC  
1200 Laurel Oak Road, Suite 108  
Voorhees, NJ 08043

Subject: Underground Storage Tank(s) For: Ocean Food & Fuel LLC  
Located At: 233 Main Street North, Cape May Courthouse, NJ 08210  
Facility ID Number: NJ 05243  
ICIS Number: 3601366464

Dear Mr. Multani:

Please find enclosed a copy of an inspection report(s) where a representative of the U.S. Environmental Protection Agency, Region 2 (EPA) conducted an Underground Storage Tank (UST) Inspection(s) on November 19, 2021 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"). Ocean Food & Fuel LLC owns and 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 Ocean Food & Fuel 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 me, at 212-637-5036 or by email at [Gutierrez.Claudia@epa.gov](mailto:Gutierrez.Claudia@epa.gov)

Thank you for your cooperation.

Sincerely,

CLAUDIA  
GUTIERREZ

Digitally signed by  
CLAUDIA GUTIERREZ  
Date: 2021.12.23  
11:43:11 -05'00'

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

Enclosure

cc: [michael.hollis@dep.nj.gov](mailto:michael.hollis@dep.nj.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):

JEFF BLAIR

DATE:

11/19/21

SIC CODE:

ICIS #:

I. Location of Tank(s)
II. Ownership of Tank(s)
III. Operator of Tank(s)
III. Ownership of UST(s) at Other Facilities
III. Notification
IV. Financial Responsibility
V. Operator Training

VI. Tank Information	Tank No.	ES	EC	ET
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)				
Substance Stored		12000G	→	
Compatibility Records Available?		-	-	-
(Compatibility Demonstrated?)		-	-	-
M/Y Tank <u>Installed</u> Upgraded		01/91	→	
<u>Tank Construction:</u> Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted		FRP	→	
Secondary Containment?		DOUBLE WALL	→	
Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]		SPILL BUCKETS	→	
Double Walled? <u>Y/N</u>				
If Yes, Last Monthly Check?				
If No, Last Triennial Containment Integrity Test?		* NO ON-SITE RECORDS	→	
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]		AUTO SHUTOFFS	→	
Last Triennial Inspection?		* NO ON-SITE RECORDS	→	
<u>Special Configuration:</u>		-	-	-
Compartmentalized, Manifolder,		-	-	-
Field Constructed,		-	-	-
Airport Hydrant System		-	-	-
<b>VII. Piping Information</b>		PRESSURE	→	
<u>Piping Type:</u> Pressure, Suction				
<u>Piping Construction:</u> Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping		DW FRP	→	
<u>Under Dispenser Containment ("UDC")? Y/N</u> If Yes, installation date?		YES	→	
Date of last visual inspection/periodic monitoring		01/91	→	
Part of Line RD? Y/N		NO RECORD		
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?		* NO RECORD *		

Section Continues to Page 3

**VII. Piping Information**

(Continued)

Tank No.	E5	EC	ET			
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?	NO RECORDS *					

**Tank and Piping Notes:** TANKS MONITORED BY CSLD, NO ON-SITE RECORDS OF LEAK DETECTOR TESTING, LINE TESTING OR MONTHLY LINE MONITORING

Tank No.	E5	EC	ET			
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**VIII. Corrosion Protection (§ 280.31)**

Integrity Assessment conducted prior to upgrade		E5	EC	ET		
<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					
<u>Sacrificial Anode:</u>	CP Test Records					

N/A

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

**IX. Release Detection (§ 280.43-Subpart D)**

Tank RD Methods	E5	EC	ET			
ATG	YES →					
Interstitial Monitoring						
Groundwater Monitoring*						
Vapor Monitoring*						
Inventory Control w/ TTT						
Manual Tank Gauging						
Manual Tank Gauging w/ TTT						
SIR						

N/A

12 Months Monitoring Records (§ 280.41(a), § 280.45(b))

**Must Make Available Last 12 Months For Compliance**

*Site assessment/installation documentation?	-	-	-			
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RD Equipment Last Tested?	NO ON-SITE RECORDS →					
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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)

I REVIEWED (12) PREVIOUS MONTHS OF PRESSURE CSLO RESULTS  
 TANK MONITOR → VEEPER ROOT "TL-350"

Tank No.	ES	EC	E7			
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Pressurized & Non-Exempt Suction Piping  
 RD Methods  N/A

Interstitial Monitoring						
Groundwater Monitoring*						
Vapor Monitoring*						
Other? (specify)						

OR

Annual Line Tightness Test						
----------------------------	--	--	--	--	--	--

AND

Installed? Y/N						
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**ALLD**

Last Annual Test (§ 280.44(a))	* NO ON-SITE RECORDS →					
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12 Months Monitoring Records (§ 280.41(b)(1)(ii))

\*Site assessment/installation documentation?

	—	—	—			
--	---	---	---	--	--	--

RD Equipment Last Tested?

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

Are under Dispenser Containments (UDC) Monitored?

via Visual Inspection	* NO ON-SITE RECORDS →					
via Electronic Monitoring						
Records of inspections available?						

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

\* NO ON-SITE RECORDS \*

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

NO ON-SITE RECORDS

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]

JKB  
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
- Releases reported to implementing agency; if so, date(s) \_\_\_\_\_  Greater than 25 gallons (estimate) [§ 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: / POTENTIAL RELEASE LG: FUEL ALARM PREMIUM UNKNOWN IF FUEL ALARM IS PREMIUM SUMP OR MISCIBLE TRUCK WASH

XIII. Walkthrough Inspections [§ 280.36 – Subpart C]

\* NO ON-SITE RECORDS \*

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.

# SITE DRAWING

GPS WPT USTs:

DATE: 11/19/21 TIME ON SITE: 8:30AM TIME OFF SITE: 10:00AM

39.08745 'N  
-74.81967 'W

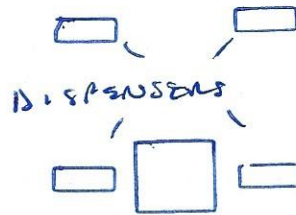
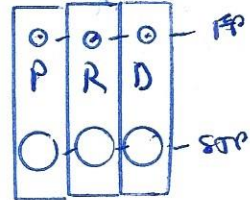
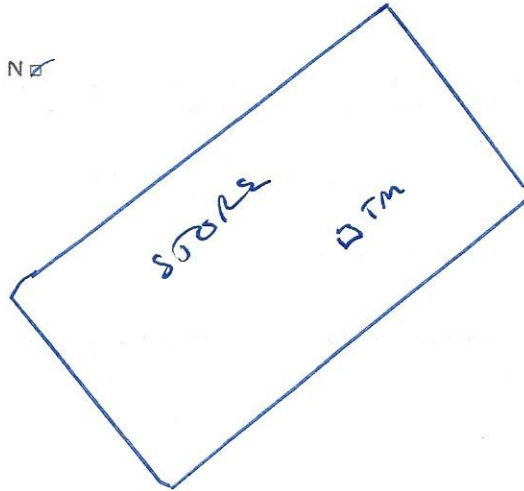
WEATHER: 45°, SUNNY + WINDY

ENVIRONMENTALLY SENSITIVE AREA: Y  N

If "Yes", please describe:

## PHOTOS

- 607 Fuel PAD
- 608 FP PLE
- 609 STP ↓
- 610 FP RES
- 611 STP ↓
- 612 FP DIE
- 613 STP DIE
- 614 INSIDE DESK
- 615 |
- 616 |
- 617 |
- 618 TANK MONITOR
- 619 UST REGISTRATION
- 620 INSP OBS SHEET
- 621 |
- 622 |
- 623 |
- 624 S.O.E



Pictures



pg 1

Facility Name OCEAN FISH + FUEL LLC  
 Address 233 MAIN STN, CAPE MAY COURTHOUSE  
 UST Reg # NJ 055243

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
§ 280.34 (b)(6)	POSSIBLE FAILURE TO MAINTAIN ANY DOCUMENTATION OF PERIODIC WALKTHROUGH INSPECTIONS
§ 280.34 (b)(9)	POSSIBLE FAILURE TO MAINTAIN ANY DOCUMENTATION OF OPERATOR TRAINING
§ 280.35 (c)(1)	POSSIBLE FAILURE TO MAINTAIN RECORDS OF TESTING OF PREVENTION EQUIPMENT, TESTING OF CONTAINMENT SUMPS, AND INSPECTION OF OVERFLOW PREVENTION EQUIPMENT
§ 280.44 (a)	POSSIBLE FAILURE TO ANNUALLY TEST LEAK DETECTOR

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

Comments/Recommendations:

- NO WALKTHROUGH INSPECTION RESULTS
- NO RECORDS OF OPERATOR TRAINING
- NO RESULTS OF OVERFLOW PREVENTION EQUIPMENT TESTING, CONTAINMENT SUMPS OR SPILL BUCKET TESTS
- NO ANNUAL LEAK DETECTOR TEST RESULTS

Title of UST Owner/Operator Representative: MGR

Name of UST Owner/Operator Representative:  
Judge Sethi  
 (Please print)  
J.S.  
 (Signature)

Other Participants: \_\_\_\_\_

Name of EPA Inspector/representative:  
JEFFREY K BLAIR  
 (Please print)  
Jeffrey K Blair  
 (Signature)  
19020130118  
 (Credential Number)

Date of Inspection 11/19/21 Time 10:00  AM  PM

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

ACEIN FOOD

Location: 1 FUEL LLC

Facility ID Number: NJ 005243

- 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) TESTING OF OVERFILL PREVENTION EQUIPMENT + TESTING OF SPILL BUCKETS AND SUMPS

Additional Recommendations:

- PLEASE FORWARD MISSING RECORDS TO INSPECTOR OR EPA



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

Facility Name OCEAN FOOD + FUEL LLC  
CAPE MAY  
 Address 233 MAIN ST N, COURTHOUSE  
 UST Reg # NY 005243

**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
§ 230.41(b)(1)(B)	POSSIBLE FAILURE TO HAVE ANNUAL LINE TIGHTNESS TEST OR MONTHLY MONITORING OF PRESSURIZED PIPING
§ <del>230.45(b)</del>	<del>POSSIBLE FAILURE TO MAINTAIN (OK)</del>
§ 230.45(b)(1)	POSSIBLE FAILURE TO MAINTAIN RESULTS OF ANNUAL OPERATION TESTS OF RELEASE DETECTION COMPONENTS
§ 230.83(a)	POSSIBLE FAILURE TO REPORT A SPILL/OVERFILL TO IMPLEMENTING AGENCY WITHIN 24 HOURS
§ 230.93	POSSIBLE FAILURE TO FULLY COMPLY WITH FINANCIAL RESPONSIBILITY REQUIREMENTS

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

Comments/Recommendations:

- NO LINE TEST OR MONTHLY LINE MONITORING RESULTS ON PRESSURIZED LINES
- NO ANNUAL ATG/COMPONENT TEST RESULTS
- POTENTIAL RELEASE (LC: FUEL MARKER PREMIUM)
- NO TANK INSURANCE POLICY

Title of UST Owner/Operator Representative: MGR

Name of UST Owner/Operator Representative:  
Judge Sethi  
 (Please print)  
S. Sethi  
 (Signature)

Name of EPA Inspector/representative:  
JEFFREY K BLAIR  
 (Please print)  
Jeffrey K Blair  
 (Signature)  
1902013011B  
 (Credential Number)

Other Participants: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Date of Inspection 11/19/21 Time 10:00 AM/PM

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

Location: OCEAN FOOD  
+ FOSL LLC

Facility ID Number: NJ 005243

- 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) ANNUAL NTC / COMPONENT TEST RESULTS
- POTENTIAL ISSUES

Additional Recommendations:

- PLEASE FORWARD MISSING RESULTS TO INSPECTOR OF EPA

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?

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

HIEP  
TRAN

Digitally signed by  
HIEP TRAN  
Date: 2021.12.22  
13:42:14 -05'00'

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)]		✓	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]		✓	
		<input checked="" 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)]			
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)]	✓		
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)]  <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.	✓		

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)]	✓		
IV. Tank and Piping Corrosion Protection	8	<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 checked="" 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.



# 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>B. Automatic Tank Gauge (ATG)</b></p> <p><input checked="" type="checkbox"/> ATG is set up properly. [280.40(a)(2)]</p> <p><input checked="" 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> <p>ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]</p>
<input type="checkbox"/>			<p><b>C. Manual Tank Gauging (MTG)</b></p> <p><input type="checkbox"/> Tank size is appropriate for using MTG. [280.43(b)(5)]</p> <p><input type="checkbox"/> 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)]</p> <p><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> <p>Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>D. Tightness Testing (Safe Suction piping does not require testing)</b></p> <p><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)]</p> <p><input type="checkbox"/> Tightness testing is conducted within specified time frames for method:</p> <p><input type="checkbox"/> Tanks - every 5 years [280.41(a)(1)]</p> <p><input type="checkbox"/> Pressurized Piping - annually [280.41(b)(1)(ii)]</p> <p><input type="checkbox"/> Non-exempt suction piping - every 3 years [280.41(b)(2)]</p> <p><input type="checkbox"/> Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>E. Ground Water or Vapor Monitoring</b></p> <p><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> <p>Vapor monitoring well is not affected by high ground water. [280.43(e)(3)]</p> <p><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"/></p> <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><b>F. Interstitial Monitoring</b></p> <p><input type="checkbox"/> Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)]</p> <p><input type="checkbox"/> Sensor properly positioned. [280.40(a)(2)]</p>

NS005243

## 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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>G. Automatic Line Leak Detector (ALLD)</b></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>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]</b></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) &amp; 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.