

Technician: Teddy Barnett
Technician Certification: (See forms)

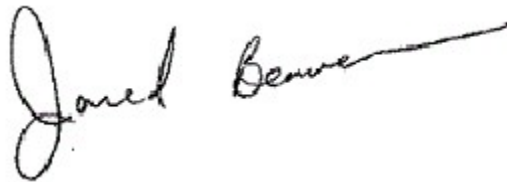
CATHODIC PROTECTION COMPLIANCE SURVEY UST SYSTEM

FOR: SIMARS CONVENIENCE 2
2068 E MARKET ST
NAPPANEE IN 46550

Contact: Gurmail Singh

SITE: SIMARS CONVENIENCE 2
2068 E MARKET ST
NAPPANEE IN 46550

BY: Tanknology Inc.



Jared Beavers
(NACE CP2 #52250)



Survey Date: 8/28/2024

Report Date: 9/4/2024

Work Order: 1356413

COMPLIANCE SURVEY

SACRIFICIAL CP SYSTEM

SIMARS CONVENIENCE 2
SIMARS CONVENIENCE 2
2068 E MARKET ST
NAPPANEE IN 46550

I. SCOPE:

A cathodic protection survey was conducted on 08/28/2024, on the cathodic protection system for SIMARS CONVENIENCE 2 at SIMARS CONVENIENCE 2, 2068 E MARKET ST, NAPPANEE, IN. The purpose of this survey was to determine if the UST system meets corrosion protection requirements. The cathodic protection system for the underground tanks consists of magnesium or zinc anodes. The UST facility consists of one 10000-gallon stip3 (diesel), one 10000-gallon stip3 (unleaded), one 10000-gallon stip3 (premium), one 4000-gallon stip3 (kerosene) tanks and associated fiberglass piping with metallic flexible connectors at the submersible turbine pumps (STP) and dispensers.

II. RESULTS & ANALYSIS:

The structure-to-soil potential measurements are tabulated on the attached survey data sheets. The potential measurements for the underground tanks, ranged from -631 millivolts to -1329 millivolts. The potential measurements for the flexible connectors, ranged from -699 millivolts to -771 millivolts.

III. CONCLUSIONS:

The results of the survey indicate that the structure-to-soil potential measurements for the diesel tank and flexible connectors did not meet the -850 millivolts criterion for cathodic protection. Current requirement testing and remote cell testing on the diesel tank indicated that the tank is electrically isolated from the associated risers. The testing also indicated that the diesel tank and all flexible connectors can be repaired with additional magnesium anodes.

IV. RECOMMENDATIONS:

It is recommended that additional magnesium anodes be installed on the diesel tank and flexible connectors. On completion of the repairs a structure-to-soil potential survey be conducted thereafter by a qualified cathodic protection tester.

Test Procedures: Description of test procedures utilized for this project are contained in the Appendix.

STI-P3 Cathodic Protection System: The STI-P3 cathodic protection system is designed to protect the outside of the tanks only. The risers/piping are electrically isolated from the tank and are not included. The STI-P3 tank incorporates a good exterior coating and factory installed magnesium anodes. The magnesium anodes are provided to protect the surface areas on the tank where coating holidays exist and exposure to corrosion occurs. The surface areas are very small and do not require a large number of anodes for protection. When foreign structures are electrically shorted to the tanks (i.e. piping) the protective effect is depleted and the magnesium anodes for the tanks are consumed rapidly. This is why it is very important to maintain effective electrical isolation of the STI-P3 tank.

V. REGULATORY REQUIREMENTS:

INDIANA CODE: 329 IAC 9-3-1 (c) (1) references EPA ?280.31

FEDERAL REGULATIONS

40 CFR ? 280.31 Operation and maintenance of corrosion protection. All owners and operators of metal UST systems with corrosion protection must comply with the following requirements to ensure that releases due to corrosion are prevented until the UST system is permanently closed or undergoes a change-in-service pursuant to ? 280.71: (a) All corrosion protection systems must be operated and maintained to continuously provide corrosion protection to the metal components of that portion of the tank and piping that routinely contain regulated substances and are in contact with the ground. (b) All UST systems equipped with cathodic protection systems must be inspected for proper operation by a qualified cathodic

protection tester in accordance with the following requirements: (1) Frequency. All cathodic protection systems must be tested within 6 months of installation and at least every 3 years thereafter or according to another reasonable time frame established by the implementing agency; and (2) Inspection criteria. The criteria that are used to determine that cathodic protection is adequate as required by this section must be in accordance with a code of practice developed by a nationally recognized association. Note to paragraph (B). The following codes of practice may be used to comply with paragraph (b) of this section: (A) NACE International Test Method TM 0101, "Measurement Techniques Related to Criteria for Cathodic Protection of Underground Storage Tank Systems"; (B) NACE International Test Method TM0497, "Measurement Techniques Related to Criteria for Cathodic Protection on Underground or Submerged Metallic Piping Systems"; (C) Steel Tank Institute Recommended Practice R051, "Cathodic Protection Testing Procedures for STI-P3 USTs"; (D) NACE International Standard Practice SP 0285, "External Control of Underground Storage Tank Systems by Cathodic Protection"; or (E) NACE International Standard Practice SP 0169, "Control of External Corrosion on Underground or Submerged Metallic Piping Systems". (c) UST systems with impressed current cathodic protection systems must also be inspected every 60 days to ensure the equipment is running properly. (d) For UST systems using cathodic protection, records of the operation of the cathodic protection must be maintained (in accordance with ? 280.34) to demonstrate compliance with the performance standards in this section. These records must provide the following: (1) The results of the last three inspections required in paragraph (c) of this section; and (2) The results of testing from the last two inspections required in paragraph (b) of this section.

APPENDIX: TEST PROCEDURES

Local structure-to-soil potentials are obtained over the tanks and/or steel lines to a copper-copper sulfate reference electrode (CSE). The CSE is placed over the steel tank/s and/or steel line/s in the electrolyte to measure cathodic protection levels. The structure-to-soil potential measurements are obtained by making electrical contact to steel structures and CSE placed in various locations in the electrolyte through a Fluke or Beckman digital voltmeter. The digital voltmeter utilized has a minimum 10 Meg Ohms impedance. The local structure-to-soil potentials are obtained with the magnesium anodes connected. The potentials obtained are evaluated to determine cathodic protection levels. Please see the criterion for cathodic protection. The measurements are recorded on the cathodic protection survey data sheets. Local "on" potentials are recorded on the location where the reference cell was placed. For example, a local "on" potential recorded on the ATG row for tank is the local structure-to-soil potential on that tank with the CSE placed in the electrolyte at the ATG man way. Remote (fixed) structure-to-soil potentials are obtained on all tank/s, associated risers, and piping to a CSE that remains in a fixed location in the electrolyte while obtaining all potentials. The measurements are recorded on the cathodic protection survey data sheets. For example a reading recorded on the ATG row under remote potential is a fixed cell potentials from the ATG riser with the CSE located in a remote (fixed) location. Structures of less than 3.0 millivolts (mV) difference are considered electrically continuous with each other. Structures with a difference between 3.0 mV to 10.0 mV indicate an inconclusive electrical continuity test. Structures with a difference of greater than 10.0 mV are considered electrically discontinuous.

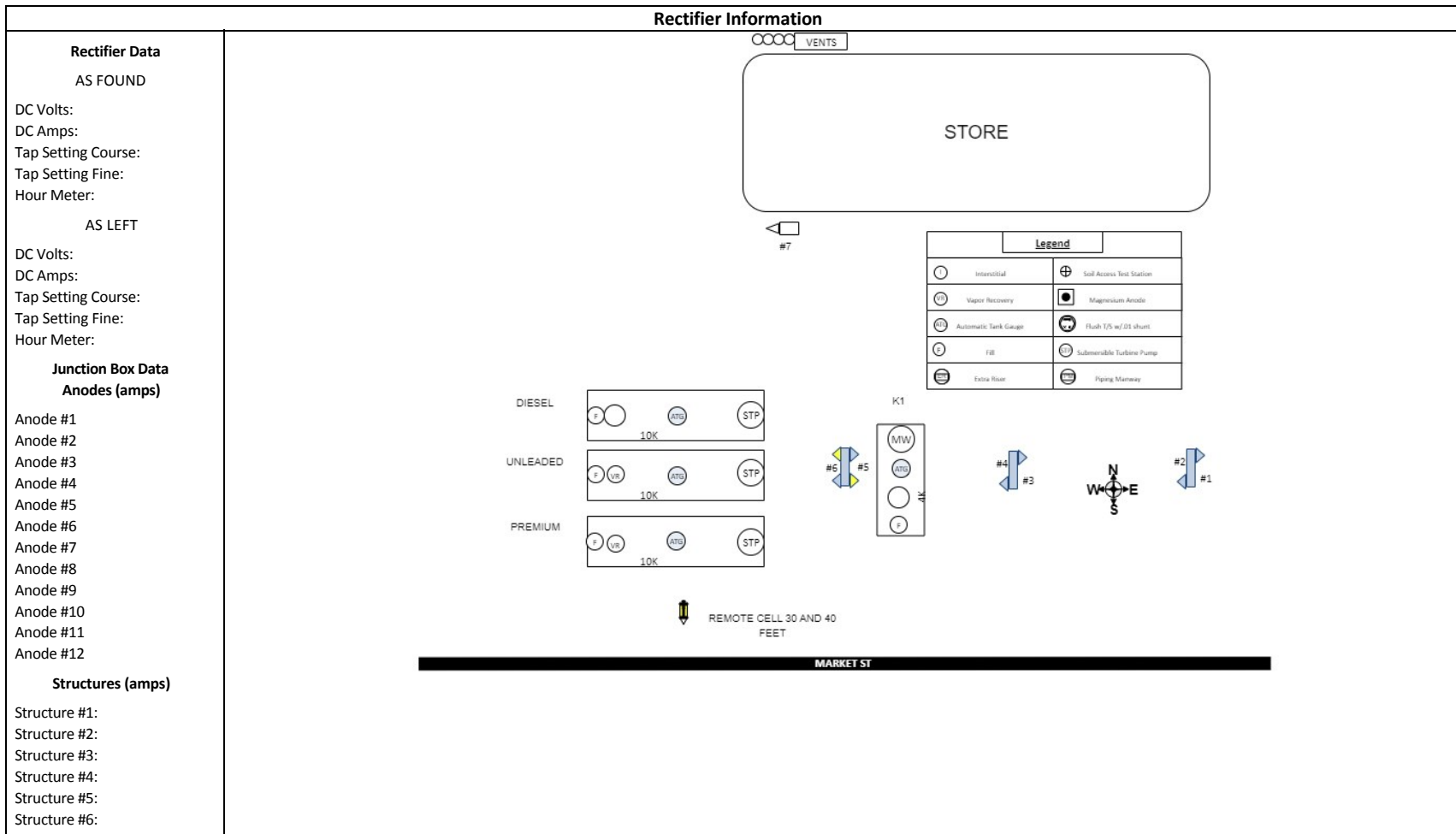
In order to determine the effectiveness of the cathodic protection system, local structure-to-soil potential measurements are obtained at representative locations throughout the subject area. These measurements were collected with the magnesium anodes attached. These measurements are then evaluated to determine if an adequate level of cathodic protection has been achieved.

The two (2) most common criteria for cathodic protection as established by the NACE standard practice SP0285-2011 "External Corrosion Control of Underground Storage Tank Systems by Cathodic Protection" are as follows:

1. A negative voltage of at least 0.85 volts as measured between the structure surface and a saturated copper/copper sulfate reference electrode placed in contact with the electrolyte.
2. A minimum negative (cathodic) polarization voltage shift of 100 millivolts measured between the structure surface and a stable reference electrode contacting the electrolyte. This polarization voltage shift is to be determined by interrupting the protective current and measuring the polarization decay. When the current is initially interrupted, an immediate voltage shift will occur. The voltage reading after the immediate shift shall be used as the base reading from which to measure polarization decay.

[illegible]

Customer Name: SIMARS CONVENIENCE 2	Site ID: NAPPANEE	Work Order: 1356413	Date: 8/28/2024
Site Address: 2068 E MARKET ST , NAPPANEE, IN 46550			

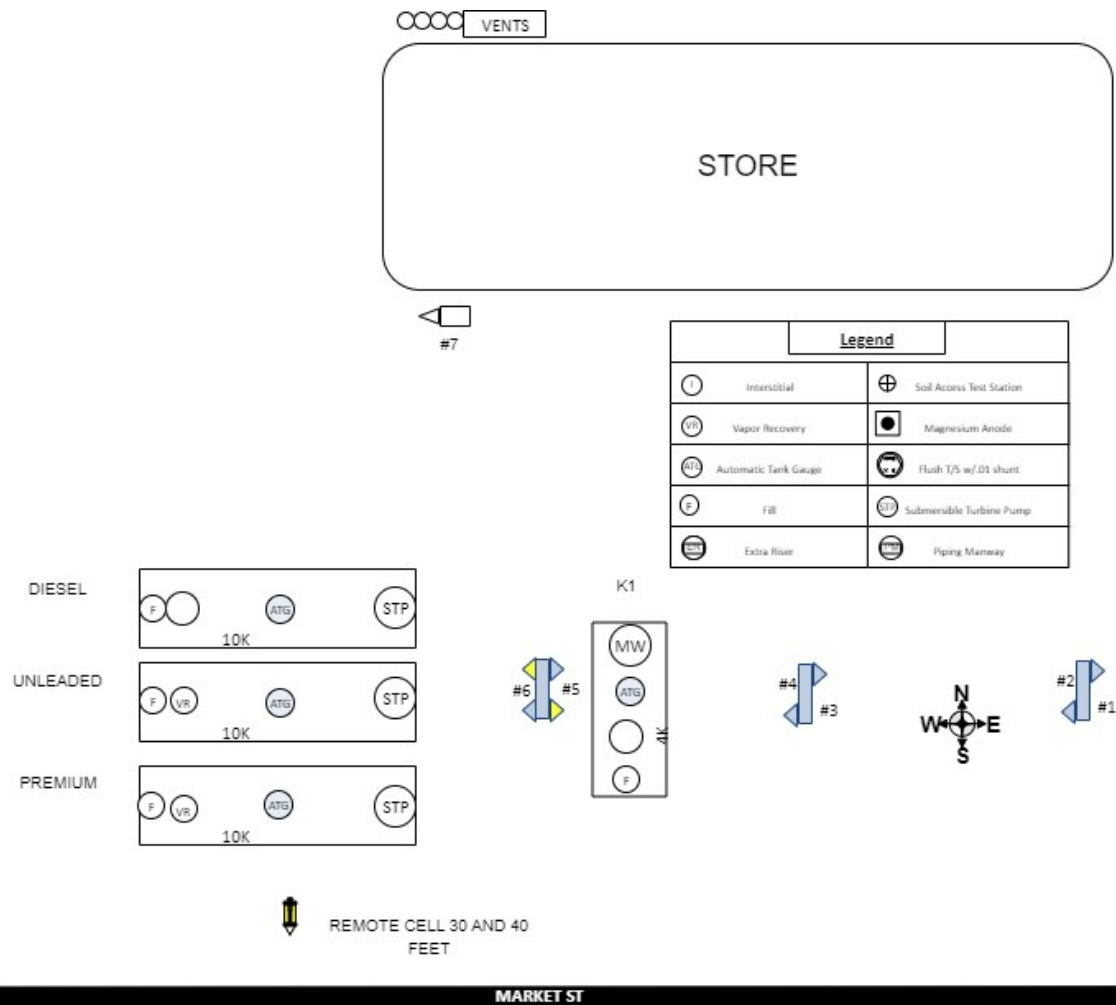




Site Diagram

(This site diagram is for reference only and is not drawn to scale)

Work Order: 1356413
Site ID / Name: NAPPANEE / SIMARS CONVENIENCE 2
Address: 2068 E MARKET ST
City: NAPPANEE State: IN Zip: 46550



 Tanknology Inc. 11000 N. MoPac Expressway, Suite 500 Austin, TX 78759 (800) 964-0010		JOB CLEARANCE FORM & SITE SAFETY CHECKLIST – OVF Policy 100-29-A Rev: H Revised: 6/25/2022	
Site Name/ID: <u>Sims conference II</u>		Street Address: <u>2068 E. Market St. Waller TX 77794</u> W.O.# <u>1356413</u>	
Arrival Time: <u>1552</u>	Departure Time: <u>2000</u>	Travel Time:	Others on site:
Date: <u>8-28-24</u>			
Scope of Work and Tasks Performed (JSA's must be available for all tasks): <u>Cathodic Protection Survey</u>			
Repairs to Equipment or Parts Provided:			
Follow-up actions required; equipment isolated; comments:			
PPE - PERSONAL PROTECTIVE EQUIPMENT REQUIRED (Check ✓ items used or mark ~ if not applicable)			
☒ Safety Vest/Shirt (all jobs)	☒ Gloves (all jobs)	☐ Splash Goggles (if needed)	☐ Hearing Protection (if needed)
☒ Safety Toe Boots (all jobs)	☒ Safety Glasses (all jobs)	☐ Hard Hat (if needed)	☐ Other
✓ PRE-TEST PROCEDURES (Check ✓ each item completed or mark ~ if not applicable)			
1. ☐ Discuss safety procedures with site personnel. Nearest hospital: _____			
2. ☒ Get ATG printout & check fuel/water levels. Prior to fuel delivery the system must be placed back into working order.			
3. ☒ Barricade work area (cones, flags, bars/tape) and place Fire Extinguishers & "No Smoking" Signs at perimeter.			
4. ☐ Confined Space Entry – If required complete separate CSE Checklist. If NO CSE check the following reason: ☐ No CS's ☐ CS's not opened ☐ No entry only visual ☐ No entry - used tools ☒ Work from prone position w/o risk of falling in			
5. ☐ Implement Lockout/Tagout per API 1646 (when accessing product piping during tasks)			
☐ Secure nozzles with "Out of Service" bags and nylon ties. ☐ Secure the circuit breaker(s) with lockout devices and tags.			
☐ Close ball valves or check valves on product piping. ☐ Disconnect electrical "bayonet" connector from the STP(s).			
☐ All applicable equipment disabled during test(s). ☐ Verify LOTO is complete by trying to operate pumps.			
SIGN IN		Lead Technician Name: <u>T. Baratz</u>	
General Safety Checks: All site personnel have been informed. Is a fuel delivery due today? _____ LOTO procedures have been discussed. Work areas barricaded to protect workers, staff & public.		Lead Technician Signature: <u>[Signature]</u>	
		Site Representative Name: <u>Mike Hatch</u>	
		Site Representative Signature: <u>[Signature]</u>	
✓ POST-TEST PROCEDURES (Check ✓ each item completed or mark ~ if not applicable)			
1. ☐ Remove all "Lockout/Tagout" devices and nozzle bags/ties.			
2. ☐ Run all pumps and verify there are no leaks:			
☐ Leak Detector & Vent Tubes ☐ Impact Valve Test Ports under dispensers			
☐ STP Functional Elements & Relief Screws			
3. ☒ Get ATG printout. Confirm water levels same as start or explain difference: <u>make to print. pictures.</u>			
4. ☐ Check following components operational:			
☐ ATG probes, sensors, & caps ☐ Shear valves are open			
☐ Ball floats, dry breaks & caps ☐ Dispensers & POS operational			
☐ Containment sumps are dry ☐ Dispenser panels are replaced			
☐ Manhole covers and sump lids ☐ Vents & Extractors (not capped, plugged or isolated)			
☐ Spill containers & drain valves ☐ Cathodic protection operational			
☐ Drop tubes, flapper valves, fill adapters & caps ☐ Siphon lines and manifold valves open			
5. ☐ Remove barricades.			
SIGN OUT & Operator Verification of Work (OVF)		Lead Technician Name: <u>T. Baratz</u>	
General Safety Checks: Work area has been left clean & safe. Site staff aware of work status including any remaining isolation. Changes to equipment are documented and communicated. All incidents, near incidents, and unsafe situations reported.		Lead Technician Signature: <u>[Signature]</u>	
		Site Representative Name: <u>Mike Hatch</u>	
		Site Representative Signature: <u>[Signature]</u>	
Site Representative Comments:			

COMPANY CONFIDENTIAL

Printed copies of this document are uncontrolled. The current version is available in the Tanknology On-Line Document Control System.

© Tanknology Inc., 2022. All Rights Reserved.

OVF