



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

January 4, 2023

Waterford Street Property LLC
Attn: Sarwan Singh, Registered Agent
15482 Bryanton Ct
Granger, IN 46530

Wakarusa Petroleum Inc
Attn: Sarwan Singh, Registered Agent
15482 Bryanton Ct
Granger, IN 46530

Re: Violation Letter
Wakarusa C Store
914 E Waterford St
Wakarusa, Elkhart County
UST Facility ID # **8958**

Dear Mr. Singh:

An inspector from the Indiana Department of Environmental Management (IDEM), Underground Storage Tank (UST) Section, conducted an inspection of the site referenced above on December 2, 2022.

The inspection was conducted pursuant to Indiana Code (IC) 13-14-2-2 to determine compliance with the provisions of IC 13-23 and 329 IAC 9. In accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Initial

Results of Inspection: Violations were discovered and require a submittal.

Within thirty (30) days of receipt of this letter, documentation demonstrating compliance with each of the requirements listed in the attached Inspection Report and Description of Violations (DOV) must be submitted to IDEM. Failure to submit this documentation may lead to this facility being referred for enforcement.

An enforcement action may include civil penalties of up to \$10,000 per UST. Enforcement actions may also affect the owner's and/or operator's eligibility for reimbursement from the Excess Liability Trust Fund (ELTF). Additionally, IDEM may deem the USTs at this facility ineligible for delivery, deposit or acceptance of regulated substances pursuant to IC 13-23-1-4. Finally, federal and criminal penalties may apply for failure to provide required notification; or submitting false information pursuant to IC 13-23-14-2 and liable under IC 13-30-10.

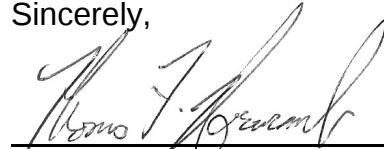
Thank you for your attention to this matter. Please submit the required documents to the UST Section via email at USTCompliance@idem.in.gov. Include in the subject line of the response the UST Facility ID # **8958**.

Inspector: Adam James
Phone: (317) 408-7187

Direct any questions regarding the inspection to:

Compliance Manager: Caitlin Shaffer
Phone: (317) 234-4112

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas F. Newcomb", is written over a horizontal line.

Thomas F. Newcomb, Chief
UST Compliance Section
Office of Land Quality

cc: Caitlin Shaffer
Adam James
UST Facility ID File # 8958
Wakarusa C Store
Attn: Sarwan Singh
Via email: sarwanp3@gmail.com

DESCRIPTION OF VIOLATIONS	
This inspection or records review revealed that the owner and/or operator of this facility is in violation of Indiana UST Rule 329 IAC 9. 329 Indiana Administrative Code ("IAC") 9 incorporates certain federal underground storage tank requirements found in 40 Code of Federal Regulations ("CFR") Part 280, including those identified below. The Description of Violations (DOV) and corrective measures are as follows:	
FACILITY NAME: Wakarusa C Store	UST FACILITY ID: 8958
ADDRESS: 914 E Waterford St, Wakarusa, Elkhart County	INSPECTION DATE: 12/02/2022
VIOLATIONS NOTED IN THIS INSPECTION	

329 IAC 9-2-2(c) – Failure to register/notify with complete information
Citation:
Pursuant to 329 IAC 9-2-2(c), an owner required to submit a notification under this section shall provide: (1) a notification for each UST owned; (2) complete information required on the form for each UST owned; and (3) if applicable, a separate notification form for each separate place of operation at which the USTs are located.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because an updated notification form with the correct piping material, release detection method and install date for PREM, DSL and REG South along with the correct overfill prevention method is required. Auto Shutoff was only observed in the DSL tank.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall fill out and submit to IDEM a correct and complete copy of the appropriate state form with required attachments, within fifteen (15) days of receipt of this notice.

§ 280.34(b)(4) – Failure to maintain documentation of UST system repairs (§ 280.33(g))
Citation:
Pursuant to 40 CFR 280.34(b)(4), owners and operators must maintain the documentation of UST system repairs (§ 280.33(g)).
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because PREM, DSL and REG South have updated double wall piping that has been replaced recently. Please provide verification on how much of the piping run was replaced. If over 50%, interstitial monitoring is required.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall submit to IDEM complete documents detailing the repairs to UST system components as identified within fifteen (15) days of receipt of this notice.

329 IAC 9-8-11(b) – Failure to demonstrate the ability to pay the deductible amount

Citation:

Pursuant to 329 IAC 9-8-11(b), an owner or operator of:

- (1) twelve (12) or fewer USTs shall demonstrate the ability to pay the applicable deductible amount under IC 13-23-9-1.3; or
- (2) more than twelve (12) USTs shall demonstrate the ability to pay two (2) times the applicable deductible amount under IC 13-23-9-1.3.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because documentation of financial responsibility was not provided.

Corrective Action:

The owner and/or operator of the UST systems at this site shall submit a copy of the instrument proving they have the coverage required by this rule within thirty (30) days of receipt of this notice.

§ 280.20(c)(1)(i) – Failure to have spill prevention equipment that will prevent release

Citation:

Pursuant to 40 CFR 280.20(c)(1)(i), to prevent spilling and overfilling associated with product transfer to the UST system, owners and operators must use the following spill and overfill prevention equipment:

- (i) Spill prevention equipment that will prevent release of product to the environment when the transfer hose is detached from the fill pipe (for example, a spill catchment basin).

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because REG South spill bucket is severely damaged and would not perform as designed during a spill or overfill.

Corrective Action:

The owner and/or operator of the UST systems at this site shall, within thirty (30) days of receipt of this notice, contract with a certified contractor to install or replace absent or substandard spill prevention equipment that will prevent the release of product to the environment. The UST owner and/or operator must submit proof that the spill prevention equipment has been installed within forty five (45) days of receipt of this notice.

§ 280.31(b) – Failure to inspect CP system, frequency and criteria
Citation:
Pursuant to 40 CFR 280.31(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.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because documentation of periodic test results for the corrosion protection system was not provided. Testing was due in 2017 and 2020.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall submit to IDEM the required documents within fifteen (15) days of receipt of this notice or have their UST systems fully inspected by a qualified cathodic protection tester within fifteen (15) days and submit the results within thirty (30) days of receipt of this notice.

§ 280.20(c)(1)(ii) – Failure to have overfill prevention equipment installed or installed properly

Citation:

Pursuant to 40 CFR 280.20(c)(1)(ii), to prevent spilling and overfilling associated with product transfer to the UST system, owners and operators must use the following spill and overfill prevention equipment:

(ii) Overfill prevention equipment that will:

(A) Automatically shut off flow into the tank when the tank is no more than 95 percent full; or

(B) Alert the transfer operator when the tank is no more than 90 percent full by restricting the flow into the tank or triggering a high-level alarm; or

(C) Restrict flow 30 minutes prior to overfilling, alert the transfer operator with a high level alarm one minute before overfilling, or automatically shut off flow into the tank so that none of the fittings located on top of the tank are exposed to product due to overfilling.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because the REG North and South tanks have coaxial drop tubes with ball float overfill. These are not compatible and the overfill device needs to be replaced on the REG North and South tanks.

Corrective Action:

The owner and/or operator of the UST systems at this site shall, within thirty (30) days of receipt of this notice, contract with a certified contractor to install or replace absent or substandard overfill prevention equipment that will operate as required. The UST owner and/or operator must submit proof that the overfill prevention equipment has been installed properly to the 90% or 95% fill level as required by the type of equipment within forty five (45) days of receipt of this notice. In the case where an owner has changed the overfill prevention equipment from a flow restrictor (ball float) to an auto-shutoff device, the owner must document the entire flow restrictor has been removed or that the automatic shut off device is installed at 90% or lower.

§ 280.35(a)(1) – Failure to perform periodic testing of spill prevention equipment and containment sumps used for IM

Citation:

Pursuant to 40 CFR 280.35(a)(1), owners and operators of UST systems with spill and overfill prevention equipment and containment sumps used for interstitial monitoring of piping must meet these requirements to ensure the equipment is operating properly and will prevent releases to the environment:

(1) Spill prevention equipment (such as a catchment basin, spill bucket, or other spill containment device) and containment sumps used for interstitial monitoring of piping must prevent releases to the environment.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because documentation of periodic test results for the spill buckets was not provided.

Corrective Action:

The owner and/or operator of the UST systems at this site shall, within thirty (30) days of receipt of this notice, contract with a certified contractor to inspect, repair and test all spill prevention equipment. Documentation, to include photographs, inspection, repair and testing results, showing the spill prevention equipment are liquid tight must be submitted within forty five (45) days of the receipt of this notice.

§ 280.35(a)(2) – Failure to perform periodic testing of overfill prevention equipment

Citation:

Pursuant to 40 CFR 280.35(a)(2), overfill prevention equipment must be inspected at least once every three years. At a minimum, the inspection must ensure that overfill prevention equipment is set to activate at the correct level specified in § 280.20(c) and will activate when regulated substance reaches that level. Inspections must be conducted in accordance with one of the criteria in paragraph (a)(1)(ii)(A) through (C) of this section.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because documentation of periodic test results for the overfill prevention equipment was not provided.

Corrective Action:

The owner and/or operator of the UST systems at this site shall, within thirty (30) days of receipt of this notice, contract with a certified contractor to inspect, repair and test all overfill prevention equipment. Documentation, to include photographs, inspection, repair, measurements and testing results, showing the overfill prevention equipment is fully functional and set at the correct level must be submitted within forty five (45) days of the receipt of this notice.

§ 280.40(a)(3)(i) – Failure to perform annual tests of ATG
Citation:
Pursuant to 40 CFR 280.40(a)(3)(i), owners and operators of UST systems must provide a method, or combination of methods, of release detection that beginning on October 13, 2018, is operated and maintained, and electronic and mechanical components are tested for proper operation, in accordance with one of the following: manufacturer's instructions; a code of practice developed by a nationally recognized association or independent testing laboratory; or requirements determined by the implementing agency to be no less protective of human health and the environment than the two options listed in paragraphs (a)(1) and (2) of this section. A test of the proper operation must be performed at least annually and, at a minimum, as applicable to the facility, cover the following components and criteria: (i) Automatic tank gauge and other controllers: test alarm; verify system configuration; test battery backup.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because documentation of annual test result of the ATG unit was not provided.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall have all components of the automatic tank gauge or other controllers tested for proper operation within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

§ 280.40(a)(3)(ii) – Failure to perform annual tests of probes & sensors
Citation:
Pursuant to 40 CFR 280.40(a)(3)(ii), owners and operators of UST systems must provide a method, or combination of methods, of release detection that beginning on October 13, 2018, is operated and maintained, and electronic and mechanical components are tested for proper operation, in accordance with one of the following: manufacturer's instructions; a code of practice developed by a nationally recognized association or independent testing laboratory; or requirements determined by the implementing agency to be no less protective of human health and the environment than the two options listed in paragraphs (a)(1) and (2) of this section. A test of the proper operation must be performed at least annually and, at a minimum, as applicable to the facility, cover the following components and criteria: (ii) Probes and sensors: inspect for residual buildup; ensure floats move freely; ensure shaft is not damaged; ensure cables are free of kinks and breaks; test alarm operability and communication with controller.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because documentation of annual test result of the probes was not provided.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall have all components of the automatic tank gauging probes tested for proper operation within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

§ 280.40(a)(3)(iii) – Failure to perform annual tests of ALLD

Citation:

Pursuant to 40 CFR 280.40(a)(3)(iii), owners and operators of UST systems must provide a method, or combination of methods, of release detection that beginning on October 13, 2018, is operated and maintained, and electronic and mechanical components are tested for proper operation, in accordance with one of the following: manufacturer's instructions; a code of practice developed by a nationally recognized association or independent testing laboratory; or requirements determined by the implementing agency to be no less protective of human health and the environment than the two options listed in paragraphs (a)(1) and (2) of this section. A test of the proper operation must be performed at least annually and, at a minimum, as applicable to the facility, cover the following components and criteria:
(iii) Automatic line leak detector: test operation to meet criteria in § 280.44(a) by simulating a leak.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because documentation of annual line leak detector test was not provided.

Corrective Action:

The owner and/or operator of the UST systems at this site shall have the automatic line leak detectors tested for proper operation by simulating a leak within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

§ 280.41(b)(1)(i)(B) – Failure to perform annual piping LTT or monthly monitoring

Citation:

Pursuant to 40 CFR 280.41(b)(1)(i)(B), pressurized underground piping installed on or before April 11, 2016 (previously cited as September 2, 2009 under 329 IAC 9-2-1(2)(D)) that routinely contains regulated substances must have an annual line tightness test conducted in accordance with § 280.44(b) or have monthly monitoring conducted in accordance with § 280.44(c).

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because monthly release detection records for the piping are incomplete.

Corrective Action:

The owner and/or operator of the UST systems at this site shall have any piping that contains a regulated amount of product and found to not have had appropriate monthly monitoring or an annual line tightness test within the 12 months prior to inspection tightness tested within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

§ 280.36(a)(1)(ii) – Failure to perform annual walkthrough inspections
Citation:
Pursuant to 40 CFR 280.36(a)(1)(ii), to properly operate and maintain UST systems, not later than June 28, 2021 owners and operators must conduct a walkthrough inspection annually that, at a minimum, checks containment sumps and hand held release detection equipment.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because documentation of an annual walkthrough inspection was not provided.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall, within seven (7) days of receipt of this notice, perform the annual walkthrough inspection for all UST systems at the site in accordance with a standard of practice referenced in the rule. Documentation, to include photographs, inspection forms, repair documents, and waste disposal records, showing the walkthrough inspection has been completed must be submitted within forty five (45) days of the receipt of this notice.

§ 280.245 – Failure to maintain list of designated operators and/or training records
Citation:
Pursuant to 40 CFR 280.245, owners and operators of underground storage tank systems must maintain a list of designated Class A, Class B, and Class C operators and maintain records verifying that training and retraining, as applicable, have been completed, in accordance with § 280.34.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because documentation of A, B and C certificates were not provided.</i>
Corrective Action:
The owner or operator of the UST systems at this site shall submit a list of those employees designated to be Class A, Class B and Class C operators. Those so designated must be trained and certification of that training submitted within thirty (30) days of receipt of this notice.



UNDERGROUND STORAGE TANK INSPECTION REPORT

INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

UST FAC ID: **8958**

Inspector's Name:	Adam James
Date:	December 2, 2022
Time In:	11:30
Time Out:	12:30
Inspection Type:	Initial

FACILITY NAME / LOCATION					
FACILITY NAME Wakarusa C Store			FACILITY ADDRESS (number and street) 914 E Waterford St		
ADDRESS (line 2)	CITY	STATE	ZIP CODE	COUNTY	
	Wakarusa	IN	46550	Elkhart	
UST OWNER					
UST Owner Name (Business Name as registered with the Secretary of State) Waterford Street Property LLC				BUSINESS ID (From the Secretary of State) 2016011100248	
PREFIX	FIRST NAME	MI	LAST NAME		SUFFIX
	Sarwan		Singh		
TELEPHONE NUMBER (574) 532-7858		EMAIL ADDRESS sarwanp3@gmail.com			
UST OPERATOR					
UST Operator Name (Business Name as registered with the Secretary of State) Wakarusa Petroleum Inc				BUSINESS ID (From the Secretary of State) 2016011100244	
PREFIX	FIRST NAME	MI	LAST NAME		SUFFIX
	Sarwan		Singh		
TELEPHONE NUMBER (574) 532-7858		EMAIL ADDRESS			
PROPERTY OWNER					
UST Property Owner Name (Business Name as registered with the Secretary of State) Waterford Street Property LLC				BUSINESS ID (From the Secretary of State) 2016011100248	
PREFIX	FIRST NAME	MI	LAST NAME		SUFFIX
TELEPHONE NUMBER (574) 532-7858		EMAIL ADDRESS			
COMPLIANCE ELEMENTS					
All USTs properly registered and up-to-date notification form on file			☐ YES	☒ NO	☐ UNK
An updated notification form with updated piping info for PREM, DSL and REG South along with the correct overfill equipment is required					
O/O is in compliance with reporting & record keeping requirements			☒ YES	☐ NO	☐ UNK
O/O is in compliance with release reporting or investigation			☐ YES	☐ NO	☒ N/A
O/O is in compliance with all UST closure requirements			☐ YES	☐ NO	☒ N/A
O/O has met all financial responsibility requirements			☐ YES	☒ NO	☐ N/A
Financial Responsibility documentation is needed					
40 CFR 280, Subpart A installation requirements (partially excluded) met			☒ YES	☐ NO	☐ N/A
40 CFR 280, Subpart B installation and upgrade requirements met			☐ YES	☒ NO	☐ UNK
REG South spill bucket is damaged and would not be able to perform as designed.					
40 CFR 280, Subpart C spill/overfill control requirements met			☒ YES	☐ NO	☐ N/A
40 CFR 280, Subpart C compatibility requirements met			☒ YES	☐ NO	☐ N/A
40 CFR 280, Subpart C O&M and testing requirements met			☐ YES	☒ NO	☐ UNK
Corrosion protection test, Spill bucket test, Overfill prevention test					
40 CFR 280, Subpart D release detection requirements met			☐ YES	☒ NO	☐ UNK
Monthly release detection records (Piping), Line leak detector test, ATG/probe test					
40 CFR 280, Subpart J operator training requirements met			☐ YES	☒ NO	☐ UNK
Operator Certificates A, B and C					

The information contained on this page is based upon a review of files related to this site and/or observations from an underground storage tank inspector. This page may contain information not specifically related to possible violations found during the review or inspection and is meant to give the owners and/or operator specific information to assist them.

Site Maintains:**Four (4) USTs**

- One (1) 8k GSL - installed 6/7/1996 - Stip3
- One (1) 10k GSL - installed 6/7/1996 - Stip3
- One (1) 4k GSL - installed 7/20/2001 - DW Fiberglass
- One (1) 6k DSL - installed 6/18/2004 - Fiberglass

Section Chief Note: The normal operational lifespan of a UST before failing is 25 to 30 years old. Two of the USTs at this site are now 26 years old and the owner should already be planning on removing or replacing them soon.

Piping is DW flex and pressurized

RD UST = ATG

RD Piping = LLD, LTT, ATG

Overfill/Spill = Spill Buckets + Ball Float + Auto Shutoff (DSL)

CP = galvanic, last known inspection completed 6/30/2014

ATG Certification = No

Overfill Protection Test = No

Spill Bucket Test = No

Site History:

- Two (2) tanks were installed in 1981, removed 6/5/1996. Closure notification on file but no closure report was found in the file
- One (1) tank installed in 1985, removed 7/11/2001. Closure report on file
- One (1) tank installed in 1985, removed 6/18/2004. Closure report on file
- 1996 tanks originally registered with both Ball Floats and Auto Shutoff. All forms since 2003 have only ASD indicated for all tanks
- Tanks have original Environ piping but also have new/additional piping with an unknown installation date

Documentation provided at the time of the file review:

- Notification Form approved 1/16/2018
- Monthly walkthrough inspections completed June July, Sept, Oct, Nov 2022

Inspector notes:

- There are (3) types of piping observed on site. The first type of piping is the Environ indicated on previous notification forms. This piping was only observed in REG North STP sump, a transition sump, and beneath the dispensers for the REG North line. The piping observed in the PREM and REG South STP sumps and associated dispensers appears to have been upgraded to OPW Pisces. The piping observed in the DSL STP sump appears to be ATP Poly-Tech based on the color and the fittings.
- Upgraded piping appears to be using the same piping run. Confirmation of how much piping was upgraded and when will determine if interstitial monitoring is required.
- The transition sump was observed to have ATP Poly-Tech that transitions to Environ piping.
- Observation of the DSL vapor recovery port did not show the presence of a ball float. Auto shut-off is installed on the drop tube. The (3) gasoline tanks do not have auto shutoff devices in the fill ports.
- REG North and South drop tubes were observed to be coaxial for vapor recovery.

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The following are AREAS OF CONCERN found during the inspection that will need to be addressed by the owner and/or operator:

1. Fluids were observed in spill buckets and sumps. Fluids should be removed from spill buckets and UDCs along with being periodically monitored.
2. DSL spill bucket cover is cracked. DSL spill bucket cover should be replaced.

The following are VIOLATIONS discovered during the inspection that will need to be corrected within 30 days of receipt of this inspection report to avoid further action and achieve compliance with the state underground storage tank program:

3. An updated notification form with the correct piping material, release detection method and install date for PREM, DSL and REG South is required. Additional violations may apply depending on the installation date(s) of the APT and OPW piping. Also, the correct overfill equipment for all three gasoline tanks is needed. Auto Shutoff was only observed in the DSL tank.
4. Documentation of financial responsibility was not provided.
5. REG South spill bucket is severely damaged and would not perform as designed.
6. Documentation of periodic test results for the corrosion protection system was not provided. Testing was due in 2017 and 2020.
7. The REG North and South tanks have coaxial drop tubes and ball float overfill. These are not compatible and the overfill device may not function properly during fuel deliveries.
8. Documentation of periodic test results for the spill buckets was not provided.
9. Documentation of periodic test results for the overfill prevention equipment was not provided.
10. Documentation of annual test result of the ATG unit and probes was not provided.
11. Documentation of annual line leak detector test was not provided.
12. 12 months of release detection records for the piping were not provided or available.
13. An annual walkthrough inspection was not provided.
14. Documentation of A, B and C certificates was not provided.
15. PREM, DSL and REG South has updated double wall piping that has been replaced recently. Please provide verification on how much of the piping run was replaced. If over 50% interstitial monitoring is required.

The information contained on this page is based upon a review of files related to this site and/or observations from an underground storage tank inspector. This page may contain information not specifically related to possible violations found during the review or inspection and is meant to give the owners and/or operator specific information to assist them.

The following are RECORDS to be submitted to the inspector within 30 days of receipt of this inspection report to avoid further action and achieve compliance with the state underground storage tank program:

- Updated notification form with the correct piping material, release detection method and install date for PREM, DSL and REG South along with the correct overfill prevention method
- Financial responsibility documentation
- Monthly PLLD release detection records or line tightness test
- Line leak detector test
- Corrosion protection tests that were due in 2017 and 2020
- Spill bucket test
- Overfill prevention test
- ATG/probe test
- Annual walkthrough inspection
- Operator Certificate A, B and C
- Confirmation REG South spill bucket repair/replacement
- Confirmation of PREM, DSL and REG South piping installed date and amount replaced. If post 09/02/2009, then interstitial monitoring would be required
- Documentation of ball float removal and alternative overfill installation - alarm or auto shutoff