



The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

12/26/2018

CHAUDHARY K JAWEED
ONLY GAS ALONE
378 HUDSON ST
CORNWALL ON HUDSON, NY 12520-

Subject Site: HILLSBOROUGH, MOBIL, 22 HENNIKER ST
DES Site # 198904015, UST Facility # 0110384

Reference: Underground Storage Tank Facility Inspection Report

On December 26, 2018 the New Hampshire Department of Environmental Services, Waste Management Division (DES) conducted an inspection of the underground storage tank (UST) system(s) at the subject site. The inspection was conducted to determine the level of compliance with key elements of the New Hampshire Code of Administrative Rules Env-Or 400 Underground Storage Facilities (UST Rules) and Env-Or 500, Recovery of Gasoline Vapors. These rules were established for the purpose of reducing the number of product releases to the environment from UST systems and to establish a leak detection system which would alert a facility owner or operator before significant environmental damage and economic loss occurs. The inspection conducted at this facility is part of the DES release prevention effort.

Deficiencies noted during this inspection warrant your facility to be considered in substantial non-compliance with applicable rules. This means they pose a threat of a release to the environment and may result in a release going undetected. The following deficiency(ies) requires your immediate attention:

GENERAL

Env-Or 404.05-07 requires a permit to operate and that the permit is permanently affixed on the facility premises and visible to a DES inspector.

The field inspection revealed that the permit is not posted. If you are unable to locate your permit, a replacement permit can be submitted to you upon request.

Please post the permit on the facility premises and submit in writing that the permit has been posted.

Env-Or 405.01(g) requires that a UST certificate be permanently affixed and visible to the DES inspector at the facility premises and RSA 146-C requires specific UST operator training postings and reporting, and requires significant operational compliance with the release prevention and release detection measures of the statute and Env-Or 400.

The DES inspector could not document that a certificate was posted.

Please post the UST certificate on the facility premises and submit in writing that the certificate has been posted.

Env-Or 505.10 requires the owner or operator of a gasoline storage tank at a gasoline dispensing facility with an active or decommissioned Stage II system to conduct system testing every 3 years. Additionally, Env-Or 504.07 requires the owner or operator of a gasoline storage tank at a Stage I gasoline dispensing

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TDD Access: Relay NH 1-800-735-2964

facility having a monthly throughput of 100,000 gallons per month or more to also conduct system testing every 3 years.

The DES inspector determined that a system test was not conducted or did not pass.

Please perform a vapor recovery system test for this gasoline facility. Please notify DES of the test date and submit passing test results.

RSA 146-C:19 requires that monthly visual inspections be conducted by or under the direction of the Class A or B operator at all underground storage tank facilities.

The DES inspector has determined that monthly inspections have not been consistently or comprehensively conducted pursuant to statutory requirement.

Please conduct monthly visual inspections pursuant to the requirements of RSA 146-C:19 and provide DES with a copy of the next inspection report.

RSA 146-C:17-21 requires that all regulated facilities in New Hampshire have designated Class A, B and C operators who have been trained and certified in accordance with an approved training program.

The DES inspector could not document that a listing of Class C operator(s) meeting the requirements of RSA 146-C:17,IV was posted.

Please post the listing of Class C operators assigned to the facility pursuant to the requirements of RSA 146-C:17,IV and notify the DES in writing when complete.

RSA 146-C:17-21 requires that all regulated facilities in New Hampshire have designated Class A, B and C operators who have been trained and certified in accordance with an approved training program.

The DES inspector could not document that Facility Response Guidelines meeting the requirements of RSA 146-C:17,III was posted.

Please post the Facility Operator Response Guidelines pursuant to the requirements of RSA 146-C:17,III and notify DES in writing when complete.

TANK #7 (Containing DIESEL FUEL with Capacity of 6000 gallons)

Env-Or 408.04-10 requires that temporary and permanent closure requirements be met for certain UST systems and components.

The DES inspector has determined that tank #7 (diesel product) has single wall components that routinely contain regulated substance requiring closure by December 22, 2015.

Please permanently close all single wall components, starting with submittal of closure notification form at least 30 days prior to the closure and submittal of a closure report within 30 days after the closure.

TANK #8 (Containing GASOLINE with Capacity of 8000 gallons)

Env-Or 504.01 and 504.02 requires an owner or operator of a gasoline storage tank at either a gasoline dispensing facility or a bulk gasoline plant to install, maintain and operate stage I equipment, and to properly notify DES of its existence and upkeep.

The DES inspector has determined that a Stage I Notification Form was not completed nor submitted to DES.

Please submit a Stage I Notification Form to the division.

Env-Or 405.08 requires continuous leak monitoring of double wall tank systems and Env-Or 406.20 requires annual leak monitoring system testing for proper operation.

The leak monitor was not tested annually.

Please provide monitor annual test results.

Env-Or 406.16 requires annual testing and reporting.
The passing annual line leak detector test had not been performed.

Please provide line leak detector test results.

Env-Or 406.20 requires annual leak monitoring system testing and reporting.
The leak monitoring equipment was not tested annually for proper operation.

Please provide leak monitoring test results.

Env-Or 406.24(b) requires the owner of a motor fuel dispensing UST system to test the primary containment system for tightness no later than December 22, 2017 and triennially thereafter.
The DES inspector has determined that primary containment tightness testing has not been conducted pursuant to rule requirement.

Please conduct primary containment tightness testing pursuant to the requirements of Env-Or 406.24 and provide DES with a copy of the tightness test reports.

TANK #9 (Containing GASOLINE with Capacity of 8000 gallons)

Env-Or 504.01 and 504.02 requires an owner or operator of a gasoline storage tank at either a gasoline dispensing facility or a bulk gasoline plant to install, maintain and operate stage I equipment, and to properly notify DES of its existence and upkeep.

The DES inspector has determined that a Stage I Notification Form was not completed nor submitted to DES.

Please submit a Stage I Notification Form to the division.

Env-Or 405.08 requires continuous leak monitoring of double wall tank systems and Env-Or 406.20 requires annual leak monitoring system testing for proper operation.
The leak monitor was not tested annually.

Please provide monitor annual test results.

Env-Or 406.16 requires annual testing and reporting.
The passing annual line leak detector test had not been performed.

Please provide line leak detector test results.

Env-Or 406.20 requires annual leak monitoring system testing and reporting.
The leak monitoring equipment was not tested annually for proper operation.

Please provide leak monitoring test results.

Env-Or 406.24(b) requires the owner of a motor fuel dispensing UST system to test the primary containment system for tightness no later than December 22, 2017 and triennially thereafter.
The DES inspector has determined that primary containment tightness testing has not been conducted pursuant to rule requirement.

Please conduct primary containment tightness testing pursuant to the requirements of Env-Or 406.24 and provide DES with a copy of the tightness test reports.

The above noted **deficiencies must be corrected within 30 days** of the date of this inspection. To verify that the proper corrective measures were taken, documentation, in the form of a report from the

certified technician that effected the repair, testing results, invoices, inventory records, photographs, etc., indicating the date and description of the corrective measures taken must be **submitted to DES within 45 days** of the date of this inspection. Please be advised that failure to correct the deficiencies in a proper and timely manner will result in DES proceeding under the DES Compliance Assurance Response Policy to determine an appropriate enforcement response. Please note that New Hampshire RSA 125-C and 146-C authorize permit revocation, administrative fines not to exceed \$2,000 per violation, administrative orders, delivery prohibition, injunctive relief, and civil penalties not to exceed \$10,000 per violation per day of continuing violation, and \$25,000 for each continued day of a repeat violation.

Your signature below acknowledges that you were briefed by DES staff concerning the noted deficiencies. Should you have any questions concerning the content of this letter, please contact me in the Waste Management Division of DES at (603) 271-3899. DES appreciates your willingness to comply with the UST program in an effort to preserve New Hampshire's environment.

Sincerely,



12/26/2018

HARDING SCHOFIELD, Inspector

Date

12/26/2018

CHAUDHARY K JAWEED, Facility Manager

Date

Important Dates

Requirement	Tanks	Next Date Due	Frequency
Tank Leak Monitor Test	7		Annual
Tank Leak Monitor Test	8, 9	Test Immediately	Annual
LLD Function Check	7		Annual
LLD Function Check	8, 9	Test Immediately	Annual
Tank Corrosion Protection Test	N/A	N/A	Every 3 years
Piping Corrosion Protection Test	N/A	N/A	Every 3 years
Fittings Corrosion Protection Test	N/A	N/A	Every 3 years
Spill Bucket Tightness Testing	7, 8, 9	5/13/2020	Every 3 years OR monthly interstice monitoring
Overfill Testing	7		Every 3 years
Overfill Testing	8, 9	5/18/2020	Every 3 years
Primary Containment System Tightness Test	7	5/18/2020	Every 3 years
Primary Containment System Tightness Test	8, 9	Test Immediately	Every 3 years
Operator Monthly Checklist			Monthly
JASON FRIGON - A Operator Training		10/24/2020	Every 2 years