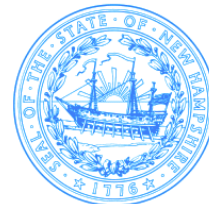




The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

9/5/2019

JEFF STONE
GEORGE C STAFFORD & SONS INC
PO BOX 220
LACONIA, NH 03247-0220

Subject Site: LACONIA, STAFFORD OIL, 227 COURT ST
DES Site # 199602042, UST Facility # 0111695

Reference: Underground Storage Tank Facility Inspection Report

On September 05, 2019 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:

TANK #7 (Containing GASOLINE with Capacity of 12000 gallons)

ENV-OR 406.12 REQUIRES THAT NO LATER THAN DECEMBER 22, 2017 AND TRIENNIALLY THEREAFTER, ALL SPILL CONTAINMENT EQUIPMENT WITHOUT SECONDARY CONTAINMENT AND LEAK MONITORING SHALL BE TESTED FOR TIGHTNESS AS SPECIFIED IN ENV-OR 406.05 THROUGH ENV-OR 406.08.

THE DES INSPECTOR HAS DETERMINED THAT SPILL CONTAINMENT INTEGRITY TESTING HAS NOT BEEN CONDUCTED PER ENV-OR 406.12(A).

PLEASE CONDUCT SPILL CONTAINMENT INTEGRITY TESTING AND SUBMIT THE TEST RESULTS TO DES. IF THE TIGHTNESS TEST FAILS, PLEASE NOTIFY DES PER ENV-OR 406.08, INVESTIGATE THE CAUSE OF THE FAILURE AND DETERMINE IF THE SYSTEM HAS LEAKED WITHIN 30 DAYS; AND EITHER REPAIR OR REPLACE THE SPILL CONTAINMENT IN ACCORDANCE WITH ENV-OR 408.03 OR TEMPORARILY CLOSE THE UST SYSTEM, PER ENV-OR 408.04, WITHIN 30 DAYS OF THE INITIAL FAILURE. THE OWNER SHALL ALSO SUBMIT A SUMMARY OF CLOSURE ACTIVITY, INCLUDING, BUT NOT LIMITED TO, MEASUREMENTS FROM A PHOTOIONIZATION DETECTOR AND TIGHTNESS TEST RESULTS, PER ENV-OR 406.14(F), IN THE CASE OF NEW SPILL CONTAINMENT INSTALLATION.

TANK #8 (Containing GASOLINE with Capacity of 10000 gallons)

DES Web Site: www.des.nh.gov

P.O. Box 95, 29 Hazen Drive, Concord, New Hampshire 03302-0095

Telephone: (603) 271-3899

Fax: (603) 271-2181

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

Env-Or 405.06 requires overfill protection devices be installed and maintained in good working order on all UST systems.

The overfill protection device was not maintained in good working order.

The above issue was resolved during the on-site inspection. No additional documentation is needed for this specific issue.

ENV-OR 406.12 REQUIRES THAT NO LATER THAN DECEMBER 22, 2017 AND TRIENNIALLY THEREAFTER, ALL SPILL CONTAINMENT EQUIPMENT WITHOUT SECONDARY CONTAINMENT AND LEAK MONITORING SHALL BE TESTED FOR TIGHTNESS AS SPECIFIED IN ENV-OR 406.05 THROUGH ENV-OR 406.08.

THE DES INSPECTOR HAS DETERMINED THAT SPILL CONTAINMENT INTEGRITY TESTING HAS NOT BEEN CONDUCTED PER ENV-OR 406.12(A).

PLEASE CONDUCT SPILL CONTAINMENT INTEGRITY TESTING AND SUBMIT THE TEST RESULTS TO DES. IF THE TIGHTNESS TEST FAILS, PLEASE NOTIFY DES PER ENV-OR 406.08, INVESTIGATE THE CAUSE OF THE FAILURE AND DETERMINE IF THE SYSTEM HAS LEAKED WITHIN 30 DAYS; AND EITHER REPAIR OR REPLACE THE SPILL CONTAINMENT IN ACCORDANCE WITH ENV-OR 408.03 OR TEMPORARILY CLOSE THE UST SYSTEM, PER ENV-OR 408.04, WITHIN 30 DAYS OF THE INITIAL FAILURE. THE OWNER SHALL ALSO SUBMIT A SUMMARY OF CLOSURE ACTIVITY, INCLUDING, BUT NOT LIMITED TO, MEASUREMENTS FROM A PHOTOIONIZATION DETECTOR AND TIGHTNESS TEST RESULTS, PER ENV-OR 406.14(F), IN THE CASE OF NEW SPILL CONTAINMENT INSTALLATION.

TANK #9A (Containing DIESEL FUEL with Capacity of 7000 gallons)

Env-Or 405.06 requires overfill protection devices be installed and maintained in good working order on all UST systems.

The overfill protection device was not maintained in good working order.

The above issue was resolved during the on-site inspection. No additional documentation is needed for this specific issue.

Env-Or 405.09 and 406.08 require leak monitoring for piping be properly installed and continuously operate. The low point sump and leak monitoring system must be maintained pursuant to the requirements of Env-Or 406.08. Additionally, Env-Or 407.05(d) and Saf-C 6000 requires that UST system components be installed in accordance with fire code requirements.

The DES inspector has determined that the primary piping for(Off Road Diesel)may have a leak or possibly be weeping and may not be tight and/or that a release may have occurred as a result of an unusual operating condition.

Please conduct a tightness test in accordance with Env-Or 406.11 requirements to determine the tightness of this system within 7 days and if not tight immediately conduct applicable notification and response actions required per Env-Or 600.

ENV-OR 406.12 REQUIRES THAT NO LATER THAN DECEMBER 22, 2017 AND TRIENNIALLY THEREAFTER, ALL SPILL CONTAINMENT EQUIPMENT WITHOUT SECONDARY CONTAINMENT AND LEAK MONITORING SHALL BE TESTED FOR TIGHTNESS AS SPECIFIED IN ENV-OR 406.05 THROUGH ENV-OR 406.08.

THE DES INSPECTOR HAS DETERMINED THAT SPILL CONTAINMENT INTEGRITY TESTING HAS NOT BEEN CONDUCTED PER ENV-OR 406.12(A).

PLEASE CONDUCT SPILL CONTAINMENT INTEGRITY TESTING AND SUBMIT THE TEST RESULTS TO DES. IF THE TIGHTNESS TEST FAILS, PLEASE NOTIFY DES PER ENV-OR 406.08,

INVESTIGATE THE CAUSE OF THE FAILURE AND DETERMINE IF THE SYSTEM HAS LEAKED WITHIN 30 DAYS; AND EITHER REPAIR OR REPLACE THE SPILL CONTAINMENT IN ACCORDANCE WITH ENV-OR 408.03 OR TEMPORARILY CLOSE THE UST SYSTEM, PER ENV-OR 408.04, WITHIN 30 DAYS OF THE INITIAL FAILURE. THE OWNER SHALL ALSO SUBMIT A SUMMARY OF CLOSURE ACTIVITY, INCLUDING, BUT NOT LIMITED TO, MEASUREMENTS FROM A PHOTOIONIZATION DETECTOR AND TIGHTNESS TEST RESULTS, PER ENV-OR 406.14(F), IN THE CASE OF NEW SPILL CONTAINMENT INSTALLATION.

TANK #9B (Containing DIESEL FUEL with Capacity of 3000 gallons)

Env-Or 405.09 and 406.08 require leak monitoring for piping be properly installed and continuously operate. The low point sump and leak monitoring system must be maintained pursuant to the requirements of Env-Or 406.08. Additionally, Env-Or 407.05(d) and Saf-C 6000 requires that UST system components be installed in accordance with fire code requirements.

The DES inspector has determined that the primary piping for(On Road Diesel)may have a leak or possibly be weeping and may not be tight and/or that a release may have occurred as a result of an unusual operating condition.

Please conduct a tightness test in accordance with Env-Or 406.11 requirements to determine the tightness of this system within 7 days and if not tight immediately conduct applicable notification and response actions required per Env-Or 600.

ENV-OR 406.12 REQUIRES THAT NO LATER THAN DECEMBER 22, 2017 AND TRIENNIALLY THEREAFTER, ALL SPILL CONTAINMENT EQUIPMENT WITHOUT SECONDARY CONTAINMENT AND LEAK MONITORING SHALL BE TESTED FOR TIGHTNESS AS SPECIFIED IN ENV-OR 406.05 THROUGH ENV-OR 406.08.

THE DES INSPECTOR HAS DETERMINED THAT SPILL CONTAINMENT INTEGRITY TESTING HAS NOT BEEN CONDUCTED PER ENV-OR 406.12(A).

PLEASE CONDUCT SPILL CONTAINMENT INTEGRITY TESTING AND SUBMIT THE TEST RESULTS TO DES. IF THE TIGHTNESS TEST FAILS, PLEASE NOTIFY DES PER ENV-OR 406.08, INVESTIGATE THE CAUSE OF THE FAILURE AND DETERMINE IF THE SYSTEM HAS LEAKED WITHIN 30 DAYS; AND EITHER REPAIR OR REPLACE THE SPILL CONTAINMENT IN ACCORDANCE WITH ENV-OR 408.03 OR TEMPORARILY CLOSE THE UST SYSTEM, PER ENV-OR 408.04, WITHIN 30 DAYS OF THE INITIAL FAILURE. THE OWNER SHALL ALSO SUBMIT A SUMMARY OF CLOSURE ACTIVITY, INCLUDING, BUT NOT LIMITED TO, MEASUREMENTS FROM A PHOTOIONIZATION DETECTOR AND TIGHTNESS TEST RESULTS, PER ENV-OR 406.14(F), IN THE CASE OF NEW SPILL CONTAINMENT INSTALLATION.

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,



9/5/2019

ROBERT STOCKMAN, Inspector

Date

JEFF STONE, Facility Manager

Date

Important Dates

Requirement	Tanks	Next Date Due	Frequency
Tank Leak Monitor Test	7, 8, 9A, 9B	6/20/2020	Annual
LLD Function Check	7, 8, 9A, 9B	6/20/2020	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, 9A, 9B	Past Due	Every 3 years OR monthly interstice monitoring
Overfill Testing	7	8/1/2020	Every 3 years
Overfill Testing	8, 9A, 9B	7/13/2020	Every 3 years
Primary Containment System Tightness Test	7, 8, 9A, 9B	3/26/2022	Every 3 years
Operator Monthly Checklist			Monthly
JEFF STONE - A Operator Training		9/26/2020	Every 2 years
TOM ASELTON - B Operator Training		1/30/2021	Every 2 years