

From: Szmyt, Emily
To: ["lauren.simons"](#)
Cc: [lloyd helm](#); [Alicia Metz](#); ["Mike Cormier"](#); [Rodney Belanger](#); [Jones, Matthew](#); [Krautmann, Charlie](#)
Subject: RE: Site #- 199306030
Date: Thursday, December 17, 2020 3:56:00 PM
Attachments: [Inspection 11-18-2016.pdf](#)
Importance: High

Lauren,

Thank you for the email.

Regarding the liquid in the dispenser sump 1 /2 ...

- Please see the attached inspection report dated 11/18/2016. The report states "The inspector has determined that dispenser sump 1 / 2 contains evidence of residual product. Please repair leaking super grade meter flange gasket and/or dispenser piping and submit repair results to DES."
 - o This is considered an unusual operating condition per Env-Or 406.04. Therefore, the Administrative Order requested the facility owner to investigate the cause of the liquid in the sump, determine if a release has occurred and submit a written report to DES that describes the investigation and its conclusions in accordance with Env-Or 406.04(e).
 - o NHDES requires confirmation from a contractor that the residual product was from a leaking gasket.

After talking with Mike Cormier with Insight, I think my last email may not have been understood so I am going to re-summarize...

1. DES requires compliance with the Administrative Order.

- o To achieve compliance with the Administrative Order:
 - Please complete the investigation of the residual product in the dispenser sump 1 /2, as detailed above. Please also provide DES with a conclusion of the investigation and maintenance documentation for repairs that were made, including the replacement of the flange gasket.
 - Please conduct monthly visual inspections and provide a copy of a recent monthly visual inspection form to confirm the inspections are being done.

2. DES requires compliance with Env-Or 408.04(e) by reactivating the UST systems per Env-Or 408.04(f), remain in temporary closure provided the conditions specified in Env-Or 408.04(g) are met OR permanently close the UST systems in accordance with Env-Or 408.06 through 408.10.

- o To remain in temporary closure, from a file review of NHDES records the following is required to be completed (see Env-Or 408.04(g)):
 - Passing annual leak monitoring test results;
 - Passing triennial test results for overfill protection and spill containment;
 - Passing annual stage 1 vapor maintenance inspection (please note that in the

- attached inspection dated 11/18/2016, the DES determined the correct P/V vent cap was not installed. DES requires maintenance for the replacement of the PV vent cap since this is part of the Stage 1 inspection); and
- Confirmation that the UST systems have been properly placed into temporary closure by removing product to less than 1 inch, placing locks on the fill caps and by submitting an updated registration.
- To reactivate the UST systems, from a file review of NHDES records, the following is required (see Env-Or 408.04(f)):
- Passing annual leak monitoring and line leak detection test results;
 - Passing triennial test results for overfill protection and spill containment;
 - Passing annual stage 1 vapor maintenance inspection (please note that in the attached inspection dated 11/18/2016, the DES determined the correct P/V vent cap was not installed. DES requires maintenance for the replacement of the PV vent cap since this is part of the Stage 1 inspection);
 - Passing primary containment tightness test results; and
 - Confirmation that the UST certificate and a Permit to Operate have been posted.

3. Action for the liquid in the dispenser sump 1 /2 from the canopy...

- If and when the UST facility is to be re-activate, please follow-up with Matt Jones. Liquid in a dispenser sump is an unusual operating condition. DES may require a tightness testing per Env-Or 406.04(h) to ensure the UST system is tight (dispenser sump, secondary piping and tank sump).
- Please note water entering the UST system may cause damage to the UST system over time or it may have already.

Please call myself or Matt Jones if you would like to discuss anything further. We are happy to talk this through with you to make sure you understand the regulations and what is needed to come into compliance.

Thank You,

Emily Szmyt
Enforcement Specialist
Waste Management Division
New Hampshire Department of Environmental Services
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From: lauren simons <lauren66simons@gmail.com>
Sent: Wednesday, December 16, 2020 9:49 AM
To: Szmyt, Emily <Emily.D.Szmyt@des.nh.gov>
Cc: lloyd helm <wlhelm4800@gmail.com>; Alicia Metz <aliciametz1@gmail.com>
Subject: Site #- 199306030

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Dear Emily:

Attached is a copy of the explanation for the liquid in Dispenser Sump 1/2; in addition, I have contracted Mike Cormier from Insight, Inc. to perform all necessary testing, which he feels should be complete by year's end. Insight, Inc. will also be removing all liquids from the existing tanks, pad locking the fill ports, and performing the monthly inspections.

Once the above has been completed, I will submit a UST Registration for the existing two tanks to remain in temporary closure. Should you need additional information, please feel free to contact me.

Most sincerely,

Lauren Simons
518-789-0051