



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



1/5/2021

JEREMY HOLLAND
NHLG-UST I LLC C/O CROSS AMERICA PARTNERS
600 HAMILTON ST STE 500
ALLENTOWN, PA 18101-

Subject Site: SEABROOK, NH0021, 587 LAFAYETTE RD
DES Site # 199106013, UST Facility # 0111950

Reference: Underground Storage Tank Facility Inspection Report

On January 13, 2021 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 #8 (Containing GASOLINE with Capacity of 10000 gallons)

Env-Or 503.01 requires that the facility owner or operator of a gasoline storage tank with a capacity equal to or greater than 250 gallons shall equip the tank with a submerged fill tube, install the submerged fill tube with a clearance of 4 to 6 inches between the bottom of the tank and the highest opening of the submerged fill tube and utilize a submerged fill tube to fill the tank. Env-or 405.01(j) requires that all UST systems be equipped with a submerged fill tube installed with a clearance of at least 4 but less than 6 inches between the bottom of the tank and the point at which the regulated substance can first exit the submerged fill tube.

The DES inspector could not verify the highest exit point of the drop tube is within 4 to 6 inches from the bottom of the tank.

Please install a new drop tube with the highest exit point 4 to 6 inches above the bottom of the tank or verify the drop tube is installed in accordance with Env-Or 405.01(j) and submit documentation of the installation (including measurements and photographs) to DES.

Env-Or 405.05 and 406.01 require spill containment devices be installed and maintained in good working order on all UST systems.

The DES inspector could not verify the fill spill containment was maintained in good working order.

Please submit written notification that the spill containment device is in good working order; repair or replace the spill containment in accordance with Env-Or 408.03; or temporarily close the

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

UST system, per Env-Or 408.04 and submit maintenance to DES. In the case of a spill containment device replacement, please submit tightness test results for the new device and a summary of closure activity in accordance with Env-Or 406.12 and Env-Or 408.03(g). For closure of a spill containment device, please submit a summary of closure activity. If contamination is observed or if the integrity of the device is not verified prior to removal, include measurements from a photoionization detector per, Env-Or 406.12(g) and Env-Or 408.03(e).

Env-Or 405.06 and Env-Or 406.01 require overfill protection devices be installed and maintained in good working order on all UST systems. Env-Or 405.06(f) requires each overfill protection device to be accessible for inspection of proper operation.

The DES inspector could not verify the overfill protection was installed at the required 90% alert or 95% shut off level per Env-Or 405.06(c).

Please submit documentation, including measurements and photographs, to DES that verifies overfill protection installation at the 90 percent alert or the 95 percent shut off level and overfill protection test results. Any repaired or replaced overfill prevention device shall be immediately tested and reported to DES. Per Env-Or 406.03(c), no transfer of regulated substances shall be made to a UST system that is not equipped with overfill protection devices as required by Env-Or 405.06.

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the tank leak monitoring equipment was not tested annually for proper operation.

Please conduct annual leak monitor testing and submit passing test results to DES that meet the requirements of Env-Or 406.13(e) through (g).

If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure until satisfactory repairs are made.

Finally, if the leak monitor indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the annual test documentation was not available for the tank leak monitoring equipment.

Please submit passing test results to DES that meet the requirements of Env-Or 406.13(e) through (g).

Env-Or 405.08 and Env-Or 406.02 require leak monitoring of tank systems to be installed and in good working order to continuously perform their original design function. Env-Or 406.02 requires the interstitial or annular space for tanks to be free of debris and water.

The DES inspector could not verify the leak monitoring for the tank system listed was continuously performing.

Please conduct maintenance to the leak monitoring system and submit passing leak monitoring test results to DES that meet the requirements of Env-Or 406.13(e) through (g). Please provide a description of maintenance in the comments section of the leak monitoring test report.

If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure in accordance with Env-Or 408.04 until satisfactory repairs are made.
Finally, if the leak monitor indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

Env-Or 406.09 requires automatic line leak detectors to be tested annually in accordance with the manufacturer's requirements to confirm that they are operating in accordance with their designed functions and requires the facility owner to submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the line leak detector was not tested annually for proper operation.
Please conduct annual line leak detection testing and submit passing test results to DES that meet the requirements of Env-Or 406.09(b) and (c).

If it is determined that the line leak detection system is malfunctioning, Env-Or 406.09(f) requires the owner to remove the affected piping system(s) from service until the line leak detector is repaired or replaced and passes the line leak detector test.

Finally, if the line leak detection system indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

Env-Or 406.09 requires automatic line leak detectors to be tested annually in accordance with the manufacturer's requirements to confirm that they are operating in accordance with their designed functions and requires the facility owner to submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the annual test documentation was not available for the line leak detector.

Please submit passing test results to DES that meet the requirements of Env-Or 406.09(b) and (c).

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the piping leak monitoring equipment was not tested annually for proper operation.

Please conduct annual leak monitor testing and submit passing test results to DES that meet the requirements of Env-Or 406.13(e) through (g).

If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure until satisfactory repairs are made.

Finally, if the leak monitor indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the annual test documentation was not available for the piping leak monitoring equipment.

Please submit passing test results to DES that meet the requirements of Env-Or 406.13(e) through (g).

Env-Or 405.09 and Env-Or 406.02 require leak monitoring of tank systems to be installed and in good working order to continuously perform their original design function. Env-Or 405.04, Env-Or 406.01 and Env-Or 406.02 require secondary containment for UST piping systems that is in good working order to perform their original design function, liquid tight and maintained free of liquid and debris.

The DES inspector could not verify the leak monitoring for the piping was continuously performing.

Please conduct maintenance to the leak monitoring system and submit passing leak monitoring test results to DES that meet the requirements of Env-Or 406.13(e) through (g). Please provide a description of maintenance in the comments section of the leak monitoring test report.

If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure in accordance with Env-Or 408.04 until satisfactory repairs are made.

Finally, if the leak monitor indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

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 the fill spill containment failed a tightness test, a reportable unusual operating condition, per Env-Or 406.04.

Please remove liquid (if present), investigate the cause of the failure, determine if the system has leaked and implement prevent or eliminate a release; and either repair or replace the spill containment or temporarily close the UST system within 30 days of the initial failure. As an unusual operating condition, submit a written report to NHDES that describes the investigation and its conclusions, per Env-Or 406.04(e).

For closure of a spill containment device, please also submit a summary of closure activity which includes measurements from a photoionization detector, per Env-Or 406.12(g).

Env-Or 406.17 requires the owner of a motor fuel dispensing UST system to test the primary containment system for tightness no later than December 22, 2017, prior to operation after a significant system modification, and triennially after the initial test.

The DES inspector has determined the triennial primary containment system test failed.

Please investigate the cause of the test failure within 24 hours, implement measures to prevent or minimize a release, eliminate the leak, or otherwise correct the deficiency and determine if a release has occurred. As an unusual operating condition, submit a written report to NHDES that describes the investigation and its conclusions within 7 days, per Env-Or 406.04(e).

Please refer to Env-Or 406.08 for test failure requirements, Env-Or 408.01 and Env-Or 408.02 for repair requirements, Env-Or 408.06 through 408.10 for closure requirements, if applicable.

If it is determined a release has occurred, please also immediately conduct the response action requirements of Env-Or 600.

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

Env-Or 503.01 requires that the facility owner or operator of a gasoline storage tank with a capacity equal to or greater than 250 gallons shall equip the tank with a submerged fill tube, install the submerged fill tube with a clearance of 4 to 6 inches between the bottom of the tank and the highest opening of the submerged fill tube and utilize a submerged fill tube to fill the tank. Env-or 405.01(j) requires that all UST systems be equipped with a submerged fill tube installed with a clearance of at least 4 but less than 6

inches between the bottom of the tank and the point at which the regulated substance can first exit the submerged fill tube.

The DES inspector could not verify the highest exit point of the drop tube is within 4 to 6 inches from the bottom of the tank.

Please install a new drop tube with the highest exit point 4 to 6 inches above the bottom of the tank or verify the drop tube is installed in accordance with Env-Or 405.01(j) and submit documentation of the installation (including measurements and photographs) to DES.

Env-Or 405.05 and 406.01 require spill containment devices be installed and maintained in good working order on all UST systems.

The DES inspector could not verify the fill spill containment was maintained in good working order.

Please submit written notification that the spill containment device is in good working order; repair or replace the spill containment in accordance with Env-Or 408.03; or temporarily close the UST system, per Env-Or 408.04 and submit maintenance to DES. In the case of a spill containment device replacement, please submit tightness test results for the new device and a summary of closure activity in accordance with Env-Or 406.12 and Env-Or 408.03(g).

For closure of a spill containment device, please submit a summary of closure activity. If contamination is observed or if the integrity of the device is not verified prior to removal, include measurements from a photoionization detector per, Env-Or 406.12(g) and Env-Or 408.03(e).

Env-Or 405.06 and Env-Or 406.01 require overfill protection devices be installed and maintained in good working order on all UST systems. Env-Or 405.06(f) requires each overfill protection device to be accessible for inspection of proper operation.

The DES inspector could not verify the overfill protection was installed at the required 90% alert or 95% shut off level per Env-Or 405.06(c).

Please submit documentation, including measurements and photographs, to DES that verifies overfill protection installation at the 90 percent alert or the 95 percent shut off level and overfill protection test results. Any repaired or replaced overfill prevention device shall be immediately tested and reported to DES. Per Env-Or 406.03(c), no transfer of regulated substances shall be made to a UST system that is not equipped with overfill protection devices as required by Env-Or 405.06.

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the tank leak monitoring equipment was not tested annually for proper operation.

Please conduct annual leak monitor testing and submit passing test results to DES that meet the requirements of Env-Or 406.13(e) through (g).

If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure until satisfactory repairs are made.

Finally, if the leak monitor indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the annual test documentation was not available for the tank leak monitoring equipment.

Please submit passing test results to DES that meet the requirements of Env-Or 406.13(e) through (g).

Env-Or 405.08 and Env-Or 406.02 require leak monitoring of tank systems to be installed and in good working order to continuously perform their original design function. Env-Or 406.02 requires the interstitial or annular space for tanks to be free of debris and water.

The DES inspector could not verify the leak monitoring for the tank system listed was continuously performing.

Please conduct maintenance to the leak monitoring system and submit passing leak monitoring test results to DES that meet the requirements of Env-Or 406.13(e) through (g). Please provide a description of maintenance in the comments section of the leak monitoring test report.

If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure in accordance with Env-Or 408.04 until satisfactory repairs are made.

Finally, if the leak monitor indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the piping leak monitoring equipment was not tested annually for proper operation.

Please conduct annual leak monitor testing and submit passing test results to DES that meet the requirements of Env-Or 406.13(e) through (g).

If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure until satisfactory repairs are made.

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Env-Or 405.09 and Env-Or 406.02 require leak monitoring of tank systems to be installed and in good working order to continuously perform their original design function. Env-Or 405.04, Env-Or 406.01 and Env-Or 406.02 require secondary containment for UST piping systems that is in good working order to perform their original design function, liquid tight and maintained free of liquid and debris.

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Finally, if the leak monitor indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

Env-Or 406.17 requires the owner of a motor fuel dispensing UST system to test the primary containment system for tightness no later than December 22, 2017, prior to operation after a significant system modification, and triennially after the initial test.

The DES inspector has determined the triennial primary containment system test failed.

Please investigate the cause of the test failure within 24 hours, implement measures to prevent or minimize a release, eliminate the leak, or otherwise correct the deficiency and determine if a release has occurred. As an unusual operating condition, submit a written report to NHDES that describes the investigation and its conclusions within 7 days, per Env-Or 406.04(e).
Please refer to Env-Or 406.08 for test failure requirements, Env-Or 408.01 and Env-Or 408.02 for repair requirements, Env-Or 408.06 through 408.10 for closure requirements, if applicable.
If it is determined a release has occurred, please also immediately conduct the response action requirements of Env-Or 600.

TANK #10 (Containing GASOLINE with Capacity of 6000 gallons)

Env-Or 503.01 requires that the facility owner or operator of a gasoline storage tank with a capacity equal to or greater than 250 gallons shall equip the tank with a submerged fill tube, install the submerged fill tube with a clearance of 4 to 6 inches between the bottom of the tank and the highest opening of the submerged fill tube and utilize a submerged fill tube to fill the tank. Env-or 405.01(j) requires that all UST systems be equipped with a submerged fill tube installed with a clearance of at least 4 but less than 6 inches between the bottom of the tank and the point at which the regulated substance can first exit the submerged fill tube.

The DES inspector could not verify the highest exit point of the drop tube is within 4 to 6 inches from the bottom of the tank.

Please install a new drop tube with the highest exit point 4 to 6 inches above the bottom of the tank or verify the drop tube is installed in accordance with Env-Or 405.01(j) and submit documentation of the installation (including measurements and photographs) to DES.

Env-Or 405.05 and 406.01 require spill containment devices be installed and maintained in good working order on all UST systems.

The DES inspector could not verify the fill spill containment was maintained in good working order.

Please submit written notification that the spill containment device is in good working order; repair or replace the spill containment in accordance with Env-Or 408.03; or temporarily close the UST system, per Env-Or 408.04 and submit maintenance to DES. In the case of a spill containment device replacement, please submit tightness test results for the new device and a summary of closure activity in accordance with Env-Or 406.12 and Env-Or 408.03(g).
For closure of a spill containment device, please submit a summary of closure activity. If contamination is observed or if the integrity of the device is not verified prior to removal, include measurements from a photoionization detector per, Env-Or 406.12(g) and Env-Or 408.03(e).

Env-Or 405.06 and Env-Or 406.01 require overfill protection devices be installed and maintained in good working order on all UST systems. Env-Or 405.06(f) requires each overfill protection device to be accessible for inspection of proper operation.

The DES inspector could not verify the overfill protection was installed at the required 90% alert or 95% shut off level per Env-Or 405.06(c).

Please submit documentation, including measurements and photographs, to DES that verifies overfill protection installation at the 90 percent alert or the 95 percent shut off level and overfill protection test results. Any repaired or replaced overfill prevention device shall be immediately tested and reported to DES. Per Env-Or 406.03(c), no transfer of regulated substances shall be made to a UST system that is not equipped with overfill protection devices as required by Env-Or 405.06.

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the tank leak monitoring equipment was not tested annually for proper operation.

Please conduct annual leak monitor testing and submit passing test results to DES that meet the requirements of Env-Or 406.13(e) through (g).

If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure until satisfactory repairs are made.

Finally, if the leak monitor indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

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The DES inspector could not verify the leak monitoring for the tank system listed was continuously performing.

Please conduct maintenance to the leak monitoring system and submit passing leak monitoring test results to DES that meet the requirements of Env-Or 406.13(e) through (g). Please provide a description of maintenance in the comments section of the leak monitoring test report.

If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure in accordance with Env-Or 408.04 until satisfactory repairs are made.

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Env-Or 406.09 requires automatic line leak detectors to be tested annually in accordance with the manufacturer's requirements to confirm that they are operating in accordance with their designed functions and requires the facility owner to submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the line leak detector was not tested annually for proper operation.

Please conduct annual line leak detection testing and submit passing test results to DES that meet the requirements of Env-Or 406.09(b) and (c).

If it is determined that the line leak detection system is malfunctioning, Env-Or 406.09(f) requires the owner to remove the affected piping system(s) from service until the line leak detector is repaired or replaced and passes the line leak detector test.

Finally, if the line leak detection system indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

Env-Or 406.09 requires automatic line leak detectors to be tested annually in accordance with the manufacturer's requirements to confirm that they are operating in accordance with their designed functions and requires the facility owner to submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the annual test documentation was not available for the line leak detector.

Please submit passing test results to DES that meet the requirements of Env-Or 406.09(b) and (c).

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to DES no later than 30 days after the date of the test.

The DES inspector has determined the piping leak monitoring equipment was not tested annually for proper operation.

Please conduct annual leak monitor testing and submit passing test results to DES that meet the requirements of Env-Or 406.13(e) through (g).

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The DES inspector could not verify the leak monitoring for the piping was continuously performing.

Please conduct maintenance to the leak monitoring system and submit passing leak monitoring test results to DES that meet the requirements of Env-Or 406.13(e) through (g). Please provide a description of maintenance in the comments section of the leak monitoring test report. If it is determined that the leak monitoring system is malfunctioning, Env-Or 406.02(c) requires the owner to repair the system and clear and reset any alarm condition to normal operating mode within 15 working days, or place the affected system(s) into temporary closure in accordance with Env-Or 408.04 until satisfactory repairs are made. Finally, if the leak monitor indicates a possible leak, the owner shall investigate the cause of the indication to determine if a leak has occurred, in accordance with Env-Or 406.04.

Env-Or 406.17 requires the owner of a motor fuel dispensing UST system to test the primary containment system for tightness no later than December 22, 2017, prior to operation after a significant system modification, and triennially after the initial test.

The DES inspector has determined the triennial primary containment system test failed.

Please investigate the cause of the test failure within 24 hours, implement measures to prevent or minimize a release, eliminate the leak, or otherwise correct the deficiency and determine if a release has occurred. As an unusual operating condition, submit a written report to NHDES that describes the investigation and its conclusions within 7 days, per Env-Or 406.04(e).

Please refer to Env-Or 406.08 for test failure requirements, Env-Or 408.01 and Env-Or 408.02 for repair requirements, Env-Or 408.06 through 408.10 for closure requirements, if applicable.

If it is determined a release has occurred, please also immediately conduct the response action requirements of Env-Or 600.

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,

A handwritten signature in black ink, appearing to read "R. Stockman", written in a cursive style.

1/5/2021

ROBERT STOCKMAN, Inspector

Date

JEREMY HOLLAND, Facility Manager

Date

Important Dates

Requirement	Tanks	Next Date Due	Frequency
Tank Leak Monitor Test	8, 9, 10	Past Due	Annual
LLD Function Check	8, 10	Past Due	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	8	Failed - Retest Immediately	Every 3 years OR monthly interstice monitoring
Spill Bucket Tightness Testing	9, 10	9/25/2023	Every 3 years OR monthly interstice monitoring
Overfill Testing	8, 9, 10	11/13/2022	Every 3 years
Primary Containment System Tightness Test	8, 9, 10	Failed - Retest Immediately	Every 3 years
Operator Monthly Checklist			Monthly
JAMES ROGERS - B Operator Training		Past Due	Every 2 years
TODD LACOURSE - A Operator Training		Past Due	Every 2 years
TODD LACOURSE - B Operator Training		Past Due	Every 2 years
WILLIAM WHIPPLE - A Operator Training		Past Due	Every 2 years