



The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

4/13/2021

TEJASKUMAR PATEL
RUHI LLC
221 CENTRAL AVE
DOVER, NH 03820-

Subject Site: DOVER, MOBIL, 221 CENTRAL AVE
DES Site # 199012028, UST Facility # 0111679

Reference: Underground Storage Tank Facility Inspection Report

On April 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 REGULAR with Capacity of 8000 gallons)

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 has determined the overfill protection device was not 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, as required by Env-Or 406.11. 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.

TANK #9 (Containing SUPER with Capacity of 6000 gallons)

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 has determined the fill spill containment cover was broken or missing and must be repaired or replaced.

Please repair or replace cover and submit maintenance results to DES.

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

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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.

The DES inspector has determined the primary piping for the tank system is showing deterioration and may not be tight.

Please remove the liquid (if present), determine if the primary piping is tight and if a release has occurred by conducting a tightness test on the primary piping that meets the requirements of Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15. As an unusual operating condition, submit a written report to DES that describes the investigation and its conclusions, per Env-Or 406.04(e).

Please refer to Env-Or 406.08 for test failure requirements, Env-Or 408.03 for repair requirements, Env-Or 408.06 through 408.10 for closure requirements, if applicable.

Immediately conduct applicable notification and response actions required of Env-Or 600 if a release has occurred.

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,



4/15/2021

ROBERT STOCKMAN, Inspector

Date

TEJASKUMAR PATEL, Facility Manager

Date

Important Dates

Requirement	Tanks	Next Date Due	Frequency
Tank Leak Monitor Test	8, 9	2/24/2022	Annual
LLD Function Check	8, 9	2/24/2022	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, 9	1/30/2023	Every 3 years OR monthly interstice monitoring
Overfill Testing	8, 9	Failed - Retest Immediately	Every 3 years
Primary Containment System Tightness Test	8, 9	2/24/2024	Every 3 years
Operator Monthly Checklist			Monthly
TEJASKUMAR PATEL - A Operator Training		11/20/2021	Every 2 years
TEJASKUMAR PATEL - B Operator Training		11/20/2021	Every 2 years