



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



6/28/2022

JEFF CUEVAS
JEFFREY CUEVAS
1260 PROVINCE LAKE RD
EAST WAKEFIELD, NH 03830-

Subject Site: WAKEFIELD, SEVEN LAKES PROVISIONS, 1260 PROVINCE LAKE RD
NHDES Site # 199608010, UST Facility # 0113050

Reference: Underground Storage Tank Facility Inspection Report

On June 28, 2022 the New Hampshire Department of Environmental Services, Waste Management Division (NHDES) 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 NHDES 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 403.02, American Petroleum Institute standards, Env-Or 403.06, National Fire Protection Association standards and Env-Or 405.02, piping standards for UST systems, require certain standards for vent piping for tanks, including, but not limited to location and protection from damage.

The NHDES inspector has determined bollards are not installed around free-standing vents to prevent damage from vehicles, per Env-Or 405.02(n).

Please install bollards (or a barrier equivalent to), spaced no more than 4 feet apart to span any area exposed to potential vehicle access, painted with reflective paint or striped with reflective tape or paint, constructed of steel tubing having a minimum diameter of 4 inches and filled with concrete and terminated not less than 3 feet above the ground, per Env-Or 405.02(o) and submit installation documentation to NHDES.

Env-Or 403.02, American Petroleum Institute standards, Env-Or 403.06, National Fire Protection Association standards and Env-Or 405.02, piping standards for UST systems, require certain standards for vent piping for tanks, including, but not limited to location and protection from damage.

The NHDES inspector has determined the vent line is not secured.

NHDES 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

Please secure the vent line as specified in approved plans to prevent damage and submit maintenance documentation to NHDES.

TANK #3A (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 NHDES inspector has determined the overfill protection device was not installed at the required 95% shut off level per Env-Or 405.06(c).

Please submit documentation, including measurements and photographs, to NHDES that verifies overfill protection installation at 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 NHDES. 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 #3B (Containing GASOLINE with Capacity of 4000 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 NHDES inspector has determined the overfill protection device was not installed at the required 95% shut off level per Env-Or 405.06(c).

Please submit documentation, including measurements and photographs, to NHDES that verifies overfill protection installation at 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 NHDES. 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.

DISPENSER #1/2

Env-Or 405.04 and Env-Or 406.01(a) require dispenser sumps to be installed that are liquid-tight, free of liquid and debris, maintained and provided with continuous leak detection monitoring.

The NHDES inspector has determined the containment sump integrity testing for all dispenser pans has not been conducted.

Please conduct triennial tightness testing of the dispenser containment sump that meets the requirements of Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15. and submit the passing test results to NHDES.

Please refer to Env-Or 406.08 for test failure requirements, Env-Or 408.03 for repair requirements, Env-Or 406.14(h) and 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.

DISPENSER #3/4

Env-Or 405.04 and Env-Or 406.01(a) require dispenser sumps to be installed that are liquid-tight, free of liquid and debris, maintained and provided with continuous leak detection monitoring.

The NHDES inspector has determined the containment sump integrity testing for all dispenser pans has not been conducted.

Please conduct triennial tightness testing of the dispenser containment sump that meets the requirements of Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15. and submit the passing test results to NHDES.

Please refer to Env-Or 406.08 for test failure requirements, Env-Or 408.03 for repair requirements, Env-Or 406.14(h) and 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.

SUMP #T#3A tank top

Env-Or 406.14 requires the owner to test each new sump for tightness at installation, in accordance with Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15. Env-Or 406.14 requires that no later than October 13, 2021 and triennially thereafter, in accordance with Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15.

The NHDES inspector has determined the containment sump integrity testing has not been conducted.

Please conduct triennial tightness testing of the containment sump that meets the requirements of Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15. and submit the passing test results to NHDES.

Please refer to Env-Or 406.08 for test failure requirements, Env-Or 408.03 for repair requirements, Env-Or 406.14(h) and 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.

SUMP #T#3B tank top

Env-Or 406.14 requires the owner to test each new sump for tightness at installation, in accordance with Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15. Env-Or 406.14 requires that no later than October 13, 2021 and triennially thereafter, in accordance with Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15.

The NHDES inspector has determined the containment sump integrity testing has not been conducted.

Please conduct triennial tightness testing of the containment sump that meets the requirements of Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15. and submit the passing test results to NHDES.

Please refer to Env-Or 406.08 for test failure requirements, Env-Or 408.03 for repair requirements, Env-Or 406.14(h) and 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 NHDES 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 NHDES proceeding under the NHDES 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 NHDES 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 NHDES at (603) 271-3899. NHDES appreciates your willingness to comply with the UST program in an effort to preserve New Hampshire's environment.

Sincerely,



6/28/2022

COREY ROUSSEAU, Inspector

Date

JEFF CUEVAS, Facility Manager

Date

Important Dates

Requirement	Tanks	Next Date Due	Frequency
Tank Leak Monitor Test	3A, 3B	11/30/2022	Annual
LLD Function Check	N/A	N/A	Annual
Tank Corrosion Protection Test	N/A	N/A	Every 3 years
Piping Corrosion Protection Test	N/A	N/A	Every 3 years

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Fittings Corrosion Protection Test	N/A	N/A	Every 3 years
Spill Bucket Tightness Testing	3A, 3B	12/3/2023	Every 3 years OR monthly interstice monitoring
Overfill Testing	3A, 3B	12/4/2023	Every 3 years
Primary Containment System Tightness Test	3A, 3B	12/30/2023	Every 3 years
Operator Monthly Checklist			Monthly
KIAWA KRZCUIK - A Operator Training		1/6/2024	Every 2 years
KIAWA KRZCUIK - B Operator Training		1/6/2024	Every 2 years