



The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

8/18/2022

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

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

Reference: Underground Storage Tank Facility Inspection Report

On August 18, 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:

TANK #7 (Containing REGULAR with Capacity of 12000 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 NHDES inspector determined that spill containment equipment for the vapor recovery dry brake is not installed.

Please install spill containment equipment in accordance with Env-Or 405.05 at all Stage I riser pipes and submit installation documentation and passing spill containment tightness test results to NHDES in accordance with Env-Or 406.12.

TANK #8 (Containing SUPER with Capacity of 10000 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 NHDES inspector determined that spill containment equipment for the vapor recovery dry brake is not installed.

Please install spill containment equipment in accordance with Env-Or 405.05 at all Stage I riser pipes and submit installation documentation and passing spill containment tightness test results to NHDES in accordance with Env-Or 406.12.

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

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

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 NHDES inspector determined the highest exit point of the drop tube is not 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 and submit documentation of the installation (including measurements and photographs) to NHDES.

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.

DISPENSER #5/6

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 #7/8

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#7 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 tightness test failed.

Please remove the liquid (if present), repair or replace the sump, investigate the source of liquid and determine if a release has occurred by conducting a tightness test on the containment sump 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 NHDES 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 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#8 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 tightness test failed.

Please remove the liquid (if present), repair or replace the sump, investigate the source of liquid and determine if a release has occurred by conducting a tightness test on the containment sump 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 NHDES 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 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#9A 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 tightness test failed.

Please remove the liquid (if present), repair or replace the sump, investigate the source of liquid and determine if a release has occurred by conducting a tightness test on the containment sump 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 NHDES 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 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#9B 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 tightness test failed.

Please remove the liquid (if present), repair or replace the sump, investigate the source of liquid and determine if a release has occurred by conducting a tightness test on the containment sump 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 NHDES 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 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,



8/18/2022

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	5/23/2023	Annual
LLD Function Check	7, 8, 9A, 9B	5/23/2023	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	9A	Failed - Retest Immediately	Every 3 years
Spill Bucket Tightness Testing	7, 8, 9A, 9B	5/23/2025	Every 3 years OR monthly interstice monitoring
Overfill Testing	7, 8, 9A, 9B	8/18/2025	Every 3 years
Primary Containment System Tightness Test	7, 8, 9A, 9B	5/23/2025	Every 3 years
Operator Monthly Checklist			Monthly
JEFF STONE - A Operator Training		12/2/2023	Every 2 years
TOM ASELTON - B Operator Training		10/21/2023	Every 2 years