



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



12/20/2023

SATISH PATEL
425 LAKE AVE INC
425 LAKE AVE
MANCHESTER, NH 03103-

Subject Site: MANCHESTER, LAKE FOOD MART, 425 LAKE AVE
NHDES Site # 200507041, UST Facility # 0115700

Reference: Underground Storage Tank Facility Inspection Report

On December 20, 2023 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

RSA 146-C:17-21 requires that all regulated facilities in New Hampshire have designated Class A, B and C operators who have been trained and certified in accordance with an approved training program, a posting of the certified Class C operators for the facility and a posting for the facility response guidelines. Env-Or 404.06 through 404.08 require a permit to operate and that the permit is permanently affixed on the facility premises in a location that is visible to a NHDES inspector. Env-Or 405.01(g) requires that a UST certificate be permanently affixed and visible to the NHDES inspector at the facility premises.

The NHDES inspector has determined a current listing of class C operator(s) is not posted per RSA 146-C:17, IV.

Please post a current listing of class C operators, submit a copy of the class C list to NHDES and notify NHDES in writing that the listing has been posted.

RSA 146-C:17-21 requires that all regulated facilities in New Hampshire have designated Class A, B and C operators who have been trained and certified in accordance with an approved training program, a posting of the certified Class C operators for the facility and a posting for the facility response guidelines. Env-Or 404.06 through 404.08 require a permit to operate and that the permit is permanently affixed on the facility premises in a location that is visible to a NHDES inspector. Env-Or 405.01(g) requires that a UST certificate be permanently affixed and visible to

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

the NHDES inspector at the facility premises.

The NHDES inspector has determined the class B operator is currently overdue for recertification, as required by RSA 146-C:18(I)(b)(5).

Please have at least one employee certified as a class B operator by an approved training program in accordance with RSA-C:18 and submit a new Statement of Training form to NHDES designating the certified class B operator for the subject facility. Please visit <https://www.des.nh.gov/business-and-community/fuel-storage-tanks/underground-storage-tanks/operator-training> for the NHDES UST Operator Training Program schedule. Please contact Suzanne Picone (suzanne.m.picone@des.nh.gov) for questions regarding the UST Operator Training Program.

RSA 146-C:17-21 requires that all regulated facilities in New Hampshire have designated Class A, B and C operators who have been trained and certified in accordance with an approved training program, a posting of the certified Class C operators for the facility and a posting for the facility response guidelines. Env-Or 404.06 through 404.08 require a permit to operate and that the permit is permanently affixed on the facility premises in a location that is visible to a NHDES inspector. Env-Or 405.01(g) requires that a UST certificate be permanently affixed and visible to the NHDES inspector at the facility premises.

The NHDES inspector could not verify Operator Response Guidelines meeting the requirements of RSA 146-C:17, III and RSA 146-C:19, I are posted.

Please post Operator Response Guidelines for the UST facility that include spill reporting procedures, contact phone numbers, malfunctioning equipment lock-out/tag-out and notification procedures and initial mitigation protocol for emergencies and notify NHDES in writing when complete.

TANK #1 (Containing REGULAR MASTER with Capacity of 15000 gallons)

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to NHDES no later than 30 days after the date of the test. The NHDES 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 NHDES 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 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 NHDES inspector has determined the visual indicator (lights) for the tank leak monitoring system was not working or working properly.

Please repair or replace the visual indicator, verify the alarm is operational and submit maintenance documentation to NHDES.

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 NHDES no later than 30 days after the date of the test.

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

The NHDES 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 NHDES 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 406.12 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 NHDES inspector has determined the fill pipe spill containment integrity testing has not been conducted.

Please conduct triennial tightness testing of the spill containment, per Env-Or 406.12, and submit the passing test results to NHDES.

Please refer to Env-Or 406.08(i) for test failure requirements, Env-Or 408.03 for repair requirements, and Env-Or 406.12(g) for closure requirements, if applicable.

For closure of a spill containment device, please submit a summary of closure activity per Env-Or 406.12(g) and Env-Or 408.03(e).

Env-Or 406.12(c) requires that no later than October 13, 2021 and triennially thereafter, all stage I system connection spill containment equipment that otherwise was not tested pursuant

to Env-Or 406.12(a) shall be tested for tightness as specified in Env-Or 406.05 through Env-Or 406.08.

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

Please conduct triennial tightness testing of the spill containment, per Env-Or 406.12, and submit the passing test results to NHDES.

Please refer to Env-Or 406.08(i) for test failure requirements, Env-Or 408.03 for repair requirements, and Env-Or 406.12(g) for closure requirements, if applicable.

For closure of a spill containment device, please submit a summary of closure activity per Env-Or 406.12(g) and Env-Or 408.03(e).

TANK #2A (Containing REGULAR SLAVE with Capacity of 7500 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 a primary overfill protection device was not installed on this UST system.

Please submit primary overfill protection installation documentation and passing primary overfill device test results (including measurements and photographs) to NHDES as specified in Env-Or 406.11(d) through (h). 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 NHDES no later than 30 days after the date of the test.

The NHDES 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 NHDES 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 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 NHDES inspector has determined the visual indicator (lights) for the tank leak monitoring system was not working or working properly.

Please repair or replace the visual indicator, verify the alarm is operational and submit maintenance documentation to NHDES.

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to NHDES no later than 30 days after the date of the test. The NHDES 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 NHDES 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 406.12 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 NHDES inspector has determined the fill pipe spill containment integrity testing has not been conducted.

Please conduct triennial tightness testing of the spill containment, per Env-Or 406.12, and submit the passing test results to NHDES.

Please refer to Env-Or 406.08(i) for test failure requirements, Env-Or 408.03 for repair requirements, and Env-Or 406.12(g) for closure requirements, if applicable.

For closure of a spill containment device, please submit a summary of closure activity per Env-Or 406.12(g) and Env-Or 408.03(e).

Env-Or 406.11 requires that no later than December 22, 2017 and triennially thereafter, the owner of a UST system shall test the primary overfill protection system.

The NHDES inspector determined the primary overfill prevention device testing has not been conducted pursuant to Env-Or 406.11(a).

The above issue was resolved during the on-site inspection. No additional documentation is needed for this specific issue.

Env-Or 406.12(c) requires that no later than October 13, 2021 and triennially thereafter, all stage I system connection spill containment equipment that otherwise was not tested pursuant to Env-Or 406.12(a) shall be tested for tightness as specified in Env-Or 406.05 through Env-Or 406.08.

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

Please conduct triennial tightness testing of the spill containment, per Env-Or 406.12, and submit the passing test results to NHDES.

Please refer to Env-Or 406.08(i) for test failure requirements, Env-Or 408.03 for repair requirements, and Env-Or 406.12(g) for closure requirements, if applicable.

For closure of a spill containment device, please submit a summary of closure activity per Env-Or 406.12(g) and Env-Or 408.03(e).

TANK #2B (Containing SUPER with Capacity of 7500 gallons)

Env-Or 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to NHDES no later than 30 days after the date of the test. The NHDES 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 NHDES 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 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 NHDES inspector has determined the visual indicator (lights) for the tank leak monitoring system was not working or working properly.

Please repair or replace the visual indicator, verify the alarm is operational and submit maintenance documentation to NHDES.

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 NHDES no later than 30 days after the date of the test.

The NHDES 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 NHDES 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 406.13 requires the owner to conduct annual leak monitoring system testing for proper operation and submit test results to NHDES no later than 30 days after the date of the test. The NHDES 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 NHDES 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 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 NHDES inspector has determined an electrical conduit or work box in the tank/piping sump is severely corroded and/or damaged and therefore not liquid-tight.

Please repair or replace the electrical conduit and/or box, conduct a tightness test on the sump that meets the requirements of Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15 and submit maintenance documentation and test results to NHDES.

NFPA 70, "National Electric Code", states that a tank sump having a pump is classified as a NEC Class I, Group D, Division 1, or a location where fire or explosion hazards may exist due to flammable gases or vapors or flammable liquids. Electrical conduits and/or boxes located in the tank pump sumps shall be made liquid and vapor tight.

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 NHDES inspector has determined one or more entry boots in the tank/piping sump is/are damaged or not installed and therefore secondary containment may not be tight.

Please install or replace the boot(s) per Env-Or 408.03 and conduct a tightness test after maintenance of the tank/piping sump that meets the requirements of Env-Or 406.05 through Env-Or 406.08 or Env-Or 406.15. 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.

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 NHDES inspector has determined the fill pipe spill containment integrity testing has not been conducted.

Please conduct triennial tightness testing of the spill containment, per Env-Or 406.12, and submit the passing test results to NHDES.

Please refer to Env-Or 406.08(i) for test failure requirements, Env-Or 408.03 for repair requirements, and Env-Or 406.12(g) for closure requirements, if applicable.

For closure of a spill containment device, please submit a summary of closure activity

per Env-Or 406.12(g) and Env-Or 408.03(e).

Env-Or 406.11 requires that no later than December 22, 2017 and triennially thereafter, the owner of a UST system shall test the primary overfill protection system.

The NHDES inspector determined the primary overfill prevention device testing has not been conducted pursuant to Env-Or 406.11(a).

The above issue was resolved during the on-site inspection. No additional documentation is needed for this specific issue.

Env-Or 406.12(c) requires that no later than October 13, 2021 and triennially thereafter, all stage I system connection spill containment equipment that otherwise was not tested pursuant to Env-Or 406.12(a) shall be tested for tightness as specified in Env-Or 406.05 through Env-Or 406.08.

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

Please conduct triennial tightness testing of the spill containment, per Env-Or 406.12, and submit the passing test results to NHDES.

Please refer to Env-Or 406.08(i) for test failure requirements, Env-Or 408.03 for repair requirements, and Env-Or 406.12(g) for closure requirements, if applicable.

For closure of a spill containment device, please submit a summary of closure activity per Env-Or 406.12(g) and Env-Or 408.03(e).

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 there is product accumulating in the dispenser sump.

Please remove the liquid, investigate the source of liquid, determine if a release has occurred by conducting a tightness test on the dispenser 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.

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 secondary containment for piping is not open to allow leakage from primary piping to a liquid-tight containment sump with a sensor per Env-Or 405.02(k).

The above issue was resolved during the on-site inspection. No additional documentation is needed for this specific issue.

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 there is product accumulating in the dispenser sump.

Please remove the liquid, investigate the source of liquid, determine if a release has occurred by conducting a tightness test on the dispenser 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.

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 secondary containment for piping is not open to allow leakage from primary piping to a liquid-tight containment sump with a sensor per Env-Or 405.02(k).

The above issue was resolved during the on-site inspection. No additional documentation is needed for this specific issue.

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 secondary containment for piping is not open to allow leakage from primary piping to a liquid-tight containment sump with a sensor per Env-Or 405.02(k).

The above issue was resolved during the on-site inspection. No additional documentation is needed for this specific issue.

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 there is product accumulating in the dispenser sump.

Please remove the liquid, investigate the source of liquid, determine if a release has occurred by conducting a tightness test on the dispenser 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.

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 secondary containment for piping is not open to allow leakage from primary piping to a liquid-tight containment sump with a sensor per Env-Or 405.02(k).

The above issue was resolved during the on-site inspection. No additional documentation is needed for this specific issue.

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 there is evidence of the dispenser piping, meters and/or filter(s) leaking or weeping into the dispenser sump.

Please repair, replace or tighten the dispenser piping, meters and/or filter(s), remove product and/or debris from the dispenser sump and submit maintenance results to NHDES.

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.

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,



12/20/2023

HARDING SCHOFIELD, Inspector

Date

SATISH PATEL, Facility Manager

Date

Important Dates

Requirement	Tanks	Next Date Due	Frequency
Tank Leak Monitor Test	1, 2A, 2B	Past Due	Annual
LLD Function Check	1, 2B	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	1, 2A, 2B	Past Due	Every 3 years OR monthly interstice monitoring
Overfill Testing	1, 2A, 2B	12/20/2026	Every 3 years
Primary Containment System Tightness Test	1, 2A, 2B	12/23/2023	Every 3 years
Operator Monthly Checklist			Monthly

GEORGE GEKIS - B Operator Training		Past Due	Every 2 years
GEORGE GEKIS - A Operator Training		Past Due	Every 2 years
SATISH K. PATEL - A Operator Training		10/18/2025	Every 2 years