ARKANSAS DEPARTMENT OF ENERGY & ENVIRONMENT - DEQ
UST COMPLIANCE INSPECTION CHECKLIST

A. Ownership of Tank(s)

Avitaj LLC
Owner Name (Corporation, Individual, Public Agency, or other entity)

8006 Dollarway Road
Street Address

Jefferson
County

White Hall, AR 71602
City, State Zip

870-247-1607
Phone Number

Contact Person at UST Location: Mr. Bobby Singh

Phone Number: 845-283-5299

B. Location of Tank(s)

(If same as "Owner", check here: ✔)

White Hall Fuel and Food
Facility Name or Company Site Identifier, as applicable

Street Address or State Road, as applicable

County

City (nearest), State Zip

Phone Number

Number of Tanks at This Location: 2

Registration certificate posted in a conspicuous location: ✔ Yes No

C. Tank Information

(1) Tank(s) presently in use	Tank # 1	Tank # 2	Tank #	Tank #
(2) If not in use, date last used				
(3) If emptied, verify 1" or less of product in tank				
(4) Month and Year Tank Installed (E-estimate or K-known)	E 01/1974	E 01/1974		
(5) Material of Construction (E-estimate or K-known)	K STEEL	K STEEL		
(6) Capacity of Tank (in gallons) (E-estimate or K-known)	K 8K	K 8K		
(7) Substance Stored (E-estimate or K-known)	Gasoline	Gasoline		

D. Release Detection For Tanks

Release detection system must meet the performance standards in 280.43 or 280.44

(1) Automatic Tank Gauging				
(2) Vapor Monitoring				
(3) Groundwater Monitoring	✔	✔		
(4) Statistical Inventory Reconciliation (SIR)				
(5) Secondary Containment With Interstitial Monitoring **(required on piping installed after July 1, 2007)**				
(6) Other approved method (write in name of method)				

E. Release Detection For Piping

Release detection system must meet the performance standards in 280.43 or 280.44

(1) Check Type of Piping for each Tank	Pressure Pipe	✔	✔		
	Suction Pipe				
(2) FOR PRESSURE PIPING: Automatic Line Leak Detectors, and (check one)		✔	✔		
(a) Vapor Monitoring					
(b) Groundwater Monitoring					
(c) Secondary Containment With Interstitial Monitoring **(required on piping installed after July 1, 2007)**					
(d) Line Tightness Testing		✔	✔		
(e) Other approved method (write in name of method)					

Date: 12/15/2021

Please save your changes before proceeding.

Facility ID: 35000034 AFIN: 35-00582 Facility Name: White Hall Fuel and Food

RELEASE DETECTION FOR PIPING

Pressurized Piping A method must be selected from each set. Where applicable indicate date of last test.

Set 1	**Tank #** 1	**Tank #** 2	**Tank #**	**Tank #**
(1) Automatic Flow Restrictor	✔	✔		
(2) Automatic Shut-off Device				
(3) Continuous Alarm System				
and				
Set 2				
(4) Annual Line Tightness Testing	DUE	DUE		
(5) Vapor Monitoring				
(6) If Vapor Monitoring, documentation of monthly monitoring is available?				
(7) Interstitial Monitoring				
(8) If Interstitial Monitoring, documentation of monthly monitoring is available?				
(9) Groundwater Monitoring				
(10) If Groundwater Monitoring, documentation of monthly monitoring is available?				
(11) Other Approved Method (specify in comments)				
Suction Piping Indicate date of most recent test.				
(12) Line Tightness Testing (required every 3 years)				
(13) Vapor Monitoring				
(14) Secondary Containment with Interstitial Monitoring				
(15) Groundwater Monitoring				
(16) Other Approved Method (specify in comments)				
(17) **No Leak Detection Required? (must answer yes to all of the following questions**)				
(a) Operates at less than atmospheric pressure				
(b) Has only one check valve, which is located directly under pump				
(c) Slope of piping allows product to drain back into tank when suction released				
(d) All information on suction piping is verifiable				

Comments:

Annual Line Leak Detector and Annual Line Tightness Tests due but completed.

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RELEASE PREVENTION

Check (√) for compliance; "No" for noncompliance. Leave blank for "N/A".

I. SPILL PREVENTION	Tank # 1	Tank # 2	Tank #	Tank #
(1) Spill prevention device present and operational.	✔	✔		
(2) Spill prevention device in good repair.	✔	✔		
(3) Spill prevention device has no significant debris or liquid.	✔	✔		
(4) Spill prevention device is tested at least every three years, or is double walled and periodically monitored.	NO	NO		
II. OVERFILL PREVENTION				
(1) Overfill prevention device present and operational.	✔	✔		
A. Automatic shutoff device.				
(1) Verified by observations.	✔	✔		
(2) Automatic shutoff device is functional and operational.	✔	✔		
(3) Automatic shutoff device appropriate for system.	✔	✔		
(4) Tested every three years.	NO	NO		
B. High level alarm				
(1) Present				
(2) Alarm is functional and operational.				
(3) Alarm is audible/visible to delivery driver.				
(4) Tested every three years.				
C. Ball float valves				
(1) Presence verified thru records and/or observation.				
(2) Ball float is operational.				
(3) Ball float is appropriate for system.				
(4) Tested every three years.				
III. OPERATION AND MAINTENANCE				
(1) Repairs to UST system performed according to a recommended practice.				
(2) Repaired UST system tightness tested within 30 days of repair.				
(3) CP system tested within 6 months of any CP repair.				
(4) Records of UST system repairs.				
(5) CP system properly operated and maintained to provide continuous protection.	✔	✔		
(6) CP system performing adequately based on results of testing.	✔	✔		
(7) Walkthrough inspections are conducted at least every 30 days. Facilities must have records for the two most recent consecutive months, and for 10 of the last 12 months.	NO	NO		

Comments:

3 Year Corrosion Protection Recertification was done on 01/15/2019 by Scott's Underground. All Passed
Next 3 Year CP again by 01/12/2022

Rectifier is on but 60 day rectifier checks were not provided
No Overfill and Spill prevention testing was provided
Monthly walkthrough inspections were not provided

Date: 12/15/2021

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RELEASE PREVENTION
(CONTINUED)

Check (√) for compliance; "No" for noncompliance. Leave blank for "N/A".

IV. CORROSION PROTECTION A. Material of Construction (Check all that apply)	System # 1		System # 2		System # _____		System # _____	
	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping
NON-CORRODIBLE		✔		✔				
CORRODIBLE	✔		✔					
B. Internal lining								
(1) Installed according to a recommended practice.								
(2) Inspected in a timely manner and lining is in compliance.								
(3) Inspected according to approved protocol.								
(4) Corrective action taken on failed inspection.								
C. Galvanic (sacrificial) anodes								
(1) Designed by CP expert/specialist.								
(2) Tested in a timely manner.								
(3) Corrective action taken on failed test.								
(4) Metal components (i.e., flex lines, subpumps, etc.) protected as required.								
(5) Operational records available.								
D. Impressed current	✔		✔					
(1) Designed by CP expert/specialist.	✔		✔					
(2) Tested in a timely manner.	✔		✔					
(3) Rectifier is operational.	✔		✔					
(4) Verify records of 60 day check.	NO		NO					
(5) Corrective action taken on failed check.								
(6) Operational records available.	✔		✔					
(7) CP system maintained.	✔		✔					
(8) Metal components (i.e., flex lines, subpumps, etc.) protected as required.	✔		✔					
V. COMPATIBILITY All portions of the system are compatible with product stored.	✔	✔	✔	✔				

Comments:

3 Year Corrosion Protection Recertification was done on 01/15/2019 by Scott's Underground. All Passed
Next 3 Year CP again by 01/12/2022

Date: 12/15/2021

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FINANCIAL ASSURANCE

(1) Petroleum Storage Tank Trust Fund (PSTTF)? (check one) ✔ Yes No N/A

(2) Can PSTTF deductible be satisfied? ✔ Yes No N/A

If No or N/A for PSTTF, mechanism for meeting financial responsibility? _____

Other SOC

(1) Implementing agency has been notified of suspected release as required.	Yes	No	✔ N/A
(2) Hazardous substance UST system release detection meets requirements (i.e., either secondarily contained or otherwise approved by the implementing agency).	Yes	No	✔ N/A
(3) UST systems in temporary closure but still containing product, are compliant with release detection requirements (i.e., method present, operational, release investigated & reported as required.	Yes	No	✔ N/A

Operator Training/Certification Requirements

Class A designated operator Name Harpreet Singh # 000527	✔ Yes	No	
Class B designated operator Name Harpreet Singh # 000527	✔ Yes	No	
Class C designated operator (minimum 1 operator per shift)	Yes	✔ No	*N/A
*Unmanned emergency generator facility (no class C required); OR	Yes	No	
*Unmanned facility in compliance with Arkansas State Fire Code (no class C required);	Yes	No	
If "NO", explain in comments			
Training records maintained for all Class A, B, and C operators	Yes	✔ No	
Class A and Class B Operators certified within 30 days of assuming O/M responsibilities	✔ Yes	No	
Class A and Class B Operators recertified within 45 days of delivery prohibition violation	Yes	No	✔ *N/A

Class C Operator(s) training:

• Conducted by DEQ-certified Class A or Class B operator	Yes	✔ No
• Specific to facility	Yes	✔ No
• Documented by DEQ provided forms	Yes	✔ No
• Adequately addresses delivery controls, monitoring of dispensing and emergency response	Yes	✔ No
• Trained prior to assuming Class C responsibility	Yes	✔ No

Comments:

DEQ Zylab show Petroleum Storage Tank Trust Fund as method of financial assurance
No Class C training

Date: 12/15/2021

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GROUNDWATER MONITORING

Monitoring Performed by: unknown

Date GWM System Installed: 1994 Number of Wells: 2

Groundwater monitoring well assessment was conducted by: Cruzen

Please answer each question for each well.

	Well # 1	Well # 2	Well # _____	Well # _____
(1) Well is clearly marked & secured to avoid unauthorized access or tampering?	Yes	Yes		
(2) Well was opened & presence of water was observed in well at depth of 0-4 feet?	full	4'		

Check (√) for compliance; "No" for noncompliance. Leave blank for "N/A".

(3) Wells are used to monitor piping?	No
(4) Groundwater monitoring well assessment was performed prior to installation of wells?	✔
(5) Documentation of monthly readings is available?	No
(6) Specific gravity of product is less than one?	✔
(7) Hydraulic conductivity of soil between UST system & monitoring wells is not less than 0.01 cm/sec. According to:	✔
(8) Groundwater is not more than 20 feet from ground surface?	✔
(9) Wells are sealed from the ground surface to top of filter pack?	✔
(10) Continuous monitoring device or manual bailing method used can detect the presence of at least one-eighth inch of free product on top of groundwater in well?	✔
(11) Groundwater is monitored: ✔ Manually Automatically	✔
(12) If groundwater is monitored **manually**: Bailer used is accessible & functional?	
(13) If groundwater is monitored **automatically**: Monitoring box is operational?	
(14) Checked for presence of sensor in monitoring well?	
(15) Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product).	✔ YES NO
(16) Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 10 months of the last 12 months).	YES ✔ NO

Comments:

Well #1 was full do to rain. Well #2 was bailed and clear. Facility must have both wells checked every 30 days to perform release detection for the tanks.

Date: 12/15/2021

Please save your changes before proceeding.

Facility ID: 35000034 AFIN: 35-00582 Facility Name: White Hall Fuel and Food

INSPECTION SUMMARY

Check (√) the appropriate box:

Facility in compliance at time of inspection.

✔ **Facility non-compliant with SOC Release Detection.**

Failure to perform release detection for tanks

Failure to perform release detection for piping

✔ **Facility non-compliant with SOC Release Prevention.**

Failure to provide records of 60 day rectifier check

Facility non-compliant with SOC Financial Assurance requirements.

✔ **Facility non-compliant with both SOC Release Detection and SOC Release Prevention.**

✔ **Facility has other non-SOC compliance issues.**

Failure to have documentation of C operator training

Failure to perform monthly walkthrough for 10 of 12 months

Failure to perform annual release detection testing

Failure to perform three-year release prevention testing

I Bryan Paul certify that I have inspected the above named facility on 12/15/2021.

Inspector's Signature: Bryan Paul Digitally signed by Bryan Paul Date: 2021.12.16 07:54:32 -06'00' (date/time)

IF DELIVERY PROHIBITION IS INVOKED, THE DESIGNATED CLASS A AND CLASS B OPERATOR MUST BE RECERTIFIED WITHIN 45 DAYS OF THE FACILITY BEING RED-TAGGED. IF FUEL DELIVERY PROHIBITION IS NOT IMMEDIATELY IMPLEMENTED. FAILURE TO CORRECT SOC NONCOMPLIANCE ISSUES IN THE TIMEFRAME GIVEN MAY RESULT IN FUEL DELIVERY PROHIBITION.

This inspection checklist and summary serve as your Notice of Noncompliance (if violations are indicated).

You have until 01/17/2022 **to provide evidence of compliance. Noncompliance issues could result in enforcement actions but not limited to, penalty assessments. Failure to resolve these noncompliance issues within the specified time frame could result in the escalation of enforcement action.**

RANAN		12/15/2021
Name of Owner/Owner's Representative (Please Print)	Signature of Owner/Owner's Representative	Date

Please save your changes before proceeding.

INSPECTION SUMMARY
(CONTINUED)

Comments:

There have been no enforcement actions against the facility in the past three years

Arrived at 11:27

Failure to perform release detection for tanks
Failure to perform release detection for piping
Failure to provide records of 60 day rectifier check
Failure to have documentation of C operator training
Failure to perform monthly walkthrough for 10 of 12 months
Failure to perform annual release detection testing
Failure to perform three-year release prevention testing

Well #1 was full do to rain. Well #2 was bailed and clear. Facility must have both wells checked every 30 days to perform release detection for the tanks.
Facility must provide an annual line leak detector and annual line tightness tests to ensure leak detectors are functioning properly and lines are tight. Annual Line Leak Detector and Annual Line Tightness tests are due once annually.
Rectifier is on, but not rectifier checks were provided. Facility must check the rectifier at once every 60 days to ensure rectifier is on and operating.
Facility must provide documentation of Class C operator training. Facility must have at least one class c operator trained per shift when A/B operator is not on site.
Facility must perform monthly walkthrough inspections
Facility must provide annual release detection testing
Facility must provide three-year release prevention testing.

Date: 12/15/2021

Please save your changes before proceeding.

SITE DIAGRAM

A CURRENT SITE DIAGRAM IS ON FILE FOR THIS FACILITY

Date: 12/15/2021

Please save your changes before proceeding.