

FILED
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Response ANSWER D/H-16-2021

ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
IN RE.

SILKY ASSOCIATES LLC,
DOCKET NO. RCRA-03-2018-0131

RCRA APPEAL
NO. 21-02

ANSWER TO

ORDER ELECTING TO EXERCISE SUA SPONTE REVIEW
AND ESTABLISHING BRIEFING SCHEDULE

Mileesa send me list of paper she want to see. I have send her most of Report I mail her like

- ① Cathodic Protection Rectifier Report
- ② Veeder Root - current - Paper from Veeder Root with all 02 Gallon Report
- ③ I believe send Line, and Leak detector Report - 2013 Dated 11-6-2013
- ④ Report - of Undergroun from UST Corrosion management - 2013

I have spoken with her few times and one time I ask her what should I do that I will not I have any Problem. Mileesa Toffel told me

I should to keep all the Report of Leak Detector and every 3 year Undergroun Test if you do not do test then it will be

Big Muge Penalty. I told her now you are making
Big Penalty than I will have no choice do the
Bankruptcy and close the business. then Milkesa
Toffel said right away no no. I am not
Penalting Now. I have checked the market for
overflow Drop tube and also order ~~the~~ get
current underflow Tank report which CST
corrogen management company had send ~~to~~
directly to her.

But overflow Droptube was
not available because there was High Demand
and manufacturer was unable to fulfill
requirement. I was explaining the situation
to her but she was insit to it now
I keep explaining the problem but she was
not listening some time I was discussing
Big Dates ~~and~~ this matter in my daughter
in law home in her living room she just
ask me let me talk her but I do not know
what they talk suddenly my daughter in law
she got mad and told Milkesa I will sue you
I got mad to my in law doctor and told
her that's not the way to talk an officer
I took the phone from her and Apologize
Apologize with Milkesa Toffel several time
she says its OK I am not mad but I
~~this~~ believe she was upset and mad

I got telephone number from my supplier manufacturer
of overflow Equenal - and I explain the situation
my problem then he said I ship just for me
5 Droptube for all my underground TANK
and I install in front of DEA officer with
my technician. Melissa Tuffel send the DEA
OFFICER.

I was discussing with my supplier
Name Petro supply she told me I should have
in the TANK Floating Ball with Alarm system
because I have purchase from well known company
Pilot they have 16 Gas station in Virginia
and she told me that they are installing over
Flow Alarm system from 1989. I talk to
Melissa Tuffel How come you have not checked
Pilot not to have Alarm system.
She not given me any answer she told me
you are now owner you have to install
that I said I am doing now. I believe
believe she (M.T.) was unhappy and mad
by asking why not the Department checked.

I am An Optician making
eyeglasses. I purchase Gas station because
its Reputed Pilot Co. they have all over the
country Gas station and I do not have Any
Any experience of this business DAY by DAY
year by year I am learning I was doing all
the best year by year, like Leak Detector line test

and monitoring Cathodic protection ~~in~~ equipment every month and also did ~~an~~ underground test.

I have ~~probably~~ did Tennessee computer test in 2012 Test A and Test B, some how I miss ~~LINE~~ ~~of~~ ~~feak~~ ~~detector~~ test probably after 11-6-2013 then maybe test after 2017 and as per Melissa Taffel I am doing test every year, I did the test of underground 2013 and just did in 2018

I have purchase this gas station from PILOT Co. on June 30-2005 my 1st day of operating was July 1-2005

I was reading march 23 Paper

I have to read several time to understand the Paper I did Partial violation not to do feak detector test every year but now I am doing every year and in Tennessee test I think underground TAXI test was every 5 year but now I found it is every 3 year

April 14-2021 Officer Mickel Kelly here checked and did thorough INSPECTION and took all the Report-Photographs.

I not understood when Millieera Trotter clearly told me she is not

Penalizing if I do all the test what she told me and I follow all her order and I have done all the test. still she not kept her word and punished me with huge penalty.

~~Accord~~ According to March 23 Papers For Overflow Prevention equipment Equipment on Page 5 As Amendment in 2003 Proposal of Automatic shut off equipment install and it was amended finally on Feb 2004

I purchase the Gas station in June 30 - 2005 After over one year.

If Department have checked the this and other Pilot Gas station This incident - this problem never happen and I was do not have to use my saving which cost me over 10 thousand dollars and if it today I was not penalize

I hope this truth will help me and all the Judges to forgive me and Pardon me. now I am doing every thing by DEQ and Environment Code & Rule and Law. All papers are updated till now. Officer Michael Kelly had all Photographs which he took on April 14 - 2001

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Yours

Lakshmi

Line/LD Test Data Sheet

COMPANY	Silky Associates LLC	TEST NUMBER	131106A08
LOCATION	Lucky Mart	TEST DATE	11/6/2013
ADDRESS	200 East Williamsburg Road	TECHNICIAN	Gary Burchard
CITY / STATE	Sandston, VA 23510	CERTIFICATION	2574.LTN

LINE TEST					
Product	Diesel	Regular	Premium	Kerosene	
STP Pressure	30	30	25	25	
Isolation	Isolation Plug	Isolation Plug	Isolation Plug	Check Valve	
Test Pressure	50	50	50	50	
Initial Level	0.0775	0.0625	-	0.0425	
Final Level	0.0775	0.0625	-	0.0425	
Leak Rate	0.0000	0.0000	-	0.0000	
Start Time	8:30	9:30	-	10:45	
End Time	9:00	10:30	-	11:30	
Test Time	30	60	-	45	
Result	Pass	Pass	See Notes	Pass	

LD TEST					
LD Model	XLD	FXIV	FXIV	FXIV	
Serial #	-	116-056	116-056	116-056	
Check Valve PSI	15	20	25	10	
Resiliency	50	75	-	15	
Test Leak Rate	3 gph	3 gph	3 gph	3 gph	3 gph
Opening Time	6	8	-	4	
Result	Pass	Pass	Inconclusive	Pass	

COMMENTS

Premium Line will not pressure up for Line Test. It will not come out of slow flow to pump.
 Removed the Leak Detector and installed a Plug. The Pump is putting out 25 PSI but that drops off to 5 PSI in about 30 minutes.