



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

HAND DELIVERY

December 3, 2019

Ms. Bevin Esposito
Regional Hearing Clerk
Office of Regional Counsel
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103

U.S. EPA-REGION 3-RHC
FILED-3DEC2019am10:27

Re: Administrative Complaint, Compliance Order, and Notice of Opportunity for Hearing
Top Gas and Mini Mart LLC. and Ezra Reuven
EPA Docket No. RCRA-03-2019-0103

Dear Ms. Esposito:

The enclosed Answer to EPA's Administrative Complaint, Compliance Order, and Notice of Opportunity for Hearing filed on September 17, 2019 against Respondent Ezra Reuven, individually, and Top Gas and Mini Mart, LLC. was received by me today, December 3, 2019, from Respondent Ezra Reuven attorney, Kenneth L. Mirsky. Please file this Answer as a formal response to EPA's Administrative Complaint.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. Ramalho".

Louis F. Ramalho
Sr. Assistant Regional Counsel

Enclosures



KENNETH L. MIRSKY

Attorney-at-Law

2033 Walnut Street
Philadelphia, PA 19103-4403
(215) 569-4055
Fax (610) 601-2020
klmirsky@comcast.net

November 25, 2019

Ms. Marie Owens-Powell
RCRA Section
Mail Code 3ED22
US Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Louis F. Ramalho, Esquire
Senior Assistant Regional Counsel
Mail Code 3RC40
US Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Top Gas and Mini Mart, LLC and Ezra Reuven
RCRA-03-2019-0103

U.S. EPA-REGION 3-RHC
FILED-3DEC2019AM9:05

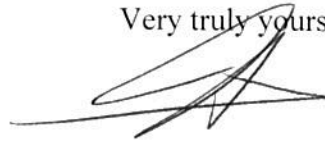
Dear Ms. Owens-Powell and Mr. Ramalho:

Please find enclosed Respondent Ezra Reuven's Answer to the Administrative Complaint along with the following documents:

Storage System Report Form (10/29/18)
Test Results (12/24/18)
Test Data (9/13/17)

Respondent is requesting a hearing in this matter.

Very truly yours,



KENNETH L. MIRSKY

KLM/ms
Enclosures
cc: Kris A. Shiffer
Ezra Reuven

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III**

In the Matter of	:	
	:	U.S. EPA Docket Number
Top Gas & Mini Mart, LLC	:	RCRA-03-2019-0103
	:	
Ezra Reuven	:	
	:	
	:	
Gas Auto Repair and Mini Mart	:	
	:	
Facility	:	

U.S. EPA-REGION 3-RHC
FILED-30DEC2019am9:05

ANSWER TO ADMINISTRATIVE COMPLAINT

Respondent Ezra Reuven ("Reuven"), by his attorney, Kenneth L. Mirsky, Esquire, hereby answers the Complaint as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted in part and denied in part. UST No. 4 was removed on or about May 29,

2019.

9. Admitted in part and denied in part. UST No. 4 was removed on or about May 29, 2019.

10. Admitted

COUNT I

11. Admitted.

12. Admitted.

13. Admitted.

14. Admitted.

15. Denied. Reuven, who is the owner of the property at 4548 Baltimore Avenue, Philadelphia, Pennsylvania, leased the property to Respondent Top Gas and Mini Mart, LLC (Top Gas) on April 1, 2012, and the lease was in effect at all times relevant to the violations alleged in the Complaint. Pursuant to the terms of the lease, it was the responsibility of Top Gas to provide the information requested. Top Gas assured Reuven that the information had or would be sent to EPA.

16. Denied. Pursuant to the terms of the lease between Reuven and Top Gas it was the responsibility of Top Gas to provide the information requested; Top Gas assured Reuven that the information had or would be sent to EPA.

COUNT #2

17. Reuven incorporates all preceding paragraphs of his Answer as if fully re-alleged herein.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted.

23. Denied. Pursuant to the terms of the lease between Reuven and Top Gas it was the responsibility of Top Gas to perform the required tests; Top Gas assured Reuven that the testing had been performed.

24. Denied. Pursuant to the terms of the lease between Reuven and Top Gas it was the responsibility of Top Gas to perform the required tests; Top Gas assured Reuven that the testing had been performed.

COUNT #3

25. Reuven incorporates all preceding paragraphs of his Answer as if fully re-alleged herein.

26. Admitted.

27. Admitted.

28. Denied. Pursuant to the terms of the lease between Reuven and Top Gas it was the responsibility of Top Gas to perform the required tests; Top Gas assured Reuven that the testing had been performed.

29. Denied. Pursuant to the terms of the lease between Reuven and Top Gas it was the responsibility of Top Gas to perform the required tests; Top Gas assured Reuven that the testing had been performed.

COUNT #4.

30. Reuven incorporates all preceding paragraphs of his Answer as if fully re-alleged herein.

31. Admitted.

32. Denied. Reuven lacks knowledge or information sufficient to form a belief about the

truth of the allegations of this paragraph and they are therefore denied.

33. Denied. Pursuant to the terms of the lease between Reuven and Top Gas it was the responsibility of Top Gas to maintain the line leak detector for UST No. 3.

WHEREFORE, Respondent Ezra Reuven requests that the Complaint against him be dismissed.



KENNETH L. MIRSKY, ESQUIRE
Attorney for Respondent Ezra Reuven
2033 Walnut Street
Philadelphia, PA 19103
(215) 569-4055

CERTIFICATION

I certify that the information contained in or accompanying this Answer is true, accurate, and complete. As to those identified portions of this Answer for which I cannot personally verify their accuracy, I certify under penalty of law that this Answer and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.



EZRA REUVEN

U.S. EPA-REGION 3-RHC
FILED-3DEC2019AM9:05



STORAGE SYSTEM REPORT FORM
NARRATIVE INFORMATION

EPA-REGION 3-RHC
FILED-3DEC2019AM9:06

2018

Storage Tank Facility ID Number 51-42774	Facility Name Gas Autorepair and Tire Mart
Facility Location (911) Address 4548 Baltimore Ave. Phila, PA 19143	Municipality City of Phila
	County Phila
Owner Name EZRA REMEN	Owner/Contact Address
Owner Telephone Number 610-398-4140 (voice/cell) -368- (fax)	(e-mail)

Narrative:

An inspection is being conducted at this site due to a Facility Operations Inspection being overdue. The inspection has been overdue since May 15, 2018. During this visit DEP personnel present include Quadriah Glover and Dana Kutz. Personnel met with Mr. Mohammad Amur and Lou Zewile. Mr. Amur explained Benn Cohen of Environmental Testing and Inspections had been to the site to complete an FDI back in April. DEP has not received a copy of this inspection report. Please complete and submit a Facility Operations Inspection by November 2, 2018 (this Friday). Benn Cohen was called while at this inspection and his voicemail was full. DEP left a copy of an old certified inspector list along with a list of certified tank handlers for the removal of the used motor oil tank. The DEP is also in the process of formulating an enforcement action for the removal of tank 014 (the UNIC

DEP Representative Name (Print) Quadriah Glover	DEP Representative Signature <i>Quadriah Glover</i>	Title Water Quality Insp	Date 10-29-18 Telephone 484-250-57
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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Name of Person Interviewed (Print)	Signature of Person Interviewed <i>Amur</i>	Title operator	Date 10/29/18 Telephone
------------------------------------	--	-------------------	-------------------------------

- White - DEP Yellow - Facility Pink - Inspector

Year: 18
Mo: 12
Day: 24

State: Pennsylvania
City: Philadelphia
Location: East Mini Mart.

OWNER: _____

1 LOCATION: East Mini Mart
Street No. and/or Corner: 801 S. 46th St.
City: Philadelphia Pa. 19143

2 OWNER: Amin
Name: Amin
Address: _____
District, Mgr. or Other: _____
Address (if different than location): _____
City: _____
State: _____
Telephone: _____

3 OPERATOR: Amin
Name: Amin
Address: _____
District, Mgr. or Other: _____
Address (if different than location): _____
City: _____
State: _____
Telephone: _____

4 REASON FOR TEST: tower light brightness

5 TEST REQUESTED BY: Amin
Name: Amin
Position: _____
Order No.: 302-458-6839
Billing Address: _____

6 SPECIAL INSTRUCTIONS: _____

7 CONTRACTOR OR COMPANY MAKING TEST: MWD - Atlantic Petroleum Services Inc. Dennis Barry
MECHANIC(S) NAME: _____
8 IS A TANK TEST TO BE MADE WITH THIS LINE TEST? YES NO
9 MAKE AND TYPE OF PUMP OR DISPENSERS: MWD # Red Teckat STP
10 WEATHER: _____
TEMPERATURE IN TANKS: _____ F _____ C
COVER OVER LINES: concrete
APPROXIMATE BURIAL DEPTH: _____
CONCRETE, BLOCK TOB, ETC.

11 IDENTIFY EACH LINE AS TESTED	12 TIME (MILITARY)	13 LOG OF TEST PROCEDURES, AMBIENT TEMPERATURE, WEATHER, ETC.	14 PRESSURE		15 VOLUME		16 TEST RESULTS
			BEFORE	AFTER	BEFORE	AFTER	
1028	1028	Bleedback test	60	0	040	021	+031
1030	1030	Start line test		60			
1045	1045	Continue line test	56	60	0400	0375	-0025
1100	1100	"	57	60	0375	0355	-0020
1115	1115	"	58	60	0355	0340	-0015
1130	1130	"	59	60	0340	0330	-0010
1132	1132	Bleedback test	60	0	0330	061	+028

Value at STP stored

Line tested light

According to NEMA State of PA MS + De

Amin R. Barry

For Use With

Petro Plus

For Use With

Petro Plus

1 LOCATION: Coca + Mini Mart 801 S. 46th St. Philadelphia Pa 19143
Street No. and/or Corner City State Telephone N

2 OWNER: Amin Amin Address District, Mgr. or Other Address (if different than Location) Telephone N
Name Name Address District, Mgr. or Other Address (if different than Location) Telephone N

3 OPERATOR: Amin Position Order No. Billing Address
Name Name Position Order No. Billing Address Telephone N

4 REASON FOR TEST: verify brightness

5 TEST REQUESTED BY: Amin Position Order No. Billing Address
Name Name Position Order No. Billing Address Telephone N

6 SPECIAL INSTRUCTIONS: 302. 438-6839

7 CONTRACTOR OR COMPANY MAKING TEST: Mild-Atlantic Petroleum Services Inc. Dennis Barry

8 IS A TANK TEST TO BE MADE WITH THIS LINE TEST? YES NO

9 MAKE AND TYPE OF PUMP OR DISPENSERS: MPD + Red Teckat STP

10 WEATHER: Concrete APPROXIMATE BURIAL DEPTH
TEMPERATURE IN TANKS °F °C COVER OVER LINES Concrete, Black Top, etc.

11 IDENTIFY EACH LINE AS TESTED	12 TIME (MILITARY)	13 LOG OF TEST PROCEDURES, AMBIENT TEMPERATURE, WEATHER, ETC.	14 PRESSURE		15 VOLUME		16 TEST RESULTS
			BEFORE	AFTER	BEFORE	AFTER	
Super	1033	Bleedback test	60	0	047	072	+025
	1035	Start line test.		60			
	1050	Continue line test	57	60	0470	0450	-0020
	1105	"	57	60	0450	0430	-0020
	1120	"	58	60	0430	0415	-0015
1135	"	59	60	0415	0405	-0010	
1137	Bleedback test.	60	0	040	062	+022	

Value at STP stored

~00065 GPH

Line tested 4/15

according to NFPA as State of PA NS+De a

Amin R. Bar

LDT 880 - LEAK DETECTOR CHECKLIST

LOCATION

Coop + Mini Mart

CONTRACTOR <i>Amel - Atlantic Petroleum Services Inc.</i>		CUSTOMER <i>Amin</i>	
DATE <i>12/24/18</i>	PRODUCT <i>Regular</i>	LOCATION <i>Coop + Mini Mart 901 S. 46th St. + Balt. Ave Phila. Pa. 19143</i>	
TECHNICIAN <i>Dennis Barry</i>			

I SUBMERSIBLE PUMP IDENTIFICATION *302, 438-6839*

CHECK MFG. INDICATE MODEL NO. IF KNOWN							RECORD SERIAL #	
RED JACKET	TOKHEIM	GILBARCO	BENNETT	DRESSER WAYNE	A.O. SMITH	BOWSER KEENE	SOUTH WEST	OTHER
<input checked="" type="checkbox"/>								

II LEAK DETECTOR IDENTIFICATION

CHECK TYPE				
RED JACKET MODEL 116-030 P.L.D-2SEC HEX HEAD	RED JACKET MODEL 116-017 DLD 2SEC HEX HEAD	RED JACKET MODEL 116-011A DLD 5SEC ROUND HEAD	TOKHEIM MODEL 585PM DLD 2SEC SQUARE HEAD	OTHER <input checked="" type="checkbox"/>

PRE-TEST CONDITIONS
 VOLUME OF PRODUCT FLUSHED THRU LINE _____ GALLONS

OTHER COMMENTS _____

TEST PROCEDURE

<p>LEAK DETECTOR INSTALLED TEST AT DISPENSER</p> <p>III GENERAL LINE AND PUMP INFORMATION</p> <p>RECORD OPERATING PUMP PRESSURE <u>30</u> psig. AIR-VAPOR TEST WITH PUMP OFF MEASURE AND RECORD <u>031</u> sec.</p> <p>IV PRESSURE STEP TEST</p> <p>WITH BOTTOM SELECTOR IN PRESSURE STEP TEST POSITION TURN ON PUMP RECORD TIME IN SECONDS GAUGE NEEDLE REMAINS IN COLORED ZONE <u>2</u> SEC.</p> <p>V 3 GALLON PER HOUR LEAK SIMULATED TEST</p> <p>WITH BOTTOM SELECTOR IN 3 GPH TEST POSITION A) MEASURE AND RECORD VOLUME IN CALIBRATED BEAKER FOR 60 SECOND TEST <u>17.5 ml</u> B) OPEN DISPENSER NOZZLE OR PLACE BOTTOM SELECTOR IN DISPENSER NOZZLE POSITION. FLOW RATE OF APPROX. 1 1/2-GAL PER MINUTE WILL BE OBSERVED. DOES GAUGE NEEDLE MOVE TO LOWER END OF COLORED ZONE YES <input checked="" type="checkbox"/> NO _____ DOES FLOW RATE INCREASE TO APPROX. 1 1/2-GAL PER MINUTE YES <input checked="" type="checkbox"/> NO _____ C) CLOSE DISPENSER NOZZLE OR PLACE BOTTOM SELECTOR IN 3GPH TEST POSITION: GAUGE RETURN TO COLORED ZONE YES <input checked="" type="checkbox"/> NO _____ GAUGE DOES NOT RETURN TO COLORED ZONE YES _____ NO <input checked="" type="checkbox"/> GAUGE GOES TO OPERATING PRESSURE YES <input checked="" type="checkbox"/> NO _____</p> <p style="text-align: right;">LEAK DETECTOR TEST PASS <input checked="" type="checkbox"/></p>	<p>LEAK DETECTOR ISOLATED FROM PRODUCT LINE - TEST AT PUMP PIT REFER TO LDT INSTRUCTIONS</p> <p>III GENERAL PUMP INFORMATION</p> <p>FLUSH LDT TESTOR RECORD OPERATING PUMP PRESSURE _____ psig.</p> <p>IV PRESSURE STEP TEST - SUBMERSIBLE PUMP REMAINS ON THRU-OUT TEST PROCEDURE</p> <p>WITH BOTTOM SELECTOR IN PRESSURE STEP TEST POSITION ROTATE ISOLATOR FULLY (CCW) RECORD TIME IN SECONDS GAUGE NEEDLE REMAINS IN COLORED ZONE _____ SEC.</p> <p>V 3 GALLON PER HOUR LEAK SIMULATED TEST</p> <p>WITH BOTTOM SELECTOR IN 3 GPH TEST POSITION A) MEASURE AND RECORD VOLUME IN CALIBRATED BEAKER FOR 60 SECOND TEST _____ ML B) PLACE BOTTOM SELECTOR IN DISPENSER NOZZLE POSITION. FLOW RATE OF APPROX. 1 1/2-GAL PER MINUTE WILL BE OBSERVED. DOES GAUGE NEEDLE MOVE TO LOWER END OF COLORED ZONE YES _____ NO _____ DOES FLOW RATE INCREASE TO APPROX. 1 1/2-GAL PER MINUTE YES _____ NO _____ C) PLACE BOTTOM SELECTOR IN 3GPH TEST POSITION: GAUGE RETURN TO COLORED ZONE YES _____ NO _____ GAUGE DOES NOT RETURN TO COLORED ZONE YES _____ NO _____ GAUGE GOES TO OPERATING PRESSURE YES _____ NO _____</p> <p style="text-align: right;">LEAK DETECTOR TEST PASS <input checked="" type="checkbox"/></p>
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LDT 880 - LEAK DETECTOR CHECKLIST

LOCATION

Gas + Mini Mart

CONTRACTOR <i>Amil - Atlantic Petroleum Services Inc.</i>		CUSTOMER <i>Amin</i>	
DATE <i>12/24/18</i>	PRODUCT <i>Super</i>	LOCATION <i>Gas + Mini Mart 901 S. 46th St. + Balt. Ave Phila. Pa. 19143</i>	
TECHNICIAN <i>Dennis Barry</i>			

I SUBMERSIBLE PUMP IDENTIFICATION *302.438-6839*

CHECK MFG. INDICATE MODEL NO. IF KNOWN						RECORD SERIAL #		
RED JACKET	TOKHEIM	GILBARCO	BENNETT	DRESSER WAYNE	A.O. SMITH	BOWSER KEENE	SOUTH WEST	OTHER
<input checked="" type="checkbox"/>								

II LEAK DETECTOR IDENTIFICATION

CHECK TYPE			
RED JACKET MODEL 116-030 PLD-2SEC HEX HEAD	RED JACKET MODEL 116-017 DLD 2SEC HEX HEAD	RED JACKET MODEL 116-011A DLD 5SEC ROUND HEAD	TOKHEIM MODEL 585PM DLD 2SEC SQUARE HEAD
			<input checked="" type="checkbox"/>

PRE-TEST CONDITIONS

VOLUME OF PRODUCT FLUSHED THRU LINE _____ GALLONS

OTHER COMMENTS _____

TEST PROCEDURE

<p>LEAK DETECTOR INSTALLED TEST AT DISPENSER</p> <p>III GENERAL LINE AND PUMP INFORMATION</p> <p>RECORD OPERATING PUMP PRESSURE <u>29</u> psig. AIR-VAPOR TEST WITH PUMP OFF MEASURE AND RECORD <u>025</u></p> <p>IV PRESSURE STEP TEST</p> <p>WITH BOTTOM SELECTOR IN PRESSURE STEP TEST POSITION TURN ON PUMP RECORD TIME IN SECONDS GAUGE NEEDLE REMAINS IN COLORED ZONE <u>2</u> SEC.</p> <p>V 3 GALLON PER HOUR LEAK SIMULATED TEST</p> <p>WITH BOTTOM SELECTOR IN 3 GPH TEST POSITION MEASURE AND RECORD VOLUME IN CALIBRATED BEAKER FOR 60 SECOND TEST <u>148 ml</u></p> <p>A) OPEN DISPENSER NOZZLE OR PLACE BOTTOM SELECTOR IN DISPENSER NOZZLE POSITION. FLOW RATE OF APPROX. 1 1/2-3GAL PER MINUTE WILL BE OBSERVED. DOES GAUGE NEEDLE MOVE TO LOWER END OF COLORED ZONE YES <input checked="" type="checkbox"/> NO _____ DOES FLOW RATE INCREASE TO APPROX. 1 1/2-3GAL PER MINUTE YES <input checked="" type="checkbox"/> NO _____</p> <p>B) CLOSE DISPENSER NOZZLE OR PLACE BOTTOM SELECTOR IN 3GPH TEST POSITION: GAUGE RETURN TO COLORED ZONE YES <input checked="" type="checkbox"/> NO _____ GAUGE DOES NOT RETURN TO COLORED ZONE YES _____ NO <input checked="" type="checkbox"/> GAUGE GOES TO OPERATING PRESSURE YES <input checked="" type="checkbox"/> NO _____</p>	<p>LEAK DETECTOR ISOLATED FROM PRODUCT LINE - TEST AT PUMP PIT REFER TO LDT INSTRUCTIONS</p> <p>III GENERAL PUMP INFORMATION</p> <p>FLUSH LOT TESTOR RECORD OPERATING PUMP PRESSURE _____ psig.</p> <p>IV PRESSURE STEP TEST - SUBMERSIBLE PUMP REMAINS ON THRU-OUT TEST PROCEDURE</p> <p>WITH BOTTOM SELECTOR IN PRESSURE STEP TEST POSITION ROTATE ISOLATOR FULLY (CCW) RECORD TIME IN SECONDS GAUGE NEEDLE REMAINS IN COLORED ZONE _____ SEC.</p> <p>V 3 GALLON PER HOUR LEAK SIMULATED TEST</p> <p>WITH BOTTOM SELECTOR IN 3 GPH TEST POSITION MEASURE AND RECORD VOLUME IN CALIBRATED BEAKER FOR 60 SECOND TEST _____ ML</p> <p>A) PLACE BOTTOM SELECTOR IN DISPENSER NOZZLE POSITION. FLOW RATE OF APPROX. 1 1/2-3GAL PER MINUTE WILL BE OBSERVED. DOES GAUGE NEEDLE MOVE TO LOWER END OF COLORED ZONE YES _____ NO _____ DOES FLOW RATE INCREASE TO APPROX. 1 1/2-3GAL PER MINUTE YES _____ NO _____</p> <p>B) PLACE BOTTOM SELECTOR IN 3GPH TEST POSITION: GAUGE RETURN TO COLORED ZONE YES _____ NO _____ GAUGE DOES NOT RETURN TO COLORED ZONE YES _____ NO _____ GAUGE GOES TO OPERATING PRESSURE YES _____ NO _____</p>
--	---

LEAK DETECTOR TEST PASS <input checked="" type="checkbox"/>	LEAK DETECTOR TEST PASS <input type="checkbox"/>
--	---

MONITOR CERTIFICATION FORM

Customer: Amini Site I.D.: _____ Date: 12/24/18

Address: Const Mgmt Mart.
9013.46th St. + Balt Ave
Phila Pa. 19143

Work Order: 122418

1) Tank Probes:

Manufacturer: Vander Root Model #: TL535

Serial #: Various Number of tanks Monitored: 3

Set up for monthly test (Y/N): yes Last Test Passed: 12/24/18

Does the system display or print out monthly test results (Y/N): yes Type. (Display or print out): both

OPERATIONAL (Y/N): yes

Comments: Tank Test History is perfect for the last year

2) Tank External Probes:

Manufacturer: float Vander Root Model #: float

	Number of Probes	Liquid or Vapor Sensor	Positive Shut Down (Y/N)	Fall Safe (Y/N)	Operational
Annular Probe					
Turbin Sump	<u>2</u>	<u>Liquid</u>	<u>No</u>	<u>yes</u>	<u>yes</u>
Fill Sump					
Fiber Trench					
Monitoring Well					

Annular Space Wet or dry: DNA

3) Product Line Pressure Monitor

Manufacturer: DNA Model #: _____

Number Of Sensors: DNA

Mech. Leak Detector (Y/N): yes.
Mech. Leak Detector: yes
Operational (Y/N): yes

Does the system display or print out monthly test results (Y/N): DNA

Type. (Display or print out): DNA

Does the system go into alarm with the simulated leak test (Y/N): DNA

Positive Shut Down (Y/N): N.

OPERATIONAL (Y/N): yes

4) Overall System Performance

Does the fuel system remain operational when power is shut off to the monitoring panel (Y/N): yes.
(FAIL SAFE)

Do all alarms include both audible and visual alarms (Y/N): yes.

The monitoring system is certified operational (Y/N): yes.

Dennis Barry
Technician (Print)

Dennis R. Barry
Technician (Signature)

Comments: _____

2017

U.S. EPA-REGION 3-RHC
FILED-30DEC2019AM8:06

PRESSURE VACUUM VALVE

TEST

Date of Test 9/13/17
Location Gas - Mini Mart - 901 S 46th St - Balt. Ave Phila
Type of valve Fanco A0084, Q38 Pa. 19143
Valve settings 3" pressure 8" vacuum

PRESSURE

Did the valve hold pressure up to the cracking setting? Yes No

Did the valve open at the correct cracking setting? Yes NO

VACUUM

Did the valve hold vacuum up to the release setting? Yes No

Did the valve open at the correct cracking setting? Yes NO

Valve Passed? Yes NO

2017

Determination of 2 Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities

SUMMARY OF SOURCE TEST DATA

SOURCE INFORMATION		FACILITY PARAMETERS	
GDF Name and address <i>Gas + Mini Mart</i> <i>9015. 46th + Belt Ave</i> <i>Phila Pa. 19143</i>	GDF Representative and Title <i>Amin</i>	PHASE II SYSTEM TYPE (Check One)	
	GDF Phone No. ()	Balance <input checked="" type="checkbox"/>	Hirt
Permit Conditions <i>unknown</i>	Source: GDF Vapor Recovery System <i>Emco Balance System</i>	Red Jacket	Hasstech
	GDF # <i>unknown</i>	Healy	Other
	A/C # <i>unknown</i>	Manifolded? Y or N	
Operating Parameters			
Number of Nozzles Served by Tank #1		Number of Nozzles Served by Tank #3	
Number of Nozzles Served by Tank #2		Number of Nozzles Served by Tank #4	
Applicable Regulations: <i>CAARB + the State of Pa.</i>		VN Recommended <i>none</i>	
Source Test Results and Comments			
Tank #:	1 2 3 4		
1. Product Grade	<i>Reg. Reg Super</i>		
2. Actual Tank Capacity, gallons	<i>6000 6000 6000</i>		
3. Gasoline Volume	<i>1689 1788 714</i>		
4. Ullage, gallons (#2-#3) <i>Total 13,500</i>	<i>4208 4109 5183</i>		
5. Initial Pressure, inches H ₂ O	<i>2.0</i>		
6. Pressure After 1 Minute, inches H ₂ O	<i>1.99</i>		
7. Pressure After 2 Minutes, inches H ₂ O	<i>1.98</i>		
8. Pressure After 3 Minutes, inches H ₂ O	<i>1.97</i>		
9. Pressure After 4 Minutes, inches H ₂ O	<i>1.96</i>		
10. Final Pressure After 5 Minutes, inches H ₂ O	<i>1.95</i>		
11. Allowable Final Pressure <i>System passed.</i>	<i>1.92</i>		
Test Conducted by: <i>Dennis Berry</i>	Test Company: <i>Mid-Atlantic Petroleum Service Inc</i> <i>302.438.6839</i>	Date of Test: <i>9/13/17</i>	

Form 1

<h2 style="margin: 0;">Dynamic Back Pressure Source Test Results</h2>	Report No.: _____ Test Date: <u>9/13/17</u> Test Times: _____ Run A: <u>Normal</u>
---	---

Source Information		Representatives
Station Name and Address: <u>Gas + Mini Mart</u> <u>901 S. 46th St. + Belt Ave</u> <u>Phila. Pa. 19143</u>	Station Representative and Title: <u>Amin</u> Phone No. () _____	Source Test Engineers / Technicians: <u>Dennis Berry</u> <u>Atul-Atlantic Petro. Serv</u> <u>302. 438. 6839</u>
Permit Conditions: <u>unknown</u>	Source: <u>GDF Vapor Recovery</u> <u>Emco Balance Systems</u> GDF # <u>unknown</u> A/C # <u>unknown</u>	Permit Services Division/Enforcement Division: Test Requested By: <u>Amin</u>
Operating Parameters: <u>Normal</u>		Applicable Regulations: <u>CARB + the State of Pa</u>
		VN Recommended: <u>None</u>

Sources Test Results and Comments:

Nozzle #	Gas Grade	Nozzle Model	Dynamic Back Pressure, Inches H ₂ O			wet
			20' CFH	60 CFH	100 CFH	
1	Reg-Super	Emco RA4005				60
2	Reg-Super	" "	1 .03'	.09'	.21'	
3	Reg-Super	" "	2 .04'	.12'	.26'	
4	Reg-Super	OPW 11UF	3 .04'	.13'	.28'	
5	Reg-Super	" "	4 .04'	.17'	.27'	
6	Reg-Super	" "	5 .05'	.15'	.31'	
7	Reg-Super	Emco RA4005	6 .06'	.18'	.38'	
8	Reg-Super	" "	7 .05'	.15'	.32'	
			8 .06'	.17'	.36'	

All nozzles + users passed according to CARB
and State of Pa. criteria
Dennis R. Berry

Results Received by	Date	Results Reviewed by	Date	Results Approved/Disapproved
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For Use With

Petro Plus
177 HIGH

1 LOCATION: Coast Mini Mart 9015. 46th St. + Balt Ave Pikula Pa. 19143
 Street No. and/or Corner City State Telephone No.

2 OWNER: Amin Amin Coast + Mini Mart 19143
 Name Address Representative Position Telephone No.

3 OPERATOR: Amin Amin Coast + Mini Mart 19143
 Name Address (if different than Location) Position Telephone No.

4 REASON FOR TEST: toxin by tightness

5 TEST REQUESTED BY: Amin Coast + Mini Mart
 Name Address Order No. Billing Address

Year 17 Pennsylvania
 Mo. 9 Pikula
 Day 13 Coast + Mini Mart
 DATE OF TEST State Location

6 SPECIAL INSTRUCTIONS: Mild - Athletic Petroleum Services Inc. Dennis Barry

7 CONTRACTOR OR COMPANY MAKING TEST (MECHANIC(S) NAME): MWD + Red Seal STP

8 IS A TANK TEST TO BE MADE WITH THIS LINE TEST? YES NO

9 MAKE AND TYPE OF PUMP OR DISPENSERS: Concrete

10 WEATHER: Concrete

11 APPROXIMATE BURIAL DEPTH: _____

11 IDENTIFY EACH LINE AS TESTED	12 TIME (MILITARY)	13 LOG OF TEST PROCEDURES, AMBIENT TEMPERATURE, WEATHER, ETC.	14 PRESSURE		15 VOLUME		16 TEST RESULTS
			BEFORE	AFTER	BEFORE	AFTER	
<u>Regular</u>	<u>1028</u>	<u>Bleedback test</u>	<u>60</u>	<u>0</u>	<u>042</u>	<u>072</u>	<u>+ 030</u>
	<u>1030</u>	<u>Start line test</u>		<u>60</u>			
	<u>1045</u>	<u>Continue line test</u>	<u>57</u>	<u>60</u>	<u>0420</u>	<u>0400</u>	<u>- 0020</u>
	<u>1100</u>	<u>"</u>	<u>57</u>	<u>60</u>	<u>0400</u>	<u>0380</u>	<u>- 0020</u>
	<u>1115</u>	<u>"</u>	<u>58</u>	<u>60</u>	<u>0380</u>	<u>0365</u>	<u>- 0015</u>
	<u>1130</u>	<u>"</u>	<u>59</u>	<u>60</u>	<u>0365</u>	<u>0355</u>	<u>- 0010</u>
	<u>1132</u>	<u>Bleedback test</u>	<u>60</u>	<u>0</u>	<u>035</u>	<u>061</u>	<u>+ 026</u>

Value at STP stored

~ 0065 GPH

line tested tight

according to NFPA and State of Pa. NIT + De oxia

Dennis Barry

For Use With

Year 17⁰ Name Pennsylvania
 No. 9 City Pitula
 Day 13⁰ State Pa OWNER
 DATE OF TEST LOCATION

1 LOCATION: Coast Mini Mart Penn Mart 9015. 46th St + Balt Ave Pitula Pa 19143
 Street No. and/or Corner Telephone No.
 2 OWNER: Amin Name Address Representative Telephone No.
 3 OPERATOR: Amin Name Dealer, Mgr. or Other Address (if different than Location) Telephone No.
 4 REASON FOR TEST: to verify tightness
 5 TEST REQUESTED BY: Amin Name Order No. Billing Address
 6 SPECIAL INSTRUCTIONS: Coast + Mini Mart Position
 7 CONTRACTOR OR COMPANY MAKING TEST: Mick-Atlantic Rekolraum Services Inc Dennis Barry
 MECHANIC(S) NAME
 8 IS A TANK TEST TO BE MADE WITH THIS LINE TEST? YES NO
 MAKE AND TYPE OF PUMP OR DISPENSER: MPD + Red Tealcof STP
 9 WEATHER: TEMPERATURE IN TANKS: 7 °F 3 °C COVER OVER LINES: concrete
 CONCRETE, DUCT TOP, etc.
 10 APPROXIMATE BURIAL DEPTH: _____

11 IDENTIFY EACH LINE AS TESTED	12 TIME (MILITARY)	13 LOG OF TEST PROCEDURES, AMBIENT TEMPERATURE, WEATHER, ETC.	14 PRESSURE		15 VOLUME		NET CHANGE	16 TEST RESULTS	CONCLUSIONS, REPAIRS AND COMMENTS
			BEFORE	AFTER	BEFORE	AFTER			
<u>Super</u>	<u>1033</u>	<u>Bleedback test</u>	<u>60</u>	<u>0</u>	<u>050</u>	<u>089</u>	<u>+039</u>	<u>Value at STP stored</u>	
	<u>1035</u>	<u>Start line test</u>		<u>60</u>					
	<u>1050</u>	<u>Continue line test</u>	<u>57</u>	<u>60</u>	<u>0500</u>	<u>0480</u>	<u>-0020</u>		
	<u>1105</u>	<u>"</u>	<u>58</u>	<u>60</u>	<u>0480</u>	<u>0465</u>	<u>-0015</u>		
	<u>1120</u>	<u>"</u>	<u>58</u>	<u>60</u>	<u>0465</u>	<u>0450</u>	<u>-0015</u>		
	<u>1135</u>	<u>"</u>	<u>59</u>	<u>60</u>	<u>0450</u>	<u>0440</u>	<u>-0010</u>		
	<u>1137</u>	<u>Bleedback test</u>	<u>60</u>	<u>0</u>	<u>044</u>	<u>079</u>	<u>+035</u>		

Line tested tight
 according to NFPA and
 State of Pa. NF + De order
 Dennis R. Barry

-0000 GPH

LDT 880 - LEAK DETECTOR CHECKLIST

LOCATION

Gas + Mini Mart
Route 90 S. 46th St. + Belt Ave
Fluke Pa. 19143

CONTRACTOR <i>Amica - Atlantic Petroleum Services Inc.</i>	CUSTOMER <i>Amin</i>
DATE <i>9/13/17</i>	LOCATION <i>Gas + Mini Mart Route 90 S. 46th St. + Belt Ave Fluke Pa. 19143</i>
TECHNICIAN <i>Dennis Barry</i>	PRODUCT <i>Regular</i>

I SUBMERSIBLE PUMP IDENTIFICATION

CHECK MFG. INDICATE MODEL NO. IF KNOWN								RECORD SERIAL #	
RED JACKET	TOKHEIM	GILBARCO	BENNETT	DRESSER WAYNE	A.O. SMITH	BOWSER KEENE	SOUTH WEST	OTHER	
<input checked="" type="checkbox"/>									

II LEAK DETECTOR IDENTIFICATION

CHECK TYPE				
RED JACKET MODEL 116-030 P.L.D-2SEC HEX HEAD	RED JACKET MODEL 116-017 DLD 2SEC HEX HEAD	RED JACKET MODEL 116-011A DLD 5SEC ROUND HEAD	TOKHEIM MODEL 585PM DLD 2SEC SQUARE HEAD	OTHER <input checked="" type="checkbox"/>

PRE-TEST CONDITIONS

VOLUME OF PRODUCT FLUSHED THRU LINE _____ GALLONS

OTHER COMMENTS _____

TEST PROCEDURE

<p>LEAK DETECTOR INSTALLED TEST AT DISPENSER</p> <p>III GENERAL LINE AND PUMP INFORMATION</p> <p>RECORD OPERATING PUMP PRESSURE <u>28</u> psig. AIR-VAPOR TEST WITH PUMP OFF MEASURE AND RECORD <u>030g</u></p> <p>IV PRESSURE STEP TEST</p> <p>WITH BOTTOM SELECTOR IN PRESSURE STEP TEST POSITION TURN ON PUMP RECORD TIME IN SECONDS GAUGE NEEDLE REMAINS IN COLORED ZONE <u>2</u> SEC.</p> <p>V 3 GALLON PER HOUR LEAK SIMULATED TEST</p> <p>WITH BOTTOM SELECTOR IN 3 GPH TEST POSITION</p> <p>A) MEASURE AND RECORD VOLUME IN CALIBRATED BEAKER FOR 60 SECOND TEST <u>1.97</u> ML</p> <p>B) OPEN DISPENSER NOZZLE OR PLACE BOTTOM SELECTOR (IN DISPENSER) NOZZLE POSITION. FLOW RATE OF APPROX. 1 1/2-3GAL PER MINUTE WILL BE OBSERVED. DOES GAUGE NEEDLE MOVE TO LOWER END OF COLORED ZONE YES <input checked="" type="checkbox"/> NO _____ DOES FLOW RATE INCREASE TO APPROX. 1 1/2-3GAL PER MINUTE YES <input checked="" type="checkbox"/> NO _____</p> <p>C) CLOSE DISPENSER NOZZLE OR PLACE BOTTOM SELECTOR IN 3GPH TEST POSITION: GAUGE RETURN TO COLORED ZONE YES <input checked="" type="checkbox"/> NO _____ GAUGE DOES NOT RETURN TO COLORED ZONE YES _____ NO <input checked="" type="checkbox"/> GAUGE GOES TO OPERATING PRESSURE YES <input checked="" type="checkbox"/> NO _____</p> <p style="text-align: right;">LEAK DETECTOR TEST PASS <input checked="" type="checkbox"/> FAIL <input type="checkbox"/></p>	<p>LEAK DETECTOR ISOLATED FROM PRODUCT LINE - TEST AT PUMP PIT REFER TO LDT INSTRUCTIONS</p> <p>III GENERAL PUMP INFORMATION</p> <p>FLUSH LDT TESTOR RECORD OPERATING PUMP PRESSURE _____ psig.</p> <p>IV PRESSURE STEP TEST - SUBMERSIBLE PUMP REMAINS ON THRU-OUT TEST PROCEDURE</p> <p>WITH BOTTOM SELECTOR IN PRESSURE STEP TEST POSITION ROTATE ISOLATOR FULLY (CCW) RECORD TIME IN SECONDS GAUGE NEEDLE REMAINS IN COLORED ZONE _____ SEC.</p> <p>V 3 GALLON PER HOUR LEAK SIMULATED TEST</p> <p>WITH BOTTOM SELECTOR IN 3 GPH TEST POSITION</p> <p>A) MEASURE AND RECORD VOLUME IN CALIBRATED BEAKER FOR 60 SECOND TEST _____ ML</p> <p>B) PLACE BOTTOM SELECTOR IN DISPENSER NOZZLE POSITION. FLOW RATE OF APPROX. 1 1/2-3GAL PER MINUTE WILL BE OBSERVED. DOES GAUGE NEEDLE MOVE TO LOWER END OF COLORED ZONE YES _____ NO _____ DOES FLOW RATE INCREASE TO APPROX. 1 1/2-3GAL PER MINUTE YES _____ NO _____</p> <p>C) PLACE BOTTOM SELECTOR IN 3GPH TEST POSITION: GAUGE RETURN TO COLORED ZONE YES _____ NO _____ GAUGE DOES NOT RETURN TO COLORED ZONE YES _____ NO _____ GAUGE GOES TO OPERATING PRESSURE YES _____ NO _____</p> <p style="text-align: right;">LEAK DETECTOR TEST PASS <input type="checkbox"/> FAIL <input type="checkbox"/></p>
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LDT 880 - LEAK DETECTOR CHECKLIST

LOCATION

Gas + Mini Mart

CONTRACTOR <i>AmTel - Atlantic Petroleum Supply</i>		CUSTOMER <i>Amin</i>	
DATE <i>9/13/17</i>	PRODUCT <i>Supr</i>	LOCATION <i>Gas + Mini Mart, 901 S. 46th St. + Belt Ave, Okla OK 73143</i>	
TECHNICIAN <i>Dennis Barry</i>			

I SUBMERSIBLE PUMP IDENTIFICATION

CHECK MFG. INDICATE MODEL NO. IF KNOWN					RECORD SERIAL #				
RED JACKET	TOKHEIM	GILBARCO	BENNETT	DRESSER WAYNE	A.O. SMITH	BOWSER KEENE	SOUTH WEST	OTHER	
<input checked="" type="checkbox"/>									

II LEAK DETECTOR IDENTIFICATION

CHECK TYPE				
RED JACKET MODEL 116-030 P.I.D.-2SEC HEX HEAD	RED JACKET MODEL 116-017 DLD 2SEC HEX HEAD	RED JACKET MODEL 116-011A DLD 5SEC ROUND HEAD	TOKHEIM MODEL 585PM DLD 2SEC SQUARE HEAD	OTHER
				<input checked="" type="checkbox"/>

PRE-TEST CONDITIONS

VOLUME OF PRODUCT FLUSHED THRU LINE _____ GALLONS

OTHER COMMENTS _____

TEST PROCEDURE

<p>LEAK DETECTOR INSTALLED TEST AT DISPENSER</p> <p>III GENERAL LINE AND PUMP INFORMATION</p> <p>RECORD OPERATING PUMP PRESSURE <u>28</u> psig. AIR-VAPOR TEST WITH PUMP OFF MEASURE AND RECORD <u>039</u> sec</p> <p>IV PRESSURE STEP TEST</p> <p>WITH BOTTOM SELECTOR IN PRESSURE STEP TEST POSITION TURN ON PUMP RECORD TIME IN SECONDS GAUGE NEEDLE REMAINS IN COLORED ZONE <u>2</u> SEC.</p> <p>V 3 GALLON PER HOUR LEAK SIMULATED TEST</p> <p>WITH BOTTOM SELECTOR IN 3 GPH TEST POSITION MEASURE AND RECORD VOLUME IN CALIBRATED BEAKER FOR 60 SECOND TEST <u>1 1/2</u> ML</p> <p>A) OPEN DISPENSER NOZZLE OR PLACE BOTTOM SELECTOR IN DISPENSER NOZZLE POSITION. FLOW RATE OF APPROX. 1 1/2-3GAL PER MINUTE WILL BE OBSERVED. DOES GAUGE NEEDLE MOVE TO LOWER END OF COLORED ZONE YES <input checked="" type="checkbox"/> NO _____ DOES FLOW RATE INCREASE TO APPROX. 1 1/2-3GAL PER MINUTE YES <input checked="" type="checkbox"/> NO _____</p> <p>B) CLOSE DISPENSER NOZZLE OR PLACE BOTTOM SELECTOR IN 3GPH TEST POSITION: GAUGE RETURN TO COLORED ZONE YES <input checked="" type="checkbox"/> NO _____ GAUGE DOES NOT RETURN TO COLORED ZONE YES _____ NO <input checked="" type="checkbox"/></p> <p>C) GAUGE GOES TO OPERATING PRESSURE YES <input checked="" type="checkbox"/> NO _____</p> <p style="text-align: right;">LEAK DETECTOR TEST PASS <input checked="" type="checkbox"/> FAIL</p>	<p>LEAK DETECTOR ISOLATED FROM PRODUCT LINE - TEST AT PUMP PIT REFER TO LDT INSTRUCTIONS</p> <p>III GENERAL PUMP INFORMATION</p> <p>FLUSH LOT TESTOR RECORD OPERATING PUMP PRESSURE _____ psig.</p> <p>IV PRESSURE STEP TEST - SUBMERSIBLE PUMP REMAINS ON THRU-OUT TEST PROCEDURE</p> <p>WITH BOTTOM SELECTOR IN PRESSURE STEP TEST POSITION ROTATE ISOLATOR FULLY (CCW) RECORD TIME IN SECONDS GAUGE NEEDLE REMAINS IN COLORED ZONE _____ SEC.</p> <p>V 3 GALLON PER HOUR LEAK SIMULATED TEST</p> <p>WITH BOTTOM SELECTOR IN 3 GPH TEST POSITION MEASURE AND RECORD VOLUME IN CALIBRATED BEAKER FOR 60 SECOND TEST _____ ML</p> <p>A) PLACE BOTTOM SELECTOR IN DISPENSER NOZZLE POSITION. FLOW RATE OF APPROX. 1 1/2-3GAL PER MINUTE WILL BE OBSERVED. DOES GAUGE NEEDLE MOVE TO LOWER END OF COLORED ZONE YES _____ NO _____ DOES FLOW RATE INCREASE TO APPROX. 1 1/2-3GAL PER MINUTE YES _____ NO _____</p> <p>B) PLACE BOTTOM SELECTOR IN 3GPH TEST POSITION: GAUGE RETURN TO COLORED ZONE YES _____ NO _____ GAUGE DOES NOT RETURN TO COLORED ZONE YES _____ NO _____ GAUGE GOES TO OPERATING PRESSURE YES _____ NO _____</p> <p style="text-align: right;">LEAK DETECTOR TEST PASS <input type="checkbox"/> FAIL</p>
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