

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,

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.

KENNETH L. MIRSKY

Very truly vours,

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 :

Respondents:

Gas Auto Repair and Mini Mart :

Facility:

U.S. EPA-REGION 3-RHC FILED-SDEC2018a+9405

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.
- 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.
 - 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

Esse Ruch

2630-FM-BECB0182 2/2012



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF ENVIRONMENTAL CLEANUP AND BROWNFIELDS

STORAGE SYSTEM REPORT FORM EPA-REGION 3-RHC NARRATIVE INFORMATION

	NARRATIVE INFORMATION
Storage Tank Facility ID Number	Facility Name
51-42774	Gas Hutoripair and line last
Facility Location (911) Address	Municipality (1 th of Phyla
4548 Psaltin	tre Ave. County
Phila, PA	19143 Phila
Owner Name EZRA RAMEN	Owner/Contact Address
Owner Telephone Number 010 - 379- 4140 (voice/ce	II)
(fa:	x)(e-mail)
Narrative:	
an inspection is be	ing conducted at this site due to a
Facility Operation	s'Inspection being overdue. The inspection
has been overdu	I some May 15, 2018. During this irsat
DEP personnel presen-	+ include Obadiesh Glover and Dana Kut
Personnel mot with	Mr. Mohammid Amer and Low Zeurle.
	Renn Coren of Environmental Festing and
	to the site to complete an FOI back in April . TH
has not recieved a c	apy of this inspection report. Please complete
and support a fac	ulity Operations Inspection by November 2,201
	open was called while at this insportion and he
unicemail was fel	II. DEP left a copy of an old routified inspector
	st of certified tankhandless for the removal
of the used motor or	of tank. The DEP is also in the proness of
formulating and an en	
DEP Representative Name (Print)	DEP Representative Signature Title Date 10 - 29 - 18
Quadwah Glover	Qualifolder Quality Inop 484-250-5
Signature by the person interviewed of acknowledge that the person was show	does not necessarily imply concurrence with the findings on this report, but does in the report or that a copy was left with the person.
Name of Person Interviewed (Print)	Signature of Person Interviewed Title Date
2	Avalow. Feléphone
☐ White - DEP	☐ Yellow – Facility ☐ Pink – Inspector

U.S. EPA-REGION 3-RHC

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For Use With

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LDT 880 - LEAK DETECTOR CHECKLIST

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WITH BOTTOM SELECTOR IN PRESS	URE STEP TEST		N CMI	41117	ON THRU-C	ULLESTE	ROCEDURE				
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Green Mine Mant

LDT 880 - LEAK DETECTOR CHECKLIST

CONTRACTO	P-AHan	Ex Petro	kun Suc	STic	cus	TOMER	Am				
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MONITOR CERTIFICATION FORM

Customer: Amin		Site I.D.:		- M	Date:	12/24/18
Address: Coust Mi	in Mert.					•
9013.46	th 3+. + Ba	If Ave			1221110	
Phila	Pa. 19.	143	•	Work Örder:	122418	
Tank Probes:			£.		2.	
anufacturer: <u>Vevede</u>	r. Roof				Model #:	7435
Serial # :Unrious	o		Nur	nber of tanks	: Monitored:	3.
	<u> </u>					
Set up for monthly	test (Y/N):	yes.	Last	Test Passed:	12/24/13	8
Does the system displa out monthly test res		UPS.	Тур	oe. (Display o	or print out):	both
		-			964 N.C 95767s ,	
		ONAL (Y/N):		0 16	, ,	<u>U</u>
Comments:	Tank Test	History)	sportest	for the	last yea	<u> </u>
			u 			
Tank External Probes:	M	lanufacturer:	float	Veedy Ra	p Model #:	float
=	Number of Probes	Liquid or Vapor Sensor	Positive Shut Down (Y/N)	Fall Safe (Y/N)	Operational	
Annular Probe						
Turbin Sump	Z	Liquid	No	100	yes	
FIII Sump		0			J	
Fiber Trench		35				
Monitoring Well		q				
					*	

Page 1 of 2

Annular Space Wet or dry:

3) Product Line Pressure Monitor Manufacturer: Model #: _____ Mech. Leak Detector (Y/N): MCS. Number of Sensors: DNA Operational (Y/N): 45 Does the system display or print out monthly test results (Y/N): Type. (Display or print out): DWA Does the system go into alarm with the simulated leak test (Y/N): Positive Shut Down (Y/N): OPERATIONAL (Y/N): _L 4) Overall System Performance Does the fuel system remain operational when power is shut Do all alarms include both audible and visual alarms (Y/N):_ (FAIL SAFE) The monitoring system is certified operational (Y/N): comments:

U.S. EPA-REGION 3-RHC FILED-SDEC2019AMS/OS

PRESSURE VACUUM VALVE

TEST

Date of Test 9/13/17	D(1
Location Gus - Mini Mart - 9015 46th St. + Bult.	Ace Phila
Type of valve Fra: 40084, 038	Pa.14143
Valve settings 3 pressue 8 Vacu	
PRESSURE	
Did the valve hold pressure up the the cracking setting? Yes_X No	•
Did The valve open at the correct cracking setting? Yes X NO	
VACUUM	
Did the valve hold vacuum up to the release setting? Yes X No	
Did the valve open at the correct cracking setting? YesNO	
Valve Passed? Yes X NO	

2017

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

SUMMARY OF SOURCE TEST DATA

SOURCE	NFORMATION	FACILITY PARAMETERS
GES+ Mini Mart 9015. 46th Bull A	GDF Representative and Title	PHASE II SYSTEM TYPE (Check One)
Phila Pa. 19143	GDF Phone No. ()	Hirt
Permit Conditions	Source: GDF Vapor Recovery System	Red Jacket Hasstech
Culyour.	,	Healy Other
	GDF# unwour	
	AC# au mouss	Manifolded? Y or N
Operating Parameters Number of Nozzles Served by T Number of Nozzles Served by T		Served by Tank #3 Served by Tank #4
Applicable Regulations: 4	IAB+The State of Pa.	VN Recommended none
Source Test Results and Com Tank #:	ments	1 2 3 4
1. Product Grade		Reg. Rey Sugar
2. Actual Tank Capaci	ty, gallons	6000 6000 60ED
3. Gasoline Volume		1689 1788 714
4. Ullage, gallons (#2-	#3) Total 13,500	4208 41095183
5. Initial Pressure, inch	nes H ₂ O	
6. Pressure After 1 Mi	nute, inches H ₂ O	1.99
7. Pressure After 2 Mi	nutes, inches H₂O	1.98
8. Pressure After 3 Mi	nutes, inches H₂O	1.97
9. Pressure After 4 Mi	nutes, inches H ₂ O	
10. Final Pressure Afte	r 5 Minutes, inches H₂O	
11. Allowable Final Pre	ssure Systempar	ned
Test Conducted by Berry	Test Company: Mich - Ather Petrolen Suice 7 302, 438-683	a 13 10

Form 1

	Dynamic Back Pressui Source Test Results	Report No.: Test Date: 9:13/17 Test Times: Run A: Nomal	
Sou	rce Information	Representatives	
Station Name and Address, Cas + Mini Mart. 9015.46ths. Belti Au Philas Pa. 19143	Station Representative and Title Amin Phone No. ()	Denvice Bern Petro Save Whil-Attentic Petro Save 302. 438. 6839	>
Permit Conditions:	Source: GDF Vapor Recovery Euro Belince System	Permit Services Division/Enforcement Div	roisiv
	A/C # unfunous.	Test Requested By:	
Operating Parameters: Applicable Regulations:	CARB+the. State of Pa-	VN Recommended: None	

Sources Test Results and Comments:

Nozzle# Gas G	rade Nozzle i	Model	Dynamic Back	Pressure, Inches	
2 Regarden 5 Regarden 5 Regarden 7 Regarden 7	Super of OPW () Super of	VF 3 V 4 D 5 244005 6 4 7	20'CFH 03' 04' 04' ,04' ,05' ,06'	-09' 112' 13' 11-' 15' 18'	100 CFH 60 , Z ' , ZB' , Z7' , 3 ' , 38' 32' , 36'
	tate of Pa	Auser's parse	Venius R.	Bury Approved/Disapproved	

For Use With

AS TESTED + Mew Man SINION Day 13 DATE OF YEST OWNER 12 TIME (MILITARY) 12/15 Ē 1029 1045 1030 1132 S 1 LOCATION: TO WEATHER . 4 REASON FOR TEST ___ DOPERATOR: 2 OWNER: S TEST REQUESTED BY: @ SPECIAL INSTRUCTIONS: MADE WITH THIS LINE TEST? CONTRACTOR OR COMPANY MAKING TEST Bleedbuck test Bleedback feat. 13 LOG OF YEST PROCEDURES, AMBIENT TEMPERATURE, WEATHER, ETC. Start Line test. Continue Live test 2 2 Amin Capt MUNI West Amin. town by highlycess 2 4 TEMPERATURE IN TANKS_ NO YES Mid-Atlatic Petroleum Serices Free Gast Mini Man 52 58 57 57 60 BEFORE B 14 PRESSURE PUMP OR DISPENSERS pel OR LPa Dealer, Mgr. or Other AFTER 0 9 60 00 60 0 60 9015.46th St + Bast, Are Vila 0420 035 acho 240 858O. 0365 BEFORE ₹. × 0380 READING MPD + Red Jacket STP 0400 COVER LINES 0355 16 VOLUME 8365 220 AFTER 06 Address (If different than Location) Order No. +. Q30 1.0015 J208-0100% 7,0020 + 026 CHANGE Concrete Black Top or Value at STP closed Vennis Bessy state of fa. NJ+De onkine CONCLUSIONS, REPAIRS AND COMMENTS Position Bunng Address Line tooked tight allein K. Bury 1.00CS GPH APPROXIMATE 16 TEST RESULTS 149/43 Telephone No.

11 IDENTIFY
EACH UNE + Min Man State LOCATION Day 13 DATE OF TEST (xus OWNER 12 TIME (MILITARY) 1033 1135 1120 1105 1050 2801 1137 1 LOCATION 10 WEATHER ! 3 OPERATOR 2 OWNER: 5 TEST REQUESTED BY: A REASON FOR TEST _ 7 CONTRACTOR OR COMPANY MAKING TEST SPECIAL INSTRUCTIONS:_ MADE WITH THIS LINE TEST? Bleedbucktest 13 LOG OF TEST PROCEDURES. AMBIENT TEMPERATURE WEATHER. ETC. Bleedbuck fest. Start Line test. Continue Live test 2 F Aunin Gast Mini Mest Amin. tower by higheress Aurin 2 = 4 YES TEMPERATURE IN TANKS ___ Mich- 4 Habic Petroleum Services Free 58 Gast Mini Mas 80 BEFORE 57 60 59 B 14 PRESSURE For Use With PUMP OR DISTENSERS. pel OR kPa 0 AFTER 60 8 60 60 60 0 9015. 46th St 0480 2500 440 0450 0465 8450 BEFORE 050 1. 5910 READING 079 MPD + Red Jucket STP 0890 COVER LINES 0440 16 VOLUME 580 AFTER Address (If different than Location) Order No. 5100% 0100-5100% -,0020 +.035 +039 NET CONCIL CTC Value af STP closed Vennis State of Pa. NJ+De orkon CONCLUSIONS, REPAIRS AND COMMENTS according to NEPA and Blating Address Line tooked tight -,00000 GPH Vern K. Bury Best APPROXIMATE 16 TEST RESULTS 9143 Talephone Ma Telephone No: Telephone No.

LDT 880 - LEAK DETECTOR CHECKLIST

TRACTOR ALL I	· Pakal	دس ک دو		CUSTO	TOR (1		
April -Atlant 9/13/17 Dennis	PRODUCT Pay			LOCAT	ION .	Tini Ma Poffe. 46	ind y	Bult Ave
IBMERSIBLE PUI	UP IDENTIFIC	ногта		/wando-7-81/-				
ECK MFG. DICATE MODEL	NO. IF KNO	wn .		REC	ORD SE	AL #		
CKET TOKHEIM	GILBARCO	BENNETT	DRESS	ER A	.0. ѕмпн	BOWSER KEENE	SOUTH WEST	OTHER
\times								
LEAK DETECTO	identifica	ноп						
HECK TYPE								
ED JACKET DDEL 118-030 D-2SEC EX HEAD	RED JACKE MODEL 116- DLD 2SEG HEX HEAD	017	RED JAC MODEL DLD 5SE ROUND	116-01 C	1A M	OKHEIM ODEL 585PM .D 2SEC OUARE HEAC	ОТН	IER X
THER COMMENTS EST PROCEDURI EAK DETECTOR EST AT DISPENS	E INSTALLED			F	ROM PRO	CTOR ISOL	ATED - TEST AT F	PUMP PIT
III GENERAL LIN	E AND PUMP	INFORMA	HON	1000		שו דם.	ictions Iformatio	N
RECORD OPERA	IE AND PUMP TING PUMP PRE WITH PUMP OF	SSURE	28 p	sig.	II GENER	DT INSTRU AL PUMP IN	PORMATIO	URE pskg.
RECORD OPERA AIR-VAPOR TEST AND RECORD TV PRESSURE S WITH BOTTOM S POSITION TURN RECORD TIME IN	TING PUMP PRE WITH PUMP OF TEP TEST ELECTOR IN PRE	ESSURE F MEASURE ESSURE STER	28 p	sig.	FLUSH L RECORD V PRESS REMAI WITHBO POSITIO RECORD NEEDLE	DT INSTRU AL PUMP IN OPERATING I URE STEP NS ON THR THOM SELECT N ROTATE ISC TIME IN SECON REMAINS IN CORE	PUMP PRESSU TEST SUBN U-OUT TEST OR IN PRESSU ULATOR FULLY DNOS GUAGE COLORED ZON	MERSIBLE PUMP T PROCEDURE URE STEP TEST (CCM) ESEC.
AECORD OPERA AIR VAPOR TEST AND RECORD IV PRESSURE S WITH BOTTOM S POSITION TURN RECORD TIME IN NEEDLE REMAIN V 3 GALLON PI WITH BOTTOM S MEASURE AND CALIDRATEO DE CALIDRATEO TO FLOW RATE OF FLOW RATE OF WILL BE ODSER	TING PUMP PRE TWITH PUMP OF TEP TEST ELECTOR IN PRE ON PUMP IS IN COLORED ER HOUR LEA SELECTOR IN 3 C RECORD VOLUM ER HOR CO S ER HOUZZLE OR I ISPENSEN NOZZLE OR I I INTERNET NOZZLE OR I I INTERNET NOZZLE OR I I INTERNE	ESSURE F MEASURE ESSURE STEP AGE ZONE AK SIMULA OPH TEST PO IE IN ECOND TEST PLACE BOTTOM GAL PER MINI	TEST	II.	T GENER FLUSH L RECORD V PRESS REMAI WITHBO POSITION NEEDLE V 3 GALI WITHBO CALIBRA PLACE FLOW R WILL BE DOES B	DT INSTRU AL PUMP IN OPERATING I URE STEP NS ON THR ITOM SELECT N ROTATE ISC PEMAINS IN C ON PER HO DITOM SELEC ITEM BEAKER POSTOM SELE POSTOM SELE POSTOM SELE POSTOM SELE OBSERVED. UAGE NEEDLI	PUMP PRESSU PUMP PRESSU U-OUT TEST ORINPRESSU LIATOR FULLY DNDS GUAGE COLORED ZON DUR LEAK S TOR IN 3 GPH FOR 60 SECO CTOR IN DISP DX. 11/2-3GAL	MERSIBLE PUMP T PROCEDURE URE STEP TEST (CCW) ESEC. SIMULATED TEST TEST POSITION NO TESTML ENSER PER MINUTE WER
AECORD OPERA AIR-VAPOR TEST AND RECORD IV PRESSURE S WITH BOTTOM S POSITION TURN RECORD TIME IN NEEDLE REMAIN V 3 GALLON PI WITH BOTTOM S A) MEASURE AND CALIBRATEO RE B) OPEN DISPENS SELECTOR IN D FLOW RATE OPE DOES FLOW RA 11/A-3GAL PER IN CLOSE DISPENS SELECTOR IN 3 GUAGE RETUR ZONE GUAGE DOES COLORED ZON	TING PUMP PRE WITH PUMP OF TEP TEST ELECTOR IN PRE ON PUMP N SECONDS GUA IS IN COLORED ER HOUR LEA SELECTOR IN 3 C RECORD VOLUM RAKER FOR ROS APPROX, 112-30 INSPENSEIN NOZZ IED ZONE INSPENSEIN NOZZ IED	ESSURE STEP SESSURE STEP AGE ZONE AK SIMULA SPH TEST PO ALE POSITION SAL PER MINI O LOWER O APPROX. I PLACE BOT TION: YES	TEST Z S TED TE SITION X NO X N	I I I I I I I I I I I I I I I I I I I	TI GENER FLUSH L RECORD V PRESS REMAI WITH BO RECORD NEEDLE V 3 GALI WITH BO MEASURA PLACE I HOOZELE FLOORS OF L'A-3GE DOES F L'A-3GE CO DES F L'A-3	DT INSTRU AL PUMP IN TOT TESTOR OPERATING IN OPERATING IN STEP INSON THREE TOM SELECT IN ROTATE ISC TIME IN SECON THEE INCOME AND RECOUNT ON SELECT IN ROTATE INCOME IN	PUMP PRESSU PEST SUBM U-OUT TEST OR IN PRESSU LATOR FULLY DOLORED ZON OUR LEAK S FOR IN 3 GPH AFON 60 SECO CTOR IN 01SP OX, 11/2-9GAL E MOVE TO LO REASE TO AVE CTOR IN E COLORED ETURN TO	MERSIBLE PUMP T PROCEDURE INE STEP TEST (CCM) E SEC. SIMULATED TEST TEST POSITION NO TEST ML ENSER PER MINUTE WER YES NO

LOCATION

Buo + Mini Ma

LDT 880 - LEAK DETECTOR CHECKLIST

CONTRACTOR ANTIL Pebrole	4 Suca Tre	cus	TOMER	,						
TECHNICIAN Dennics Barry		-	ATION GUO T	Mini	May 1-	3 × £	Felt AL			
SUBMERSIBLE PUMP IDENTIFICA	TION			Ni			=			
CHECK MFG. INDICATE MODEL NO. IF KNOW!	, V	RE	CORD	SERIAL#						
JACKET TOKHEIM GILBARCO B		SSER	A.O. SMI	TH BOWSE			OTHER			
II LEAK DETECTOR IDENTIFICATION	ОИ				and the second s					
CHECK TYPE										
RED JACKET MODEL 116-030 PI.D-2SEC HEX HEAD RED JACKET MODEL 116-017 DLD 2SEC HEX HEAD	RED JA MODEL DLD 55 ROUND	.116-0 EC		TOKHEIM MODEL 585F DLD 2SEC SOUARE HE		OTHER				
TEST PROCEDURE LEAK DETECTOR INSTALLED TEST AT DISPENSER		F	ROM PF	TECTOR ISC	E-TEST		AP PIT			
III GENERAL LINE AND PUMP IN		I	ITI GENERAL PUMP INFORMATION							
ARCORD OPERATING PUMP PRESSU AIR-VAPOR TEST WITH PUMP OFF M AND RECORD	EASURE 039	sky.		LOT TESTOR RD OPERATING	B PUMP PR	ESSURE	prig.			
IV PRESSURE STEP TEST WITHBOTTOM SELECTOR IN PRESSUR POSITION TURN ON PUMP RECORD TIME IN SECONDS GUAGE NEEDLE REMAINS IN COLORED ZON	7		PEM WITH POSIT RECO	BSURE STEP AINS ON THI BOTTOM SELEC ION ROTATE IS RD TIME IN SE LE REMAINS IN	RU-OUT STORIN PR SOLATOR F CONDS GU	TEST PI ESSURE ULLY (CC AGE	STEP TEST			
V 3 GALLON PER HOUR LEAKS WITH BOTTOM SELECTOR IN 3 GPH A) MEASURE AND RECORD VOLUME W CALIBRATED BEAKER FOR RO SECO B) OPEN DISPENSER NOZZLE OR PLACE SELECTOR IN DISPENSER NOZZLE OR FLOW RATE OF APPROX. 112-3GAL WILL BE ODSERVED. DOES GUAGE NEEDLE MOVE TO LO END OF COLORED ZONE DOES FLOW RATE INCREASE TO AR 112-3GAL PER MINUTE C) CLOSE DISPENSER NOZZLE OR PL	NO TEST POSITION NO TEST 14 SE BOTTOM V PEN MINUTE WER NO PEN X N	<u></u>	WITH MEAS CALIB CALIB PLAC NOZZ FLOW WILL DOES END: 11/47	BOTTOM SELE URE AND RECO RATED BEAKE E BOTTOM SEL LE POSITION. PAATE OF APP BE OBSERVED GUAGE NEED OF COLORED Z FLOW RATE IF BAL PER MINU E BOTTOM SEL	CTOR IN 3 DRD VOLUM R FOR 60 S ECTOR IN ROX. 11/2-3 LE MOVE T ONE VOCEASE T TE LECTOR IN	GPH TES ME IN ECOND T DISPENS MAL PER TO LOWER YE	TESTML ER I MINUTE R IS NO			
SELECTOR IN JIGHT TEST POSITION GUAGE RETURN TO COLORED ZONE GUAGE DOES NOT RETURN TO COLORED ZONE GAUGE GOES TO OPERATING PRESSURE	YES X NO YES X NO	X	GUAC ZONE GUAC GOLC GAUC	TEST POSITION E RETURN TO E SE DOES NOT P DRED ZONE GE GOES TO OF	COLORED RETURN TO) YE	ESNO			
LEAK DETECTOR TEST	PASS	\leq	LEA	K DETECTOR	R TEST		PASS			