

## Toffel, Melissa

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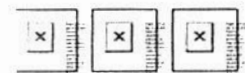
**From:** Tim Miller <tmiller@nationalpremiumbeer.com>  
**Sent:** Tuesday, July 24, 2018 3:33 PM  
**To:** Toffel, Melissa  
**Subject:** Re: Easton Point follow-up questions to EPA's inspection on 6/13/18


Right, and I just follow what MDE tells me to do.

Veeder root has been running all along but finding those records will be difficult.

Tank 1 - N?A  
Tank 2 - Unleaded 93 octane  
Tank 3 - Diesel  
  Tank 4 - 91 Non Ethanol  
Tank 5 - 87 Unleaded  
Tank 6 - Off Road Diesel

 **Tim Miller**  
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On Tue, Jul 24, 2018 at 3:27 PM, Toffel, Melissa <[Toffel.Melissa@epa.gov](mailto:Toffel.Melissa@epa.gov)> wrote:

Tim – can you tell me how they are identifying the tanks in this report? For example, where it says Tank: 1 at the top of the first page, can you tell me the size and content? And do that for each of them? Thanks!

If this is all you have, I understand. However, just to make you aware, Inventory Control is an allowable method of tank release detection (in conjunction with Tank Tightness Testing every 5 years) for only a max of 10 years from the time a tank is upgraded. Since your tanks were installed with cathodic protection and spill/overflow, that means this method – by itself! - would have been acceptable up until January 2004 by EPA. We understand that MDE requires that all their facilities do Inventory Control regardless of their other method selected for release detection, but for our purposes, what you provided in the attachment would not meet the requirement of conducting tank release detection.

Was there any other method being utilized during the time period I requested, such as SIR, or the Veeder-Root running .2 or CSLD tests?

*Melissa Toffel*

U.S. EPA Region III

Land & Chemicals Division

RCRA Underground Storage Tank Branch

1650 Arch Street (Mail Code 3LC31)

Philadelphia, PA 19103

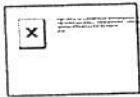
P: 215-814-2060

F: 215-814-3163

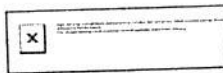
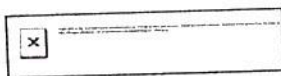


**From:** Tim Miller [mailto:[tmiller@nationalpremiumbeer.com](mailto:tmiller@nationalpremiumbeer.com)]  
**Sent:** Tuesday, July 24, 2018 2:52 PM  
**To:** Toffel, Melissa <[Toffel.Melissa@epa.gov](mailto:Toffel.Melissa@epa.gov)>  
**Subject:** Re: Easton Point follow-up questions to EPA's inspection on 6/13/18

Release detection back to September of 2017



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On Thu, Jul 12, 2018 at 2:46 PM, Toffel, Melissa <[Toffel.Melissa@epa.gov](mailto:Toffel.Melissa@epa.gov)> wrote:

Hi Tim – now that I've had time to write up my report and look at what info was provided during the inspection, as I had mentioned I do have follow-up questions for you. You had said that you had taken over operating the facility about a year and a half ago. Can you please provide **an exact date** that you took back over? This will be important in that the information I am requesting below will need to be provided going back to when you resumed operating the facility.

1. Please provide monthly tank release detection records for all five tanks going back to when you resumed operating the facility up through April 2018.
2. Provide annual functionality testing documentation of the line leak detectors for each tank, going back to when you resumed operation at the facility. I already have testing dated 6/27/16 and 3/23/18, but if you have any others please provide them.
3. Provide line tightness testing documentation for each tank, going back to when you resumed operation at the facility. I already have testing dated 6/27/16 and 3/23/18, but if you have any others please provide them.
4. Overfill could not be verified in the field, but it was mentioned that you may be utilizing ballfloats for each tank. Please provide verification from a third party that overfill is installed and functioning. If in fact ballfloats are being utilized, please provide a picture of each ballfloat lying next to its adjacent fillport.
5. I reviewed cathodic protection testing dated 6/17/16, 2/1/18, and 3/8/18 – do you have any others to provide since you resumed operation at the site?

Please submit this information by August 3, 2018. If you will have trouble meeting this timeframe, please give me a call to discuss. Thank you,

*Melissa Toffel*

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