

From: Ramalho.Louis@epa.gov,
To: lramalho64@verizon.net,
Subject: FW: Easton Point - EPA Follow-Up to our Conf Call on 5/9/19
Date: Fri, Feb 19, 2021 11:38 am
Attachments: Tests sent earlier.pdf (236K),

From: Toffel, Melissa
Sent: Wednesday, May 22, 2019 3:40 PM
To: Ramalho, Louis <Ramalho.Louis@epa.gov>
Subject: FW: Easton Point - EPA Follow-Up to our Conf Call on 5/9/19

I received some documentation from Tim Miller today (see attached). I probably won't get to review it until next week.

Melissa Toffel, U.S. EPA Region III

Enforcement & Compliance Assurance Division

Air, RCRA & Toxics Branch

1650 Arch Street (Mail Code 3ED22)

Philadelphia, PA 19103

P: 215-814-2060

F: 215-814-3163



From: Tim Miller <tmiller@nationalpremiumbeer.com>
Sent: Wednesday, May 22, 2019 3:17 PM
To: Toffel, Melissa <Toffel.Melissa@epa.gov>
Subject: Re: Easton Point - EPA Follow-Up to our Conf Call on 5/9/19

Here are copies of tests that I had sent before, the ones with an Asterisk I think are not shown on you table.

Tim Miller



photo

Owner, National Premium Beer

Phone: 410-310-3553

Email: tmiller@nationalpremiumbeer.comWebsite: NATIONALPREMIUMBEER.COM

On Fri, May 10, 2019 at 8:25 AM Toffel, Melissa <Toffel.Melissa@epa.gov> wrote:

Mr. Miller,

Thanks for speaking with Louis Ramalho and myself on the conference call yesterday. As promised, here is a summary of the violations and windows of time that we are looking for information. As discussed, please provide any documentation you may have by Friday, May 24th. If you have any questions about what is being asked for, please call me at the number below.

Violations:

I – Tank Release Detection

- Please see the attached table I made with all the records that you have provided me thus far. Please fill in any gaps by sending me any additional records you have. To see that you are currently in compliance we are asking for records up to the present.

II and III – Piping Release Detection

- For Tanks 1 and 3, please provide any Line Leak Detector and Line Tightness Testing that may have been conducted from 8/1/16 (when you resumed operating the site) – 3/23/18 (test provided)

- For Tanks 2, 4 and 5, please provide any Line Leak Detector and Line Tightness Testing that may have been conducted from 6/27/17 (test due) – 3/23/18 (test provided)

IV and V – Failure to Report/Investigate a Release

- For Tank 3, you provided Veeder-Root tank release detection records that show that the tank received Fail results on 2/20/17 and 2/27/17. If you have any documentation to provide to show that you initiated an investigation into the cause of the fails (i.e. emails to a contractor, contractor invoices, etc.), please provide that to me.

VI – Failure to test the Cathodic Protection System

- If the cathodic protection system had any testing done between 6/17/17 (when a test was due) until 2/1/18 (system tested), please provide that documentation to me.

Melissa Toffel, U.S. EPA Region III

Enforcement & Compliance Assurance Division

Air, RCRA & Toxics Branch

1650 Arch Street (Mail Code 3ED22)

Philadelphia, PA 19103

P: 215-814-2060

F: 215-814-3163



Not on Chart

Somewhat

Confusing because

Tank

Had to be reprogrammed

*

PAT PRIDE
930 FORT ST.
EASTON MD. 21601

JUL 12, 2016 8:00 AM

CSLD TEST RESULTS

JUL 12, 2016 8:00 AM

T 1: UNLEADED 4000
PROBE SERIAL NUM 229515

0.2 GAL/HR TEST
PER: JUL 12, 2016 PASS

T 2: DIESEL
PROBE SERIAL NUM 229517

0.2 GAL/HR TEST
PER: JUL 12, 2016 PASS

T 3: SUPER
PROBE SERIAL NUM 229514

0.2 GAL/HR TEST
PER: JUL 12, 2016 PASS

T 4: PLUS
PROBE SERIAL NUM 229516

0.2 GAL/HR TEST
PER: NO RESULTS AVAILABLE

T 5: UNLEADED 8000
PROBE SERIAL NUM 229511

0.2 GAL/HR TEST
PER: NO RESULTS AVAILABLE

PAT PRIDE
930 FORT ST.
EASTON MD. 21601

JUL 10, 2016 8:00 AM

CSLD TEST RESULTS

JUL 10, 2016 8:00 AM

T 1: UNLEADED 4000
PROBE SERIAL NUM 229515

0.2 GAL/HR TEST
PER: JUL 10, 2016 PASS

T 2: DIESEL
PROBE SERIAL NUM 229517

0.2 GAL/HR TEST
PER: JUL 10, 2016 PASS

T 3: SUPER
PROBE SERIAL NUM 229514

0.2 GAL/HR TEST
PER: NO RESULTS AVAILABLE

T 4: PLUS
PROBE SERIAL NUM 229516

0.2 GAL/HR TEST
PER: NO RESULTS AVAILABLE

T 5: UNLEADED 8000
PROBE SERIAL NUM 229511

0.2 GAL/HR TEST
PER: NO RESULTS AVAILABLE

PAT PRIDE
930 FORT ST.
EASTON MD. 21601

JUL 13, 2016 8:00 AM

CSLD TEST RESULTS

JUL 13, 2016 8:00 AM

T 1: UNLEADED 4000
PROBE SERIAL NUM 229515

0.2 GAL/HR TEST
PER: JUL 13, 2016 PASS

T 2: DIESEL
PROBE SERIAL NUM 229517

0.2 GAL/HR TEST
PER: JUL 13, 2016 PASS

T 3: SUPER
PROBE SERIAL NUM 229514

0.2 GAL/HR TEST
PER: JUL 13, 2016 PASS

T 4: PLUS
PROBE SERIAL NUM 229516

0.2 GAL/HR TEST
PER: NO RESULTS AVAILABLE

T 5: UNLEADED 8000
PROBE SERIAL NUM 229511

0.2 GAL/HR TEST
PER: NO RESULTS AVAILABLE

MD 20:21 9102 '61 5NK
LNO 3834
----- HWY71A METSYS -----

*
STOP IN-TANK LEAK TEST
T 1:93 OCTANE 4000
JAN 7, 2019 2:05 AM

930 PORT ST
EASTON MD 21601

JAN 7, 2019 2:05 AM

LEAK TEST REPORT

T 1:93 OCTANE 4000
PROBE SERIAL NUM 229515

TEST STARTING TIME:
JAN 7, 2019 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1236.6 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

*
STOP IN-TANK LEAK TEST
T 1:93 OCTANE 4000
DEC 24, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

DEC 24, 2018 2:05 AM

LEAK TEST REPORT

T 1:93 OCTANE 4000
PROBE SERIAL NUM 229515

TEST STARTING TIME:
DEC 24, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1504.1 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

*
STOP IN-TANK LEAK TEST
T 1:93 OCTANE 4000
NOV 19, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

NOV 19, 2018 2:05 AM

LEAK TEST REPORT

T 1:93 OCTANE 4000
PROBE SERIAL NUM 229515

TEST STARTING TIME:
NOV 19, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1171.6 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

*
STOP IN-TANK LEAK TEST
T 3:DIESEL ON ROAD
AUG 20, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

AUG 20, 2018 2:05 AM

LEAK TEST REPORT

T 3:DIESEL ON ROAD
PROBE SERIAL NUM 229514

TEST STARTING TIME:
AUG 20, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2595.7 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

*
STOP IN-TANK LEAK TEST
T 3:DIESEL ON ROAD
JUL 2, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

JUL 2, 2018 2:05 AM

LEAK TEST REPORT

T 3:DIESEL ON ROAD
PROBE SERIAL NUM 229514

TEST STARTING TIME:
JUL 2, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 3152.9 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

*
STOP IN-TANK LEAK TEST
T 3:DIESEL ON ROAD
JUN 18, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

JUN 18, 2018 2:05 AM

LEAK TEST REPORT

T 3:DIESEL ON ROAD
PROBE SERIAL NUM 229514

TEST STARTING TIME:
JUN 18, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 3102.6 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 2:OFF ROAD DIESEL 4000
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

*

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 2:OFF ROAD DIESEL 4000
PROBE SERIAL NUM 229517

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1386.4 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 5:87 OCTANE 8000
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

*

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 5:87 OCTANE 8000
PROBE SERIAL NUM 229511

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 4632.6 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 1:93 OCTANE 4000
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 1:93 OCTANE 4000
PROBE SERIAL NUM 229515

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2130.9 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 4:NON ETHANOL 91 OCTAN
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 4:NON ETHANOL 91 OCTAN
PROBE SERIAL NUM 229516

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 3179.7 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 3:DIESEL ON ROAD
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 3:DIESEL ON ROAD
PROBE SERIAL NUM 229514

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2773.6 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

*
STOP IN-TANK LEAK TEST
T 5:87 OCTANE 8000
CT 29, 2018 2:05 AM

30 PORT ST
ASTON MD 21601

CT 29, 2018 2:05 AM
LEAK TEST REPORT

5:87 OCTANE 8000
PROBE SERIAL NUM 229511

TEST STARTING TIME:
CT 29, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2920.2 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

* * * * * END * * * * *

X
STOP IN-TANK LEAK TEST
T 5:87 OCTANE 8000
NOV 12, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

NOV 12, 2018 2:05 AM

LEAK TEST REPORT

T 5:87 OCTANE 8000
PROBE SERIAL NUM 229511

TEST STARTING TIME:
NOV 12, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2704.8 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

* * * * * END * * * * *

*
STOP IN-TANK LEAK TEST
T 5:87 OCTANE 8000
DEC 31, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

DEC 31, 2018 2:05 AM

LEAK TEST REPORT

T 5:87 OCTANE 8000
PROBE SERIAL NUM 229511

TEST STARTING TIME:
DEC 31, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2430.9 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

* * * * * END * * * * *

*
STOP IN-TANK LEAK TEST
T 2:00 ROAD DIESEL 4000
JAN 7, 2019 2:05 AM

930 PORT ST
EASTON MD 21601

JAN 7, 2019 2:05 AM

LEAK TEST REPORT

T 2:00 ROAD DIESEL 4000
PROBE SERIAL NUM 229517

TEST STARTING TIME:
JAN 7, 2019 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2541.8 GAL

X
STOP IN-TANK LEAK TEST
T 2:00 ROAD DIESEL 4000
DEC 17, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

DEC 17, 2018 2:05 AM

LEAK TEST REPORT

T 2:00 ROAD DIESEL 4000
PROBE SERIAL NUM 229517

TEST STARTING TIME:
DEC 17, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1698.3 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

*
STOP IN-TANK LEAK TEST
T 2:00 ROAD DIESEL 4000
NOV 19, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

NOV 19, 2018 2:05 AM

LEAK TEST REPORT

T 2:00 ROAD DIESEL 4000
PROBE SERIAL NUM 229517

TEST STARTING TIME:
NOV 19, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1840.5 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

STOP IN-TANK LEAK TEST
T 4:NON ETHANOL 91 OCTAN
JAN 7, 2019 2:05 AM

930 PORT ST
EASTON MD 21601

JAN 7, 2019 2:05 AM

LEAK TEST REPORT

T 4:NON ETHANOL 91 OCTAN
PROBE SERIAL NUM 229516

TEST STARTING TIME:
JAN 7, 2019 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2426.2 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 4:NON ETHANOL 91 OCTAN
DEC 31, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

DEC 31, 2018 2:05 AM

LEAK TEST REPORT

T 4:NON ETHANOL 91 OCTAN
PROBE SERIAL NUM 229516

TEST STARTING TIME:
DEC 31, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2535.8 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 4:NON ETHANOL 91 OCTAN
NOV 5, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

NOV 5, 2018 2:05 AM

LEAK TEST REPORT

T 4:NON ETHANOL 91 OCTAN
PROBE SERIAL NUM 229516

TEST STARTING TIME:
NOV 5, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2439.4 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 4:NON ETHANOL 91 OCTAN
OCT 29, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

OCT 29, 2018 2:05 AM

LEAK TEST REPORT

T 4:NON ETHANOL 91 OCTAN
PROBE SERIAL NUM 229516

TEST STARTING TIME:
OCT 29, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2824.2 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 4:NON ETHANOL 91 OCTAN
SEP 10, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

SEP 10, 2018 2:05 AM

LEAK TEST REPORT

T 4:NON ETHANOL 91 OCTAN
PROBE SERIAL NUM 229516

TEST STARTING TIME:
SEP 10, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2212.4 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 4:NON ETHANOL 91 OCTAN
AUG 27, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

AUG 27, 2018 2:05 AM

LEAK TEST REPORT

T 4:NON ETHANOL 91 OCTAN
PROBE SERIAL NUM 229516

TEST STARTING TIME:
AUG 27, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 3285.4 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 2:OFF ROAD DIESEL 4000
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 2:OFF ROAD DIESEL 4000
PROBE SERIAL NUM 229517

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1386.4 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 5:87 OCTANE 8000
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 5:87 OCTANE 8000
PROBE SERIAL NUM 229511

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 4632.6 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 1:93 OCTANE 4000
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 1:93 OCTANE 4000
PROBE SERIAL NUM 229515

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2130.9 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 4:NON ETHANOL 91 OCTAN
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 4:NON ETHANOL 91 OCTAN
PROBE SERIAL NUM 229516

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 3179.7 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****

STOP IN-TANK LEAK TEST
T 3:DIESEL ON ROAD
APR 23, 2018 2:05 AM

930 PORT ST
EASTON MD 21601

APR 27, 2018 4:27 PM

LEAK TEST REPORT

T 3:DIESEL ON ROAD
PROBE SERIAL NUM 229514

TEST STARTING TIME:
APR 23, 2018 12:05 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2773.6 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

***** END *****