



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

February 22, 2022

SRG Petroleum Inc  
Attn: Pardeep Kaur Gill, Registered Agent  
4587 Cart Path Ln  
Terre Haute, IN 47802

SRG Petroleum Inc  
Attn: Pardeep Kaur Gill  
Via email: [srgpetro@yahoo.com](mailto:srgpetro@yahoo.com)

Re: Violation Letter  
Citgo Foodmart  
743 Lafayette Ave  
Terre Haute, Vigo County  
UST Facility ID # **14286**

Dear Ms. Gill:

An inspector from the Indiana Department of Environmental Management (IDEM), Underground Storage Tank (UST) Section, conducted an inspection of the site referenced above on January 31, 2022.

The inspection was conducted pursuant to Indiana Code (IC) 13-14-2-2 to determine compliance with the provisions of IC 13-23 and 329 IAC 9. In accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Initial

Results of Inspection: Violations were discovered and require a submittal.

Within thirty (30) days of receipt of this letter, documentation demonstrating compliance with each of the requirements listed in the attached Inspection Report and Description of Violations (DOV) must be submitted to IDEM. Failure to submit this documentation may lead to this facility being referred for enforcement.

An enforcement action may include civil penalties of up to \$10,000 per UST. Enforcement actions may also affect the owner's and/or operator's eligibility for reimbursement from the Excess Liability Trust Fund (ELTF). Additionally, IDEM may deem the UST's at this facility ineligible for delivery, deposit or acceptance of regulated substances pursuant to IC 13-23-1-4. Finally, federal and criminal penalties may apply for failure to provide required notification; or submitting false information pursuant to IC 13-23-14-2 and liable under IC 13-30-10.

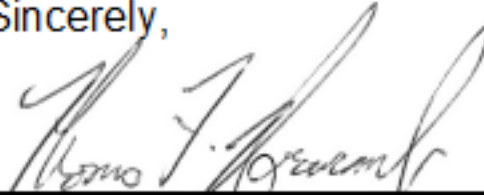
Thank you for your attention to this matter. Please submit the required documents to the UST Section via email at [USTCompliance@idem.in.gov](mailto:USTCompliance@idem.in.gov). Include in the subject line of the response the UST Facility ID # **14286**.

Inspector: Tristan Voge  
Phone: (317) 719-2574

Direct any questions regarding the inspection to:

Compliance Manager: Chuck Phipps  
Phone: (317) 234-2808

Sincerely,



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Thomas F. Newcomb, Chief  
UST Compliance Section  
Office of Land Quality

cc: Chuck Phipps  
Tristan Voge  
UST Facility ID File # 14286

### DESCRIPTION OF VIOLATIONS

This inspection or records review revealed that the owner and/or operator of this facility is in violation of Indiana UST Rule 329 IAC 9. 329 Indiana Administrative Code ("IAC") 9 incorporates certain federal underground storage tank requirements found in 40 Code of Federal Regulations ("CFR") Part 280, including those identified below. The Description of Violations (DOV) and corrective measures are as follows:

FACILITY NAME: <b>Citgo Food Mart</b>	UST FACILITY ID: <b>14286</b>
ADDRESS: <b>743 Lafayette Avenue, Terre Haute, Vigo County</b>	INSPECTION DATE: <b>01/31/2022</b>

### VIOLATIONS NOTED IN THIS INSPECTION

#### IC 13-23-12-1 Failure to Pay UST Fees

##### Citation:

Pursuant to IC 13-23-12-1, each year, if an underground storage tank has not been closed before January 1 of the year under rules adopted under IC 13-23-1-2; or a requirement imposed by the commissioner before the adoption of rules under IC 13-23-1-2; the owner of the underground storage tank shall pay to the department an annual registration fee.

The annual registration fee required by this section is ninety dollars (\$90) for each underground petroleum storage tank or two hundred forty-five dollars (\$245) for each underground storage tank containing regulated substances other than petroleum.

If an underground storage tank consists of a single tank in which there are separate compartments, a separate fee shall be paid under subsection (b) for each compartment within the single tank. If an underground storage tank consists of a combination of tanks, a separate fee shall be paid under subsection (b) for each compartment within each tank in the combination of tanks.

For tanks that contain separate compartments and that were in use before July 1, 2014, the payment of a single annual fee of ninety dollars (\$90) for a tank containing separate compartments shall be deemed to satisfy the requirements of subsection.

##### Violation Details:

*The owner and/or operator of the UST system(s) at this site are in violation of this rule because the UST fees are in arrears for 2020.*

##### Corrective Action:

The owner and/or operator of the UST systems at this site shall pay the required fees to the Indiana Department of Environmental Management within fifteen (15) days of receipt of this notice.

<b>329 IAC 9-2-2(c) – Failure to register/notify with complete information</b>
Citation:
Pursuant to 329 IAC 9-2-2(c), an owner required to submit a notification under this section shall provide: (1) a notification for each UST owned; (2) complete information required on the form for each UST owned; and (3) if applicable, a separate notification form for each separate place of operation at which the USTs are located.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because a post 2014 updated notification form was not submitted.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall fill out and submit to IDEM a correct and complete copy of the appropriate state form with required attachments, within fifteen (15) days of receipt of this notice.

<b>§ 280.21(c) – Failure to have CP for metal piping in contact with the ground and designed by corrosion expert</b>
Citation:
Pursuant to 40 CFR 280.21(c), metal piping that routinely contains regulated substances and is in contact with the ground must be cathodically protected in accordance with a code of practice developed by a nationally recognized association or independent testing laboratory and must meet the requirements of § 280.20(b)(2)(ii), (iii), and (iv).
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because during the inspection dated 01/31/2022 the metal components of the piping at all of the STP sumps were observed to be in direct contact with soil with no form of corrosion protection present.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall, within fifteen (15) days of receipt of this notice, contract with a certified contractor and corrosion expert to determine if the piping or metal components are substandard and if the field-installed cathodic protection system was designed correctly. The work must be completed within forty five (45) days of receipt of this notice. If the piping or metal components are determined to be substandard, the UST owner and/or operator shall immediately notify IDEM of their intent to permanently close the affected piping or components.

<b>§ 280.35(a)(1)</b> – Failure to perform periodic testing of spill prevention equipment and containment sumps used for IM
Citation:
Pursuant to 40 CFR 280.35(a)(1), owners and operators of UST systems with spill and overflow prevention equipment and containment sumps used for interstitial monitoring of piping must meet these requirements to ensure the equipment is operating properly and will prevent releases to the environment: (1) Spill prevention equipment (such as a catchment basin, spill bucket, or other spill containment device) and containment sumps used for interstitial monitoring of piping must prevent releases to the environment.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because a periodic spill prevention equipment test report was not provided.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall, within thirty (30) days of receipt of this notice, contract with a certified contractor to inspect, repair and test all spill prevention equipment and containment sumps. Documentation, to include photographs, inspection, repair and testing results, showing the spill prevention equipment and containment sumps are liquid tight must be submitted within forty five (45) days of the receipt of this notice.

<b>§ 280.35(a)(2)</b> – Failure to perform periodic testing of overflow prevention equipment
Citation:
Pursuant to 40 CFR 280.35(a)(2), overflow prevention equipment must be inspected at least once every three years. At a minimum, the inspection must ensure that overflow prevention equipment is set to activate at the correct level specified in § 280.20(c) and will activate when regulated substance reaches that level. Inspections must be conducted in accordance with one of the criteria in paragraph (a)(1)(ii)(A) through (C) of this section.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because a periodic overflow prevention equipment test report was not provided.</i>

**Corrective Action:**

The owner and/or operator of the UST systems at this site shall, within thirty (30) days of receipt of this notice, contract with a certified contractor to inspect, repair and test all overfill prevention equipment. Documentation, to include photographs, inspection, repair, measurements and testing results, showing the overfill prevention equipment is fully functional and set at the correct level must be submitted within forty five (45) days of the receipt of this notice.

**§ 280.36(a)(1)(i) – Failure to perform 30 day walkthrough inspections**

**Citation:**

Pursuant to 40 CFR 280.36(a)(1)(i), to properly operate and maintain UST systems, not later than June 28, 2021, owners and operators must conduct a walkthrough inspection every 30 days that, at a minimum, checks spill prevention equipment and release detection equipment (Exception: spill prevention equipment at UST systems receiving deliveries at intervals greater than every 30 days may be checked prior to each delivery).

**Violation Details:**

*The owner and/or operator of the UST system(s) at this site are in violation of this rule because 07/2021-01/2022 w althrough inspection reports were not provided.*

**Corrective Action:**

The owner and/or operator of the UST systems at this site shall, within seven (7) days of receipt of this notice, perform the 30 day walkthrough inspection for all UST systems at the site in accordance with a standard of practice referenced in the rule. Documentation, to include photographs, inspection forms, repair documents, and waste disposal records, showing the walkthrough inspection has been completed must be submitted within forty five (45) days of the receipt of this notice.

<b>§ 280.40(a)(3)(i) – Failure to perform annual tests of ATG</b>
Citation:
Pursuant to 40 CFR 280.40(a)(3)(i), owners and operators of UST systems must provide a method, or combination of methods, of release detection that beginning on October 13, 2018, is operated and maintained, and electronic and mechanical components are tested for proper operation, in accordance with one of the following: manufacturer's instructions; a code of practice developed by a nationally recognized association or independent testing laboratory; or requirements determined by the implementing agency to be no less protective of human health and the environment than the two options listed in paragraphs (a)(1) and (2) of this section. A test of the proper operation must be performed at least annually and, at a minimum, as applicable to the facility, cover the following components and criteria: (i) Automatic tank gauge and other controllers: test alarm; verify system configuration; test battery backup.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because an annual ATG functionality test report was not provided.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall have all components of the automatic tank gauge or other controllers tested for proper operation within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

<b>§ 280.40(a)(3)(ii) – Failure to perform annual tests of probes &amp; sensors</b>
Citation:
Pursuant to 40 CFR 280.40(a)(3)(ii), owners and operators of UST systems must provide a method, or combination of methods, of release detection that beginning on October 13, 2018, is operated and maintained, and electronic and mechanical components are tested for proper operation, in accordance with one of the following: manufacturer's instructions; a code of practice developed by a nationally recognized association or independent testing laboratory; or requirements determined by the implementing agency to be no less protective of human health and the environment than the two options listed in paragraphs (a)(1) and (2) of this section. A test of the proper operation must be performed at least annually and, at a minimum, as applicable to the facility, cover the following components and criteria: (ii) Probes and sensors: inspect for residual buildup; ensure floats move freely; ensure shaft is not damaged; ensure cables are free of kinks and breaks; test alarm operability and communication with controller.

<b>Violation Details:</b>
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because an annual probes and sensors functionality test report was not provided.</i>
<b>Corrective Action:</b>
The owner and/or operator of the UST systems at this site shall have all components of the automatic tank gauging probes and sensors tested for proper operation within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

<b>§ 280.41(a)(1) – Failure to monitor tanks every 30 days if installed before 9/2/2009</b>
<b>Citation:</b>
Pursuant to 40 CFR 280.41(a)(1), considering previous Indiana rule at 329 IAC 9-3-1.3 (repealed 2018), tanks installed on or before September 2, 2009 must be monitored for releases at least every 30 days using one of the methods listed in § 280.43(d) through (i).
<b>Violation Details:</b>
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because twelve (12) months of release detection records for the unleaded UST was not provided.</i>
<b>Corrective Action:</b>
The owner and/or operator of the UST systems at this site shall have any UST or line that contains a regulated amount of product and found to not have been monitored every thirty (30) days tightness tested within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice. The owner and/or operator shall continue to perform proper monthly release detection and submit the results monthly for a period of six (6) months after the receipt of this notice.

<b>§ 280.41(b)(1)(i)(A) – Failure to equip piping with or test automatic leak detectors</b>
<b>Citation:</b>
Pursuant to 40 CFR 280.41(b)(1)(i)(A), pressurized underground piping installed on or before April 11, 2016 (previously cited as September 2, 2009 under 329 IAC 9-2-1(2)(D)) that routinely contains regulated substances must be equipped with an automatic line leak detector conducted in accordance with § 280.44(a).
<b>Violation Details:</b>
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because an annual leak detector functionality test report was not provided.</i>

**Corrective Action:**

The owner and/or operator of the UST systems at this site shall have any piping that contains a regulated amount of product and found to not have had its automatic leak detector tested within the 12 months prior to inspection tightness tested within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

**§ 280.41(b)(1)(i)(B) – Failure to perform annual piping LTT or monthly monitoring**

**Citation:**

Pursuant to 40 CFR 280.41(b)(1)(i)(B), pressurized underground piping installed on or before April 11, 2016 (previously cited as September 2, 2009 under 329 IAC 9-2-1(2)(D)) that routinely contains regulated substances must have an annual line tightness test conducted in accordance with § 280.44(b) or have monthly monitoring conducted in accordance with § 280.44(c).

**Violation Details:**

*The owner and/or operator of the UST system(s) at this site are in violation of this rule because twelve (12) months of unleaded and diesel piping release detection records or a line tightness test report was not provided.*

**Corrective Action:**

The owner and/or operator of the UST systems at this site shall have any piping that contains a regulated amount of product and found to not have had appropriate monthly monitoring or an annual line tightness test within the 12 months prior to inspection tightness tested within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

**§ 280.245 – Failure to maintain list of designated operators and/or training records**

**Citation:**

Pursuant to 40 CFR 280.245, owners and operators of underground storage tank systems must maintain a list of designated Class A, Class B, and Class C operators and maintain records verifying that training and retraining, as applicable, have been completed, in accordance with § 280.34.

**Violation Details:**

*The owner and/or operator of the UST system(s) at this site are in violation of this rule because B operator certificates were not provided.*

**Corrective Action:**

The owner or operator of the UST systems at this site shall submit a list of those employees designated to be Class B operators. Those so designated must be trained and certification of that training submitted within thirty (30) days of receipt of this notice.



**UNDERGROUND STORAGE  
TANK INSPECTION REPORT**

INDIANA DEPARTMENT OF  
ENVIRONMENTAL MANAGEMENT

UST FAC ID: **14286**

Inspector's Name:	Tristan Voge
Date:	January 31, 2022
Time In:	11:00
Time Out:	11:55
Inspection Type:	Initial

**FACILITY NAME / LOCATION**

FACILITY NAME <b>Citgo Food Mart</b>		FACILITY ADDRESS (number and street) <b>743 Lafayette Avenue</b>			
ADDRESS (line 2)	CITY <b>Terre Haute</b>	STATE <b>IN</b>	ZIP CODE <b>47807</b>	COUNTY <b>Vigo</b>	

**UST OWNER**

UST Owner Name (Business Name as registered with the Secretary of State) <b>SRG Petroleum Inc</b>		BUSINESS ID (From the Secretary of State) <b>2011040700421</b>			
PREFIX	FIRST NAME <b>Pardeep Kaur</b>	MI	LAST NAME <b>Gill</b>		SUFFIX
TELEPHONE NUMBER		EMAIL ADDRESS <b>srgpetro@yahoo.com</b>			

**UST OPERATOR**

UST Operator Name (Business Name as registered with the Secretary of State) <b>SRG Petroleum Inc</b>		BUSINESS ID (From the Secretary of State) <b>2011040700421</b>			
PREFIX	FIRST NAME <b>Pardeep Kaur</b>	MI	LAST NAME <b>Gill</b>		SUFFIX
TELEPHONE NUMBER		EMAIL ADDRESS <b>srgpetro@yahoo.com</b>			

**PROPERTY OWNER**

UST Property Owner Name (Business Name as registered with the Secretary of State) <b>SRG Petroleum Inc</b>		BUSINESS ID (From the Secretary of State) <b>2011040700421</b>			
PREFIX	FIRST NAME <b>Pardeep Kaur</b>	MI	LAST NAME <b>Gill</b>		SUFFIX
TELEPHONE NUMBER		EMAIL ADDRESS <b>srgpetro@yahoo.com</b>			

**COMPLIANCE ELEMENTS**

All USTs properly registered and up-to-date notification form on file	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK
UST Fees in arrears for 2020. Post 2014 updated notification form was not submitted.						
O/O is in compliance with reporting & record keeping requirements	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	UNK
O/O is in compliance with release reporting or investigation	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/> UNK
A drip was observed at the kerosene dispenser. A suspected release may need to be reported.						
O/O is in compliance with all UST closure requirements	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>	N/A <input type="checkbox"/> UNK
O/O has met all financial responsibility requirements	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A <input type="checkbox"/> UNK
40 CFR 280, Subpart A installation requirements (partially excluded) met	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>	N/A <input type="checkbox"/> UNK
40 CFR 280, Subpart B installation and upgrade requirements met	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK
Metal components of piping at the STPs were in contact with soil with no corrosion protection.						
40 CFR 280, Subpart C spill/overflow control requirements met	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A <input type="checkbox"/> UNK
40 CFR 280, Subpart C compatibility requirements met	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A <input type="checkbox"/> UNK
40 CFR 280, Subpart C O&M and testing requirements met	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK
Spill/overflow equipment test reports and 07/2021-1/2022 walkthrough inspections not provided.						
40 CFR 280, Subpart D release detection requirements met	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK
Twelve (12) months of UNL/DSL piping RD, ATG/probes/sensors, leak detector reports needed.						
40 CFR 280, Subpart J operator training requirements met	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK
B operator certificates were not provided.						

The information contained on this page is based upon a review of files related to this site and/or observations from an underground storage tank inspector. This page may contain information not specifically related to possible violations found during the review or inspection and is meant to give the owners and/or operator specific information to assist them.

Site Maintains: (4) Underground Storage Tank systems:

- 10k - Fiberglass UST - Gasoline - Installed 4/1/1986
- 6k - Fiberglass UST - Gasoline - Installed 4/1/1986
- 4k - Fiberglass UST - Kerosene - Installed 4/1/1986
- 4k - Fiberglass UST - Gasoline - Installed 4/1/1986

Section Chief Note: The normal operational lifespan of a UST before failing is 25 to 30 years old. The USTs at this site are now 36 years old and the owner should start planning on removing or replacing them soon.

Piping: Fiberglass - Pressurized

RD UST = ATG

RD Piping = ATG+LLD

Overfill/Spill = Catchment Basins, Auto shutoff

ATG Certification required = Y

Overfill Protection Test required = Y

Spill bucket Test required = Y

Containment Sumps Test Required = N

Site History:

Site is an active service station with fueling capabilities. The most recent inspection occurred on 11/29/2017 and a violation letter was sent citing issues regarding operator records, Line Tightness and financial responsibility. It does not appear the owner at the time attempted to return to compliance. An up to date Notification Form needs to be submitted detailing the correct ownership and the UST attributes installed at the facility. According to the recent inspection, the top of the tanks are visible through the STP sumps and the inspector noted the tanks are fiberglass. The owner did not respond to the records request with compliance materials so it is unclear if any recent testing has occurred at the facility. Inspector should try to get up to date contact information for the current owner, retail merchant certificate and anything else to show ownership. Look to see if there is a compliance binder on site or any recent testing results.

Documentation provided at the time of the file review:

- The owner did not respond to records request that was sent on 12/21/2021.

The following are AREAS OF CONCERN found during the inspection that will need to be addressed by the owner and/or operator:

- UNL spill bucket appeared warped and bending and should be inspected by a certified contractor to ensure function and integrity.
- During the inspection dated 01/31/2022, the K-1 dispenser was observed to have a slow small drip, coming from above the shear valve. The facility clerk was alerted to the issue by the inspector. A suspected release may need to be reported.
- Dispenser 3/4 and 5/6 UDCs contained fluid and product that should be cleaned out and monitored as needed.

The information contained on this page is based upon a review of files related to this site and/or observations from an underground storage tank inspector. This page may contain information not specifically related to possible violations found during the review or inspection and is meant to give the owners and/or operator specific information to assist them.

The following are VIOLATIONS discovered during the inspection that will need to be corrected within 30 days of receipt of this inspection report to avoid further action and achieve compliance with the state underground storage tank program:

1. The UST fees are in arrears for 2020.
2. A post 2014 updated notification form was not submitted.
3. During the inspection dated 01/31/2022 the metal components of the piping at all of the STP sumps were observed to be in contact with soil with no form of corrosion protection present.
4. A periodic spill prevention equipment test report was not provided..
5. A periodic overfill prevention equipment test report was not provided.
6. 07/2021-01/2022 walkthrough inspection reports were not provided.
7. An annual ATG functionality test report was not provided.
8. An annual probes and sensors functionality test report was not provided.
9. Twelve (12) months of unleaded release detection records for the UST were not provided. Of the available ATG reports, the unleaded was missing four (4) months of records.
10. An annual leak detector functionality test report was not provided.
11. Twelve (12) months of unleaded and diesel piping release detection records or a line tightness test report. From the available ATG reports, the diesel and unleaded were missing twelve (12) months.
12. B operator certificate were not provided.

The following are RECORDS to be submitted to [USTCompliance@idem.IN.gov](mailto:USTCompliance@idem.IN.gov) with FID in the subject line within 30 days of receipt of this inspection report to avoid further action and achieve compliance with the state underground storage tank program (update accordingly):

- 2020 Fees
- Updated notification form
- Documentation of proper corrosion protection installation for the metal components of piping in contact with soil
- A periodic spill prevention equipment test report
- A periodic overfill prevention equipment test report
- 07/2021-01/2022 walkthrough inspection reports
- An annual ATG functionality test report
- An annual probes and sensors functionality test report
- Twelve (12) months of release detection records for the UNL UST or a new tank tightness test report
- An annual leak detector functionality test report
- Twelve (12) months of unleaded and diesel piping release detection records or a line tightness test report
- B operator certificate

\*Reminder: Updates to the rule defining underground storage tank regulations are here. Updates affect regulations regarding: sump and spill bucket testing, operator training, monthly walkthrough inspections and more. Be sure to check [www.in.gov/idem/tanks](http://www.in.gov/idem/tanks) for the latest information regarding compliance of your underground storage tank system.