



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

May 4, 2022

Shree Rang LLC
Attn: Hasmukhbhai Patel, Registered Agent
404 W Main St
Milltown, IN 47145

Shree Rang LLC
Attn: Hasmukhbhai Patel
Via email: onestop413@gmail.com

Re: Violation Letter
GNS One Stop
181 E State Road 64
Marengo, Crawford County
UST Facility ID # **5864**

Dear Mr. Patel:

An inspector from the Indiana Department of Environmental Management (IDEM), Underground Storage Tank (UST) Section, conducted an inspection of the site referenced above on April 14, 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 will be referred to Enforcement.

Details of the inspection may be found in the enclosed inspection report. An enforcement case manager will be assigned and IDEM will issue an appropriate enforcement response. Please direct any questions regarding the inspection to:

Compliance Manager: Carrie Maniet
Phone: (317) 233-3533

Sincerely,

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

cc: Carrie Maniet
Tristan Voge
UST Facility ID File # 5864

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: GNS One Stop	UST FACILITY ID: 5864
ADDRESS: 181 E State Road 64, Marengo, Crawford County	INSPECTION DATE: 04/14/2022

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 2020 and 2021 tank fees are due.

329 IAC 9-2-2(c) – Failure to register/notify with complete information
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 an updated notification form is needed with the correct overfill equipment and system information.</i>

329 IAC 9-8-11(b) – Failure to demonstrate the ability to pay the deductible amount
Citation:
Pursuant to 329 IAC 9-8-11(b), an owner or operator of: (1) twelve (12) or fewer USTs shall demonstrate the ability to pay the applicable deductible amount under IC 13-23-9-1.3; or (2) more than twelve (12) USTs shall demonstrate the ability to pay two (2) times the applicable deductible amount under IC 13-23-9-1.3.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because a mechanism of financial responsibility was not provided.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall submit a copy of the instrument proving they have the coverage required by this rule within thirty (30) days of receipt of this notice.

§ 280.34 – Reporting and recordkeeping (general provisions)
Citation:
Pursuant to 40 CFR 280.34, owners and operators of UST systems must cooperate fully with inspections, monitoring and testing conducted by the implementing agency, as well as requests for document submission, testing, and monitoring by the owner or operator pursuant to section 9005 of Subtitle I of the Solid Waste Disposal Act, as amended.
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because the owner and/or operator did not respond to IDEM's records request dated 03/07/2022.</i>

§ 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 piping release detection records or an annual line tightness test report was not provided.

§ 280.20(c)(1)(ii) – Failure to have overfill prevention equipment installed or installed properly

Citation:

Pursuant to 40 CFR 280.20(c)(1)(ii), to prevent spilling and overflowing associated with product transfer to the UST system, owners and operators must use the following spill and overfill prevention equipment:

(ii) Overfill prevention equipment that will:

(A) Automatically shut off flow into the tank when the tank is no more than 95 percent full; or

(B) Alert the transfer operator when the tank is no more than 90 percent full by restricting the flow into the tank or triggering a high-level alarm; or

(C) Restrict flow 30 minutes prior to overflowing, alert the transfer operator with a high level alarm one minute before overflowing, or automatically shut off flow into the tank so that none of the fittings located on top of the tank are exposed to product due to overflowing.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because prior notification forms indicate ball float valves for the premium USTs, during the inspection dated 04/14/2022 auto shut off devices were observed for the PREM USTs.

§ 280.20(c)(1)(i) – Failure to have spill prevention equipment that will prevent release

Citation:

Pursuant to 40 CFR 280.20(c)(1)(i), to prevent spilling and overfilling associated with product transfer to the UST system, owners and operators must use the following spill and overfill prevention equipment:

(i) Spill prevention equipment that will prevent release of product to the environment when the transfer hose is detached from the fill pipe (for example, a spill catchment basin).

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because all spill buckets appear to be warped and have gaps in the seals and would not function as designed in a spill or overfill event.

§ 280.21(b)(1)(ii) – Failure to inspect tank liner or close tank

Citation:

Pursuant to 40 CFR 280.21(b)(1)(ii), within 10 years after lining, and every 5 years thereafter, the lined tank is internally inspected and found to be structurally sound with the lining still performing in accordance with original design specifications. If the internal lining is no longer performing in accordance with original design specifications and cannot be repaired in accordance with a code of practice developed by a nationally recognized association or independent testing laboratory, then the lined tank must be permanently closed in accordance with 329 IAC 9-6.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because an interior tank liner inspection test report was not provided.

§ 280.35(a)(1) – 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 overfill 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:

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.

§ 280.35(a)(2) – Failure to perform periodic testing of overfill prevention equipment

Citation:

Pursuant to 40 CFR 280.35(a)(2), overfill prevention equipment must be inspected at least once every three years. At a minimum, the inspection must ensure that overfill 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:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because a periodic overfill prevention equipment test report was not provided.

§ 280.40(a)(3)(i) – Failure to perform annual tests of ATG

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:

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.

§ 280.40(a)(3)(ii) – Failure to perform annual tests of probes & sensors

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.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because an annual probes test report was not provided.

§ 280.40(a)(3)(iii) – Failure to perform annual tests of ALLD

Citation:

Pursuant to 40 CFR 280.40(a)(3)(iii), 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:

(iii) Automatic line leak detector: test operation to meet criteria in § 280.44(a) by simulating a leak.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because an annual leak detector test report was not provided.

§ 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:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because 07/2021-04/2022 monthly walkthrough inspections were not provided.</i>

§ 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:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because A, B and C operator certificates were not provided.</i>



**UNDERGROUND STORAGE
TANK INSPECTION REPORT**

INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

UST FAC ID: **5864**

Inspector's Name:	Tristan Voge
Date:	April 14, 2022
Time In:	11:10 am
Time Out:	12:00 pm
Inspection Type:	Initial

FACILITY NAME / LOCATION

FACILITY NAME GNS One Stop		FACILITY ADDRESS (number and street) 181 E State Road 64			
ADDRESS (line 2)	CITY Marengo	STATE IN	ZIP CODE 47140	COUNTY Crawford	

UST OWNER

UST Owner Name (Business Name as registered with the Secretary of State) Shree Rang LLC		BUSINESS ID (From the Secretary of State) 201705041194256			
PREFIX	FIRST NAME Hasmukhbhai	MI	LAST NAME Patel		SUFFIX
TELEPHONE NUMBER (811) 399-9849	EMAIL ADDRESS onestop413@gmail.com				

UST OPERATOR

UST Operator Name (Business Name as registered with the Secretary of State) Shree Rang LLC		BUSINESS ID (From the Secretary of State) 201705041194256			
PREFIX	FIRST NAME Hasmukhbhai	MI	LAST NAME Patel		SUFFIX
TELEPHONE NUMBER (811) 399-9849	EMAIL ADDRESS onestop413@gmail.com				

PROPERTY OWNER

UST Property Owner Name (Business Name as registered with the Secretary of State) Shree Rang LLC		BUSINESS ID (From the Secretary of State) 201705041194256			
PREFIX	FIRST NAME Hasmukhbhai	MI	LAST NAME Patel		SUFFIX
TELEPHONE NUMBER (811) 399-9849	EMAIL ADDRESS onestop413@gmail.com				

COMPLIANCE ELEMENTS

All USTs properly registered, on file and fees paid	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	<input type="checkbox"/>
Owes tank fees for 2020 & 2021. An updated notification form is needed with the correct overfill information.						
O/O is in compliance with reporting & record keeping requirements	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	<input type="checkbox"/>
The owner and/or operator did not respond to IDEM's records request dated 03/07/2022.						
O/O is in compliance with release reporting or investigation	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>	N/A	UNK
O/O is in compliance with all UST closure requirements	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>	N/A	UNK
O/O has met all financial responsibility requirements	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	N/A	UNK
A mechanism of financial responsibility was not provided.						
40 CFR 280, Subpart A installation requirements (partially excluded) met	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>	N/A	UNK
40 CFR 280, Subpart B installation and upgrade requirements met	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	<input type="checkbox"/>
Ball float/auto shutoff overfill coincidence was observed for each of the PREM fill ports.						
40 CFR 280, Subpart C spill/overfill control requirements met	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	N/A	UNK
All spill buckets appear to be warped and have gaps in the seals and would not function in a spill/overfill event.						
40 CFR 280, Subpart C compatibility requirements met	<input checked="" type="checkbox"/>	YES	NO	<input type="checkbox"/>	N/A	UNK
40 CFR 280, Subpart C O&M and testing requirements met	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	<input type="checkbox"/>
Spill/overfill, interior liner inspection test reports and 07/2021-04/2022 monthly walkthroughs were not provided.						
40 CFR 280, Subpart D release detection requirements met	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	<input type="checkbox"/>
ATG/probes/LLD test reports and twelve (12) months of release detection records for the piping were not provided.						
40 CFR 280, Subpart J operator training requirements met	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	<input type="checkbox"/>
A, B and C 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 four (4) steel USTs
Two (2) 2k GSL installed in 1958
One (1) 4k GSL installed in 1976
One (1) 6k GSL installed in 1976

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 46 and 64 years old and the owner should start planning on removing or replacing them immediately.

Piping - Flex - Pressurized (Installed 1998)

*Both RUL tanks are manifolded together
*Both PUL tanks are manifolded together

RD UST - ATG

CP UST - Liner installed 1998

RD Piping - ATG - LTT - LD

Overfill/Spill - Spill bucket - Ball Float

Overfill Protection Test = N

Spill bucket Test = N

Containment Sumps Test Required N

CP Last known test completed 4/24-27/2018

Liner - Last known liner inspection 9/28/2015

Site History- Tanks were lined on 8/26/1998, unable to locate date galvanic installed. 8 hoses taken out of service by weights and measures due to water in tanks. Prem measured 10 inches.

Documentation received -

Notification form - 10/18/2019 (Initial approval)

No additional documents received at time of review

Inspection Notes

- Twelve (12) months of release detection records for the USTs was collected from the ATG.

- No documentation was provided during the inspection dated 04/14/2022.

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

- All but east PREM vapor recovery valve ports were entirely covered in water and could not be opened or utilized during a delivery as designed. Vapor recovery valve ports need to be cleaned out to avoid water penetration into the tanks.

- Both UDCs contained fluid and product that should be cleaned out and monitored as needed. The source of the fluid should be determined and remediated 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.

1. The 2020 and 2021 tank fees are due.
2. An updated notification form is needed with the correct overfill equipment and system information.
3. A mechanism of financial responsibility was not provided.
4. The owner and/or operator did not respond to IDEM's records request dated 03/07/2022.
5. Twelve (12) months of piping release detection records or an annual line tightness test report was not provided.
6. Prior notification forms indicate ball float valves for the premium USTs, during the inspection dated 04/14/2022 auto shut off devices were observed for the PREM USTs.
7. All spill buckets appear to be warped and have gaps in the seals or contain liquid and/or debris and would not function as designed in a spill or overfill event.
8. An interior tank liner inspection test report was not provided.
9. A periodic spill prevention equipment test report was not provided.
10. A periodic overfill prevention equipment test report was not provided.
11. An annual ATG functionality test report was not provided.
12. An annual probes test report was not provided.
13. An annual leak detector test report was not provided.
14. 07/2021-04/2022 monthly walkthrough inspections were not provided.
15. A, B and C operator certificates were not provided.