



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

May 23, 2022

Pamela Hurley
3365 E 400 N
Hartford City, IN 47348
Via email: pam@mccammontrucking.biz

McCammon Trucking Inc
Attn: Pam Hurley, Registered Agent
3365 E 400 N
Hartford City, IN 47348

Re: Violation Letter
McCammon Trucking
3365 E 400 N
Hartford City, Blackford County
UST Facility ID # **11291**

Dear Ms. Hurley:

An inspector from the Indiana Department of Environmental Management (IDEM), Underground Storage Tank (UST) Section, conducted an inspection of the site referenced above on May 13, 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.

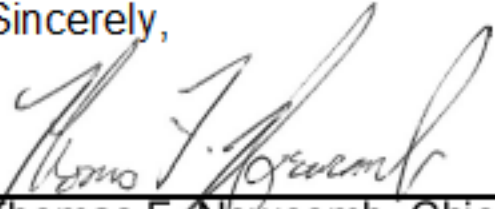
Thank you for your attention to this matter. Please submit the required documents to the UST Section via email at USTCompliance@idem.in.gov. Include in the subject line of the response the UST Facility ID # **11291**.

Inspector: Matt Rozycki
Phone: (317) 296-1853

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
Matt Rozycki
UST Facility ID File # 11291

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: McCammon Trucking	UST FACILITY ID: 11291
ADDRESS: 3365 E 400 N, Hartford City, Blackford County	INSPECTION DATE: 5/13/2022

VIOLATIONS NOTED IN THIS INSPECTION

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:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because no current financial responsibility mechanism was provided.

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.

329 IAC 9-6-5(b)– Failure to properly secure UST systems during temporary closure

Citation:

Pursuant to 329 IAC 9-6-5(b), when a UST system is temporarily closed for three (3) months or longer, the owner and operator shall leave vent lines open and functioning, cap and secure all other lines, pumps, manways and ancillary equipment.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because the fill port was still accessible at the time of inspection.

Corrective Action:

The owner and/or operator of the UST systems at this site shall immediately correct any deficiencies in properly securing the effected UST systems and submit proof of the corrections within thirty (30) days of receipt of this notice.

§ 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:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because an up to date liner inspection 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 assess the liners and tanks to ensure the liner is still performing in accordance with original design specifications. The results of the assessment must be submitted to IDEM within 45 days of receipt of this notice. If the tanks and/or liners fail the assessment and the liners cannot be repaired in accordance with a recommended practice allowed under the rule, the owner and/or operator will permanently close the affected UST systems within sixty (60) 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:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because operator A & B certificates are needed.</i>
Corrective Action:
The owner or operator of the UST systems at this site shall submit a list of those employees designated to be Class A & 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: **11291**

Inspector's Name:	Matt Rozycki
Date:	May 13, 2022
Time In:	10:00
Time Out:	10:15
Inspection Type:	Initial

FACILITY NAME / LOCATION

FACILITY NAME McCammon Trucking		FACILITY ADDRESS (number and street) 3365 E 400 N			
ADDRESS (line 2)	CITY Hartford City	STATE IN	ZIP CODE 47348	COUNTY Blackford	

UST OWNER

UST Owner Name (if in Individual Capacity) McCammon Trucking Inc				BUSINESS ID (From the Secretary of State) 196909-224	
PREFIX	FIRST NAME Pam	MI	LAST NAME Hurley	SUFFIX	
TELEPHONE NUMBER (765) 348-0493		EMAIL ADDRESS pam@mccammontrucking.biz			

UST OPERATOR

UST Operator Name (if in Individual Capacity) McCammon Trucking Inc				BUSINESS ID (From the Secretary of State) 196909-224	
PREFIX	FIRST NAME Pam	MI	LAST NAME Hurley	SUFFIX	
TELEPHONE NUMBER (765) 348-0493		EMAIL ADDRESS pam@mccammontrucking.biz			

PROPERTY OWNER

UST Property Owner Name (if in Individual Capacity) Pamela Hurley				BUSINESS ID (From the Secretary of State)	
PREFIX	FIRST NAME Pamela	MI	LAST NAME Hurley	SUFFIX	
TELEPHONE NUMBER (765) 348-0493		EMAIL ADDRESS pam@mccammontrucking.biz			

COMPLIANCE ELEMENTS

All USTs properly registered and up-to-date notification form on file	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	UNK	
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 checked="" type="checkbox"/>	N/A	UNK
O/O is in compliance with all UST closure requirements	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	N/A	UNK
Failure to properly secure UST system during temporary closure	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	N/A	UNK
O/O has met all financial responsibility requirements	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A	UNK
40 CFR 280, Subpart A installation requirements (partially excluded) met	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A	UNK
40 CFR 280, Subpart B installation and upgrade requirements met	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	
3 year corrosion protection testing was not provided	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	
40 CFR 280, Subpart C spill/overfill control requirements met	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A	UNK
40 CFR 280, Subpart C compatibility requirements met	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A	UNK
40 CFR 280, Subpart C O&M and testing requirements met	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	UNK	
40 CFR 280, Subpart D release detection requirements met	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	UNK	
40 CFR 280, Subpart J operator training requirements met	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	
Operator A & B certificates were not provided	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK	

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 one (1) USTs - Steel - Installed 9/1/1971

One (1) 10K DSL

Section Chief Note: The normal operational lifespan of a UST before failing is 25 to 30 years old. The UST at this site is now 51 years old and the owner should start planning on removing or replacing it now.

Piping - FG - European

RD UST - ATG

CP UST - Liner installed 10/13/1993

Spill protection/Overfill - Spill bucket - Ball floats

ATG Certification = N

Overfill Protection Test = N

Spill bucket Test = N

Containment Sumps Test Required N

Last known Liner inspection 2/12/2016

Site is an active

Any Site history or concerns - MCCAMMON TRUCKING INC 196909-224 Admin Dissolved on SOS.

Documentation received -

Notification form - 6/6/2019 (Approved)

No additional documents received at time of review

Documentation needed -

RD UST monthly results -

CP UST liner inspection

Annual ATG test

Overfill test required every 3 years

Spill bucket test required every 3 years

Monthly walk through July-Current month

Operator certificate - A-B-C

FR

***Tank removal submitted to IDEM

***Stuck tanks and found no fluids

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

1. The dispenser was open and should be secured

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. Financial responsibility mechanism was not provided
2. Failure to properly secure UST system during temporary closure. The fill port was able to be accessed, the cap should be locked to prevent tampering
3. Up to date 5 year liner inspection was not provided
4. Operator A & B certificates were not provided

The following are RECORDS to be submitted to USTCompliance@idem.IN.gov with FID in 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:

- All closure documents when the work is completed