



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 1, 2022

Span8 LLC
Attn: Sandeep Saini, Registered Agent
223 W Main St
Delphi, IN 46923

Span8 LLC
Attn: Sandeep Saini
Via email: write2sandeep@hotmail.com

Re: Violation Letter
Snap Stop
223 W Main St
Delphi, Carroll County
UST Facility ID # **231**

Dear Mr. Saini:

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 29, 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.

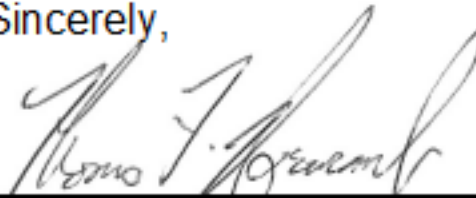
Thank you for your attention to this matter. Please submit the required documents to the UST Section via email at USTCompliance@idem.in.gov. Include in the subject line of the response the UST Facility ID # **231**.

Inspector: John Metz
Phone: (317) 296-0383

Direct any questions regarding the inspection to:

Compliance Manager: Caitlin Shaffer
Phone: (317) 234-4112

Sincerely,



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

cc: Caitlin Shaffer
John Metz
UST Facility ID File # 231

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: Snap Stop	UST FACILITY ID: 231
ADDRESS: 223 W Main S, Delphi, Carroll County	INSPECTION DATE: 04/29/2022

VIOLATIONS NOTED IN THIS INSPECTION

§ 280.35(a)(1) – Failure to perform periodic testing of spill prevention equipment

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:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because they did not provide documentation of spill bucket testing.

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.

§ 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: <i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because they did not provide results of overfill prevention equipment testing.</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.

§ 280.40(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: <i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because they did not provide results of annual ATG testing.</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.

§ 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 they did not complete the annual tests of probes and/or sensors.

Corrective Action:

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.

§ 280.41(b)(1)(i)(A) – Failure to equip piping with or test automatic leak detectors

Citation:

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).

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because they did not provide results of annual leak detector testing, and the results obtained on-site were from 2020.

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: <i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because they did not provide results of annual line tightness testing.</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 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.



**UNDERGROUND STORAGE
TANK INSPECTION REPORT**

INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

UST FAC ID: **231**

Inspector's Name:	John Metz
Date:	April 29, 2022
Time In:	10:35
Time Out:	11:45
Inspection Type:	Initial

FACILITY NAME / LOCATION

FACILITY NAME Snap Stop		FACILITY ADDRESS (number and street) 223 W Main S			
ADDRESS (line 2)	CITY	STATE	ZIP CODE	COUNTY	
	Delphi	IN	46923	Carroll	

UST OWNER

UST Owner Name (Business Name as registered with the Secretary of State) Snap 8 LLC				BUSINESS ID (From the Secretary of State) 2015030500627	
PREFIX	FIRST NAME	MI	LAST NAME		SUFFIX
	Sandeep		Saini		
TELEPHONE NUMBER (765) 714-2699		EMAIL ADDRESS write2sandeep@hotmail.com			

UST OPERATOR

UST Operator Name (Business Name as registered with the Secretary of State) Snap 8 LLC				BUSINESS ID (From the Secretary of State) 2015030500627	
PREFIX	FIRST NAME	MI	LAST NAME		SUFFIX
	Sandeep		Saini		
TELEPHONE NUMBER (765) 714-2699		EMAIL ADDRESS			

PROPERTY OWNER

UST Property Owner Name (Business Name as registered with the Secretary of State) Span 8 LLC				BUSINESS ID (From the Secretary of State) 2015030900147	
PREFIX	FIRST NAME	MI	LAST NAME		SUFFIX
	Sandeep		Saini		
TELEPHONE NUMBER (765) 714-2699		EMAIL ADDRESS			

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
O/O is in compliance with all UST closure requirements	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A
O/O has met all financial responsibility requirements	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A
40 CFR 280, Subpart A installation requirements (partially excluded) met	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A
40 CFR 280, Subpart B installation and upgrade requirements met	<input checked="" type="checkbox"/>	YES	<input 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
40 CFR 280, Subpart C compatibility requirements met	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A
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 bucket and overfill equipment test not submitted						
40 CFR 280, Subpart D release detection requirements met	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	UNK
Need ATG/probes test + line tightness test and updated leak detector test						
40 CFR 280, Subpart J operator training requirements met	<input checked="" type="checkbox"/>	YES	<input 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:

Four (4) Stip3 USTs installed 8/16/1995

- One (1) 12k GSL
- One (1) 10k GSL
- One (1) 10k DSL
- One (1) 6k KER

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 27 years old and the owner should start planning on removing or replacing them soon.

Piping is fiberglass and pressurized

RD UST = ATG

RD Piping = ELLD, LTT, ATG

Overfill/Spill = Spill Buckets + Ball Float

CP = Impressed Current, last known inspection completed 11/17/2021

ATG Certification = No

Overfill Protection Test = No

Spill Bucket Test = No

Site History:

- Three (3) tanks were installed in 1966, one (1) tank installed in 1986, all were removed 7/12/1995.

Closure notice on file

- Original galvanic CP system was replaced with an Impressed Current system 11/7/2016 - 4 MMO anodes were installed along with a rectifier, system was tested and passed. System was retested after 6 months as required

- Database incorrectly lists DSL tank as GSL and the KER tank as 4k instead of 8k. Forms on file list correct information

Documentation provided at the time of the file review:

- Notification Form approved 7/10/2020
- NONE

Documents obtained on-site:

- FR
- 12 months RD for tanks
- CP testing completed 11/17/2021
- 60-day Rectifier logs
- Leak Detector Test completed 4/17/2020
- Monthly walkthrough inspections July 2021 - April 2022
- Operator Certificates A, B, C

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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 Diesel STP sump contained sludge and debris.
2. The Premium Gas STP sump contained sludge.
3. The Regular Gas STP sump contained sludge and water.
4. The Kerosene STP sump contained sludge and several inches of fuel.
5. UDC #1/2 contained dirt and debris, and had seepage on piping.
6. UDCs #3/4 and 5/6 contained sludge, dirt, and debris, and had seepage on piping.

The following are RECORDS to be submitted to the inspector within 30 days of receipt of this inspection report to avoid further action and achieve compliance with the state underground storage tank program:

7. Spill bucket test
8. Overfill prevention equipment test
9. ATG functionality/probes test
10. Line tightness test
11. Updated leak detector test