



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Brian C. Rockensuess  
Commissioner

July 29, 2022

Bittersweet 23 LLC  
Attn: William Niemier, Registered Agent  
6910 N Shadeland Ave, Suite 200  
Indianapolis, IN 46220

LKG Food Mart Inc  
Attn: Lakhwinder Singh, Registered Agent  
405 E Freeland Rd, Suite A  
Greensburg, IN 47240

Re: Violation Letter  
Bulk 2727 / LKG Food Mart  
405 E Freeland Rd  
Greensburg, Decatur County  
UST Facility ID # **24280**

Dear Messrs. Niemier and Singh:

An inspector from the Indiana Department of Environmental Management (IDEM), Underground Storage Tank (UST) Section, conducted an inspection of the site referenced above on July 12, 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 USTs 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.

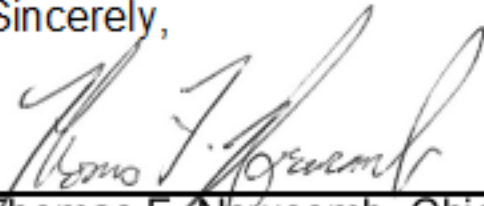
Thank you for your attention to this matter. Please submit the required documents to the UST Section via email at [USTCompliance@idem.in.gov](mailto:USTCompliance@idem.in.gov). Include in the subject line of the response the UST Facility ID # **24280**.

Inspector: Matthew James  
Phone: (317) 750-2491

Direct any questions regarding the inspection to:

Compliance Manager: Loic Maniet  
Phone: (317) 232-3592

Sincerely,



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

cc: Loic Maniet  
Matthew James  
UST Facility ID File # 24280

Attn: William Niemier, [bill@tharpinvest.com](mailto:bill@tharpinvest.com)  
Attn: Lakhwinder Singh, [winderharry@yahoo.com](mailto:winderharry@yahoo.com)  
Attn: Don Tharp, [elaine@tharpinvestments.com](mailto:elaine@tharpinvestments.com)

**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>Bulk #2727</b>	UST FACILITY ID: <b>24280</b>
ADDRESS: <b>405 E Freeland Rd Greensburg, IN 47240</b>	INSPECTION DATE: <b>7/12/2022</b>

**VIOLATIONS NOTED IN THIS INSPECTION**

**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:**

*The owner and/or operator of the UST system(s) at this site are in violation of this rule because an updated notification form needs to be submitted to IDEM. The form needs to include the correct type of piping and tank information along with release detection methods.*

**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.

**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 a FR mechanism is needed.*

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.
<b>§ 280.41(a)(2)</b> – Failure to monitor (IM) tanks every 30 days if installed after 9/2/2009
Citation:
Pursuant to 40 CFR 280.41(a)(2), and previously 329 IAC 9-3-1.3 (repealed 2018), tanks installed after September 2, 2009 must be monitored for releases at least every 30 days using the method listed in § 280.43(g).
Violation Details:
<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 interstitial records are needed for the diesel UST.</i>
Corrective Action:
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 by not having records of interstitial monitoring 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.
<b>§ 280.41(b)(2)</b> – Failure to perform monthly monitoring on piping installed after 9/2/2009, except proper European
Citation:
Pursuant to 40 CFR 280.41(b)(2), piping installed or replaced after April 11, 2016 (previously cited as September 2, 2009 under 329 IAC 9-2-1(2)(D)) must meet one of the following: (i) Pressurized piping must be monitored for releases at least every 30 days in accordance with § 280.43(g) and be equipped with an automatic line leak detector in accordance with § 280.44(a) (ii) Suction piping must be monitored for releases at least every 30 days in accordance with § 280.43(g).
Violation Details:
<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 interstitial records are needed for the diesel piping.</i>
Corrective Action:
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 by not having records of interstitial monitoring 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.

**§ 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 line tightness testing results are needed for the Premium and Regular.*

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.

**§ 280.40(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 line leak detector testing results are needed.*

Corrective Action:

The owner and/or operator of the UST systems at this site shall have the automatic line leak detectors tested for proper operation by simulating a leak within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

**§ 280.43(g) – Failure to perform Interstitial Monitoring to standard**

Citation:

Pursuant to 40 CFR 280.43(g), interstitial monitoring between the UST system and a secondary barrier immediately around or beneath it may be used, but only if the system is designed, constructed, and installed to detect a leak from any portion of the tank that routinely contains product and also meets one of the following requirements:

- (1) For double walled UST systems, the sampling or testing method can detect a leak through the inner wall in any portion of the tank that routinely contains product;
- (2) For UST systems with a secondary barrier within the excavation zone, the sampling or testing method used can detect a leak between the UST system and the secondary barrier.

Violation Details:

*The owner and/or operator of the UST system(s) at this site are in violation of this rule because the diesel sump is full of fluids and the sensor has an active alarm. The booting in the diesel sump and dispensers is tight and the valves have not been removed. In order for IM to be completed to standard the valves need to be removed or the booting needs to be loose.*

Corrective Action:

The owner and/or operator of the UST systems at this site shall clean out the diesel sump and perform the required testing within thirty (30) days of receipt of this notice and submit the results within forty five (45) days of receipt of this notice.

**§ 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 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 spill bucket testing results are needed. Sump and UDC testing is also required for the diesel UST system.*

**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, sumps and UDC's. Documentation, to include photographs, inspection, repair and testing results, showing the spill prevention equipment, sumps and UDC's 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 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:**

*The owner and/or operator of the UST system(s) at this site are in violation of this rule because overflow testing results are needed.*

**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 overflow prevention equipment. Documentation, to include photographs, inspection, repair, measurements and testing results, showing the overflow 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:

*The owner and/or operator of the UST system(s) at this site are in violation of this rule because ATG testing results are needed.*

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 ATG probe testing results are needed. Sensor testing is needed for the diesel UST system (piping and UST).*

<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>§ 280.36(a)(1)(i) – Failure to perform 30 day walkthrough inspections</b>
<b>Citation:</b>
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).
<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 30 day walk through documentation is needed.</i>
<b>Corrective Action:</b>
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>§ 280.36(a)(1)(ii) – Failure to perform annual walkthrough inspections</b>
<b>Citation:</b>
Pursuant to 40 CFR 280.36(a)(1)(ii), to properly operate and maintain UST systems, not later than June 28, 2021 owners and operators must conduct a walkthrough inspection annually that, at a minimum, checks containment sumps and hand held release detection equipment.
<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 annual walk through documentation is needed.</i>
<b>Corrective Action:</b>
The owner and/or operator of the UST systems at this site shall, within seven (7) days of receipt of this notice, perform the annual 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>§ 280.240</b> – Failure to designate Class A, Class B or Class C operators that meet requirements
Citation: Pursuant to 40 CFR 280.240, not later than October 13, 2018, all owners and operators of UST systems must ensure they have designated Class A, Class B, and Class C operators who meet the requirements of this subpart.
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 and C training certificate is needed. Expired copy was obtained.</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, B and C 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: **24280**

Inspector's Name:	Matthew James
Date:	July 12, 2022
Time In:	11:45
Time Out:	12:45
Inspection Type:	Initial

**FACILITY NAME / LOCATION**

FACILITY NAME <b>Bulk #2727</b>		FACILITY ADDRESS (number and street) <b>405 E Freeland Rd</b>			
ADDRESS (line 2)	CITY <b>Greensburg</b>	STATE <b>IN</b>	ZIP CODE <b>47240</b>	COUNTY <b>Decatur</b>	

**UST OWNER**

UST Owner Name (if in Individual Capacity) <b>LKG Food Mart Inc</b>				BUSINESS ID (From the Secretary of State) <b>2008041000304</b>	
PREFIX <b>Mr</b>	FIRST NAME <b>Lakhwinder</b>	MI	LAST NAME <b>Singh</b>	SUFFIX	
TELEPHONE NUMBER <b>(317) 417-6205</b>		EMAIL ADDRESS <b>winderharry@yahoo.com</b>			

**UST OPERATOR**

UST Operator Name (if in Individual Capacity) <b>LKG Food Mart Inc</b>				BUSINESS ID (From the Secretary of State) <b>2008041000304</b>	
PREFIX <b>Mr</b>	FIRST NAME <b>Lakhwinder</b>	MI	LAST NAME <b>Singh</b>	SUFFIX	
TELEPHONE NUMBER <b>(317) 417-6205</b>		EMAIL ADDRESS <b>winderharry@yahoo.com</b>			

**PROPERTY OWNER**

UST Property Owner Name (if in Individual Capacity) <b>Bittersweet 23 LLC</b>				BUSINESS ID (From the Secretary of State) <b>2015012200891</b>	
PREFIX <b>Mr</b>	FIRST NAME <b>William</b>	MI <b>T</b>	LAST NAME <b>Niemier</b>	SUFFIX	
TELEPHONE NUMBER <b>(317) 890-1714</b>		EMAIL ADDRESS <b>bill@tharpinvest.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
Updated notification form is needed.			
O/O is in compliance with reporting & record keeping requirements	<input type="checkbox"/> YES	<input checked="" 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 type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> N/A
O/O has met all financial responsibility requirements	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> N/A
Need FR mechanism.			
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
Monthly walkthrough, annual walkthrough, Spill bucket test, UDC/STP test (DSL), overfill test			
40 CFR 280, Subpart D release detection requirements met	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> UNK
INT records DSL (UST/Piping), ATG/Probes/Sensors test, LTT (PREM/REG), LLD (all)			
40 CFR 280, Subpart J operator training requirements met	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> UNK
Need operator training certificates.			

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:

- Three (3) USTs
- One (1) 15K REG GSL FG SW Installed in November 1999
- One (1) 8K PREM GSL FG SW Installed in November 1999
- One (1) 8K DSL FG DW UST installed in August 2016
- Piping is OPW Pisces SW (REG, PREM) and pressurized
- Piping is APT Flex DW (DSL) and pressurized

RD UST = ATG, INT (DSL only)

RD Piping = LLD, LTT, INT (DSL only)

Overfill/Spill = Spill Buckets + Auto Shutoff (consistent)

ATG Certification = N

Overfill Protection Test = N

Spill bucket Test = N

Containment Sumps Test (Required DSL Only) = N

Open VL in 2019 for failure to perform proper release detection and having release detection records

#### Site History:

Site is an active service station. There is no prior UST history at this site

#### Contact Information

Lakhwinder Singh winderharry@yahoo.com

Don Tharp, elaine@tharpinvestments.com (invalid)

William Niemier, bill@tharpinvest.com

#### Documentation not provided at the time of the file review:

- (NF 11/24/2020, no formal approval - missing RD piping information, incorrect RD USTs)
- Certificate of Financial Responsibility
- Operator Certificates
- Release Detection Records INT (DSL)
- Release Detection Records CSLD (REG, PREM)
- Release Detection Piping INT (DSL)
- Line tightness test (REG, PREM)
- Leak detector test (all)
- ATG/Probes certification (REG, PREM)
- ATG/Sensors certification (DSL)
- Spill bucket test (all)
- UDC/STPs (DSL and any associated UDCs)
- Overfill test
- Monthly walkthrough inspections
- Annual inspection

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

1. The spill buckets contained fluids and should be monitored and cleaned out when needed.
2. The gasoline sumps contained fluids and should be monitored and cleaned out when needed.

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:

3. An updated notification form is needed. The form needs to include the correct type of release detection method for the UST's and piping. Needs to have accurate tank information.
5. Financial responsibility mechanism is needed.
6. Spill bucket testing results are needed.
7. Sump and UDC testing results are needed (DSL only)
8. 30 day walk through documentation is needed.
9. Annual walk through documentation is needed.
10. ATG/probe (REG, PREM), ATG/Sensors test (DSL) testing results are needed.
11. Overfill protection testing results are needed.
12. Line tightness testing results are needed.
13. Line leak detector testing results are needed.
14. Interstitial monitoring records are needed for the diesel tank and diesel piping (only current month available)
15. Volume programmed in the ATG for the PREM is an exact value. Volume must be programmed in accordance with the tank chart.
16. IM is not being completed to standard. The Diesel sump contained fluids and is in contact with the sensor. There is an active fuel alarm for the sensor. All fluids need to be removed and testing needs to be performed. The booting in the diesel sump and dispensers is tight and the valves have not been removed. In order for IM to be completed to standard the valves need to be removed or the booting needs to be loose.
17. Operator training certificates are needed.