



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 2, 2024

Speedway LLC
c/o Corporation Creations Network Inc.
8520 Allison Pointe Blvd #220
Indianapolis, IN 46520

Speedway LLC
Attn: Andrew Rice and Mike Byrne
Via email: andrew.rice@7-11.com
michael.byrne@7-11.com

Re: Violation Letter
Speedway 6116
1640 E Washington St
Indianapolis, Marion County
UST Facility ID # **6712**

Dear Owner and Operator:

An inspector from the Indiana Department of Environmental Management (IDEM), Underground Storage Tank (UST) Section, conducted an inspection of the site referenced above on June 21, 2024.

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.

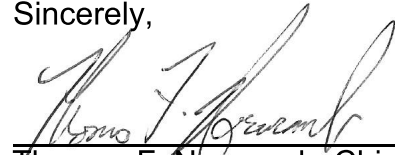
Thank you for your attention to this matter. Please submit the required documents to the UST Section via email at USTCompliance@idem.in.gov. Include in the subject line of the response the UST Facility ID # **6712**.

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

Direct any questions regarding the inspection to:

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

Sincerely,



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

cc: Loic Maniet
Tristan Voge
UST Facility ID File # 6712

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: Speedway 6116	UST FACILITY ID: 6712
ADDRESS: 1640 E Washington St, Indianapolis, Marion County	INSPECTION DATE: 06/21/2024

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 is needed with the correct overfill equipment indicated (last Notification Form had ball float but current testing documents and inspection showed that auto shutoff devices have been installed).

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.



**UNDERGROUND STORAGE
TANK INSPECTION REPORT**

INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

UST FAC ID: **6712**

Inspector's Name:	Tristan Voge
Date:	June 21, 2024
Time In:	09:50
Time Out:	10:30
Inspection Type:	Initial

FACILITY NAME / LOCATION

FACILITY NAME Speedway 6116		FACILITY ADDRESS (number and street) 1640 E Washington St			
ADDRESS (line 2)	CITY Indianapolis	STATE IN	ZIP CODE 46201	COUNTY Marion	

UST OWNER

UST Owner Name (If in Individual Capacity) Speedway LLC					BUSINESS ID (From the Secretary of State) 1997101575
PREFIX	FIRST NAME Andrew	MI	LAST NAME Rice	SUFFIX	
TELEPHONE NUMBER		EMAIL ADDRESS andrew.rice@7-11.com			

UST OPERATOR

UST Operator Name (If in Individual Capacity) Speedway LLC					BUSINESS ID (From the Secretary of State) 1997101575
PREFIX	FIRST NAME Andrew	MI	LAST NAME Rice	SUFFIX	
TELEPHONE NUMBER		EMAIL ADDRESS andrew.rice@7-11.com			

PROPERTY OWNER

UST Property Owner Name (If in Individual Capacity) Speedway LLC					BUSINESS ID (From the Secretary of State) 1997101575
PREFIX	FIRST NAME Andrew	MI	LAST NAME Rice	SUFFIX	
TELEPHONE NUMBER		EMAIL ADDRESS andrew.rice@7-11.com			

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
An updated notification form is needed with the correct overfill equipment indicated.						
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 type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input checked="" 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 type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input checked="" 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 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 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:

- Five (5) FG SW USTs installed in September 1990
- One (1) 4K KER
- One (1) 10K REG A GSL (manifolded w pump)
- One (1) 10K REG B GSL (manifolded no pump)
- One (1) 10K PREM GSL
- One (1) 10K DSL
- Piping is FG SW and pressurized

RD UST = ATG

RD Piping = LLD, ATG

Overfill/Spill = Spill Buckets + Auto Shutoff (consistent) + Ball Float (removed)

ATG Certification = N

Overfill Protection Test = N

Spill bucket Test = N

Containment Sumps Test (not required) = N

Site History:

Site is an active service station. Four (4) USTs were removed in 1990 (Closure NF in VFC). Four (4) dispensers and UDCs were replaced in 2013.

Contact Information

Andrew Rice andrew.rice@7-11.com

Michael Byrne michael.byrne@7-11.com

Documentation not provided at the time of the file review:

- (NF 2/9/2015, Approval 2/18/2015 - incorrect overfill information)
- Operator Certificates
- Release Detection Records UST
- Release Detection Records piping ELLD 0.2
- leak detector test
- ATg/Probes certification
- Spill bucket test
- Overfill test
- Monthly walkthrough
- Annual inspection

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Inspection Notes

- Documents sent 06/10/2024. Overfill testing (09/21/2023, 06/13/2023, 02/21/2023) and repair documentation. Spill test (03/17/2024). ATG/probes/sensors test (02/13/2024). LLD test (02/13/2024), 05/2023-05/2024 monthly walkthroughs. A, B and C operator certificates.
- Twelve (12) months of UST/piping RD collected from the ATG on site. No other documentation was collected or provided on site.

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

- All STP containment sumps contained fluid that should be cleaned out and monitored as needed. The source of the fluid should be determined and remediated as needed.
- All spill buckets contained fluid that should be cleaned out and monitored as needed.
- Dispenser 3/4 UDC contained fluid that should be cleaned out and monitored as needed.

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. An updated notification form is needed with the correct overfill equipment indicated. Ball float valves are indicated, auto shutoff vales were observed on site.

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 (update accordingly):

- Updated Notification form