



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

January 5, 2022

Tippecanoe County School Corporation
Attn: Gregory Haltom
21 Elston Rd
Lafayette, IN 47905

Tippecanoe County School Corporation
Attn: Gregory Haltom and Kirk Brooks
Via email: glhaltom@tsc.k12.in.us
kmbrooks@tsc.k12.in.us

Re: Violation Letter
Tippecanoe School Service Center
90 SR 25 W
Lafayette, Tippecanoe County
UST Facility ID # **6532**

Dear Messrs. Haltom and Brooks:

An inspector from the Indiana Department of Environmental Management (IDEM), Underground Storage Tank (UST) Section, conducted an inspection of the site referenced above on December 7, 2021.

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.

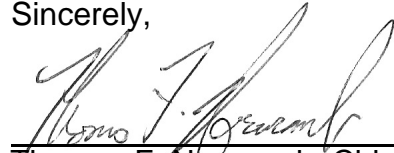
Thank you for your attention to this matter. Please submit the required documents to the UST Section via email at USTCompliance@idem.in.gov. Include in the subject line of the response the UST Facility ID # **6532**.

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

Direct any questions regarding the inspection to:

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

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas F. Newcomb", is written over a horizontal line.

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

cc: Loic Maniet
Matt Rozycki
UST Facility ID File # 6532

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: Tippecanoe School Service	UST FACILITY ID: 6532
ADDRESS: 90 Teal Rd, Lafayette, Tippecanoe County	INSPECTION DATE: 12/7/2021

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 reflecting the proper install dates of the tanks as well as the correct release detection method for the piping.

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.

§ 280.20(b) – Failure to install, design, construct or protect piping from corrosion

Citation:

Pursuant to 40 CFR 280.20(b), the piping that routinely contains regulated substances and is in contact with the ground must be properly designed, constructed, and protected from corrosion in accordance with a code of practice developed by a nationally recognized association or independent testing laboratory.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because metal components of the piping are in direct contact with soil/gravel in the STPs without apparent corrosion protection.

Corrective Action:

The owner and/or operator of the UST systems at this site shall, within fifteen (15) days of receipt of this notice, contract with a certified contractor to determine if the piping or metal components in contact with the ground are substandard and what steps will be taken to provide corrosion protection. The UST owner and/or operator must inform IDEM of the proposed work within thirty (30) days of receipt of this notice and receive approval before completing the work. The work must be completed within forty five (45) days of receipt of this notice. If the piping or metal components are determined to be substandard, the UST owner and/or operator shall immediately notify IDEM of their intent to remove or replace the affected components.



UNDERGROUND STORAGE TANK INSPECTION REPORT

INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

UST FAC ID: **6532**

Inspector's Name:	Matt Rozycki
Date:	December 7, 2021
Time In:	11:00
Time Out:	11:25
Inspection Type:	Initial

FACILITY NAME / LOCATION					
FACILITY NAME Tippecanoe School Service Center			FACILITY ADDRESS (number and street) 90 Teal Rd		
ADDRESS (line 2)		CITY Lafayette	STATE IN	ZIP CODE 47905	COUNTY Tippecanoe
UST OWNER					
UST Owner Name (If in Individual Capacity) Tippecanoe County School Corporation				BUSINESS ID (From the Secretary of State)	
PREFIX Mr.	FIRST NAME Greg	MI	LAST NAME Haltom		SUFFIX
TELEPHONE NUMBER (765) 772-4937		EMAIL ADDRESS glhaltom@tsc.k12.in.us			
UST OPERATOR					
UST Operator Name (If in Individual Capacity) Tippecanoe County School Corporation				BUSINESS ID (From the Secretary of State)	
PREFIX Mr.	FIRST NAME Greg	MI	LAST NAME Haltom		SUFFIX
TELEPHONE NUMBER (765) 772-4937		EMAIL ADDRESS glhaltom@tsc.k12.in.us			
PROPERTY OWNER					
UST Property Owner Name (If in Individual Capacity) Tippecanoe County School Corporation				BUSINESS ID (From the Secretary of State)	
PREFIX Mr.	FIRST NAME Greg	MI	LAST NAME Haltom		SUFFIX
TELEPHONE NUMBER (765) 772-4937		EMAIL ADDRESS glhaltom@tsc.k12.in.us			
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 with correct install dates and release detection method for the piping is needed					
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 checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
40 CFR 280, Subpart B installation and upgrade requirements met			<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> UNK
Metal components of the piping are in contact with backfill in the STPs					
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:

- Two (2) FG SW USTs
- One (1) 10K DSL installed in September 1986 (re-certified Owens Corning in 1988)
- One (1) 6K REG GSL installed in January 1988

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 33 and 35 years old and the owner should start planning on removing or replacing them soon.

- Piping is FG SW and pressurized

RD UST = ATG

RD Piping = LLD, LTT, ATG

Overfill/Spill = Spill Buckets + Auto Shutoff (confirmed, current) + Ball Float (earlier NF)

ATG Certification = Y (10/15/2021)

Overfill Protection Test = Y (11/20/2020)

Spill bucket Test = Y (11/20/2020)

Containment Sumps Test (not required) = N

If Auto, need BF removal, if no Auto, need proof

Site History:

Site is a school with fueling capability. Two (2) USTs were removed in 1988 (Closure NF on file). It should be noted that the 10K DSL had been relocated in 1988 from its original location near the building.

Contact Information

Greg Haltom glhaltom@tsc.k12.in.us

Kirk Brooks kmbrooks@tsc.k12.in.us (765) 269-8464 - Call before inspection

Documentation provided at the time of the file review:

- (NF 2/11/2015, Approval 7/8/2015 - incorrect install dates, missing RD method on piping)
- Certificate of Financial Responsibility (Local Government Guarantee 1/2021 to 12/31/2021)
- Operator Certificates A, B, C
- RD records (REG, DSL) 9/2021 to 11/2021
- Line and Leak detector test (REG, DSL) 11/20/2020
- Line and leak detector test (REG, DSL) 10/15/2021
- ATG/Probes test 10/15/2021
- Spill bucket test (REG, DSL) 11/20/2020
- Overfill Protection Test (REG, DSL) 11/20/2020 - Auto Shutoff
- Monthly Walkthrough 9/2021 to 11/2021

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 some fluid, they should be monitored and cleaned out as needed
2. The DSL spill bucket had some warping, it should be monitored and replaced if a crack develops
3. The protective wrapping around the metal components under the dispensers appeared to be coming loose. It should be monitored and tightened to prevent any corrosion issues

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 with the correct install dates and release detection method for the piping is needed
2. Metal components of the piping are in contact with backfill in STPs without proper corrosion protection

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 NF (NF 2/11/2015, Approval 7/8/2015 - incorrect install dates, missing RD method on piping)
- Documentation showing that the metal components are protected from corrosion