



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

February 25, 2022

Bellprop LLC
Attn: James Bellman, Registered Agent
550 E 2nd St
Bremen, IN 46506

Bellman Oil Co Inc
Attn: James Bellman, Registered Agent
550 E 2nd St
Bremen, IN 46506

Re: Violation Letter
Plymouth Bell Mart
423 N Michigan St
Plymouth, Marshall County
UST Facility ID # **9502**

Dear Mr. Bellman:

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

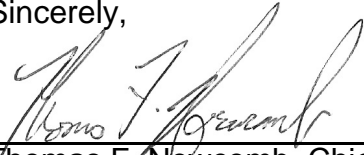
Thank you for your attention to this matter. Please submit the required documents to the UST Section via email at USTCompliance@idem.in.gov. Include in the subject line of the response the UST Facility ID # 9502.

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 # 9502
Bellman Oil Co Inc
Attn: Jamie Bellman
Via email: jamie.bellman@bellmanoil.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: Plymouth Bell Mart	UST FACILITY ID: 9502
ADDRESS: 423 N Michigan St, Plymouth, Marshall County	INSPECTION DATE: 2/21/2022

VIOLATIONS NOTED IN THIS INSPECTION

§ 280.34 – Reporting and recordkeeping (general provisions)

Citation:

Pursuant to 40 CFR 280.34, owners and operators of UST systems must cooperate fully with inspections, monitoring and testing conducted by the implementing agency, as well as requests for document submission, testing, and monitoring by the owner or operator pursuant to section 9005 of Subtitle I of the Solid Waste Disposal Act, as amended.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because no records were provided.

Corrective Action:

The owner and/or operator of the UST systems at this site shall immediately perform the monitoring or testing required by the rules and/or submit the requested documentation within seven (7) days of receipt of this notice.

329 IAC 9-6-2.5(d) – Failure to complete closure process

Citation:

Pursuant to 329 IAC 9-6-2.5(d), the permanent closure or change-in-service is not considered complete until all permanent closure or change-in-service requirements and site assessment requirements are met.

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because no closure documents were provided for the 3 USTs closed 10/6/1998 and 2/7/2010.

Corrective Action:

The owner and/or operator of the UST systems at this site shall submit to IDEM the complete documentation as required by this rule within thirty (30) 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 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.

§ 280.20(c)(1)(i) – Failure to have spill prevention equipment that will prevent release

Citation:

Pursuant to 40 CFR 280.20(c)(1)(i), to prevent spilling and overfilling associated with product transfer to the UST system, owners and operators must use the following spill and overfill prevention equipment:

(i) Spill prevention equipment that will prevent release of product to the environment when the transfer hose is detached from the fill pipe (for example, a spill catchment basin).

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because the REG spill bucket is cracked and may not contain a spill if 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 install or replace absent or substandard spill prevention equipment that will prevent the release of product to the environment. The UST owner and/or operator must submit proof that the spill prevention equipment has been installed within forty five (45) days of receipt of this notice.

§ 280.31(b) – Failure to inspect CP system, frequency and criteria
Citation:
Pursuant to 40 CFR 280.31(b), all UST systems equipped with cathodic protection systems must be inspected for proper operation by a qualified cathodic protection tester in accordance with the following requirements: (1) Frequency. All cathodic protection systems must be tested within 6 months of installation and at least every 3 years thereafter or according to another reasonable time frame established by the implementing agency; and (2) Inspection criteria. The criteria that are used to determine that cathodic protection is adequate as required by this section must be in accordance with a code of practice developed by a nationally recognized association.
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 corrosion protection testing results were not provided for the tanks.</i>
Corrective Action:
The owner and/or operator of the UST systems at this site shall submit to IDEM the required documents within fifteen (15) days of receipt of this notice or have their UST systems fully inspected by a qualified cathodic protection tester within fifteen (15) days and submit the results within thirty (30) 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 overfill 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 <u>must prevent releases to the environment.</u>
Violation Details:
<i>The owner and/or operator of the UST system(s) at this site are in violation of this rule because periodic testing of the spill prevention equipment was not provided. Containment sumps used for interstitial monitoring are also required to be tested.</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 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:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because periodic testing of the overfill prevention equipment was not provided.

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.

§ 280.36(a)(1)(i) – Failure to perform 30 day walkthrough inspections

Citation:

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).

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because monthly walkthroughs have not been provided for July 2021 through January 2022.

Corrective Action:

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.

§ 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 an ATG functionality test was not provided.

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 a functionality test of the probes and sensors was not provided.

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.

§ 280.40(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 an annual LLD was not provided.

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.

§ 280.41(a)(1) – Failure to monitor tanks every 30 days if installed before 9/2/2009

Citation:

Pursuant to 40 CFR 280.41(a)(1), considering previous Indiana rule at 329 IAC 9-3-1.3 (repealed 2018), tanks installed on or before September 2, 2009 must be monitored for releases at least every 30 days using one of the methods listed in § 280.43(d) through (i).

Violation Details:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because monthly release detection records were not provided.

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 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 and submit the results monthly for a period of six (6) months after the 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:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because monthly release detection records were not provided.

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.

§ 280.43(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 REG STP sump contained fluid, it should be kept dry so a leak can be detected as soon as possible. No sensor was seen in the REG STP sump to detect a leak if needed. The piping still had the Schrader valve stem in place which would not allow fluid to drain out of the interstitial space.

Corrective Action:

The owner and/or operator of the UST systems at this site shall have any UST or piping that contains a regulated amount of product and found to not have been monitored every thirty (30) days correctly while using 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 and submit the results monthly for a period of six (6) months after the 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:

The owner and/or operator of the UST system(s) at this site are in violation of this rule because updated operator A, B, and C certificates are needed.

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 and Class 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: **9502**

Inspector's Name:	Matt Rozycki
Date:	February 21, 2022
Time In:	12:00
Time Out:	12:20
Inspection Type:	Initial

FACILITY NAME / LOCATION							
FACILITY NAME Plymouth Bell Mart			FACILITY ADDRESS (number and street) 423 N Michigan St				
ADDRESS (line 2)		CITY Plymouth	STATE IN	ZIP CODE 46567	COUNTY Marshall		
UST OWNER							
UST Owner Name (If in Individual Capacity) Bellman Oil Co Inc				BUSINESS ID (From the Secretary of State) 197506-620			
PREFIX	FIRST NAME James	MI	LAST NAME Bellman		SUFFIX		
TELEPHONE NUMBER		EMAIL ADDRESS jamie.bellman@bellmanoil.com					
UST OPERATOR							
UST Operator Name (If in Individual Capacity) Bellman Oil Co Inc				BUSINESS ID (From the Secretary of State) 197506-620			
PREFIX	FIRST NAME James	MI	LAST NAME Bellman		SUFFIX		
TELEPHONE NUMBER		EMAIL ADDRESS jamie.bellman@bellmanoil.com					
PROPERTY OWNER							
UST Property Owner Name (If in Individual Capacity) Bellprop LLC				BUSINESS ID (From the Secretary of State) 1999050189			
PREFIX	FIRST NAME James	MI	LAST NAME Bellman		SUFFIX		
TELEPHONE NUMBER		EMAIL ADDRESS jamie.bellman@bellmanoil.com					
COMPLIANCE ELEMENTS							
All USTs properly registered and up-to-date notification form on file			<input checked="" type="checkbox"/>	YES	NO	UNK	
O/O is in compliance with reporting & record keeping requirements			<input type="checkbox"/>	YES	<input checked="" type="checkbox"/> NO	UNK	
No record were provided							
O/O is in compliance with release reporting or investigation			<input checked="" type="checkbox"/>	YES	NO	N/A	UNK
O/O is in compliance with all UST closure requirements			<input type="checkbox"/>	YES	<input checked="" type="checkbox"/> NO	N/A	UNK
Missing closure documents for 3 USTs previously on site							
O/O has met all financial responsibility requirements			<input type="checkbox"/>	YES	<input checked="" type="checkbox"/> NO	N/A	UNK
A current financial responsibility mechanism was not provided							
40 CFR 280, Subpart A installation requirements (partially excluded) met			<input checked="" type="checkbox"/>	YES	NO	N/A	UNK
40 CFR 280, Subpart B installation and upgrade requirements met			<input type="checkbox"/>	YES	<input checked="" type="checkbox"/> NO		UNK
REG spill bucket is cracked, it may not contain a spill if needed							
40 CFR 280, Subpart C spill/overfill control requirements met			<input checked="" type="checkbox"/>	YES	NO	N/A	UNK
40 CFR 280, Subpart C compatibility requirements met			<input checked="" type="checkbox"/>	YES	NO	N/A	UNK
40 CFR 280, Subpart C O&M and testing requirements met			<input type="checkbox"/>	YES	<input checked="" type="checkbox"/> NO		UNK
3 year corrosion protection test, spill bucket testing, overfill functionality, monthly walkthroughs							
40 CFR 280, Subpart D release detection requirements met			<input type="checkbox"/>	YES	<input checked="" type="checkbox"/> NO		UNK
ATG/probes functionality, LLD, Monthly records for the tanks and piping, interstitial to standard							
40 CFR 280, Subpart J operator training requirements met			<input type="checkbox"/>	YES	<input checked="" type="checkbox"/> NO		UNK
Current A B & C certificates were not provided							

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) USTs - STIP3 - Installed 6/15/1991

One (1) 8K GSL

One (1) 6K GSL

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

Piping - DW Flex - Pressurized

RD UST - ATG

CP UST - Galvanic

RD Piping - ATG - IM - LTT - LD

Spill protection/Overfill - Spill bucket - Flapper

ATG Certification = N

Overfill Protection Test = N

Spill bucket Test = N

Containment Sumps Test Required Y

Last known CP 3/6/2017

Site is an active gas station

Any Site history or concerns - Notification form lists piping RD as IM, if site performing IM sensors and containment sump testing is required.

Active Lust 201012502 \$1,086,379

Two USTs closed 6/8/1991 (Closure NF or report on file)

One UST closed 10/6/1998 (No closure report on file)

Two USTs closed 12/7/2010 (Incomplete closure report on file)

Documentation received -

Notification form - 6/27/2016

No additional documents received at time of review

2017 CP results pulled from file

***PREM sump lid frozen in place, dispenser panels could not be removed, site has piping capable of IM, however; they do not appear to have anything else setup for proper IM

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

1. Some fuel was noted in the REG STP sump, the source should be identified and corrected
2. The PREM sump lid was frozen in place
3. Dispenser panels could not be removed to verify equipment and interstitial monitoring setup
4. Spill buckets contained some fluid, they should be monitored and cleaned out as needed
5. Interstitial monitoring is listed as the release detection method for the piping. All violations for interstitial to standard could go away if the notification form is resubmitted removing that as the release detection method

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 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. No records were provided
2. Missing closure documents for 3 USTs previously on site (One UST closed 10/6/1998 - Two USTs closed 12/7/2010)
3. A current financial responsibility mechanism was not provided
4. REG spill bucket is cracked, it may not contain a spill if needed
5. 3 year corrosion protection testing was not provided for the tanks
6. Spill bucket testing / containments sumps used for interstitial monitoring was not provided
7. Overfill functionality testing was not provided
8. Monthly walkthrough inspections were not provided
9. ATG functionality test was not provided
10. Functionality testing of the probes / sensors was not provided
11. An annual LLD was not provided
12. Monthly records for the tanks were not provided
13. Monthly records for the piping were not provided
14. Interstitial monitoring is not being performed to standard. The REG STP sump contained fluid, it should be kept dry so a leak can be detected as soon as possible. No sensor was seen in the REG STP sump to detect a leak if needed. The piping still had the Schrader valve stem in place which would not allow fluid to drain out of the interstitial space. Since the PREM STP sump and dispensers could not be opened IDEM would need confirmation of sensors and that the containment areas are water tight and dry
15. Current A B & C operator 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 (update accordingly):

- RD UST monthly results
- CP UST due 3/2020
- RD Piping
- LD
- Annual ATG test
- Annual ATG probes and sensors test
- Overfill test required every 3 years
- Spill bucket test required every 3 years
- Containment sump testing required for IM
- Monthly walk through July-Current month
- Operator certificate - A-B-C
- FR
- Documentation showing interstitial monitoring is being performed to standard