

**ILLINOIS POLLUTION CONTROL BOARD**

BLAKE LEASING COMPANY, LLC – REAL	)	
ESTATE SERIES, as owner of KIRKLAND	)	
QUICK STOP,	)	
	)	
Petitioner,	)	PCB 2018-026
	)	(Water Well Setback Exception)
v.	)	
	)	
ILLINOIS ENVIRONMENTAL PROTECTION	)	
AGENCY, VILLAGE OF KIRKLAND, ILLINOIS	)	
and SOO LINE RAILROAD COMPANY (d/b/a	)	
CANADIAN PACIFIC RAILWAY and	)	
CANADIAN PACIFIC),	)	
	)	
Respondents.	)	

**NOTICE OF FILING**

To: See Attached Certificate of Service.

**PLEASE TAKE NOTICE** that on the 19<sup>th</sup> day of March, 2018, the Petitioner, Blake Leasing Company, LLC – Real Estate Series, as owner of Kirkland Quick Stop, filed the attached Reply to the Illinois Environmental Protection Agency’s Response of December 6, 2017 in PCB 2018-026, a copy of which is attached hereto and served upon you.

Dated: March 19, 2018

Respectfully submitted,

On behalf of Blake Leasing Company, LLC –  
Real Estate Series

/s/Charles F. Helsten

Charles F. Helsten  
One of Its Attorneys

Charles F. Helsten  
HINSHAW & CULBERTSON LLP  
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**CERTIFICATE OF SERVICE**

I, Charles F. Helsten, an attorney, certify that I have served the attached Blake Leasing Company, LLC – Real Estate Series, as owner of Kirkland Quick Stop’s Reply to the Illinois Environmental Protection Agency’s Response of December 6, 2017 in PCB 2018-026 on the named parties below via email and by certified mail, return receipt requested, by 5:00 p.m. on March 19, 2018, by depositing the attached in the U.S. Mail at Rockford, Illinois, with proper postage or delivery charge prepaid.

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/s/Charles F. Helsten



ST. JOHN - MITTELHAUSER & ASSOCIATES

**TECHNICAL MEMORANDUM**

Date: March 16, 2018

From: Ron St. John, Steve Swenson; St. John – Mittelhauser & Associates, Inc.

RE: **Written Responses to the Illinois Environmental Protection Agency's Response of December 6, 2017 in Blake Leasing Company, LLC v. Illinois Environmental Protection Agency and Village of Kirkland; PCB 18-026 (Water Well Setback Exception).**

Blake Leasing is providing the following reply to questions posed by the Illinois Environmental Protection Agency (Illinois EPA) in the order they were presented in the Agency's December 6, 2017 Response, which are italicized below for clarity.

1. *A section in the Petition that discusses the potential impacts to groundwater and affected well.*

**Response:** The UST system, consisting of three (3) single wall fiberglass USTs<sup>1</sup> fitted with single wall fiberglass piping was installed at the Site in October 1993. At that time of installation, spill containment and leak prevention consisted of secondary containment on the UST fill ports, pressure monitors sensors on the piping, and magnstrictive probes within the USTs. The pressure monitors and magnstrictive probes were connected to a Veeder Root TSL system to provide both inventory control and system monitoring.

In 2002, the single wall fiberglass piping was replaced with flexible double wall piping. In addition, during the replacement of the fiberglass piping, the vent lines, dispensers, and canopy were upgraded. With the installation of the double wall piping, the Veeder Root TSL system was upgraded to provide 24/7 pressure monitoring and leak detection within in the interstitial area of the double wall piping. In 2003, the Risk Management Software for product inventory reconciliation was installed on the Veeder Root TSL system.

In addition to the spill prevention and leak detection system described above, Blake Leasing contracts a third party to conduct "Tank Tightness" testing of both the product lines and the UST in accordance with 41 IAC 175. The product lines and USTs are tightness tested as follows:

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<sup>1</sup> The USTs were manufactured by Xerxes and covered by the manufacturer's warranty through October 2023.

- Product Lines: Testing of the product lines consists of pressurizing the (drained) lines and monitoring the lines for a period of time to verify the lines are holding pressure. A loss of pressure during testing would indicate a potential for a release.
- USTs: Testing of the USTs is completed by sealing the vent lines and placing a vacuum on the USTs and then monitoring the USTs for a period of time to verify the USTs are holding a vacuum. A loss of vacuum during testing would indicate a potential for a release.

As discussed in Section 6.3.2 of the Technical Report (dated November 6, 2017), the USTs and product lines at the Site have always passed tightness testing. Based on the results of the tank tightness testing and the fact that Blake Leasing has not experienced a system alarm or discrepancy in its product inventory that would be indicative of a release, there is no empirical evidence that a release has occurred from this UST system. Furthermore, under current operating conditions, there is no reason to anticipate that a release of petroleum from this UST system is likely to occur in the future.

The Illinois EPA noted in its December 6, 2017 Response that the current UST system, with proper monitoring and maintenance, does not represent a significant hazard. In that regard, should a system alarm, discrepancy in product inventory, or failure of a tightness testing occur, the UST system would be immediately shut down, thereby preventing a hazard. The UST system would then be fully assessed and repaired by a licensed tank contractor under the direction of the Illinois State Fire Marshal prior to resuming operation. Finally, a Site Assessment would be completed in accordance with 41 IAC Section 176 Subpart C to determine if a release had occurred. All of these precautionary measures, when considered as a whole, offer a significant level of protection.

In its inquiry above, the Illinois EPA refers to the “*potential impacts to groundwater and affected well*”. However, as previously noted in the Technical Report, the Site has experienced an actual historic release of petroleum into the groundwater. The release to groundwater in the area was identified in 1989 during the installation of a monitoring well and Leaking Underground Storage Tank (LUST) Incident No. 891717<sup>2</sup> was assigned to the Site. Groundwater samples collected at the Site in September 1991 identified the presence of benzene at concentrations as high as 15 mg/l. Since 1991, the concentration of benzene has declined. The highest concentration of benzene identified during the most recent sampling event (July 2017) was 0.133 mg/l. (Please note that this release is associated with the previous UST system that was removed from the Site in October, 1993 and not from the current UST system operated by the current owner).

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<sup>2</sup> The residual petroleum constituents associated with LUST Incident 891717 are currently being remediated in accordance with the Amended Corrective Action Plan & Budget submitted to the Illinois EPA on September 29, 2017 and subsequently approved on November 2, 2017.

Although the exact date of the release is unknown, it is known to have occurred prior to 1989. Since that time (over 28 years), petroleum contamination has been present in the groundwater below the Site. Notwithstanding the fact that benzene is known to have been present in the uppermost water-bearing unit since at least 1989, analytical results from a groundwater sample collected from the Emergency Backup Well #1 in May of 2015 confirm that the petroleum contamination is not migrating vertically into the lower bedrock aquifers and impacting the municipal well.

As has been previously documented and noted in other technical submittals for this Site, the lack of vertical migration of the petroleum contamination into the deeper bedrock aquifers is due to the presence of a 30-foot thick dense, dry, silty clay glacial till unit underlying the alluvial surficial sand and gravel unit. To verify the competency of the 30-foot thick silty clay aquitard underlying the alluvial surficial sand and gravel unit, a pump test was conducted in August 2016 to determine if there was a hydraulic connection between surficial alluvial sand and gravel unit and the deeper bedrock aquifers in which the Village wells are completed.

The pump test confirmed that there is no hydraulic connection between the alluvial sand and gravel aquifer at the Site and the deep bedrock aquifers where Emergency Backup Well #1 is installed. This confirms that the 30-foot silty clay glacial till that separates the alluvial sand and gravel aquifer unit from the bedrock aquifers is an effective aquitard. This aquitard significantly impedes the downward vertical migration of groundwater between the units and protects the bedrock aquifers in the vicinity of the Site from routes of contaminant migration occurring within the alluvial aquifer.

In summary:

- The current UST system includes secondary containment sumps, electronic monitoring for loss of pressure and/or the presence of water, and inventory control. These features work together to prevent a release of petroleum from entering the environment and combine to provide a system of early detection should there be a failure within the UST system;
- Since the installation of the current UST system in 1993, there is no empirical evidence that a release has occurred from this UST system. Furthermore, as noted by the Illinois EPA, based on the operation of the current UST system, it is not anticipated that a release from this UST system is likely to occur in the future. Moreover, as noted above, an over-arching program of safeguards is in place which ensures that no such release would occur;
- In 1989, a release of petroleum was identified in the groundwater below the Site. The release is currently undergoing corrective action under the Illinois Leaking Underground Storage Tank (LUST) program. The release is not associated with the current UST system;

- A groundwater sample collected from the Emergency Backup Well #1 in May 2015 was below the reporting limits of the laboratory equipment (e.g. non-detect) for all BTEX and PNA compounds. This confirms that the historic petroleum contamination noted above is not impacting the community supply wells; and
- A pump test confirmed that there is no hydraulic connection between the impacted alluvial surficial and gravel unit and the bedrock units where the municipal wells are completed. This confirms, in conjunction with the groundwater sample collected from Emergency Backup Well #1, that the current UST system does not pose a threat to the bedrock aquifers below the Site.

2. *A physical inspection of the interior of each of the subject USTs to determine if degradation is taking place.*

**Response:** On December 21, 2017, Tanknology, Inc. completed a detailed inspection of the interior of the USTs through their proprietary TankCam robotic equipment. The purpose of the inspection was to identify anomalies such as blistering, cracking, corrosion, debris, deflection, delamination, discoloration, exposed fibers, flaking, oxidation, patches, peeling/separation, tuberculation, water ingress, or other abnormal operating conditions.

The results of the camera survey did not indicate the presence of water in the UST bottoms, cracks in the fiberglass, or other indications that the integrity of the USTs are compromised. However, the camera survey did note the following items typical of a 25 year old UST system:

- Sediment and trace amounts of residue/sludge and gravel were present in the USTs. The gravel likely entered the USTs during their installation in 1993. The limited amount of residue identified in the bottom of the USTs is likely associated with dust or dirt that routinely enters the UST system during the filling process;
- White streaking and staining were noted in both the 10,000-gallon regular unleaded UST and the 4,000-gallon premium UST. Since water was not identified in the USTs, the streaking and staining is most likely associated with atmospheric humidity entering the UST through vent lines and fill ports;
- Evidence of peeling and flaking of the interior surface was noted on portions of the interior surface of the 4,000-gallon and 3,000-gallon compartmentalized UST. The UST is constructed of epoxy resin with layers of fiberglass fibers embedded within for strength. A final coat of epoxy resin is applied to provide a smooth finish. The peeling and flaking of the final coat of epoxy resin coat has exposed some of the fiberglass fibers on the interior of the UST. However, there is no indication that the peeling and flaking extends beyond the surface coat or that the integrity of the UST system is potentially compromised. Going further, it has been SMA's observation from overseeing the removal of countless fiberglass composite USTs that where

these types of USTs were broken up for disposal, the walls of the USTs are essentially a solid resin material containing well-imbedded fibers, and, consequently, any surficial flaking or peeling is cosmetic in nature only.

- Surface corrosion was noted on the unused bungs at the top of the 10,000-gallon regular unleaded UST and the 6,000-gallon diesel UST;
- Possible surface corrosion was noted on the ball float assembly and the shaft on the submersible turbine pump on the 6,000-gallon diesel UST;

A copy of the inspection report is provided in Attachment A.

3. *On-going monitoring during regular maintenance to observe for signs of degradation of the subject tanks.*

**Response:** Blake Leasing has updated its current O&M Plan to include the following:

- Inspect the UST fill port covers on a weekly basis to make sure they are secured thereby preventing the intrusion of water into the USTs that could promote bacteria growth;
- Fuel filters will be replaced on an annual basis. The replaced fuel filters will be opened and inspected for evidence of fiberglass degradation;
- Records of replaced components (valves, rubber seals, and hoses for each tank) and how often they require replacement will be maintained. Replaced components will be inspected for signs of bacterial growth; and
- Continually monitor for the presence of water within the USTs through the magnstrictive probes currently installed within the USTs and connected to the Veeder Root TSL system.

A copy of the updated O&M Plan is provided in Attachment B.

4. *A commitment to replace any of the subject USTs that are found to be degraded, with USTs that meet current BAT.*

**Response:** As noted in its December 6, 2017 Response to this Petition, the Illinois EPA believes the upgrades to the UST system in 2003 demonstrates Blake Leasing's commitment to prevent a new release of fuel into the environment. As part of this commitment, Blake Leasing will continue to monitor the UST system and repair, replace, and/or upgrade the components in accordance with the Illinois Office of the State Fire Marshal using the BAT existing at the time of replacement.

**ATTACHMENT A**





## TankCam<sup>®</sup> Summary Report

**KIRKLAND MARATHON**

**KIRKLAND, IL 60146**

**12/21/2017**

Electronic Filing: Received, Clerk's Office 3/19/2018

<b>WORK ORDER NUMBER:</b> 6284245	<b>DATE OF INSPECTION:</b> December 21, 2017
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<b>SITE NAME/NUMBER:</b>	KIRKLAND MARATHON
<b>STREET ADDRESS:</b>	411 W. MAIN ST
<b>CITY, STATE, ZIP:</b>	KIRKLAND, IL 60146

**PURPOSE**

The technician looks for evidence of undesirable conditions such as blistering, cracking, corrosion, debris, deflection, delamination, discoloration, exposed fibers, flaking, oxidation, patches, peeling/separation, tuberculation, water ingress, and other abnormal operating conditions. The internal video inspection was conducted using the proprietary TankCam® equipment.

**FINDINGS**

TANK #	PRODUCT	CAPACITY	MATERIAL	OBSERVATIONS
#1	Regular	10,000 gallons	Fiberglass Singlewall	A build-up of residue coated the bottom half of the tank. The tank walls exhibited some areas of white streaking and staining. Corrosion was observed on one of the tank bungs. The tank bottom contained pieces of debris.
#2	Premium (Connected to Midgrade)	4,000 gallons	Fiberglass Singlewall	Sections of peeling and flaking were observed on the tank walls. The tank bottom contained sediment, residue, and pieces of debris. Possible moisture staining was observed on the tank walls and endcap.
#3	Midgrade (End tank connected to Midgrade)	3,000 gallons	Fiberglass Singlewall	The tank bottom contained sludge, sediment, residue and pea gravel. An area of the tank wall exhibited possible peeling. A build-up of residue coated the bottom half of the tank.
#4	Diesel	6,000 gallons	Fiberglass Singlewall	Corrosion was observed on the ball float assembly and an unused bung. Residue coated some areas of the lower tank walls. The STP shaft exhibited possible corrosion.

*The following still images are taken from the approximate times indicated during the video inspection. The original video is in secure storage at the Tanknology corporate office. The findings are as follows:*

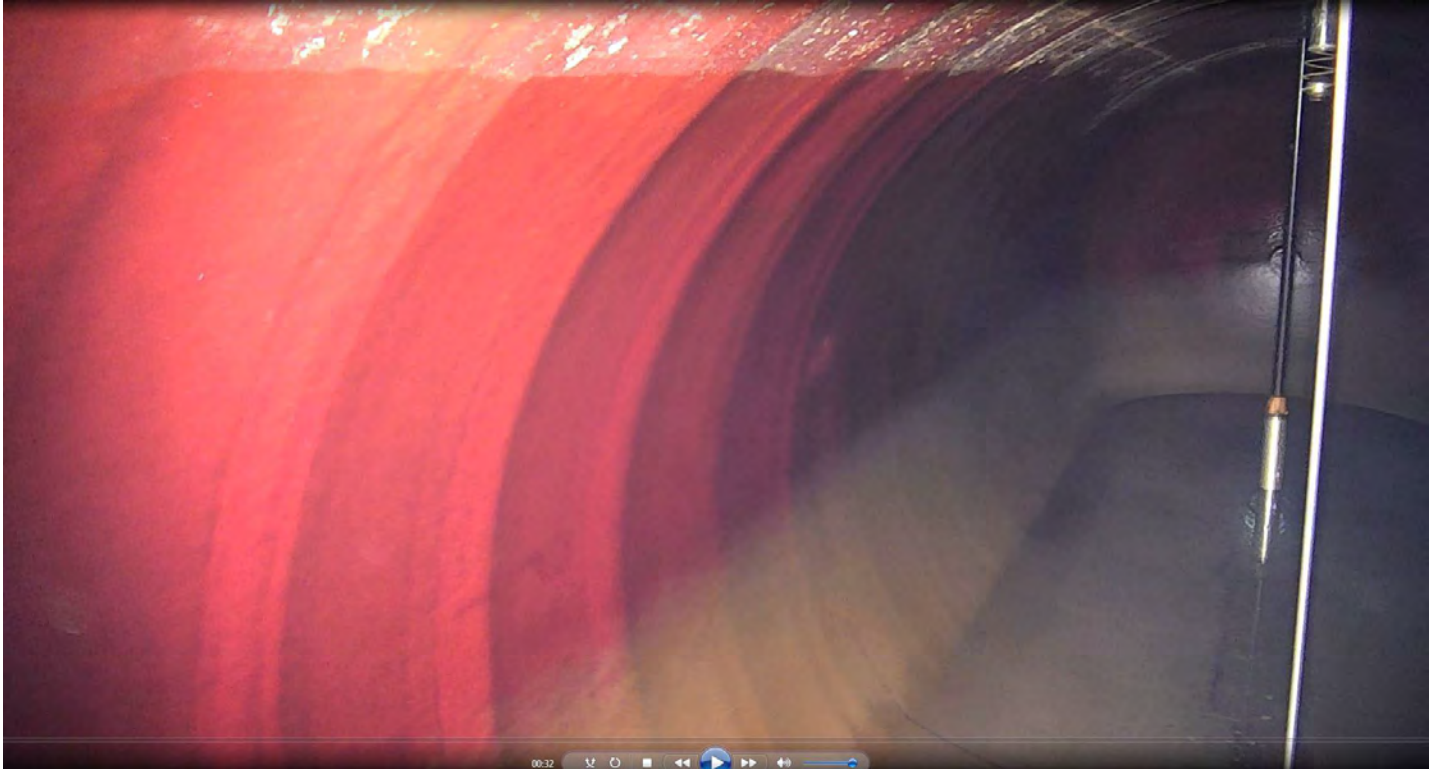


Figure 1-1: Residue build-up on lower half of tank walls (00:32)

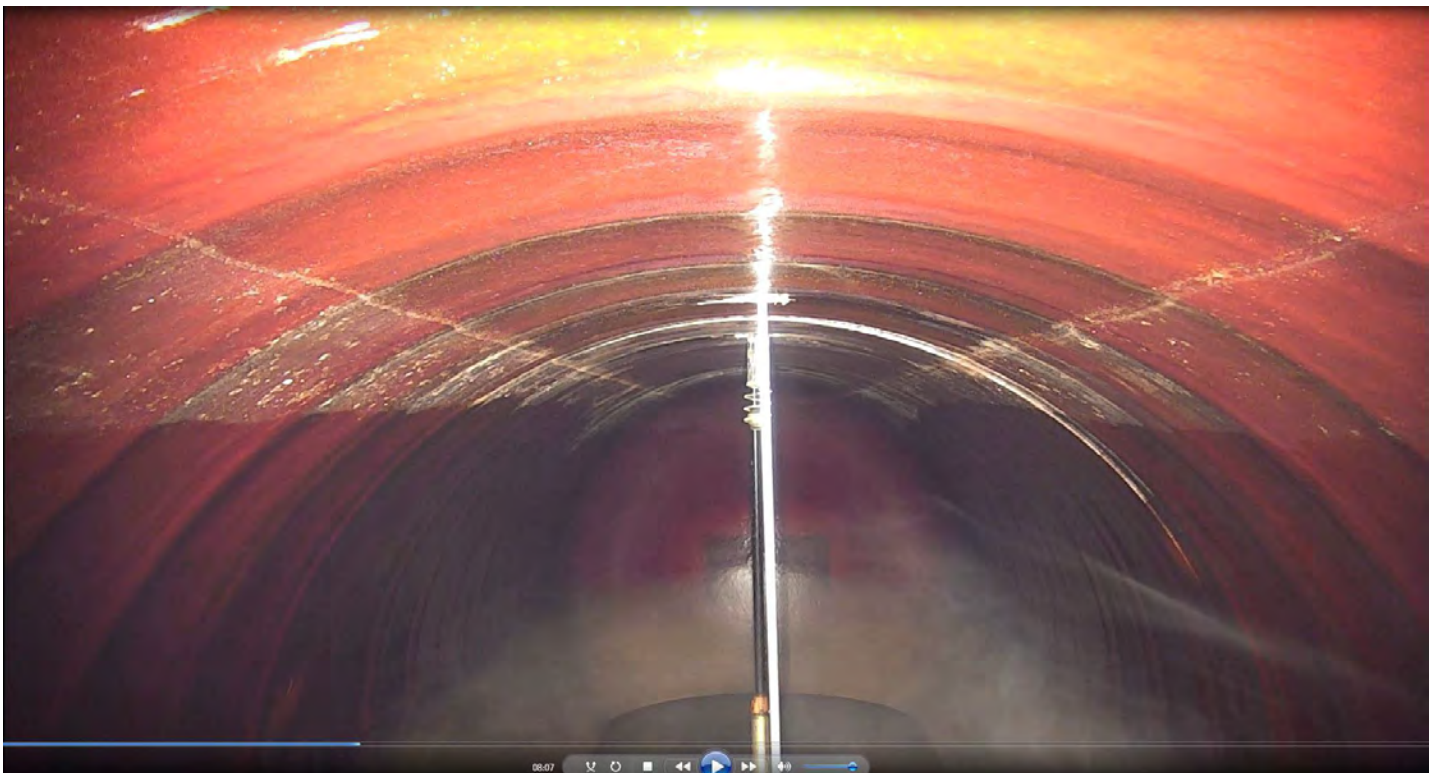


Figure 1-2: Overview of tank (08:07)

These images are provided for informational purposes. Tankology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tankology Inc.

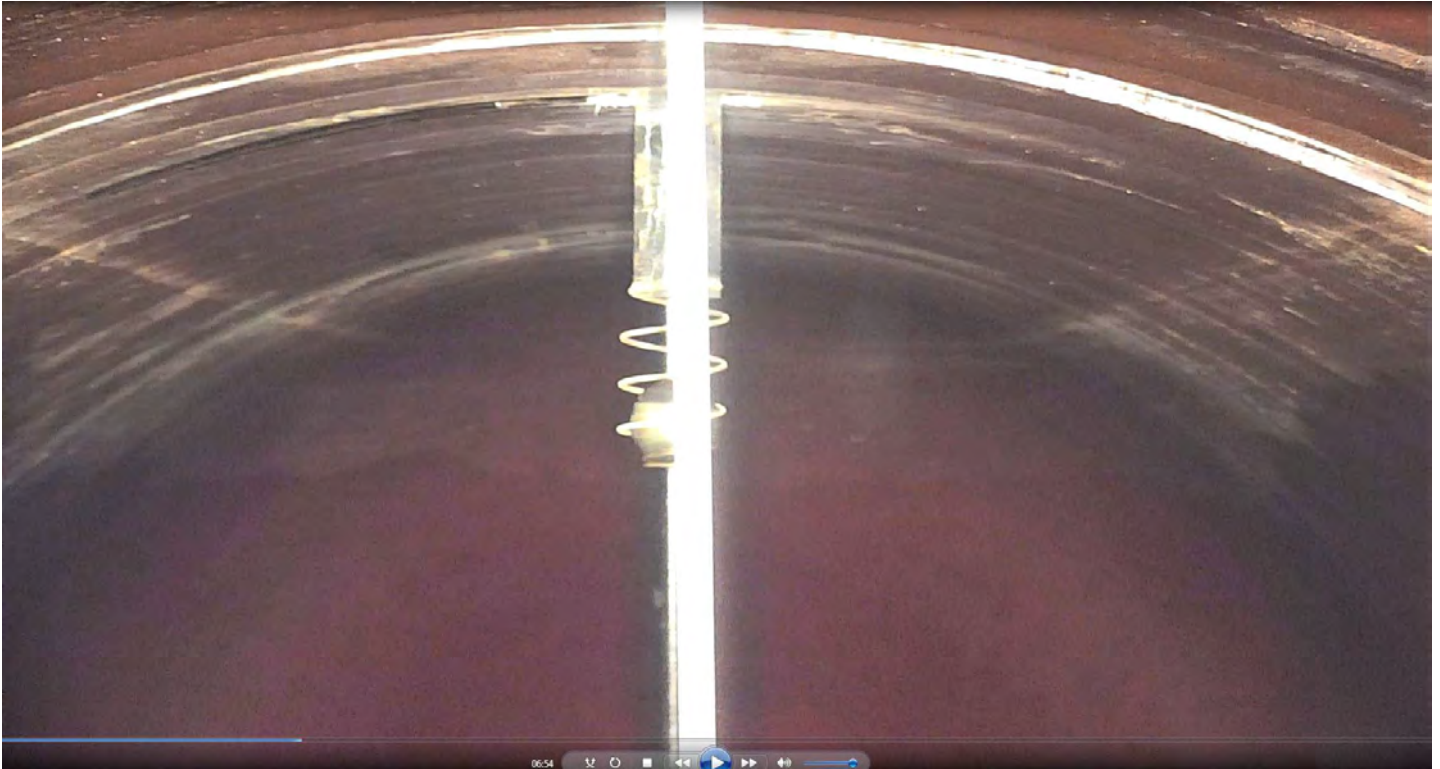


Figure 1-3: White residue on top of tank; possible oxidation or corrosion on ball float assembly (06:54)

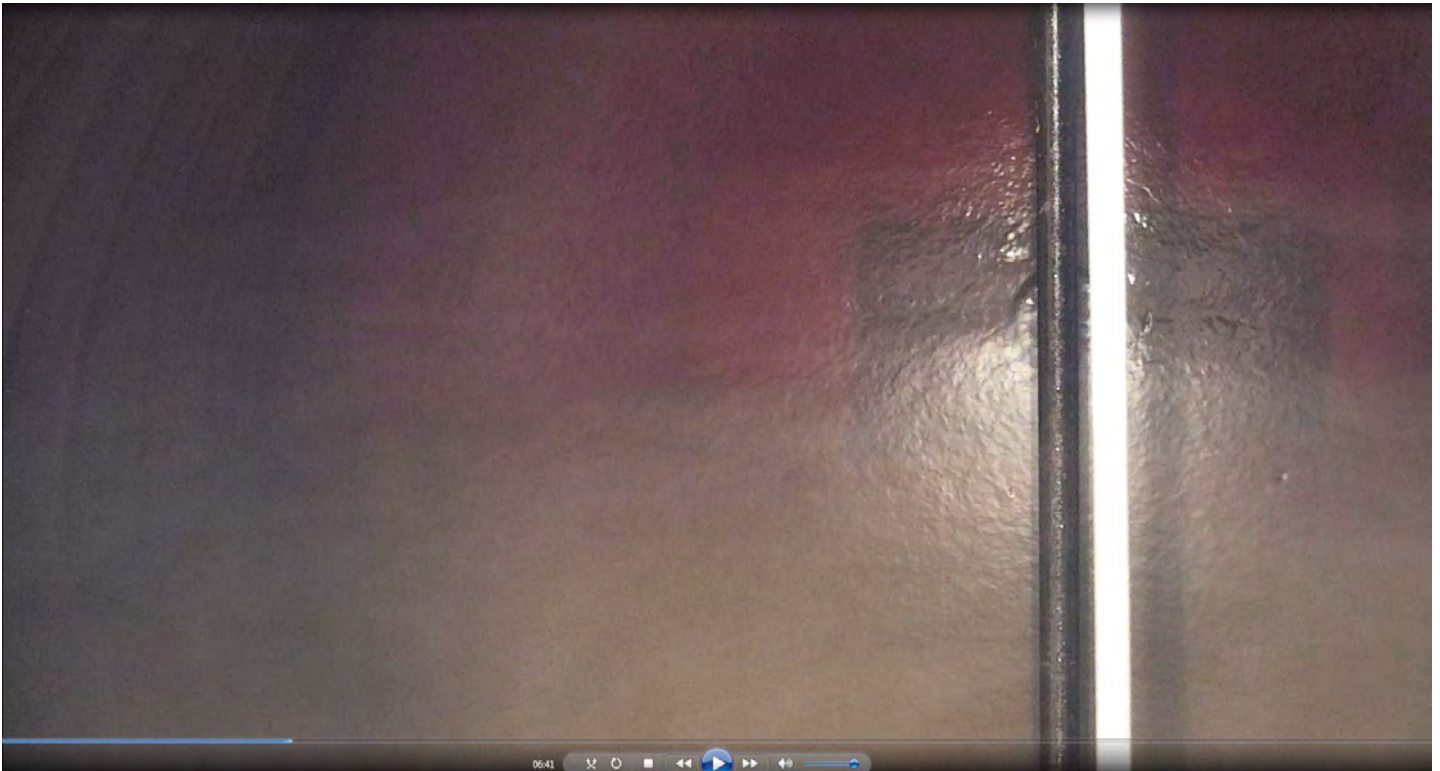


Figure 1-4: STP shaft and ATG probe (06:41)

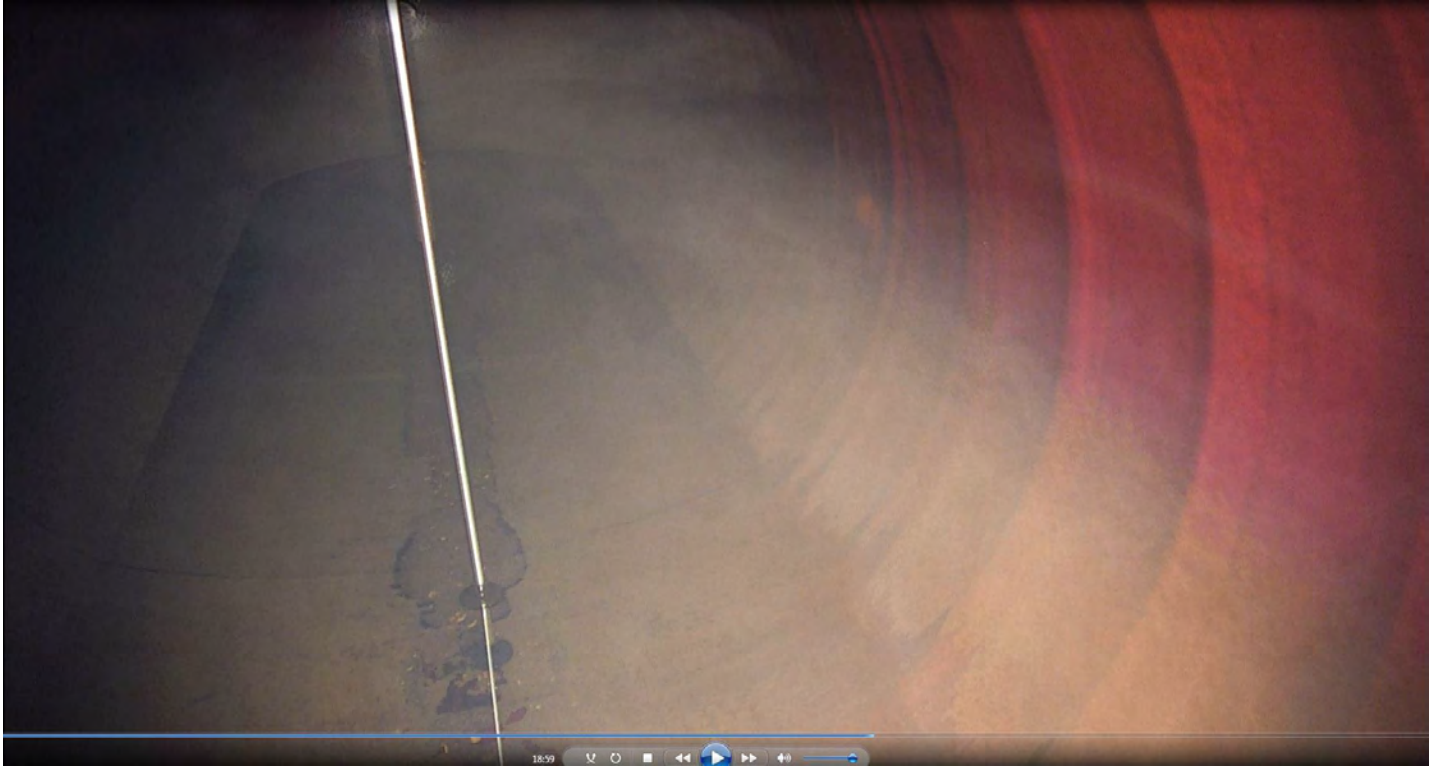


Figure 1-5: Sediment/residue on tank bottom (18:59)



Figure 1-6: Sediment/residue on tank bottom (22:20)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 1-7: Possible gravel on tank bottom (21:34)

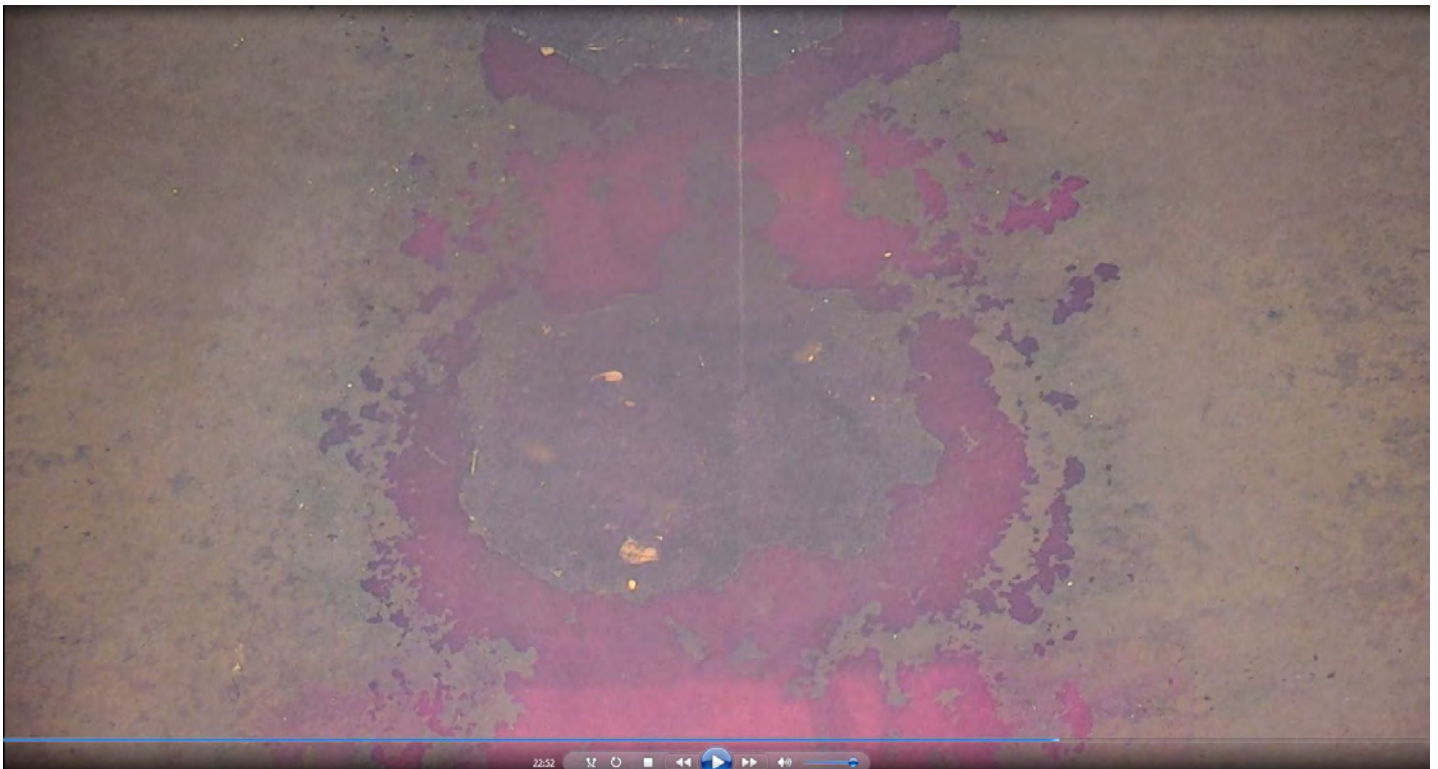


Figure 1-8: Sediment/residue on tank bottom (22:52)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.

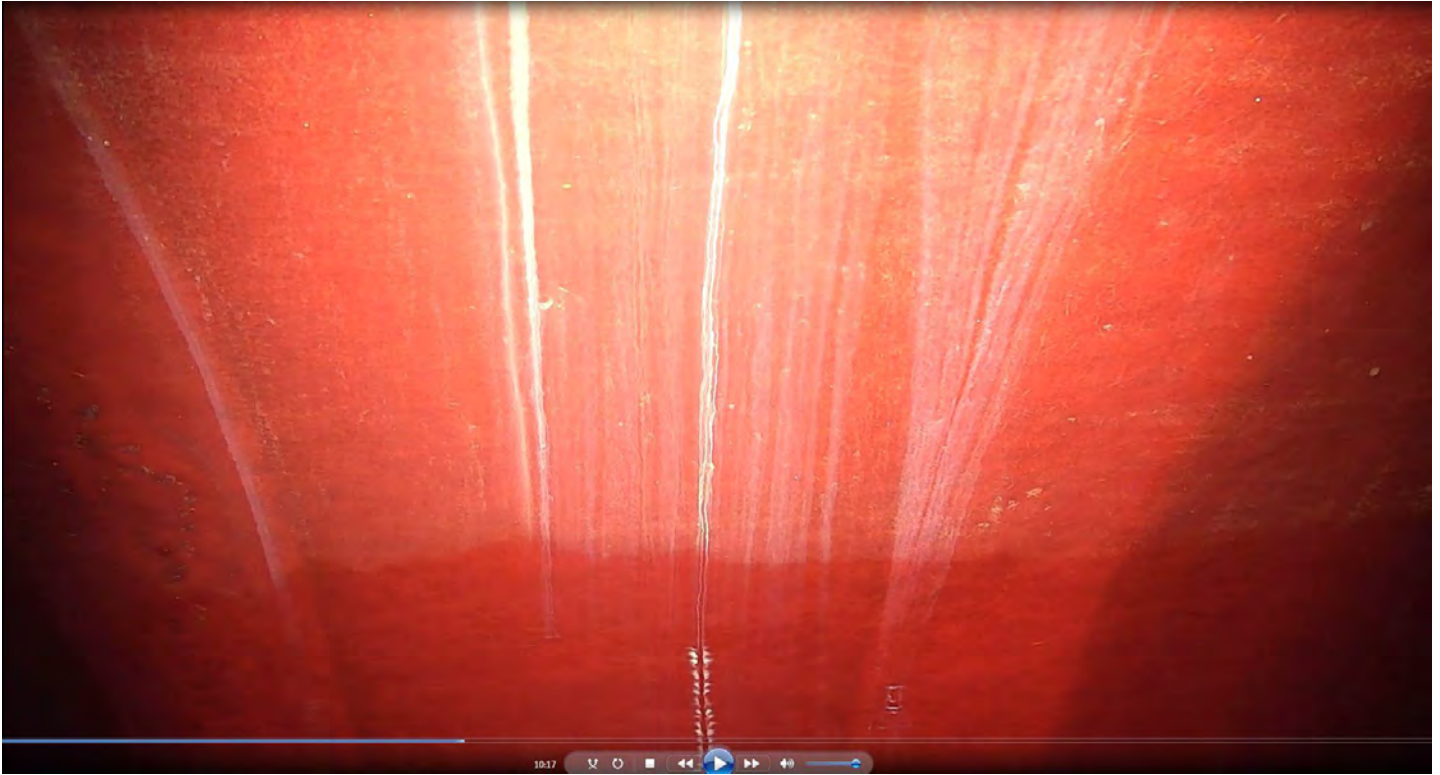


Figure 1-9: White residue staining on tank wall (10:17)

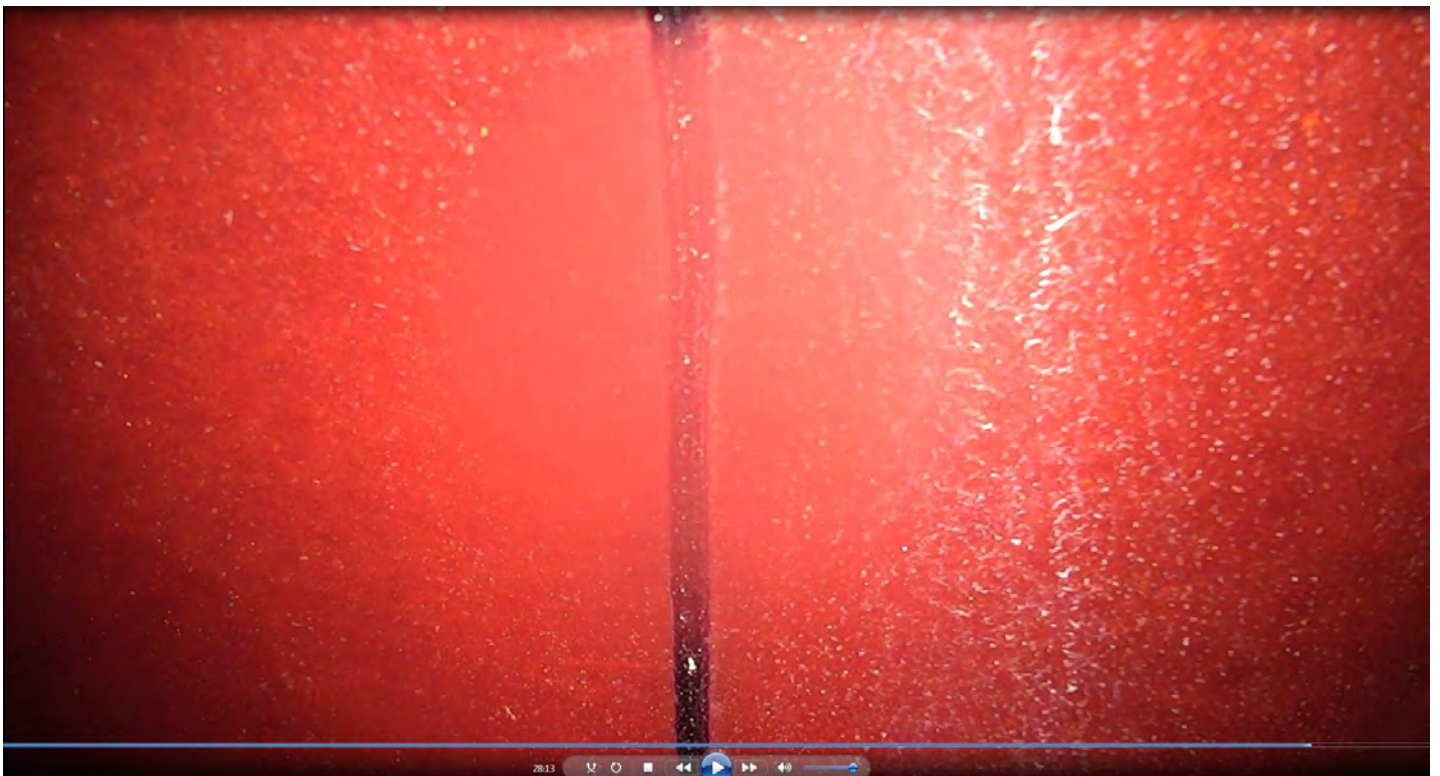


Figure 1-10: Streaking on tank wall (28:13)

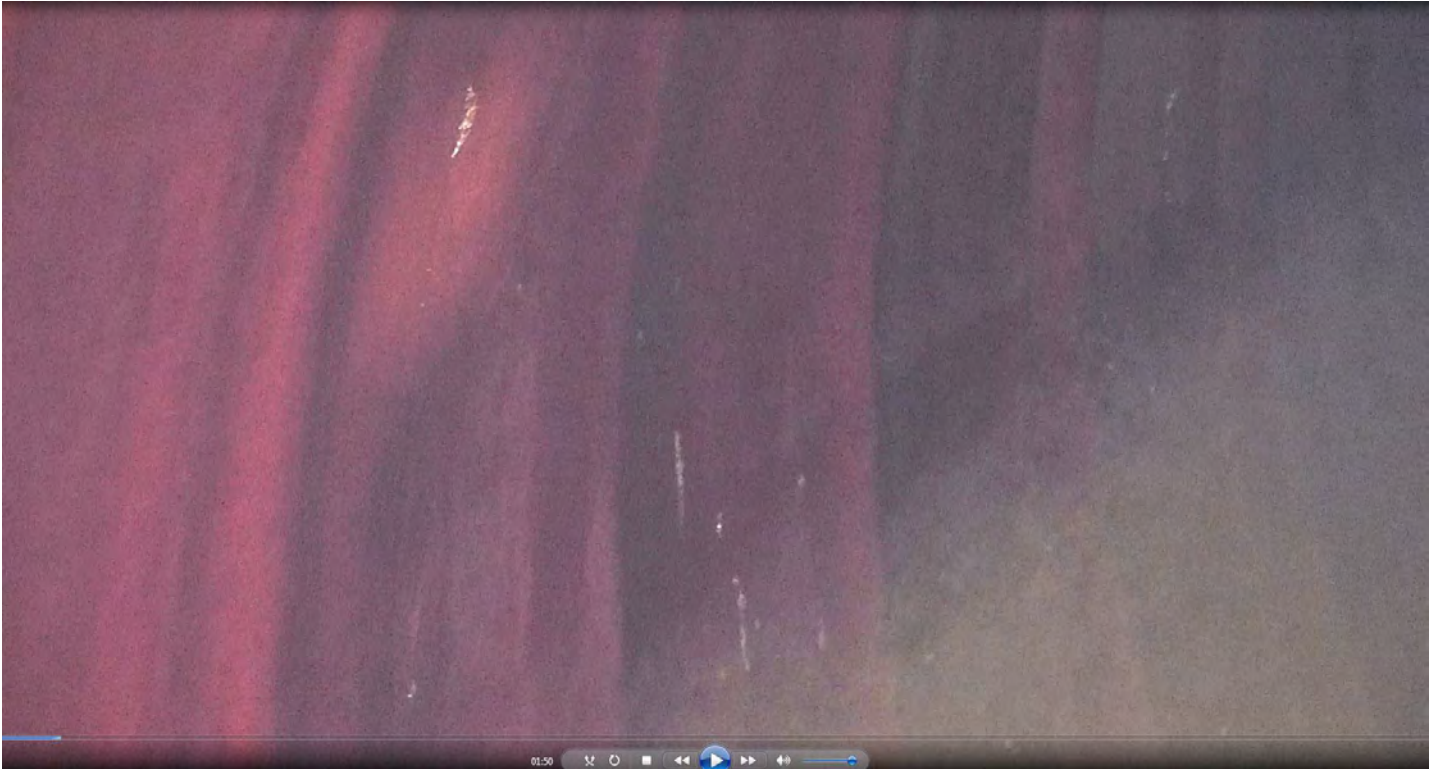


Figure 1-11: Blemishes/discoloration on tank wall (01:50)



Figure 1-12: Corrosion in bung (30:08)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



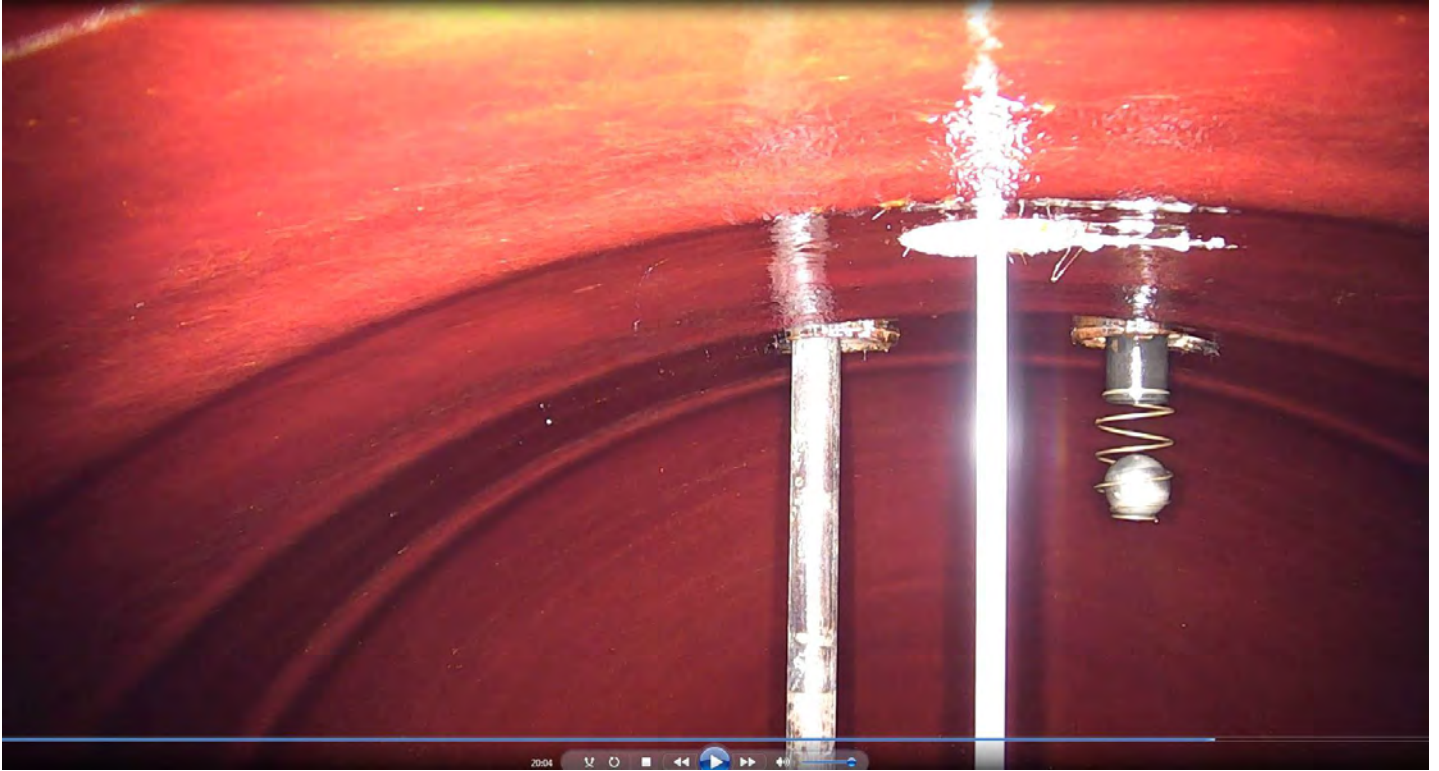


Figure 2-1: Top of tank (20:04)

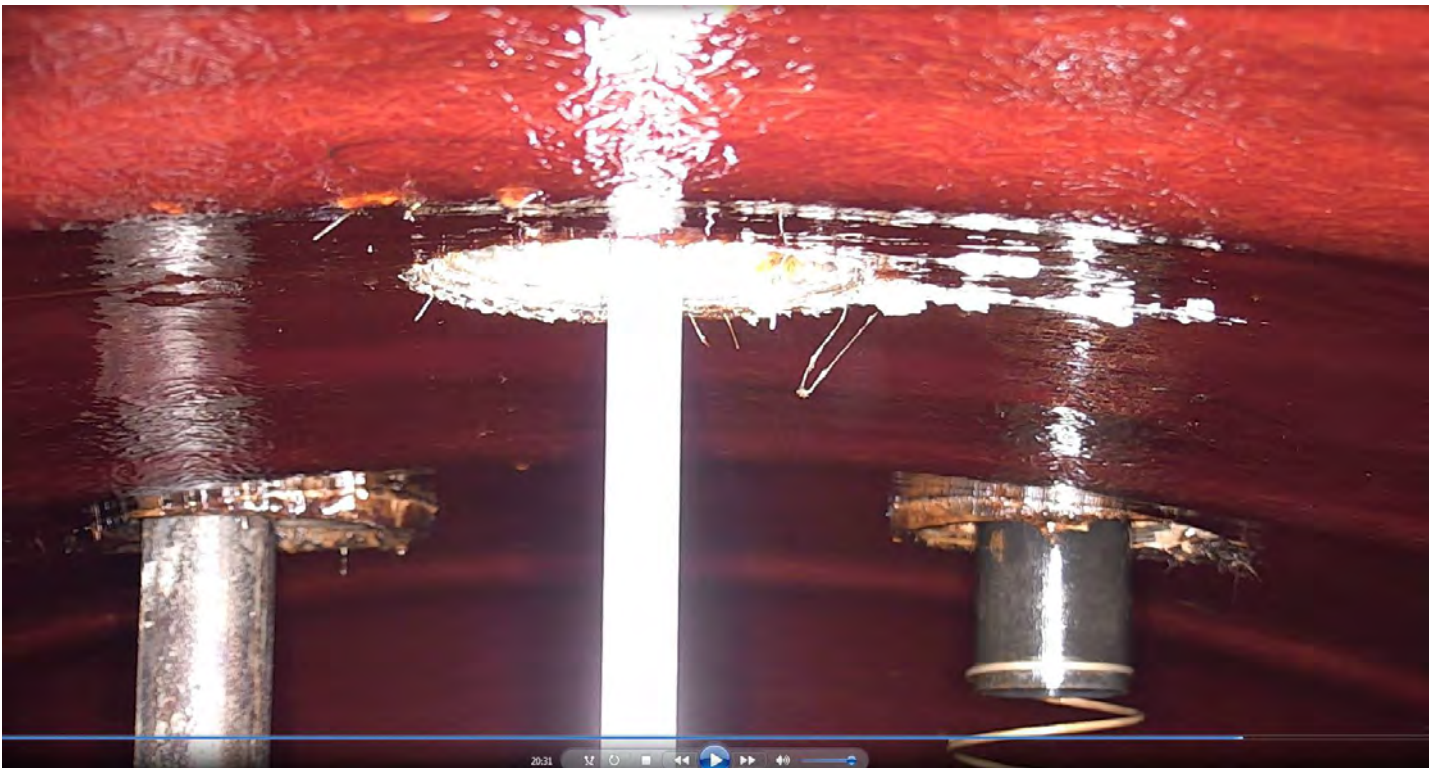


Figure 2-2: Possible corrosion on ball float bung (20:31)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 2-3: Drip falling from top of tank; possible moisture staining on end cap (03:29)

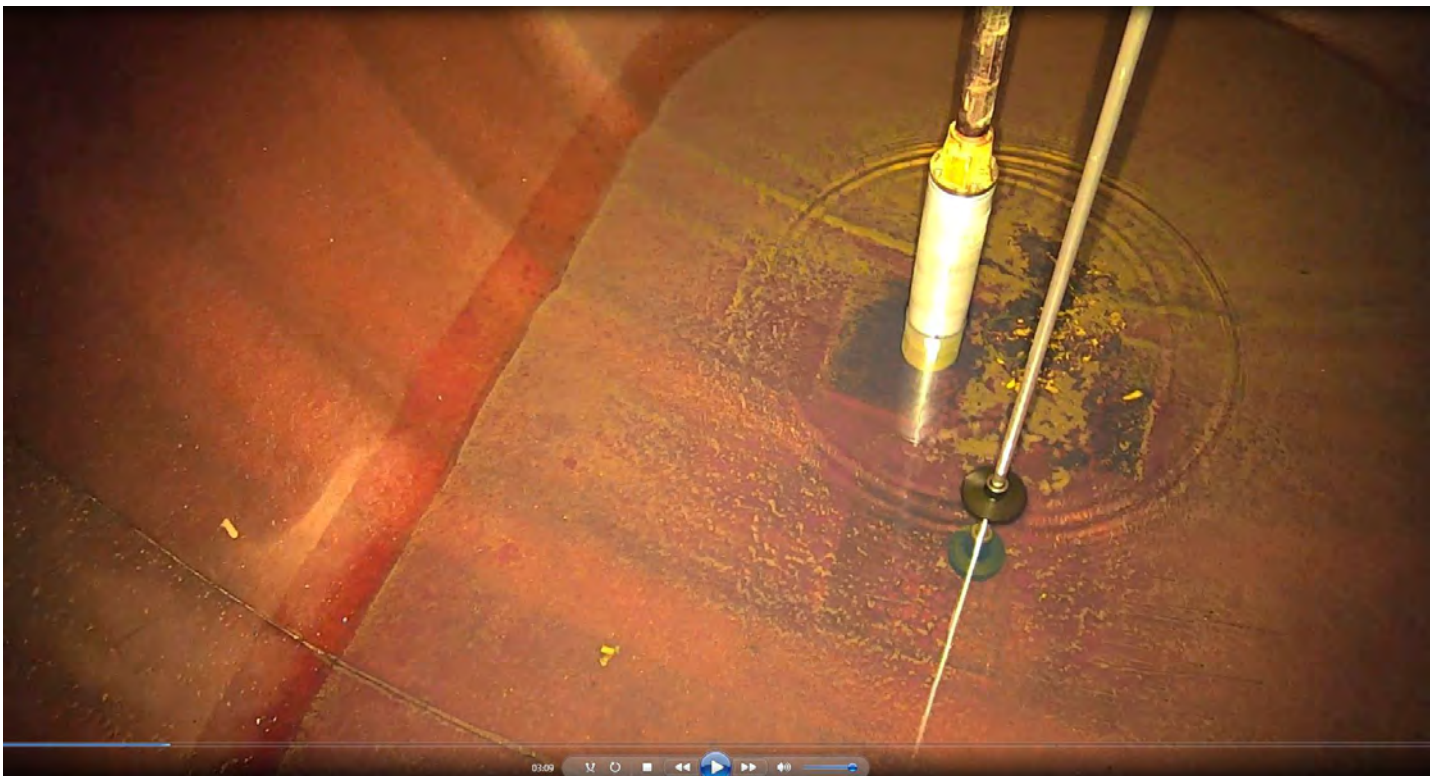


Figure 2-4: Possible oxidation on STP; debris and residue on tank bottom (03:09)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 2-5: Flaking and peeling on tank wall (10:23)

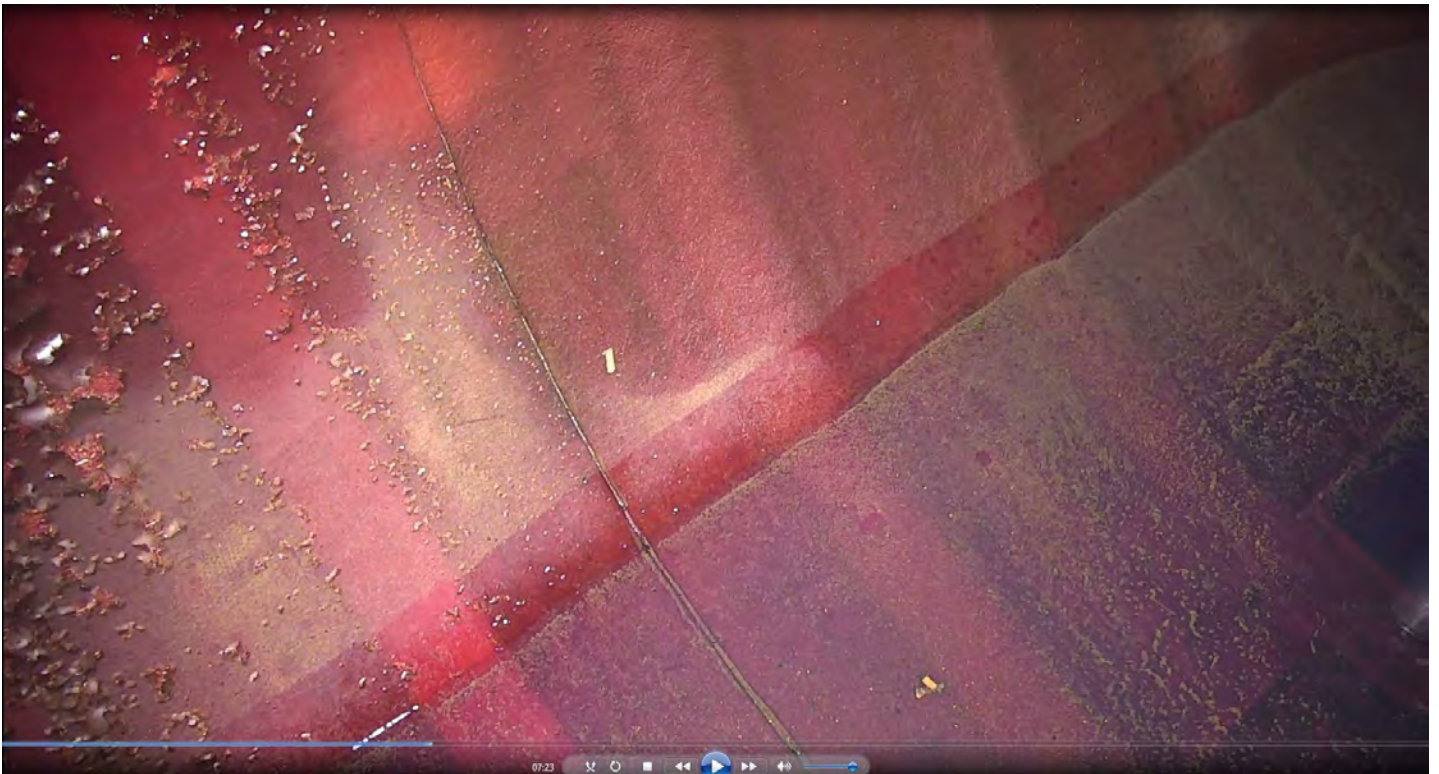


Figure 2-6: Flaking and peeling on tank wall (07:23)

These images are provided for informational purposes. Tankology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tankology Inc.



Figure 2-7: Close-up of peeling and flaking (09:36)



Figure 2-8: Flaking and peeling on tank wall (09:29)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 2-9: Flaking and peeling on top of tank (16:52)

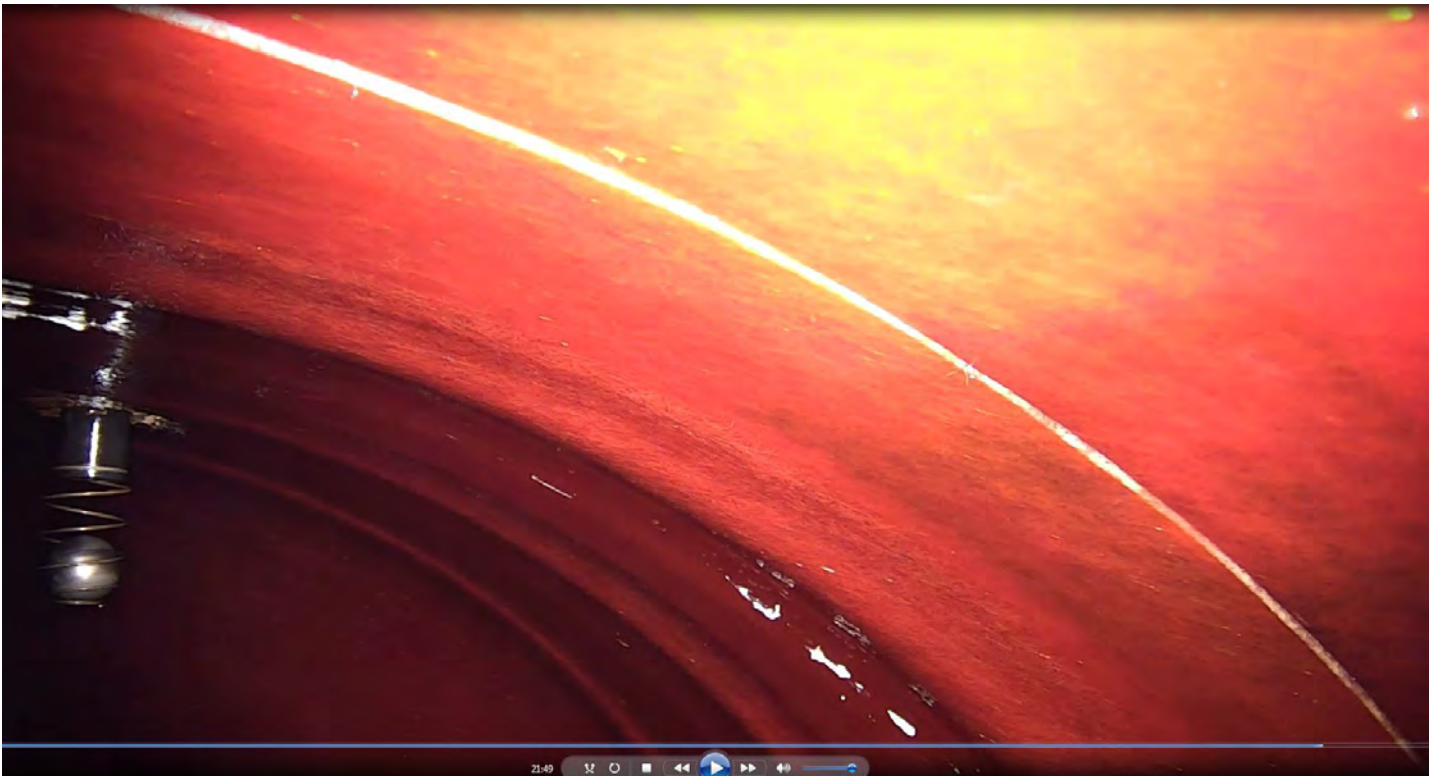


Figure 2-10: Discoloration on tank wall near seam (21:49)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.

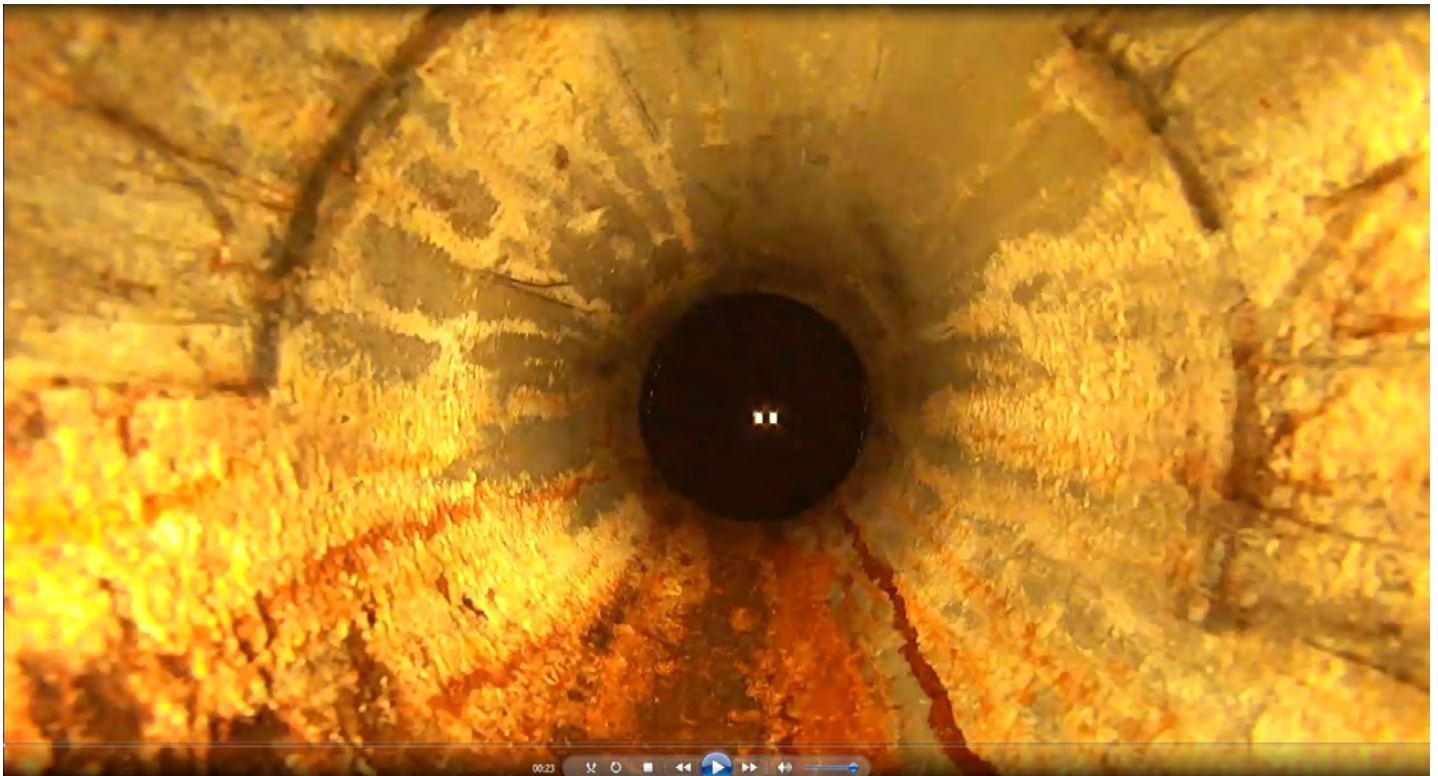


Figure 3-1: Oxidation in riser (00:23)



Figure 3-2: Sediment/residue on tank bottom (19:32)

These images are provided for informational purposes. Tankology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tankology Inc.

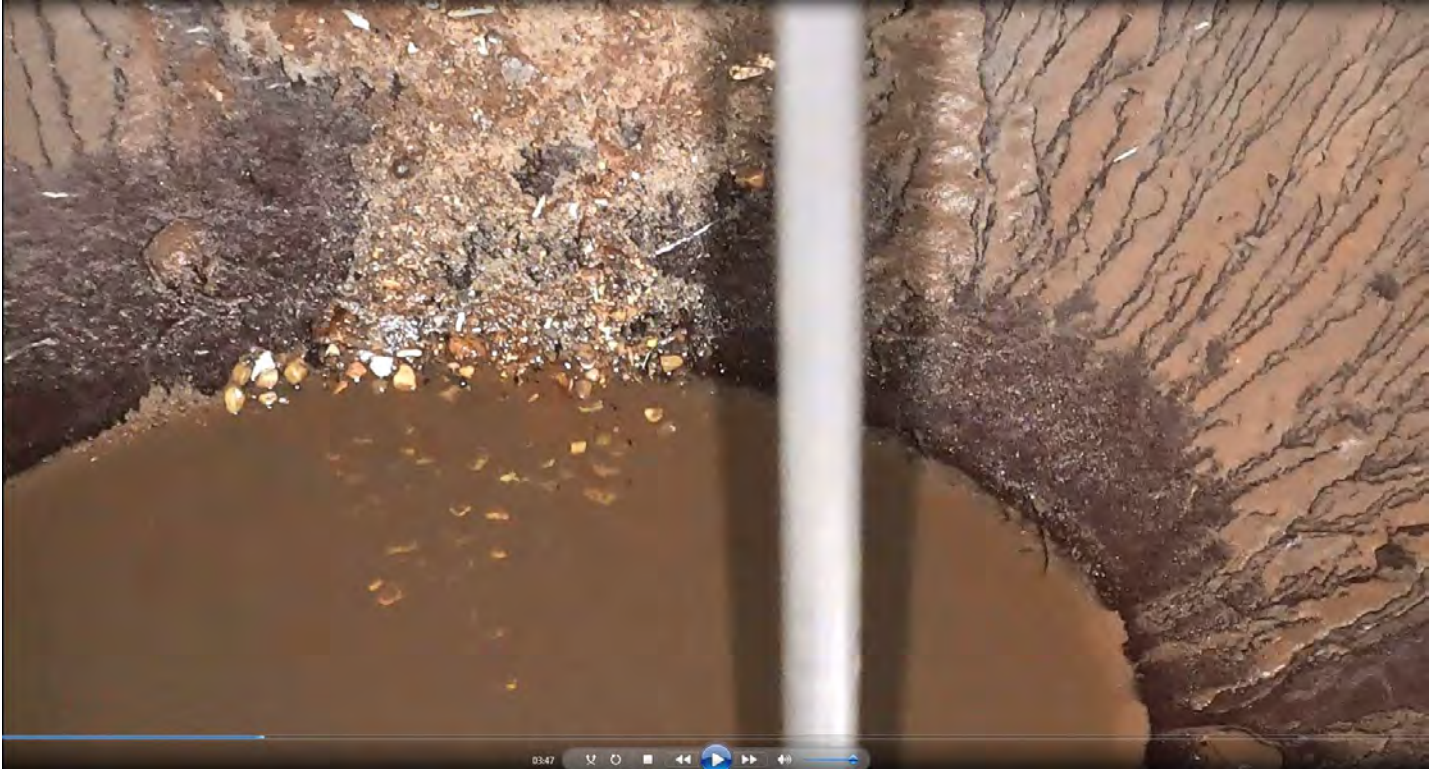


Figure 3-3: Sludge and pea gravel on tank bottom (03:47)

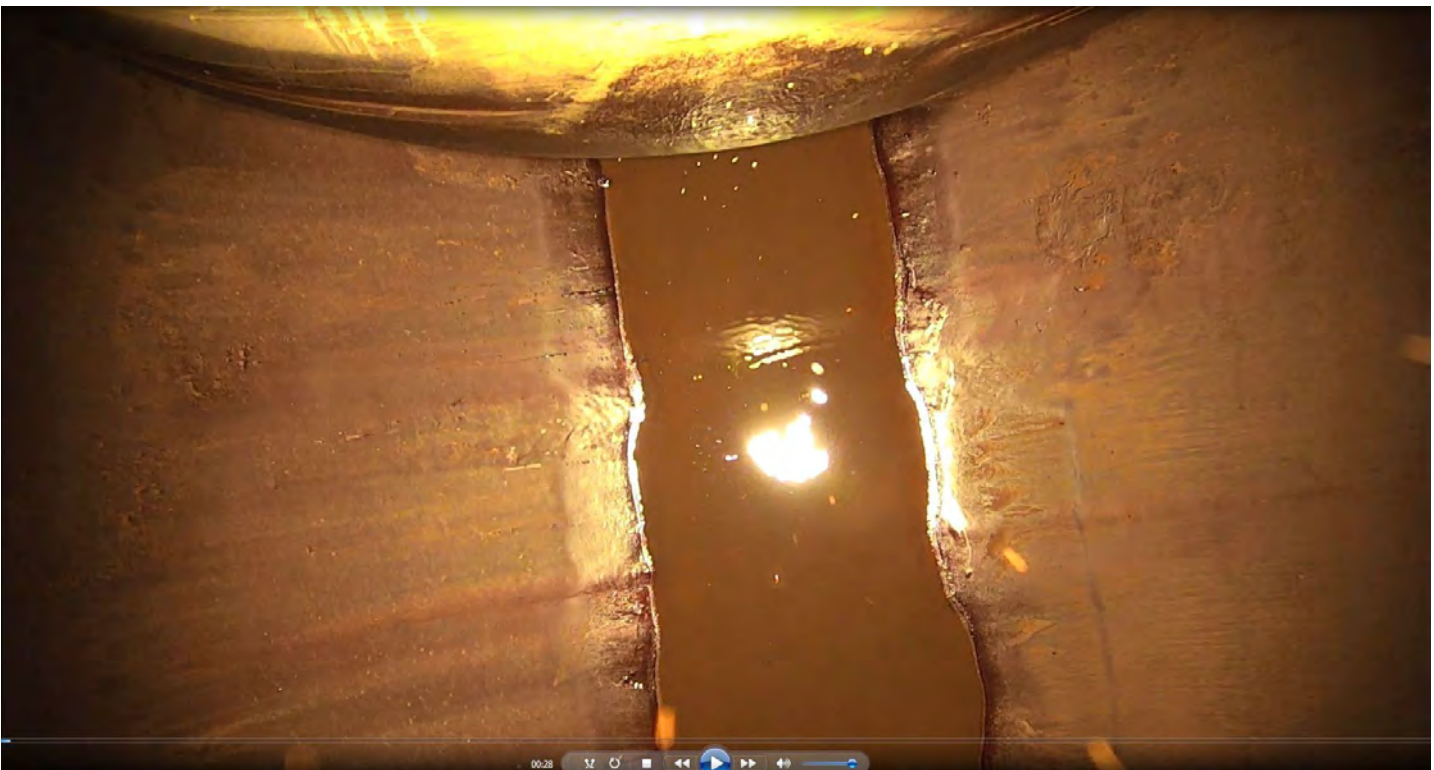


Figure 3-4: Tank bottom near end dome (00:28)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 3-5: Possible peeling on tank wall (05:23)



Figure 3-6: Possible peeling on tank wall (05:43)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.





Figure 3-7: Possible patch on tank wall (08:36)

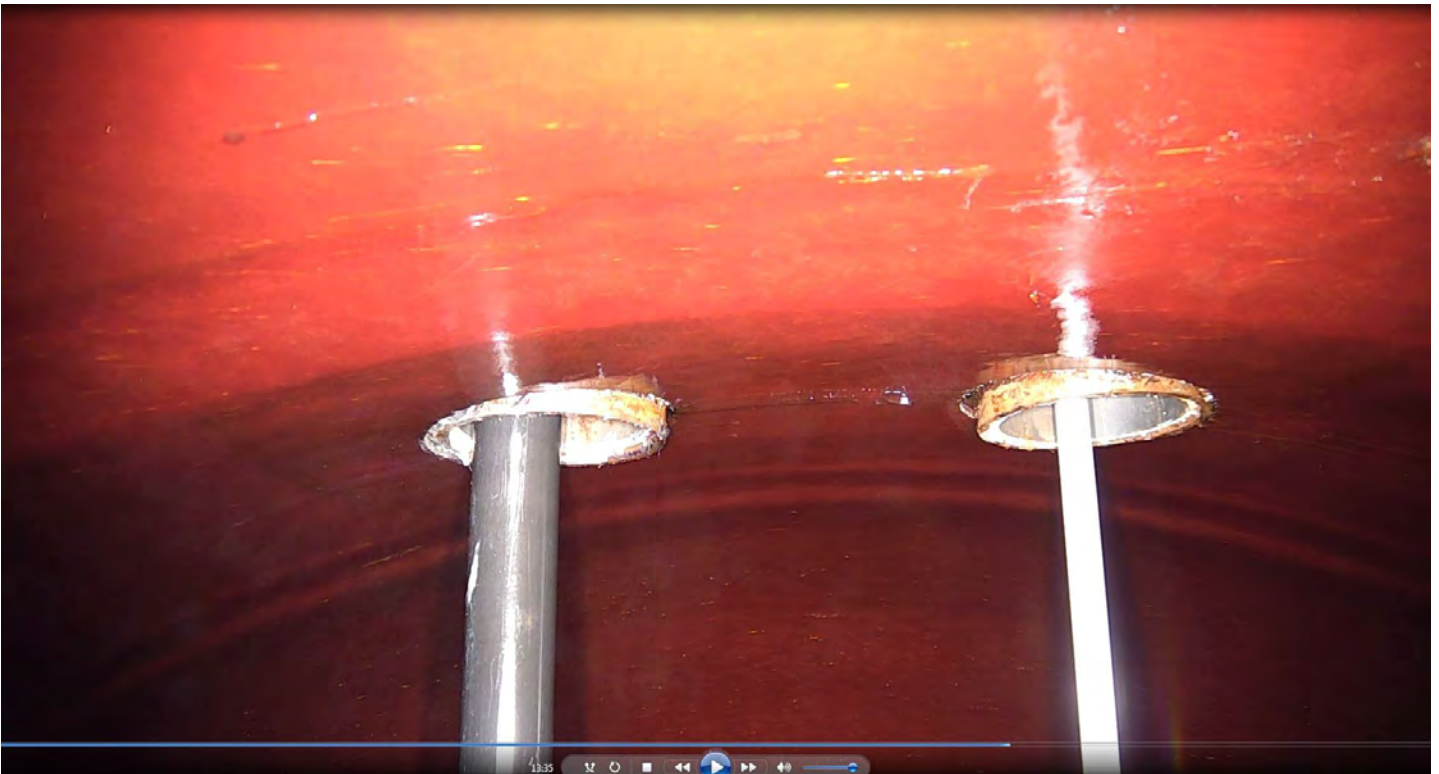


Figure 3-8: STP and ATG bungs (13:35)

These images are provided for informational purposes. Tankology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tankology Inc.



Figure 3-9: Staining on end dome; liquid drip on ball float (07:15)



Figure 3-10: Possible moisture staining next to end dome (08:05)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 3-11: Top of end dome (18:56)



Figure 3-12: Discoloration on tank wall (18:11)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 3-13: Staining on top of tank (15:57)



Figure 4-1: Tank overview (11:04)



Figure 4-2: Corrosion on ball float assembly (19:26)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 4-3: Corrosion on ball float assembly (21:42)



Figure 4-4: Corrosion in bung (21:11)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 4-5: Possible corrosion on STP shaft (10:04)

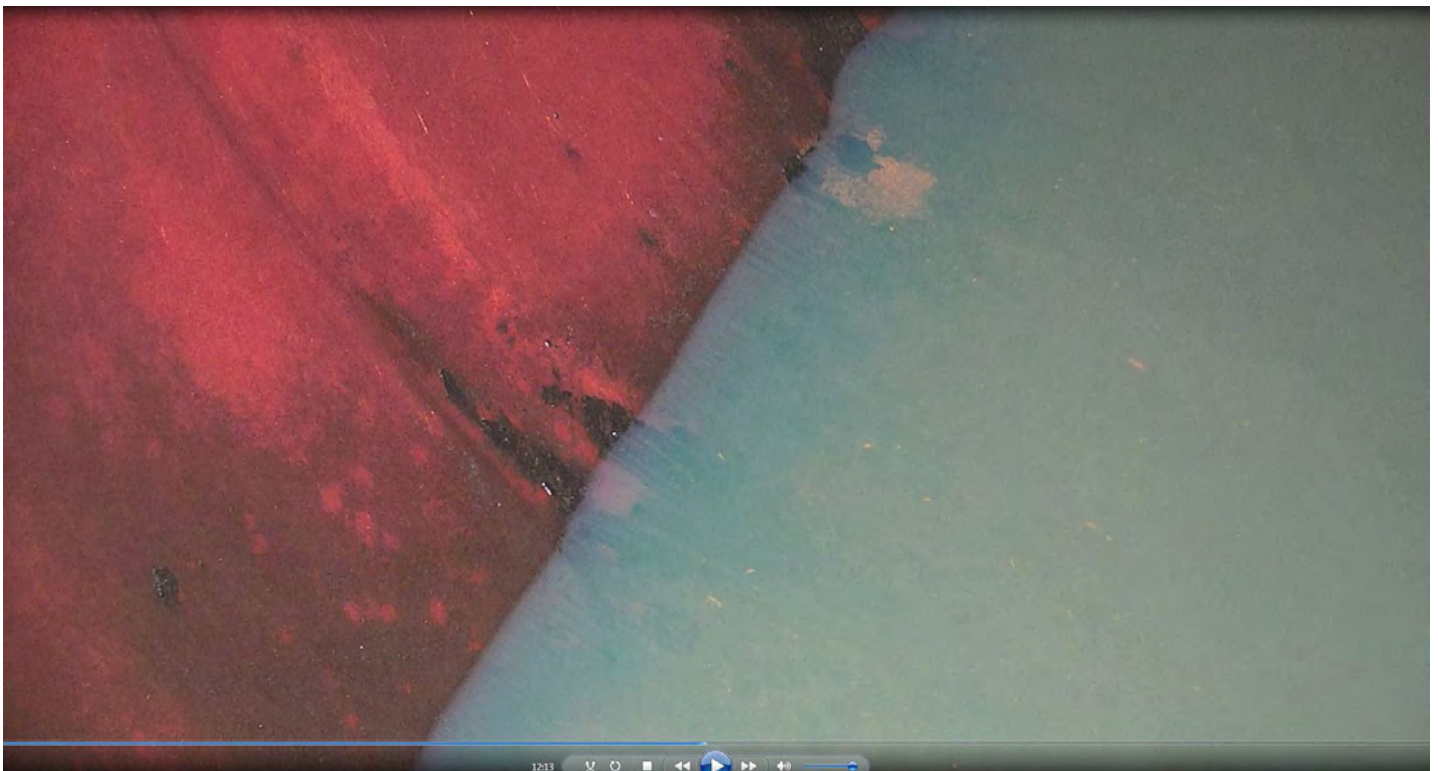


Figure 4-6: Residue build-up on tank wall (12:13)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 4-7: Possible tank seam (17:23)



Figure 4-8: Tank seam (12:59)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.





Figure 4-9: Tank seam (20:47)

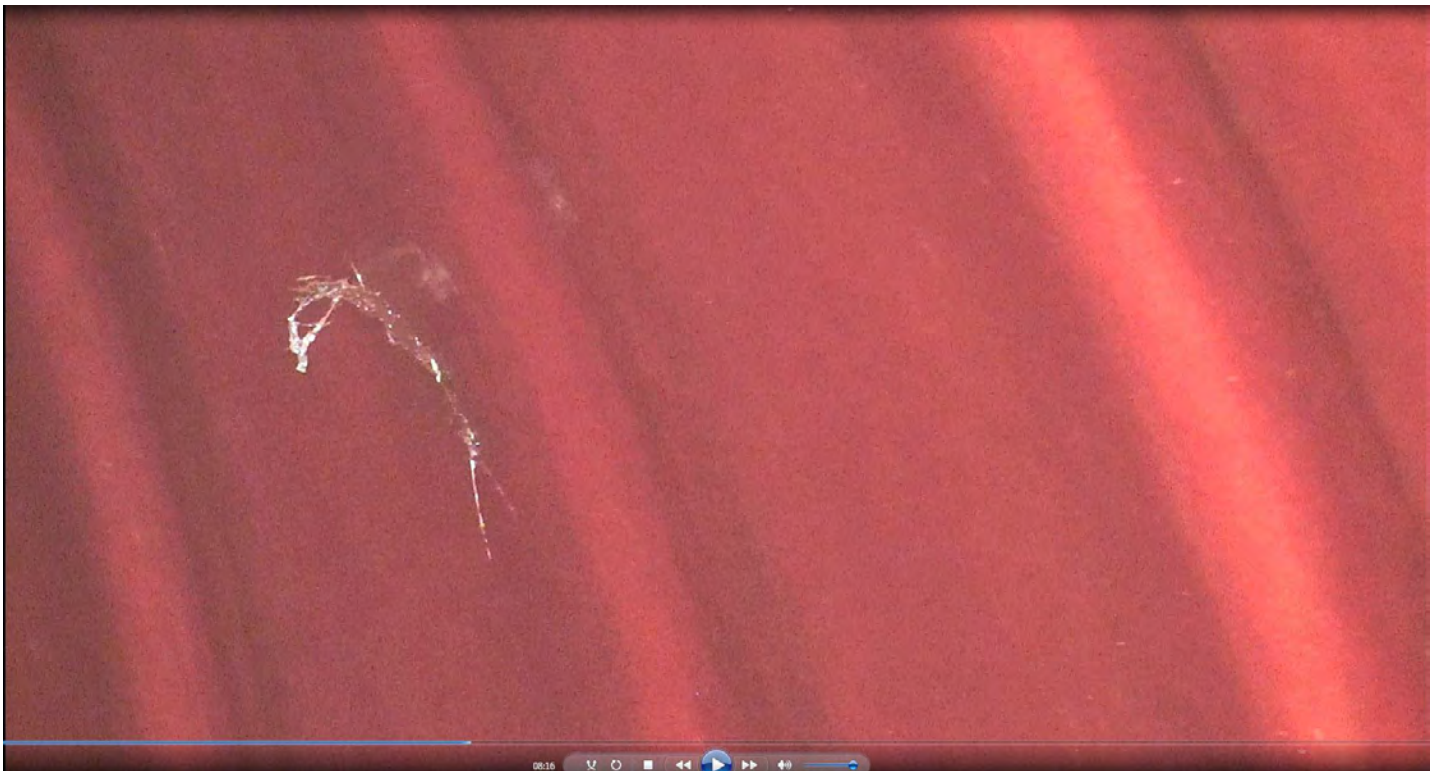


Figure 4-10: Exposed fibers on tank wall (08:16)

These images are provided for informational purposes. Tanknology makes no conclusions concerning the quality of these tanks or the extent, nature or cause of damage or degradation, if any, to these tanks. © 2017 Tanknology Inc.



Figure 4-11: Tank bottom (24:13)

**ATTACHMENT B**

Facility #: 1014986

(1) FACILITY - name and address where tanks are located:

Name: Kirkland Quick Stop

Street Address: 411 W Main

City: Kirkland County: DeKalb

A. Emergency contacts and information for a leak, spill, release, or when a alarm occurs:

A/B Operator Loretta Scholle A/B Operator/Owner John D Blake 815-693-2850

Emergency Response Contractor Trans Environmental 815-885-4840

Police 911

Fire Department 815-522-4414

B. Procedures for overfill protection during delivery of regulated substances:

Ensure Delivery Will Fit and All Alarms are Functioning Properly

Delivery Personnel are to remain in the area and observe the entire fuel delivery

C. Operation of emergency shut-off systems:

Large Spills

Dispenser Hit and Knocked Loose

In Case of Fire

D. Appropriate responses to all alarms:

Write Down Information in The Alarm Log and Call A/B Operator

E. Reporting of leaks, spills and releases:

Report All Leaks or Spills to An A/B Operator

F. Site-specific emergency procedures, if any:

Protect All Storm Sewers in Case Of A Spill With The Spill Kit

## Kirkland Quick Stop Emergency Contact List

Class A/B Operator (Manager)	Loretta Scholle	815-520-6879 (Cell)
Class A/B Operator (Owner)	John Blake	815-693-2850 (Cell)
Class A/B Operator H. Lee & Sons)	Dan Leisch	815-332-4966
Emergency Response Contractor	Trans Environmental	815-885-4840
Police		911
Fire Department	Kirkland	815-522-4414
Illinois Emergency Response Center		800-762-7860

## Kirkland Quick Stop C Operator Instructions

1. Insure all fueling customers
  - A. Turn off Vehicle
  - B. Stay at nozzle, do not re-enter vehicle
  - C. NO SMOKING
2. Record all warning alarms (Yellow) in the alarm log and monitor alarm
3. Emergency alarms (Red)
  - A. Silence Alarm
  - B. Write down the alarm Information in the alarm log
  - C. Contact an A/B Operator
4. Report all Spills to A/B Operator
  - A. Small Spills (Less than 25 Gallons)
    1. Turn pumps off at effected lanes
    2. Bag nozzles and place cones in lanes
    3. Use spill kit to clean up
    4. Place used clean up materials in the onsite hazardous waste container
  - B. Large spills
    1. Press in E Stop
    2. Call 911
    3. Call A/B Operator
    4. Clear all people
    5. Use spill kit to protect storm sewers
      - A. Storm sewer at NE corner of lot
      - B. Storm sewers located at curbs on south side of lot
5. Dispenser hit and knocked loose
  - A. Press in E Stop
  - B. Call 911
  - C. Call A/B Operator
  - D. Block off Lanes
  - E. Clean up any Spills
6. In Case of Fire
  - A. Press in E Stop
  - B. Call 911
  - C. Locate fire extinguisher and use PASS system on fire
  - D. Clear all people
  - E. Call A/B Operator

Dated 4-19-2017



**✓ Correct Filling Checklist**

<p><b>What To Do Before Your USTs Are Filled</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Post clear signs that alert delivery persons to the overfill devices and alarms in use at your facility.</li> <li><input type="checkbox"/> Make and record accurate readings for product and water in the tank before fuel delivery.</li> <li><input type="checkbox"/> Order only the quantity of fuel that will fit into 90% of the tank.</li> </ul> <p><b>Remember, the formula for determining the maximum amount of gasoline to order is:</b></p> <p>(Tank capacity in gallons X 90%) — Product currently in tank = Maximum amount of fuel to order</p> <p><b>Example:</b> (10,000 gal X 0.9) — 2,000 gal = 7,000 gal maximum amount to order</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Ensure fuel delivery personnel know the type of overfill device present at the tank and what actions to perform if it activates. For example, use sample sign on page 27 of this chapter.</li> <li><input type="checkbox"/> Review and understand the spill response procedures.</li> <li><input type="checkbox"/> Verify that your spill bucket is empty, clean, and will contain spills.</li> </ul>
<p><b>What To Do While Your USTs Are Being Filled</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Keep fill ports locked until the fuel delivery person requests access.</li> <li><input type="checkbox"/> Have an accurate tank capacity chart available for the fuel delivery person.</li> <li><input type="checkbox"/> The fuel delivery person makes all hook-ups. The person responsible for monitoring the delivery should remain attentive and observe the entire fuel delivery, be prepared to stop the flow of fuel from the truck to the UST at any time, and respond to any unusual condition, leak, or spill which may occur during delivery.</li> <li><input type="checkbox"/> Have response supplies readily available for use in case a spill or overfill occurs (see Section 3).</li> <li><input type="checkbox"/> Provide safety barriers around the fueling zone.</li> <li><input type="checkbox"/> Make sure there is adequate lighting around the fueling zone.</li> </ul>
<p><b>What To Do After Your USTs Are Filled</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Following complete delivery, the fuel delivery person is responsible for disconnecting all hook-ups.</li> <li><input type="checkbox"/> Return spill response kit and safety barriers to proper storage locations.</li> <li><input type="checkbox"/> Make and record accurate readings for product and water in the tank after fuel delivery.</li> <li><input type="checkbox"/> Verify the amount of fuel received.</li> <li><input type="checkbox"/> Make sure fill ports are properly secured.</li> <li><input type="checkbox"/> Ensure the spill bucket is free of product and clean up any small spills.</li> </ul>

UNDERGROUND STORAGE TANK  
OPERATIONS AND MAINTENANCE PLAN TEMPLATE

**Plan Purpose & Signatures Page:**

The purpose of an Operations & Maintenance Plan (O&M Plan) is to assist owners and employees operate and maintain a facility with an Underground Storage Tank (UST) by providing a document which incorporates the following 3 components:

1. An outline for all inspections, testing & maintenance that shall be performed at the facility, **specific to the facility's operations**, with the defined intervals at which the activities shall be performed.
2. Directions on how to control and clean up routine releases or spills of regulated product at a facility, including:
  - a. instructions for handling and collecting spilled or released product,
  - b. where and how contaminated debris will be safely stored,
  - c. how contaminated debris will be properly disposed of.These directions should include what equipment is to be used, where the equipment is stored, how equipment is replaced, and who the environmental contractor is, with their contact information.
3. Emergency Response Procedures, as defined in our regulations.

All operations, maintenance and inspections activities shall comply with the Illinois Office of the State Fire Marshal (OSFM) Division of Petroleum & Chemical Safety (P&CS) rules and regulations. General information about OSFM UST requirements can be found at the OSFM website: [www.sfm.illinois.gov](http://www.sfm.illinois.gov).

Specifics of the regulations as they apply to the O&M Plan can be found at:  
41 Illinois Administrative Code, Part 176.655(b)(2)(A-C)


Specifics on Part 3 of the O&M Plan, the Emergency Response Procedures, are at:  
41 Illinois Administrative Code, Part 176.645(b)(1)(A-E)

**SIGNATURE of OWNER:**

  
\_\_\_\_\_

DATE: 02/06/2018

**SIGNATURE of A/B OPERATOR:**

  
\_\_\_\_\_

DATE: 02/06/2018



UNDERGROUND STORAGE TANK  
OPERATIONS AND MAINTENANCE PLAN TEMPLATE

**Facility General Information Page:**

Facility Number: 1014986

Facility Address: 411 W Main St  
Kirkland, Illinois 60146

Facility Phone Number: 815-522-3510

**Class A/B Operator List:**

Name: John D Blake Emergency contact # 815-693-2850

Name: Loretta Scholle Emergency contact # 815-520-6879

Owner Contact Information: Blake Leasing Co, LLC - Real Estate Series 815-693-2850

**UST Contractors Contact Information:**

- OSFM Licensed UST Contractor: Howard Lee & Sons
- Contact #: 815-332-4966
- OSFM Licensed UST Contractor: Stenstrom Petroleum
- Contact #: 815-398-6250

**Other Contacts as needed:**

- Illinois Emergency Response Center 800-762-7860
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

**Local Emergency Contact Numbers:**

- Fire (local number if 911 service not available): 815-522-4414
- EMS (local number if 911 service not available): 911
- Police (local number if 911 service not available): 911

**Emergency Stop Switch Locations:**

- Sales Counter Beneath POS System
- Northwest Corner Of Carwash

UNDERGROUND STORAGE TANK  
OPERATIONS AND MAINTENANCE PLAN TEMPLATE

**OPERATIONS & MAINTENANCE PLAN, Part 1:**

**Inspection and Maintenance with Required Intervals:**

Equipment at this facility needs to be inspected, checked, tested and maintained, often at defined intervals. Below are sections for daily, weekly, monthly, quarterly, annual and other inspections/tests/maintenance. **Common examples are given, but those specific to this facility must be listed under each time interval section.** More information can be obtained from your UST contractor.

**Daily:**

On a daily basis the manager or assigned employee will check the automatic tank gauge (ATG) to ensure power is on, and check for any alarms pertaining to the monitoring of the UST. Follow up on any ATG alarm & report the Unusual Condition to the A/B Operator. Check fire extinguishers for pressure and expiration dates. If it applies, check speaker system operation. Inspect spill buckets for damage, debris or liquids; electrical boxes; sump lid(s) for damage.

Daily Items to be checked at this facility:

1. **ATG Power On**
2. **Alarms Checked & Unusual Conditions Noted**
3. Check Spill Buckets For Liquid and Keep Clean
4. Check Drive Area For Spills
5. Check Hoses, Breakaways, Swivels & Nozzles
6. Check Manhole Lids & Ensure Fill Caps Are Secure
7. Check Electrical Box & Ensure It Is Not Blocked
8. Inspect Replaced Components For Bacteria
9. Maintain Record Of Replaced Components

UNDERGROUND STORAGE TANK  
OPERATIONS AND MAINTENANCE PLAN TEMPLATE

**Weekly:**

Weekly UST inspections will be completed and may cover items such as inspections of dispensers, nozzles, sumps and ATG Monitoring Equipment.

Weekly Items to be checked at this facility:

1. All Daily Items
2. Check For Water In Tanks
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_

**Monthly:**

Monthly UST inspections will be completed and may also cover items such as Spill Kits and Emergency Shut Offs. If it applies, Vapor/Groundwater Monitoring Wells will be checked and the Monthly Log completed. If it applies, operation of the Impressed Current rectifier will be checked, and the monthly log report completed and saved in the facility folder. Interstitial Sensors must be checked, and the box initialed in the correct month on the Quarterly Equipment Inspection Checklist Report. A "PASSING" tank test from the ATG must be printed and saved, which will include, if it applies, "tank test" and "all sensors normal" status.

Monthly items to be checked at this facility:

1. ATG "PASS" test printed and saved
2. Liquid Status Report Printed And Saved
3. Check And Maintain 30 Daily Inspections
4. Check Spill Kit For Completeness
5. Check Fire Extinguishers

UNDERGROUND STORAGE TANK  
OPERATIONS AND MAINTENANCE PLAN TEMPLATE

**Quarterly:**

A quarterly inspection **must be conducted personally by the designated A/B operator assigned to this site**, and the Quarterly Equipment Inspection Checklist Report must be completed and signed by that same individual. This report will be kept for two years along with other facility records, and must be available for the OSFM inspector to inspect upon request or within 30 minutes.

Quarterly items to be checked at this facility:

1. **Quarterly Equipment Inspection Checklist Report completed.**
2. Howard Lee & Sons Contracted to do Quarterly Inspections

**Annual:**

Annual testing\*(see p. 6) may include but not be limited to: Tank/Line Precision Test; Line Leak Detection Test; Tank/Line Interstitial Sensors Test; Impressed Current Test, as applies to the facility. Sacrificial Anodes if last test was <-875 mV & >-850 mV. Emergency Shut Offs will be tested, Shear Valves inspected, and the signed annual Financial Responsibility Statement must be mailed to the OSFM.

OSFM licensed UST contractor who will conduct annual Tank/Line tests:

Tanknology INC

Tests Due: 10 / 23 / 2018.

OSFM licensed CP contractor who will conduct annual Impressed Current test:

\_\_\_\_\_

Test Due: \_\_\_\_ / \_\_\_\_ / 20\_\_\_\_.

Annual items to be checked at this facility:

1. **Emergency Shut Off Switches tested & report completed & saved.**
2. **Shear Valves inspected and checked to insure secure mounting.**
3. **OSFM Financial Responsibility Form must be mailed to the office.**
4. Fire Alarm Inspection & Security Testing Report
5. Review 5 Year Tank Tightness Test
6. Maintain 2 Years Quarterly Reports
7. Replace Pump Filters And Check For Bacteria, Debris and Fibers

UNDERGROUND STORAGE TANK  
OPERATIONS AND MAINTENANCE PLAN TEMPLATE

**Three Years:**

Vapor Monitoring Device Test, if it applies\*; Sacrificial Anode Test, if it applies.\* Sacrificial Anodes will be tested every three years if they show a reading of -875 millivolts or better, where "better" means a larger negative value. NOTE: In the event that a reading of -875 mV or lesser negative value is recorded with testing being conducted above the structure, on any type of corrosion protection system, then **annual testing** will be required thereafter as long as the system does not fall below -850 mV. Readings below -850 mV constitute a FAILED Test. OSFM must be notified, and your CP contractor must be contacted for repairs/replacement.

Vapor Monitoring Device Test, if it applies:                      Test Due: \_\_\_\_/\_\_\_\_/20\_\_\_\_.

Triennial Sacrificial Anode Test, if it applies:                      Test Due: \_\_\_\_/\_\_\_\_/20\_\_\_\_.

**\*Note:** Report any FAILED test to OSFM within 3 working days. Print and complete the form at our website for most annual tests: [Failed Test Results Report \[PDF, 1.4MB\]](#), and mail it to P&CS at the OSFM. This applies to: Tank/Line Precision Test, Cathodic Protection Test, Line Leak Detection Test, & Interstitial Monitoring Sensor Test.

All equipment testing must be performed by an OSFM licensed contractor, licensed in the module appropriate for the test being performed. **Emergency Stop Switch test and documentation is the exception, and may be done by the facility owner/operator.**

**Five Years:**

Internal Lining inspections, if it applies. Lining inspections for tanks will be five years after the tanks were lined, and the tanks will be inspected every five years thereafter. Results & data from a PASS lining inspection shall be submitted to OSFM within 10 days of the lining inspection.

Tanks failing to pass the lining inspection criteria will not be allowed to be touched up, repaired, totally relined or put back in use and shall be decommissioned immediately and removed within 60 days after the lining inspection. Results & data from a FAIL lining inspection shall be submitted to OSFM within 3 days of the lining inspection.

5 Year Internal Lining Inspection, if it applies:                      Test Due: \_\_\_\_/\_\_\_\_/20\_\_\_\_.

UNDERGROUND STORAGE TANK  
OPERATIONS AND MAINTENANCE PLAN TEMPLATE

**OPERATIONS & MAINTENANCE PLAN, Part 2:**

**Handling, Storage and Disposal of Regulated Waste Generated at Facility:**

Your facility should be equipped with a fuel spill kit. The kit may include:

- Personal Protective Equipment (PPE) including: eye/face protection, chemical-resistant nitrile gloves, clothing/shoe protection.
- Warning equipment to isolate a spill area or equipment, such as traffic cones, safety tape, nozzle bags.
- Clean absorbent materials in bags or cans, such as oil dry compound.
- Absorbent pads to soak up spills, and absorbent booms to control/contain fuel, especially if it is flowing toward an environmentally sensitive receptor.
- Safe non-sparking tools, such as a plastic dust pan or plastic scoop shovel, whisk broom, push broom, a hand pump for evacuating liquid from a sump. Do not use energized equipment in the vicinity of a fuel spill.
- Containers to hold the debris until it can be disposed of properly: chemical resistant cans/pails/buckets/barrels with lids, chemical resistant polyethylene bags with ties or zip-lock plastic bags.

Location of facility Spill Kit equipment: Northeast Corner Of Building

**This Facility's Procedure for Controlling and Cleaning Small Spills:**

If safe to do so, Turn Off Pumps, Place Cones To Secure The Area & Bag Nozzles.  
Use Spill Kit To Clean Up Spill. Placed All Used Material In The On Site Hazardous Waste Container  
Located In The Trash Area.

**This Facility's Procedure/Location for safe storage of regulated waste from spills:**

Hazardous Waste Container Located in The Waste Container Area  
Call Trans Environmental For Removal and Replacement 815-885-4840

UNDERGROUND STORAGE TANK  
OPERATIONS AND MAINTENANCE PLAN TEMPLATE

Contact for proper disposal of regulated waste:

- Environmental Contractor: Trans Environmental
- Phone Number: 815-885-4840

Vendor to contact for replacement supplies:

- Name of vendor: Blake Oil Co
- Phone Number: 815-522-3521

**General Safety Procedures for Small Spills:**

1. Always wear proper PPE before handling any regulated products. Always protect your skin and eyes.
2. If product is still flowing or the spill is 25 gallons or more, immediately push the Emergency Stop Switch, call Fire Department, contact the A/B Operator.
3. Do not allow customers to start their vehicles near the spilled product and turn off any other potential ignition sources.
4. Move customers and employees away from the spill vicinity to a safe area.
5. Isolate/Barricade spill area with traffic cones and/or caution tape.
6. In the event of a small spill, if safe to do so, bring the spill kit to the spill area:
  - a. Put on approved protective equipment. Avoid contact of spilled liquids with skin while working. Protect eyes/face from splashing liquids.
  - b. Contain spill with oil absorbent compound & pads.
  - c. Isolate/protect sensitive receptors (storm water drains, sewers, UST manways or the public right-of-way) with booms/dikes.
  - d. Follow Facility Procedure for Controlling & Cleaning Small Spills.
  - e. Report all spills and other incidents to your Class A/B Operator.

**OPERATIONS & MAINTENANCE PLAN, Part 3:**

**Emergency Response Procedures (ERP):**

Complete this third & final section of the Operations & Maintenance Plan by completing the [Emergency Response Procedures Form \[PDF, 1Mb\]](#) at our website.

Add a copy of the ERP to Parts 1 & 2 of your Operations & Maintenance Plan.

Post a second copy of the ERP where it can be easily seen by employees.

Kirkland Quick Stop      Daily Inspection      Date \_\_\_\_\_

- Check fills and vapor spill buckets for liquid and keep clean
- Check hoses, breakaways, swivels and nozzles for defects
- Check drive area for spills
- Check Veeder-Root for any warnings or alarms
- Check electrical circuit box and ensure it is not blocked
- Check Manhole Lids & Ensure Fill Caps Are Secure
- Inspect any Replaced Components for Bacterial Growth

REMARKS

\_\_\_\_\_  
SAMPLE  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Signature (C Operator or A/B Operator)



Kirkland Quick Stop      Monthly Inspection

Date \_\_\_\_\_

- Check fills and vapor spill buckets for liquid and keep clean
- Check hoses, breakaways, swivels and nozzles for defects
- Check drive area for spills
- Check Veeder Root for any warnings or alarms
- Check electrical circuit box and ensure it is not blocked
- Check spill kit for completeness
- Check all fire extinguishers
- Check and report any water in tanks
- Check and maintain passing tank test report
- Check and maintain Liquid Status Report
- Check and maintain one month of daily inspections

REMARKS

\_\_\_\_\_  
SAMPLE  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Signature (A/B Operator)



*SAMPLE*  
**Electronic Filing: Received, Clerk's Office 3/19/2018**  
**OSFM Quarterly Equipment Inspection Checklist/Operations & Maintenance Guidelines**  
**For UST System Inspections**

Facility Name: KIRKLAND QUICK STOP Facility ID: 1014986

**THIS QUARTERLY INSPECTION IS IN ADDITION TO ALL OTHER MONTHLY RELEASE DETECTION AND TESTING REQUIREMENTS**

UST Quarterly Inspection Equipment Items (place check mark in last column if unusual conditions (UC) exist)		CHECKED	N/A	UC
<b>Section A. Tank Leak Detection Records (Circle applicable number)</b>				
1. Automatic Tank Gauge	Monthly passing print out tape			
2. Interstitial Sensors	Monthly status record of normal or equivalent - Annual functional test Last tested: _____ Test due: _____			
3. S.I.R. (Includes Warren Rogers)	Monthly status report normal or equivalent		X	
4. Manual Tank Gauging < 600 gal.	Weekly stick measurements with monthly reconciliation		X	
5. Manual Tank Gauging 601-2000 gallons	Weekly stick measurements with monthly reconciliation - Annual precision test Last tested: _____ Test due: _____		X	
6. Vapor/Groundwater Monitoring	Monthly log with date, results and inspectors initials		X	
7. Water in Tank	Monitor ATG for water alarm or check tank utilizing gauge stick and water paste			
<b>Section B. Tank Component Inspection</b>				
1. Tank Monitoring System	Ensure system has power and is in a normal status with no alarms (daily)			
2. Submersible Sump Covers	Ensure all covers are present, in good condition and seated firmly			
3. Submersible Sump	Ensure no water is in submersible sump that contains interstitial sensors If piping is single wall and corrosion prevention is installed, water is allowed			
4. Electrical	Ensure junction boxes are intact and no obvious wire breaks are visible			
<b>Section C. Piping Leak Detection Records (Circle applicable number)</b>				
1. Interstitial Sensors	Monthly status record of normal or equivalent - Annual functional test Last tested: _____ Test due: _____		X	
2. Mechanical Line Leak Detector	Annual precision test of lines and functionality test of leak detector Last tested: _____ Test due: _____		X	
3. Electronic Line Leak Detector	If proof of annual 0.1 gph system leak test is performed, a functionality test of the leak detector is required only - If proof is not available a precision line test will also have to be performed Last tested: _____ Test due: _____			
<b>Section D. Piping Component Inspection (Circle applicable number)</b>				
1. Pressurized piping components	Ensure line leak detector is in place, if interstitial sensors are used, ensure they are positioned at the lowest portion of the submersible and dispenser sump			
2. American Suction	Ensure monthly monitoring is in place		X	
3. Product Piping	Inspect for obvious leaks, deformations, cracks or other abnormalities		X	
<b>Section E. Corrosion Protection Records (Circle applicable number)</b>				
1. Impressed Current System	Monthly log with date, initials of inspector, hour, volt, amp and power on verification - Annual system test: Last tested: _____ Test due: _____		X	
2. Sacrificial Anode System	System must be tested every 3 years: Last tested: _____ Test due: _____		X	
3. Internal Lining	Must be inspected every 5 years: Last tested: _____ Test due: _____		X	
<b>Section F. Corrosion Component Inspection (Circle applicable number)</b>				
1. Impressed Current System	Ensure rectifier has power and power light functions, observe and record volt, amp and hour meter readings		X	
2. Sacrificial Anodes	If anodes and connections are visible in submersible or dispenser sumps, observe for obvious connection breaks of wiring from steel components		X	
<b>Section G. Spill Protection</b>				
1. Spill Protection Equipment	Ensure spill containment is in place, clean, dry & no obvious cracks/tears (daily)			
<b>Section H. Overfill</b>				
1. Automatic Shutoff	Ensure device is in place and free of restrictive items			
2. Overfill Alarm	Ensure device is in place and test function operates properly			
<b>Section I. Dispensers and Emergency Shut-Offs</b>				
1. Hose and Nozzle Components	Observe for obvious leaks, cracks & deformations. Ensure breakaway is installed			
2. Under dispenser	Ensure shear valve is in place and properly anchored. Observe for obvious leaks Ensure interstitial sensors if installed are positioned at the lowest portion Observe for obvious open electrical junction boxes or broken wiring			
<b>Section J. Emergency Shut-Off</b>				
1. Emergency Shut-Off	Ensure emergency shut-offs are accessible and have no obvious damage Last tested: _____ Test due: _____			
<b>Section K. Emergency Actions</b>				
1. System Alarms	Ensure any alarms have been reported as required by facility operations plan			
2. Spills, Leaks or Release	Ensure any release has been reported as required by facility operations plan			

Remarks needed if unusual conditions exists (also include the date owner was notified and actions taken):

--

Verify that each monthly recordkeeping requirement on the 1st page has been accomplished by initialing in the blanks below. (Initial all that are applicable)

*Tank Leak Detection/Interstitial Monitoring*

Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec

*Line Interstitial Monitoring/Automatic Line Leak Detectors*

Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec

*Impressed Current System*

Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec

Additional Daily, Monthly, Quarterly, and Annual Inspection Items (indicate how often):

Daily:	
Monthly:	
Quarterly:	
Annually:	Submit annual Financial Responsibility Report from <a href="http://www.sfm.illinois.gov">www.sfm.illinois.gov</a> at Applications & Forms.

Identify the manner in which facility owners/operators will properly dispose of regulated substances spilled at the facility:

--

*A/B Operators must conduct the quarterly inspections personally. Sign & date the form when inspection is done.*

*If using this form as part of your Operations & Maintenance Plan, attach the list of your class A/B & C Operators & your facility's Emergency Response Procedures form. The facility Owner must sign the O&M Plan with the A/B Operator, but only the A/B Operator is required to sign the Quarterly Inspection report.*

SAMPLE

\_\_\_\_\_  
Signature of Owner

\_\_\_\_\_  
Signature of A/B Operator

\_\_\_\_\_  
Date of Inspection

Kirkland Quick Stop      Yearly Inspection      Date \_\_\_\_\_

- Check fills and vapor spill buckets for liquid and keep clean
- Check hoses, breakaways, swivels and nozzles for defects
- Check drive area for spills
- Check Veeder Root for any warnings or alarms
- Check electrical circuit box and ensure it is not blocked
- Check spill kit for completeness
- Check all fire extinguishers, insure they are up to date
- Check and report any water in tanks
- Check and maintain two passing tank test reports for each month (Maintain 2 Years)
- Check and maintain monthly passing Liquid Status Report (Maintain 2 Years)
- Check and ensure tank test are current (Passed test every 5 years)
- Check and ensure that line leak tests are current (Passed test each year)
- Check E-Stops (Passed test each year)
- Check and ensure line leak detectors test are current (passed test each year)
- Check and ensure that security system test are current (passed test each year)
- Check Quarterly Reports and attach monthly reports (Maintain 2 years)
- Replace Pump Filters and check for debris

REMARKS

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SAMPLE

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\_\_\_\_\_  
Signature (A/B Operator)

