

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

OFFICE OF COMPLIANCE & INSPECTION

IN RE: PMG NEW JERSEY II, LLC

FILE NO.: UST 2016-49-00774

NOTICE OF VIOLATION

A. Introduction

Pursuant to Sections 42-17.1-2(21) and 42-17.6-3 of the Rhode Island General Laws, as amended, (“R.I. Gen. Laws”) you are hereby notified that the Director of the Department of Environmental Management (the “Director” of “DEM”) has reasonable grounds to believe that the above-named party (“Respondent”) has violated certain statutes and/or administrative regulations under the DEM's jurisdiction.

B. Administrative History

On 9 September 2016, the DEM issued a Letter of Non-Compliance (“LNC”) to Respondent for the violations that are the subject of this Notice of Violation (“NOV”). The LNC required specific actions to correct the violations. The LNC was delivered to Respondent on 14 September 2016. Respondent did not respond to or comply with the LNC.

C. Facts

- (1) The property is located at 2148 Broad Street, Assessor’s Plat 1, Lot 491 in the city of Cranston (the “Property”). The Property includes a convenience store and a motor fuel storage and dispensing system (the “Facility”).
- (2) Respondent owns the Property.
- (3) Underground storage tanks (“USTs” or “tanks”) are located on the Property, which tanks are used for storage of petroleum products and which are subject to the DEM’s *Rules and Regulations for Underground Storage Facilities Used for Petroleum Products and Hazardous Materials* (the “UST Regulations”).
- (4) The USTs for the Facility are as follows:

UST ID No.	Date Installed	Capacity	Product Stored
006	3 September 1998	8,000 gallons	Gasoline
007	3 September 1998	8,000 gallons	Gasoline
008	3 September 1998	8,000 gallons	Gasoline

- (5) On 6 September 2016, the DEM inspected the Facility. The inspection revealed the following:
- (a) Monthly inventory reconciliation reports for the USTs for the time period of July 2014 through December 2015, were not available;
 - (b) The *Veeder Root TLS 350* continuous monitoring system (“CMS”) was displaying a “fuel alarm” for the leak sensor deployed in the tank top sump for UST No. 006. Upon information and belief, the alarm had been in effect since 1 September 2016 and Respondents had yet to investigate the release detection signal;
 - (c) The CMS console was hidden behind a cigarette display case, and the CMS console was not readily visible to the Facility operators; and
 - (d) Written verification that the registered Class A/B Facility operators (Stephanie Costa and James Banks) had conducted monthly on-site UST Facility inspections during each of the months of July 2014 through August 2016, and documented the results of those inspections on the requisite form, was not available. There were completed inspection checklists on file at the Facility for the year 2016; however, these checklists documented inspections that were performed by operators (Heriberto Casiano and Sunita Pathania) who are not registered with the DEM for the Facility. Upon information and belief, Mr. Casiano is an *International Code Council* (“ICC”) certified Rhode Island Class A/B Facility operator; however, Ms. Pathania is not.
- (6) A review of the DEM’s records revealed that a registration is on file that was submitted by Respondent for a UST facility located at 2160 Broad Street in the city of Cranston; however, no registration is on file with the DEM for the Facility.
- (7) As of the date of issuance of the NOV, Respondent has failed to demonstrate compliance with the findings described in Sections C (5) and (6) above.

D. Violation

Based on the foregoing facts, the Director has reasonable grounds to believe that Respondents have violated the following regulations:

- (1) **DEM’s UST Regulations, Rule 6.16 (B)(1)** – requiring an owner to report any change in information contained in a registration to the DEM within 10 days of that change.
- (2) **DEM’s UST Regulations, Rules 8.08(A)(2), 11.02(B)(5) and 11.03** – requiring monthly inventory reconciliation and leak check calculations for USTs and retention of the written records for at least 3 years.

- (3) **DEM's UST Regulations, Rules 8.15(C) and 12.03(A)** – requiring that a CMS be located so as to be readily seen and heard by the facility operators and requiring immediate investigation of release detection signals.
- (4) **DEM's UST Regulations, Rule 8.22(A)(4)** – requiring that Class A/B operators be registered with the DEM and that the DEM be notified whenever there is a change in the designated Class A/B facility operators.
- (5) **DEM's UST Regulations, Rule 8.22(F)** – requiring the registered, ICC-certified Class A/B facility operator to perform monthly on-site UST facility inspections.

E. Order

Based upon the violations alleged above and pursuant to R.I. Gen. Laws Section 42-17.1-2(21), you are hereby ORDERED to complete the following remedial actions **within 60 days of receipt of the NOV**:

- (1) If available, submit copies of your monthly inventory reconciliation and leak check reports for the USTs for the time period of July 2014 through December 2015 to the DEM's Office of Compliance and Inspection ("OC&I").
- (2) Investigate the "fuel alarm" for UST No. 006 that was being displayed by the CMS on 6 September 2016 in accordance with Rules 8.15(C) and 12.03 of the DEM's UST Regulations and submit a written report to the OC&I detailing the outcome of the investigation and the resolution of any problems that may have been diagnosed.
- (3) Modify the CMS console to be readily seen and heard by the Facility operators, as per Rule 8.15(C) of the DEM's UST Regulations and submit written or photographic verification of compliance to the OC&I.
- (4) Complete an updated *Certified UST Facility Operators Registration Form* listing all of the Class A/B operators that are presently assigned to the Facility and submit copies of the completed form and the Class A/B operators' certificates to the DEM's Office of Waste Management ("OWM") and the OC&I.
- (5) If available, submit copies of the completed *Class A/B UST Facility Operators Monthly Inspection Checklists* for the time period of July 2014 through August 2016 to the OC&I (completed by Ms. Costa or Mr. Banks). If such records are not available, the newly registered, ICC-certified Class A/B operators shall henceforth perform these inspections in accordance with Rules 8.22(F) and 8.15(E) of the DEM's UST Regulations and document the results of those inspections on the requisite form. Written verification of a return to compliance shall be submitted to the OC&I.
- (6) Submit a registration form to the OWM for the Facility that includes the proper address for the Facility.

F. Penalty

- (1) Pursuant to R.I. Gen. Laws Section 42-17.6-2, the following administrative penalty, as more specifically described in the attached penalty summary and worksheets, is hereby ASSESSED, jointly and severally, against each named respondent:

\$6,500

- (2) The proposed administrative penalty is calculated pursuant to the DEM's *Rules and Regulations for Assessment of Administrative Penalties*, as amended, and must be paid to the DEM within 30 days of your receipt of the NOV. Payment shall be in the form of a certified check, cashier's check or money order made payable to the "General Treasury - Water & Air Protection Program Account" and shall be forwarded to the DEM Office of Compliance and Inspection, 235 Promenade Street, Suite 220, Providence, Rhode Island 02908-5767.
- (3) Penalties assessed against Respondent in the NOV are penalties payable to and for the benefit of the State of Rhode Island and are not compensation for actual pecuniary loss.
- (4) If any violation alleged herein shall continue, then each day during which the violation occurs or continues shall constitute a separate offense and the penalties and/or costs for that violation shall continue to accrue in the manner set forth in the attached penalty summary and worksheets. The accrual of additional penalties and costs shall be suspended if the Director determines that reasonable efforts have been made to comply promptly with the NOV.

G. Right to Administrative Hearing

- (1) Pursuant to R.I. Gen. Laws Chapters 42-17.1, 42-17.6, 42-17.7 and 42-35, each named respondent is entitled to request a hearing before the DEM's Administrative Adjudication Division regarding the allegations, orders and/or penalties set forth in Sections B through O above. All requests for hearing MUST:
- (a) Be in writing. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.6-4(b);
- (b) Be **RECEIVED** by the DEM's Administrative Adjudication Division, at the following address, within 20 days of your receipt of the NOV. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.7-9:

Administrative Clerk
DEM - Administrative Adjudication Division
One Capitol Hill, 4TH Floor
Providence, RI 02903

- (c) Indicate whether you deny the alleged violations and/or whether you believe that the administrative penalty is excessive. See R.I. Gen. Laws Section 42-17.6-4(b);
AND

- (d) State clearly and concisely the specific issues which are in dispute, the facts in support thereof and the relief sought or involved, if any. See Rule 7.00(b) of the DEM's *Administrative Rules of Practice and Procedure for the Administrative Adjudication Division for Environmental Matters*.
- (2) A copy of each request for hearing must also be forwarded to:
- Tricia Quest, Esquire
DEM - Office of Legal Services
235 Promenade Street, 4TH Floor
Providence, RI 02908-5767
- (3) Each named respondent has the right to be represented by legal counsel at all administrative proceedings relating to this matter.
- (4) Each respondent must file a separate and timely request for an administrative hearing before the DEM's Administrative Adjudication Division as to each violation alleged in the written NOV. If any respondent fails to request a hearing in the above-described time or manner with regard to any violation set forth herein, then the NOV shall automatically become a Final Compliance Order enforceable in Superior Court as to that respondent and/or violation and any associated administrative penalty proposed in the NOV shall be final as to that respondent. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and (vi) and 42-17.6-4(b) and (c).
- (5) Failure to comply with the NOV may subject each respondent to additional civil and/or criminal penalties.
- (6) An original signed copy of the NOV is being forwarded to the city of Cranston, wherein the Property is located, to be recorded in the Office of Land Evidence Records pursuant to R.I. Gen. Laws Chapter 34-13 and Section 42-17.1-2 (31), as amended.
- (7) The NOV does not preclude the Director from taking any additional enforcement action nor does it preclude any other local, state, or federal governmental entities from initiating enforcement actions based on the acts or omissions described herein.

If you have any legal questions, you may contact (or if you are represented by an attorney, please have your attorney contact) Tricia Quest at the DEM's Office of Legal Services at (401) 222-6607. All other inquiries should be directed to Tracey Tyrrell of the DEM's Office of Compliance and Inspection at (401) 222-1360 ext. 7407.

Please be advised that any such inquiries do not postpone, eliminate, or otherwise extend the need for a timely submittal of a written request for a hearing, as described in Section G above.

FOR THE DIRECTOR

By: _____
David E. Chopy, Chief
DEM - Office of Compliance and Inspection

Dated: _____

CERTIFICATION

I hereby certify that on the _____ day of _____
the within Notice of Violation was forwarded to:

PMG NEW JERSEY II, LLC
c/o Corporation Service Company, Registered Agent
222 Jefferson Boulevard, Suite 200
Warwick, RI 02888

by Certified Mail.



ADMINISTRATIVE PENALTY SUMMARY	
Program:	OFFICE OF COMPLIANCE AND INSPECTION, UST COMPLIANCE
File No.:	UST 2016-49-00774
Respondent:	PMG NEW JERSEY II, LLC

GRAVITY OF VIOLATION					
SEE ATTACHED "PENALTY MATRIX WORKSHEETS."					
VIOLATION NO. & CITATION	APPLICATION OF MATRIX		PENALTY CALCULATION		AMOUNT
	Type	Deviation	Penalty from Matrix	Number or Duration of Violations	
D(1) – Monthly Inventory Reports	Type II (\$12,500 Max. Penalty)*	Minor	\$1,500	1 violation	\$1,500
D(2) – Release Detection Signals and CMS Visibility	Type II (\$12,500 Max. Penalty)*	Minor	\$2,500	1 violation	\$2,500
D(4) – Monthly Inspections by Class A/B Operators	Type II (\$12,500 Max. Penalty)*	Minor	\$2,500	1 violation	\$2,500
SUB-TOTAL					\$6,500

*Maximum Penalties represent the maximum penalty amounts per day, per violation.

ECONOMIC BENEFIT FROM NON-COMPLIANCE
<p>COSTS OF COMPLIANCE, EQUIPMENT, O&M, STUDIES OR OTHER DELAYED OR AVOIDED COSTS, INCLUDING INTEREST AND/OR ANY COMPETITIVE ADVANTAGE DERIVED OVER ENTITIES THAT ARE IN COMPLIANCE. NOTE: ECONOMIC BENEFIT MUST BE INCLUDED IN THE PENALTY UNLESS:</p> <ul style="list-style-type: none"> - THERE IS NO IDENTIFIABLE BENEFIT FROM NON-COMPLIANCE; OR - THE AMOUNT OF ECONOMIC BENEFIT CANNOT BE QUANTIFIED.
<p>A review of the record in this matter has revealed that Respondent has either enjoyed no identifiable benefit from the non-compliance alleged in this enforcement action or that the amount of economic benefit that may have resulted cannot be quantified.</p>

COST RECOVERY
<p>ADDITIONAL OR EXTRAORDINARY COSTS INCURRED BY THE DIRECTOR DURING THE INVESTIGATION, ENFORCEMENT AND RESOLUTION OF AN ENFORCEMENT ACTION (EXCLUDING NON-OVERTIME PERSONNEL COSTS), FOR WHICH THE STATE IS NOT OTHERWISE REIMBURSED.</p>
<p>A review of the record in this matter has revealed that the DEM has not incurred any additional or extraordinary costs during the investigation, enforcement and resolution of this enforcement action (excluding non-overtime personnel costs), for which the State is not otherwise reimbursed.</p>

TOTAL PENALTY PROPOSED UNDER PENALTY REGULATIONS = \$6,500

PENALTY MATRIX WORKSHEET

CITATION: Monthly Inventory Reports
 VIOLATION NO.: D (1)

TYPE		
<u> </u> TYPE I <u>DIRECTLY</u> related to protecting health, safety, welfare or environment.	<u> X </u> TYPE II <u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.	<u> </u> TYPE III <u>INCIDENTAL</u> to protecting health, safety, welfare or environment.

DEVIATION FROM THE STANDARD
 THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

FACTORS CONSIDERED:

Taken from Section 10(a)(2) of the DEM's *Rules and Regulations for Assessment of Administrative Penalties*

- (A) **The extent to which the act or failure to act was out of compliance:** Respondent failed to compile and maintain inventory reconciliation and leak check records for the USTs. The inventory control leak detection method is expressly required by the DEM's UST Regulations and is of significant importance to the regulatory program. Failure to comply would presumably reduce the likelihood of detecting leaks from the USTs.
- (B) **Environmental conditions:** The Facility is located in a densely developed area with numerous potential vapor receptors including residential structures, commercial structures and underground utilities. The Facility is located in a GB groundwater classification zone, which are groundwater resources presumed to be unsuitable for drinking water use without treatment. Upon information and belief, there are no drinking water supply wells proximate to the Facility. The Facility is located within 700 feet of the Pawtuxet and Providence Rivers and within the watersheds of those rivers.
- (C) **Amount of the pollutant:** Considered, but not utilized for this calculation.
- (D) **Toxicity or nature of the pollutant:** The volatile nature of gasoline presents both a potential public health hazard (due to potential inhalation of benzene) and a potential public safety hazard (due to the potential for explosion). Gasoline is capable of causing significant soil and groundwater contamination if released to the environment.
- (E) **Duration of the violation:** Approximately 1 ½ years (July 2014 through December 2015)
- (F) **Areal extent of the violation:** Considered, but not utilized for this calculation.

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the non-compliance:** Respondent failed to prevent the non-compliance by compiling and maintained fully-compliant inventory control records for the time period of July 2014 through December 2015.
- (H) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (I) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Negligence is attributable to Respondent for the failure to comply immediately with the inventory control requirements set forth in the DEM's UST Regulations. As owners and operators of the Facility, Respondent had full control over the occurrence of the violation. The DEM's UST Regulations expressly require monthly inventory reconciliation and leak checks for USTs and maintenance of such records for at least t3 years.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

MAJOR	MODERATE	<u> X </u> MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$12,500 to \$25,000	\$6,250 to \$12,500	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	MINOR	\$2,500 to \$6,250	\$1,250 to \$2,500 \$1,500	\$250 to \$1,250

PENALTY MATRIX WORKSHEET

CITATION: Release Detection Signals and CMS Visibility
 VIOLATION NO.: D (2)

TYPE

 TYPE I
DIRECTLY related to protecting health, safety, welfare or environment.

 X **TYPE II**
INDIRECTLY related to protecting health, safety, welfare or environment.

 TYPE III
INCIDENTAL to protecting health, safety, welfare or environment.

DEVIATION FROM THE STANDARD

THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

FACTORS CONSIDERED:

Taken from Section 10 (a) (2) of the DEM's *Rules and Regulations for Assessment of Administrative Penalties*

- (A) **The extent to which the act or failure to act was out of compliance:** Respondent failed to investigate a release detection signal. The DEM's UST Regulations require immediate investigation of release detection signals and the immediate commencement of any necessary remedial actions. Respondent also placed an obstruction in front of the CMS console, which limited the Facility operators' access to the console and their ability to see and hear release detection signals.
- (B) **Environmental conditions:** The Facility is located in a densely developed area with numerous potential vapor receptors including residential structures, commercial structures and underground utilities. The Facility is located in a GB groundwater classification zone, which are groundwater resources presumed to be unsuitable for drinking water use without treatment. There are no known drinking water supply wells proximate to the Facility. The Facility is located within 700 feet of the Pawtuxet and Providence Rivers and within the watersheds of those rivers.
- (C) **Amount of the pollutant:** Considered, but not utilized for this calculation.
- (D) **Toxicity or nature of the pollutant:** The volatile nature of gasoline presents both a potential public health hazard (due to potential inhalation of benzene) and a potential public safety hazard (due to the potential for explosion). Gasoline is capable of causing significant soil and groundwater contamination if released to the environment.
- (E) **Duration of the violation:** Approximately 5 months (1 September 2016 to the present) for the fuel alarm noncompliance. Unknown for the obstruction noncompliance.
- (F) **Areal extent of the violation:** Considered, but not utilized for this calculation.

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to prevent the non-compliance by immediately investigating the release detection signal and ensuring that the CMS console was readily accessible to the Facility operators. The DEM has no knowledge of what action, if any, Respondent has taken to mitigate the non-compliance.
- (H) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (I) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Negligence is attributable to Respondent for the failure to comply immediately with all of the requirements set forth in Rule 8.15(C) of the UST Regulations. As owners and operators of the Facility, Respondent had full control over the occurrence of the violation.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Respondent was issued an LNC from the OC&I on 9 September 2016 for the noncompliance. The LNC was delivered to Respondent, however, Respondent has failed to respond to the LNC.

MAJOR	MODERATE	<u> X </u> MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$12,500 to \$25,000	\$6,250 to \$12,500	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	MINOR	\$2,500 to \$6,250	\$1,250 to \$2,500 \$2,500	\$250 to \$1,250

PENALTY MATRIX WORKSHEET

CITATION: Monthly Inspections by Class A/B Operators
 VIOLATION NOS.: D (4)

TYPE

 TYPE I
DIRECTLY related to protecting health, safety, welfare or environment.

 X **TYPE II**
INDIRECTLY related to protecting health, safety, welfare or environment.

 TYPE III
INCIDENTAL to protecting health, safety, welfare or environment.

DEVIATION FROM THE STANDARD

THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

FACTORS CONSIDERED:

Taken from Section 10 (a) (2) of the DEM *Rules and Regulations for Assessment of Administrative Penalties*

- (A) **The extent to which the act or failure to act was out of compliance:** Respondent failed to have the registered, ICC-certified Class A/B operators inspect the Facility on a monthly basis and document the inspections on the requisite form in accordance with the DEM's UST Regulations. These inspections are expressly required by the DEM's UST Regulations and are of significant importance to the regulatory program. Failure to comply would presumably reduce the likelihood of preventing or detecting releases from the USTs.
- (B) **Environmental conditions:** The Facility is located in a densely developed area with numerous potential vapor receptors including residential structures, commercial structures and underground utilities. The Facility is located in a GB groundwater classification zone, which are groundwater resources presumed to be unsuitable for drinking water use without treatment. There are no known drinking water supply wells proximate to the Facility. The Facility is located within 700 feet of the Pawtuxet and Providence Rivers and within the watersheds of those rivers.
- (C) **Amount of the pollutant:** Considered, but not utilized for this calculation.
- (D) **Toxicity or nature of the pollutant:** The volatile nature of gasoline presents both a potential public health hazard (due to potential inhalation of benzene) and a potential public safety hazard (due to the potential for explosion). Gasoline is capable of causing significant soil and groundwater contamination if released to the environment.
- (E) **Duration of the violation:** July 2014 to the present.
- (F) **Areal extent of the violation:** Considered, but not utilized for this calculation.

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to prevent the non-compliance by having the registered and ICC-certified Class A/B operators perform the monthly inspections. Respondent had inspections performed during the year 2016; however, those inspections were performed by one operator who was not registered with the DEM for the Facility and another operator who was not an ICC-certified Class A/B operator. The DEM has no knowledge of what action, if any, Respondent has taken to mitigate the non-compliance
- (H) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (I) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Negligence is attributable to Respondent for the failure to comply immediately with the requirements set forth in Rules 8.22(F) of the DEM's UST Regulations. As owners and operators of the Facility, Respondent had full control over the occurrence of the violation. The Class A/B UST facility operator monthly inspection requirements are clearly established in the DEM's UST Regulations.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Respondent was issued an LNC from the OC&I on 9 September 2016 for the noncompliance. The LNC was delivered to Respondent, however, Respondent have failed to respond to the LNC.

MAJOR	MODERATE	<u> X </u> MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$12,500 to \$25,000	\$6,250 to \$12,500	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	MINOR	\$2,500 to \$6,250	\$1,250 to \$2,500 \$2,500	\$250 to \$1,250