GUAM ENVIRONMENTAL PROTECTION AGENCY • AHENSIAN PRUTEKSIÓN LINA'LA' GUÅHAN
LOURDES A. LEON GUERRERO • GOVERNOR OF GUAM | JOSHUA F. TENORIO • LIEUTENANT GOVERNOR OF GUAM
MICHELLE C. R. LASTIMOZA • ADMINISTRATOR

APR 2 9 2025

Lillian Perez-Posadas
Hospital Administrator/CEO
Guam Memorial Hospital Authority
688 Route 15
Mangilao, Guam 96913

RE: Notice of Violation, Order of Compliance, and Administrative Penalty Order UST25-001, GMHA Skilled Nursing Unit, Barrigada

Hafa Adai Ms. Posadas:

You are hereby advised that this Notice of Violation/Order of Compliance/Administrative Penalty Order UST25-001 is being issued to Guam Memorial Hospital Authority (GMHA) Skilled Nursing Unit (SNU).

The Guam Environmental Protection Agency (Guam EPA) is charged with the responsibility of implementing and enforcing the Underground Storage of Regulated Substances Act (USRSA), as amended, Chapter 76 of Title 10, Guam Code Annotated (GCA), Public Law No. 32-195, and the Guam Underground Storage Tank Regulations, Chapter 50 of Title 22, Guam Administrative Rules and Regulations (GAR).

The Guam EPA Administrator shall enforce rules and regulations governing UST design, construction, installation, release detection and inventory control, compatibility, record maintenance, reporting, corrective action closure, and financial responsibility in order to enforce this Chapter. 10 GCA §76104(d)

The Guam EPA Administrator shall issue and enforce orders necessary to ensure compliance with 10 GCA Chapter 76 and any rules and regulations enacted pursuant 10 GCA Chapter 76, including administrative penalty orders and orders requiring necessary or appropriate corrective action". 10 GCA §76104(g).

On March 21, 2025, representatives from the Guam EPA conducted an UST Inspection at SNU located on 449 North Sabana Drive, Barrigada. The inspection was conducted with the cooperation of Messrs. Angelio Ebeo, Acting Supervisor and Primo Lazada, Electrician 1. The UST inspection was conducted to verify compliance with Title 10 GCA Chapter 76 and Title 22 GAR Chapter 50.

During the inspection the following deficiencies were observed and are the basis for this notice of violations.

NOTICE OF VIOLATIONS

Based on the deficiency cited, SNU is in violation of the following section of Chapter 50 of Title 22 GAR.

1. "The owner or operator of a UST shall maintain results of monitoring/testing of functionality for release detection for 3 years. 22 GAR §50406(a)(2)

➢ **SNU failed to maintain results and/or records of monitoring/testing of functionality tests for the release detection mechanism.**

2. "The owner or operator of a UST shall maintain records of release detection monitoring". 22 GAR §50406(a)

➢ **SNU failed to maintain records for the tank and piping release detection.**

3. "The owner or operator of a UST shall conduct periodic testing of spill prevention, containment sumps, and overfill prevention equipment" 22 GAR §50306

➢ **SNU failed to maintain results and/or records of periodic testing of spill prevention and containment equipment.**

4. "The owner or operator shall conduct monthly/annual walkthrough inspections very thirty days." 22 GAR §50307(a)(b)

➢ **SNU failed to maintain records of monthly and annual walkthrough inspections for the UST system.**

5. "The owner or operator shall maintain records verifying training or retraining of designated Class A/B/C." 22 GAR §501006

➢ **SNU failed to maintain records verifying the training of designated Class A/B/C operators.**

ORDER OF COMPLIANCE

Based on the violations cited above, Guam EPA hereby requires SNU to perform the following corrective action to ensure compliance with 10 GCA Chapter 76 and 22 GAR Chapter 50:

1. SNU shall retain the services of a certified technician(s) to conduct diagnostic and systems servicing on the leak detection system, to determine and certify that the system is operational and functioning per manufacture specification standards and regulatory requirements. SNU shall submit copies of the results of the testing and any repairs to Guam EPA within forty-five (45) calendar days.

2. SNU shall submit copies of the release detection records to Guam EPA each month for the next three (3) months.

3. SNU shall conduct testing of spill and overfill prevention and containment sumps.

4. SNU shall conduct periodic operation and maintenance walkthrough inspections in accordance with 22 GAR §50307. (See attached example checklist: Petroleum Equipment Institute Recommended Practice RP 900, Appendix A-2 and A-3). SNU shall keep these checklist records on file.

5. SNU shall designate and have these persons train for Class A/B/C Operators from an approved and authorized entity.

6. SNU needs to place a sign near the overfill alarm equipment on the wall nearest the UST, stating "Overfill Alarm".

Nothing in this Order of Compliance limits the ability of Guam EPA to enforce any and all provisions of applicable Guam laws and regulations. Guam EPA does not waive any rights or remedies available to it. Failure to comply with this Compliance Order may subject you to additional administrative, civil or criminal penalties.

ADMINISTRATIVE PENALTY ORDER

In addition to this Notice of Violation/Order of Compliance, the Administrator of Guam EPA, pursuant to 10 GCA § 76124 (a), hereby imposes an administrative penalty.

The maximum administrative penalty for Leak Detection and Record Maintenance is sixteen thousand dollars ($16,000.00) per day, per UST violation, or eighty thousand dollars ($80,000.00) for five (5) violations for one (1) day.

SNU did not maintain a leak detection system that identifies releases dangerous to human health and the environment, and did not maintain systematic and complete records to demonstrate compliance with 10 GCA Chapter 76. The Administrator hereby assesses a penalty of two thousand seventy two dollars ($2,072.00). You are presumed under the law to be able to pay the penalty under 10 GCA Chapter 76.

The penalty amount is due and owing fifteen (15) calendar days from the date of receipt of this Administrative Penalty Order. The payment due date will be stayed upon the timely filing of a Notice of Intent to Appeal/Notice of Defense. Failure to comply with this Administrative Penalty Order may subject you to additional administrative penalties or civil or criminal actions as described above.

NOTICE OF RIGHT TO APPEAL

You may file within fifteen (15) calendar days of the date of receipt of this Notice of Violation/Order of Compliance/Administrative Penalty Order, a Notice of Intent to Appeal also known as a Notice of Defense with the Guam EPA's Board of Directors, setting forth in such Notice of Intent to Appeal/Notice of Defense, a verified petition outlining the legal and factual bases for such an appeal. A copy of the Notice of Intent to Appeal/Notice of Defense is attached for your convenience.

Unless a written request for a hearing signed by or on behalf of the person, agency or business entity named above in this Notice of Violation/Order of Compliance/Administrative Penalty Order is hand delivered or mailed to Guam EPA within fifteen (15) calendar days after the Notice of Violation/Order of Compliance/Administrative Penalty Order was personally served on you or mailed to you, Guam EPA may proceed upon the Notice of Violation/Order of Compliance/Administrative Penalty Order without a hearing.

A request for hearing may be made by delivering the enclosed form entitled "Notice of Intent to Appeal also known as a Notice of Defense", or by delivering a notice of defense as provided in 5 GCA §9205, to the following address:

Guam Environmental Protection Agency Board of Directors
c/o Administrator
Attn: Air & Land Division
Guam Environmental Protection Agency
Building 17-3304 Mariner Avenue. Tiyan
Barrigada, Guam 96913

If you file a Notice of Intent to Appeal/Notice of Defense, the Guam EPA's Board of Directors shall hold a public hearing, not more than sixty (60) calendar days after receipt of such Notice of

Intent to Appeal/Notice of Defense, at which time you may appear and present evidence in person or through counsel in support of this petition.

Failure to file a Notice of Intent to Appeal and Verified Petition within the period specified above will constitute a waiver of your right to a hearing. If you waive your rights to a hearing the Order of Compliance and Administrative Penalty Order will become final, and Guam EPA may proceed upon the Orders without a hearing and without further notice to you.

Should you have any question(s) concerning the technical aspects of this letter, please contact the Hazardous Waste Management Program at (671) 588-4711/51.

Sincerely,

MICHELLE C. R. LASTIMOZA
Administrator

Enclosures: Notice of Defense
PEI RP900

cc: Mr. Zaldy Tugade, PE, GMHA, Associate Administrator, Operations
Mr. Carl Goldstein, USEPA Region 9, Guam Program Manager
Ms. Michael Cosson., USEPA Region 9, UST/LUST Program Manager
Mr. Glenn San Nicolas, Guam EPA, Acting Air and Land Programs Administrator
Chrono/HWMP file

NOTICE OF INTENT TO APPEAL
(AKA NOTICE OF DEFENSE)

I, _____, have received your Notice of Violation, Order of Compliance and/or Administrative Penalty Order dated _____, charging me for violations and/or imposing penalties and/or other orders, and I wish to:

(Please check appropriate sections)

☐ **A. Request for a hearing and**

☐ 1. Object to the accusation on the ground that it does not state acts or omissions upon which the Agency can proceed.

☐ 2. Object to the form of the accusation on the ground that it is so indefinite or ambiguous that I cannot identify the infraction or prepare my defense.

☐ 3. Wish to prepare new matter in my defense.

☐ 4. Admit to the accusation in part.

☐ **B. Admit to the accusation in whole.**

☐ **C. Verified Petition: <u>Under penalty of perjury I hereby declare</u> that the following constitutes my legal and factual basis for this appeal:**

_____

_____

_____

[please continue on blank sheet of paper if more space is needed and attach to this paper]

My mailing address is: _____

_____

_____

_____

SIGNATURE

_____

DATE

GUAM EPA CASE NO.: UST25-001

Appendix A-2: SAMPLE FORM FOR MONTHLY UNDERGROUND STORAGE SYSTEM INSPECTION CHECKLIST – PAGE 2

Go to *www.pei.org/RP900* for an electronic version of this form

Category	Description	PEI/RP900	N/A	Tank 1	Tank 2	Tank 3	Tank 4
Stage I Vapor Recovery		7.7					
Two-Point (Dual-Point) Vapor Recovery	Cover present, colored orange, seated firmly at grade, not broken, cracked or chipped	7.7.1.1					
	If spill-containment manhole is present, no dirt, trash, water, or product	7.7.1.2					
	If spill-containment manhole is present, no cracks, bulges, or holes	7.7.1.3					
	Vapor recovery cap present, seals tightly	7.7.1.4					
	Poppet of vapor recovery adaptor seals tightly	7.7.1.5					
Observation and Monitoring Wells		7.8					
	Observation well cover is properly identified and secured	7.8.1.1					
Corrosion Protection		7.9					
Impressed-Current Cathodic Protection	Record volt and amp readings, readings consistent with previous months	7.9.1.1					
	Record hour meter reading (if present). Reading increases by about 700 hours each month	7.9.1.2					

DESCRIBE ANY DEFICIENCIES HERE:

Instructions: Mark each tank where no problem is observed with a checkmark: √
If certain equipment is not required and / or not present, mark checklist in the N/A column.
If a defect is found, mark the checklist with an "X," describe the problem in the "DEFICIENCIES" section, and notify the appropriate person.
Refer to the section in the PEI Recommended Practices on UST system equipment inspection listed in the 'PEI/RP900' column for additional information. Refer to PEI RP500, *Recommended Practices for Inspection and Maintenance of Motor Fuel Dispensing Equipment*, for inspection procedures that apply to fuel dispensing equipment.

Appendix A-2: SAMPLE FORM FOR MONTHLY UNDERGROUND STORAGE SYSTEM INSPECTION CHECKLIST – PAGE 1

Go to *www.pei.org/RP900* for an electronic version of this form

MONTHLY UNDERGROUND STORAGE SYSTEM INSPECTION CHECKLIST			
Facility ID#	Facility Name/Address	Level II Qualified Person Signature	Date
If any problem is found, contact:		Contact information:	

Category		Description	PEI/RP900	N/A	Tank 1	Tank 2	Tank 3	Tank 4
Daily Inspections		Complete daily checklist and compare to previously completed daily checklists	7.4.1					
Leak Detection Recordkeeping	**Circle method of tank leak detection: ATG, CIM, SIR, IC, GWM, SVM, MIMT Circle method of piping leak detection: CIM, MPLT, SIR, GWM, SVM, MIMP**		7.5					
Automatic Tank Gauge (ATG)		Passing tank test report printed and properly filed	7.5.1.1					
Continuous Interstitial Monitoring (CIM)		Sensor status report printed and properly filed	7.5.2.1					
Monthly Piping Leak Test (MPLT)		Passing piping leak-test report printed/documented and properly filed	7.5.3.1					
Statistical Inventory Reconciliation (SIR)		This month's inventory analyzed; last month's results passed and available for inspection	7.5.4.1					
Inventory Control (IC)		Inventory reconciled and within the company or regulatory standard	7.5.5.1					
Manual Groundwater (GWM) or Soil Vapor Monitoring (SVM)		Wells sampled and results pass	7.5.6.1					
Manual Interstitial Monitoring for Tanks (MIMT)		Steel tank: interstitial space checked and found dry	7.5.7.1					
		Fiberglass tank: interstitial space checked and found dry	7.5.7.2					
		Fiberglass tank: level of monitoring fluid within normal range	7.5.7.3					
		For steel and fiberglass tanks, vacuum level is within tolerances	7.5.7.4					
Manual Interstitial Monitoring for Piping (MIMP)		Tank-top sump inspected and no liquid found	7.5.8.1					
All Tanks			7.6					
Grade-Level Covers		All covers present, in good condition, seated firmly on the correct tank	7.6.1.1					
Spill-Containment Manhole		Drain valve in spill-containment manhole in good condition	7.6.2.1					
Drop Tube		Standard drop tube smooth, no ragged edges, in good condition	7.6.3.1					
		Top edge of coaxial drop tube smooth, round, slightly below the top edge of the fill pipe	7.6.3.2					
Tank Gauge Stick		Tank gauge stick can be clearly read, is not warped or broken	7.6.4.1					
Check for Water		No water present in the tank	7.6.5.1					
Tank Vents		Vent cap present, vent pipe solidly supported and vertical	7.6.6.1					

Appendix A-3: SAMPLE FORM FOR ANNUAL UNDERGROUND STORAGE SYSTEM INSPECTION CHECKLIST – PAGE 1

Go to *www.pei.org/RP900* for an electronic version of this form

ANNUAL UNDERGROUND STORAGE SYSTEM INSPECTION CHECKLIST			
Facility ID#	Facility Name/Address	Qualified Technician Signature	Date
If any problem is found, contact:		Contact information:	

Category	Description	PEI/RP900	N/A	Tank 1	Tank 2	Tank 3	Tank 4
Monthly Inspections	Complete monthly checklist and compare to previously completed monthly checklists	8.4.1					
	Monthly inspections reviewed and found adequate	8.4.2					
Submersible Turbine Pump (STP)		8.5					
All STP	Junction box(es) sealed, not corroded; seal-offs present; intrinsically safe wiring in good condition	8.5.1.1					
	Mechanical line-leak detector properly vented, vent tube not kinked or twisted	8.5.1.2					
	Mechanical line-leak detector passes 3.0 gph test	8.5.1.3					
	Electronic line-leak detector passes 3.0 gph test	8.5.1.4					
	Flexible connector not twisted, kinked, or bent beyond manufacturer's specifications	8.5.1.5					
	Submersible pump and visible piping and fittings show no signs of leaking	8.5.1.6					
	Piping in good condition	8.5.1.7					
No STP Sump	Submersible pump head, flex connector(s) and other metallic product piping are not in contact with soil or water or are cathodically protected	8.5.2.1					
STP in Sump	Any water or product removed and disposed of properly	8.5.3.1					
	Sump is free of cracks, holes, bulges, or other defects	8.5.3.2					
	Penetration fittings intact and secured	8.5.3.3					
	Piping interstitial space open to the sump (open piping system only)	8.5.3.4.1					
	Alarm sounds when pressure or vacuum is released (closed piping system only)	8.5.3.4.2					
	Entire interstitial space under pressure or vacuum (closed piping system only)	8.5.3.4.3					
	Sump sensor properly mounted at the bottom of the sump	8.5.3.5					
	Sensor tested and functional	8.5.3.6					

Appendix A-3: SAMPLE FORM FOR ANNUAL UNDERGROUND STORAGE SYSTEM INSPECTION CHECKLIST – PAGE 2

Go to *www.pei.org/RP900* for an electronic version of this form

Category	Description	PEI/RP900	N/A	Tank 1	Tank 2	Tank 3	Tank 4
	Sump lid, gasket, and seals present and in good condition	8.5.3.7					
	Manway cover at grade in good condition, does not touch sump cover, all bolts present, handles and lift mechanism in good condition (as applicable)	8.5.3.8					
Other Tank-Top Sump		8.6					
Other Tank-Top Sump (Same Procedure as STP Sump)	Any water or product removed and disposed of properly	8.5.3.1					
	Sump is free of cracks, holes, bulges, or other defects	8.5.3.2					
	Penetration fittings intact and secured	8.5.3.3					
	Piping interstitial space open to the sump (open piping system only)	8.5.3.4.1					
	Alarm sounds when pressure or vacuum is released (closed piping system only)	8.5.3.4.2					
	Entire interstitial space under pressure or vacuum (closed piping system only)	8.5.3.4.3					
	Sump sensor properly mounted at the bottom of the sump	8.5.3.5					
	Sensor tested and functional	8.5.3.6					
	Sump lid, gasket, and seals present and in good condition	8.5.3.7					
	Manway cover at grade in good condition, does not touch sump cover, all bolts present, handles and lift mechanism in good condition (as applicable)	8.5.3.8					
Other Sumps		8.7					
All Other Sumps (Same Procedure as STP Sump)	Any water or product removed and disposed of properly	8.5.3.1					
	Sump is free of cracks, holes, bulges, or other defects	8.5.3.2					
	Penetration fittings intact and secured	8.5.3.3					
	Piping interstitial space open to the sump (open piping system only)	8.5.3.4.1					
	Alarm sounds when pressure or vacuum released (closed piping system only)	8.5.3.4.2					
	Entire interstitial space under pressure or vacuum (closed piping system only)	8.5.3.4.3					
	Sump sensor properly mounted at the bottom of the sump	8.5.3.5					
	Sensor tested and functional	8.5.3.6					
	Sump lid, gasket, and seals present and in good condition	8.5.3.7					
	Manway cover at grade in good condition, does not touch sump cover, all bolts present, handles and lift mechanism in good condition (as applicable)	8.5.3.8					
ATG Manhole		8.8					
ATG Manhole	Cap in good condition, seals tightly, hole sealed where probe wire goes through	8.8.1					

Appendix A-3: SAMPLE FORM FOR ANNUAL UNDERGROUND STORAGE SYSTEM INSPECTION CHECKLIST – PAGE 3

Go to *www.pei.org/RP900* for an electronic version of this form

Category	Description	PEI/RP900	N/A	Tank 1	Tank 2	Tank 3	Tank 4
	Wire splices sealed and wire in good condition	8.8.2					
	Junction box and conduit sealed, in good condition	8.8.3					
	Probe and floats in good condition, both floats present and move freely (mag probe)	8.8.4					
	Verify operation of water- and product-level warnings and alarms (mag probe)	8.8.5					
	Manhole cover in good condition, adequate clearance between the ATG probe cap and manhole cover	8.8.6					
Fill Area		8.9					
Drop Tube	Drop tube extends to within 6 inches of the tank bottom (if no flow diffuser present)	8.9.1					
Vapor-Recovery Adaptor	Poppet of vapor-recovery adaptor (also known as a "dry break") moves freely, seals tightly	8.9.2					
Overfill Prevention		8.10					
Drop Tube Shutoff (Flapper Valve)	Valve moves freely and operates according to manufacturer's specifications	8.10.1.1					
	Valve installed at proper height	8.10.1.2					
Ball-Float Valve	Ball float can be removed and inspected	8.10.2.1					
	Cage intact, ball in good condition, moves freely, seats firmly; breather hole open	8.10.2.2					
	Installed at proper height	8.10.2.3					
Overfill Alarm	Alarm mounted near fills, clearly labeled	8.10.3.1					
	Alarm is functional	8.10.3.2					
	Alarm sounds at the proper product level	8.10.3.3					
Leak Detection		8.11					
ATG Console	Console has no active warnings or alarms	8.11.1.1					
	Alarm history shows no recurring leak alarms	8.11.1.2					
	Verify in-tank leak-detection tests are being completed (if used for leak detection)	8.11.1.3					
	Verify correct set-up parameters for the in-tank test	8.11.1.4					
	Verify correct set-up parameters for electronic line-leak detector (if present)	8.11.1.5					
	Verify piping leak-detection tests are being completed (if used for leak detection)	8.11.1.6					
Continuous Interstitial Monitoring	Tank interstitial access is present	8.11.2.1					
	"Dry" tank sensor tested and functional, reinstalled at bottom of tank	8.11.2.2					

Appendix A-3: SAMPLE FORM FOR ANNUAL UNDERGROUND STORAGE SYSTEM INSPECTION CHECKLIST – PAGE 4

Go to *www.pei.org/RP900* for an electronic version of this form

Category	Description	PEI/RP900	N/A	Tank 1	Tank 2	Tank 3	Tank 4
	"Wet" tank sensor functional, reinstalled in proper position	8.11.2.3					
	"Wet" tank leak-detection liquid depth within range specified by manufacturer	8.11.2.4					
Electronic Leak-Detection Monitor	Leak-monitoring console is operational and has no active warnings or alarms	8.11.3.1					
Line Tightness Testing	If pressurized piping has been tested in the last year, review the results and verify that the test passed	8.11.4.1					
	If suction piping has been tested within the last three years, review the results and verify that the test passed.	8.11.4.2					
Under Pump Check Valve (Suction Pump)	Below grade piping operates at less than atmospheric pressure	8.11.5.1					
	Below grade piping slopes continuously back to the tank	8.11.5.2					
	There is only one check valve, and it is located as close as practicable to the suction pump	8.11.5.3					
Tank Tightness Testing	If a tank test has been conducted within the last five years, review the results and verify that the test passed	8.11.6.1					
Continuous Soil-Vapor Monitoring	Sensing device calibrated and tested	8.11.7.1					
Continuous Groundwater Monitoring	Sensing device tested	8.11.8.1					
Corrosion Protection		8.12					
Galvanic CP	Verify that CP testing of all metallic components in contact with soil or water has been conducted within the past three years and test passed	8.12.1.1					
Impressed Current CP	Verify that CP testing has been conducted within the past three years and test passed	8.12.2.1					
	No exposed wires	8.12.2.2					
Tank Lining	Lining inspected as required and in good condition	8.12.3.1					
Miscellaneous		8.13					
Tank Pad & Pavement	Concrete or asphalt over or near tanks is level, no significant cracks	8.13.1.1					
Stage II Liquid-Collection Points	Cap in good condition, fits tightly, little or no liquid in bottom	8.13.2.1					
Stage II Testing	Verify that Stage II testing has been conducted and test results are passing	8.13.3.1					
Site Diagram	Site diagram accurately reflects the site conditions	8.13.4.1					
Initial Fuel Dispenser Inspection		8.14					
Initial Dispenser Inspection	All dispenser components are clean and dry	8.14.1.1					
	If fuel-dispenser sump is present, sump is dry	8.14.1.2					

Appendix A-3: SAMPLE FORM FOR ANNUAL UNDERGROUND STORAGE SYSTEM INSPECTION CHECKLIST – PAGE 5

Go to *www.pei.org/RP900* for an electronic version of this form

Category	Description	PEI/RP900	N/A	Tank 1	Tank 2	Tank 3	Tank 4
Fuel Dispenser Inspection		8.15					
All Dispensers	Junction boxes sealed, not corroded; seal-offs present; intrinsically safe wiring in good condition	8.15.1.1					
	Flexible connector not twisted, kinked, or bent beyond manufacturer's specifications	8.15.1.2					
	Piping in good condition	8.15.1.3					
	Stage II piping functional or else capped and sealed at elevation lower than the fuel dispenser island	8.15.1.4					
Dispensers Without Sumps	Flex connectors and other metallic product piping are not in contact with soil or water or are cathodically protected	8.15.2.1					
Dispensers With Sumps	Any water removed and disposed of properly	8.15.3.1					
	Sump free of trash, debris, and used filters	8.15.3.2					
	Sump is free of cracks, holes, bulges, or other defects	8.15.3.3					
	Penetration fittings intact and secured	8.15.3.4					
Piping Interstitial Space	Piping interstitial space open to the sump	8.15.4.1					
	Piping interstitial space closed to the sump	8.15.4.2					
	Sensor present in the fuel-dispenser sump with closed double-walled piping system	8.15.4.3					
Dispenser Sump Sensors	Sump sensor properly mounted at the bottom of the sump	8.15.5.1					
	Electronic sensor tested and functional	8.15.5.2					
	Mechanical float sensor free to move and properly adjusted	8.15.5.3					

DESCRIBE ANY DEFICIENCIES HERE:

Instructions: Mark each tank where no problem is observed with a checkmark: √
If certain equipment is not required and / or not present, mark checklist in the N/A column.
If a defect is found, mark the checklist with an "X," describe the problem in the "DEFICIENCIES" section, and notify the appropriate person.
Refer to the section in the PEI Recommended Practices on UST system equipment inspection listed in the 'PEI/RP900' column for additional information. Refer to PEI RP500, *Recommended Practices for Inspection and Maintenance of Motor Fuel Dispensing Equipment*, for inspection procedures that apply to fuel dispensing equipment.