

CITY OF NEW LONDON UST RECORDS (DRAFT 5-14-2018)

(Based on DEEP UST Registration Records Unless otherwise Noted)

Site	Address	UST Records	Installation Date	Registered <sup>1</sup>	Removal Date	Required Action
NL High School	490 Jefferson	1 @ 20,000 FO	1992	No	In Use	Register UST
		1@10,000 FO	1970	Yes	1992 ? <sup>2</sup>	Register as Removed
		1@10,000 FO	1950	Yes	1992 ?	Register as Removed
North Fire Station	240 Broad	1,000 (?)	1970	Yes	2001	None
Fire Headquarters	297 Bank St	1,000 FO	1956	Yes		Remove UST & Register
Harbor School	432 Montauk	2,000-2,500 FO	1960 (1947?) <sup>3</sup>	Yes	?	Confirm Removal- Register as Removed
		4,000 FO (backup)	?	No		Remove & Register Removed
BDMS (Former NL Jr, High) <sup>4</sup>	36 Waller	10,000 FO	1961 (1954?) <sup>5</sup> 1994 <sup>6</sup>	Yes Not in CTDEEP Database	?	Confirm <sup>7</sup> Removal & Register
		Diesel (Emergency Generator)	???	Not Required	In Use	Confirm size & UST Specs
Jennings (Built Circa 2008)	50 Mercer	5,000 FO	1985 1999	Yes Yes	1999 2006	None
		???? FO	C 2006	No	In Use	Register
Martin Center	110 Broad	5,000 FO	1980	Yes	Yes	None
Bates Woods	Jefferson Ave	2 @ 275 FO <sup>8</sup>		Yes		None
City Hall	State St	1,000 FO	1962	Yes	Sept 1988	None
NL DPW	109 Crystal Ave	10,000 Gas	Oct 2009	Yes		Confirm EZ Filing
		10,000 Diesel	Oct 2009	Yes		Confirm EZ Filing
New Police Station	5 Governor Winthrop Blvd	1,000 Fuel Oil 4,000 Diesel (Generator)				Removed and Replace with ASTs Register as removed
Old Police Station	111 Union	4000 gas	?	No	1990	No further action.
Ocean Beach		550 fuel oil	?	No	1995	No further action.

Does not include Water & Sewer Dept Tanks. Yellow Highlight Subject to DEEP Violation

Green Highlight- Follow up Action Required

<sup>1</sup> Registration not current with required EZ format.

<sup>2</sup> Fire Marshal Records indicate removal of a UST (one - size not specified 6/23/1992)

<sup>3</sup> Per Fire Marshal Records

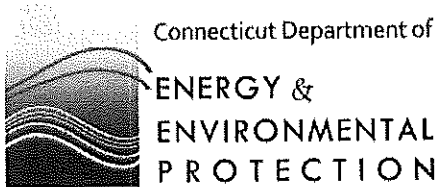
<sup>4</sup> Converted to gas 8-13 years ago per NL staff.

<sup>5</sup> Per Fire Marshal Records

<sup>6</sup> CTDEEP Registration Form- Not in CTDEEP database.

<sup>7</sup> Fire Marshal email (10/3/2013) states "oil tanks not connected- technically abandoned." Facility on natural gas.

<sup>8</sup> Incorrect filing- above ground tanks.



**NOTICE OF VIOLATION**  
**NOV # NOVUST-GB18-0021 - Site # 95-1435**

**CITY OF NEW LONDON**  
**134 WILLIAMS ST**  
**NEW LONDON, CT 06320-5231**

The purpose of this Notice is to inform you that personnel of the Department of Energy and Environmental Protection ("DEEP") have made observations or otherwise obtained information indicating that a violation of law has occurred at the property located at 490 JEFFERSON AVE, NEW LONDON, CT 06320-2525. On 2/26/2018, the DEEP, Bureau of Materials Management and Compliance Assurance, Storage Tank and PCB Enforcement Unit conducted an inspection. Based upon that inspection, it appears that you have failed to comply with Sections 22a-449(d) 101-113 of the Regulations of Connecticut State Agencies. Specifically:

*Regulation: CT state regulation (d)-1(e)(2)*

**Violation Reason: (d)-1 tank beyond life expectancy**

**Required Action: Permanently close UST**

**Applies To: TANK A-1 (Containing Heating Oil(on-site consumption) with Capacity of 10000 gallons)**

**Applies To: TANK B-1 (Containing Heating Oil(on-site consumption) with Capacity of 10000 gallons)**

When you have corrected the violation(s) alleged in this Notice, you should submit in writing the details of the corrective action(s). The submittal should be made within thirty (30) days on the enclosed Compliance Statement, and *sent to the UST NOV Compliance Office*. Until the DEEP has received such a statement, the DEEP will presume you remain in violation. If the violation(s) cannot be corrected within thirty (30) days, provide a schedule of compliance (that includes a timetable) on the enclosed Compliance Statement within thirty (30) days describing the actions you will take to correct the violation(s). Your actions in response to this Notice, including submission of the attached Compliance Statement, may affect the DEEP's decision whether or not to take formal enforcement action.

The Compliance Statement should include, but not necessarily be limited to (1) initial analytical results for samples taken from the site; (2) analytical results for samples showing that contamination at the site has been corrected; (3) analytical results evaluating the migration or lack thereof of contamination at the site, (4) documentation confirming that the alleged violations have been remedied, and (5) measures taken to prevent future such violations at this site or other sites or (6) a schedule for providing (1) through (5).

A. Other violations may exist; legal obligations. This Notice does not necessarily specify all violations of Connecticut environmental law or violations of any other legal requirements, which may exist at the aforementioned property. This Notice does not preclude the DEEP or other state, local or federal agencies from commencing any enforcement action regarding any such violations. Your facility may be inspected

again pursuant to law and without additional prior notice to determine compliance with state and any applicable federal law. It is your responsibility to comply with all legal requirements, whether or not the DEEP notifies you of any violations or takes any enforcement action against you. Nothing in this Notice relieves you of other obligations under applicable federal, state and local law.

B. Enforcement action. Civil penalties of up to \$25,000 may be assessed for each day of each violation under Sections 22a-131 and 22a-438 of the Connecticut General Statutes. Notwithstanding the issuance of this Notice, the DEEP may seek such penalties and may issue an order, seek an injunction, or take other legal action under Chapters 439, 445 and 446 of the Connecticut General Statutes.

C. No assurance by Commissioner. No provision of this Notice and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that actions you may take to address the violation alleged herein will result in compliance.

D. DEEP contact. Should you have any questions regarding the above, please contact the UST NOV Compliance Office via telephone at (860) 424-3886, via FAX at (860) 424-4061, or via email at [deep.ustnov@ct.gov](mailto:deep.ustnov@ct.gov).

For DEEP:

\_\_\_\_\_  
Signature of staff issuing NOV

2/26/2018

Date

For Respondent:

\_\_\_\_\_  
Signature

CITY OF NEW LONDON

Name (Please Print)

Facility Owner

Title

2/26/2018

Date

**COMPLIANCE STATEMENT**

This Compliance Statement shall be signed by: (I) You (*if an individual-the individual signs*); (*if a corporation or partnership-by a responsible corporate officer/general partner or a duly authorized representative of such person, as those terms are defined in Section 22a-430-3(b)(2) of the Regulations of Connecticut State Agencies*); or (*if a municipality-chief elected official or principal executive officer*) and (II) if different, by the individual responsible for actually preparing such statement, each of whom shall read and sign the certification regarding false statements on the Compliance Statement.

Within fifteen days of the date you become aware of a change in any information in the Compliance Statement, or that any information was inaccurate or misleading or that any relevant information was omitted, submit the correct or omitted information to the UST NOV Compliance Office as indicated in the Notice of Violations.

Notice of Violation No.    **NOVUST-GB18-0021**  
Facility Name:            **NEW LONDON HIGH SCHOOL**  
(Site)Address:            **490 JEFFERSON AVE**  
                                      **NEW LONDON, CT 06320-2525**

In accordance with the directions in the above-referenced Notice of Violation, I certify that the noted violations have been corrected in the following manner:

Attach additional sheet(s) as needed  
(Enclose supporting documentation demonstrating compliance)

**Certification of Accuracy**

I certify that the information in this Compliance Statement and any attachments thereto are true, accurate and complete, and I understand that any false statement may be punishable as a criminal offense under Connecticut General Statutes Section 22a-6 and 53a-157.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Telephone

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Address

\_\_\_\_\_  
Date

\_\_\_\_\_  
Preparers Signature, if different than the above

\_\_\_\_\_  
Telephone

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Address

## ADVICE TO RECIPIENTS OF NOTICES OF VIOLATION\*

**Read the Notice of Violation:** It tells you:

- ! what activity you have conducted or what condition on your property is causing or may result in damage to the environment;
- ! the environmental laws you are not complying with;
- ! in some cases, what action you need to take to address the environmental problem;
- ! how quickly DEEP expects you to take action; and
- ! who to contact if you have a question or problem.

**Do Not Cause Additional Problems:** Make sure that you do not engage in activity that might result in further environmental harm.

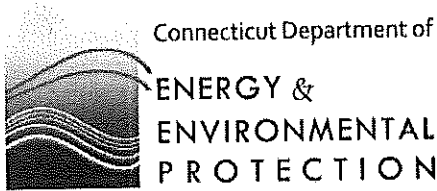
**Follow the Deadlines:** If you can't meet the deadlines provided in the Notice of Violation, call the contact person. Explain why you can't meet the deadline. Staff will explore with you the feasibility of alternate deadlines.

**Cooperate with DEEP:** Generally, DEEP's first attempt to resolve the types of violations alleged in this case is through the issuance of a Notice of Violation. If you disregard this notice, it will be assumed you do not wish to cooperate and you should expect that DEEP will take more formal enforcement action. This can include issuing an administrative order, and/or filing suit to obtain an injunction and penalties as provided by law. The most important thing to remember is to call DEEP if you have any questions.

**Call if you don't Understand:** DEEP staff name and telephone number are given at the end of the Notice of Violation. Staff are there to try to answer your questions and work with you to resolve the environmental compliance issue. In some cases you may need to obtain the services of a professional consultant to plan and implement effective corrective measures. DEEP staff can discuss with you the kind of professional help you may need to address the alleged violation cited in the notice.

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\* The Notice of Violation does not necessarily specify all environmental violations which may exist at your property regulated by the Department. Nothing in the Notice relieves you of other obligations under applicable federal, state and local law.



WARNING LETTER  
WARNING # WLUST-GB18-0035 - Site # 95-1435

**CITY OF NEW LONDON  
134 WILLIAMS ST  
NEW LONDON, CT 06320-5231**

**Subject:** Underground Storage Tank Violation(s)

The purpose of this Notice is to inform you that personnel of the Department of Energy and Environmental Protection ("DEEP") have made observations or otherwise obtained information indicating that a violation of law has occurred at the property located at 490 JEFFERSON AVE, NEW LONDON, CT 06320-2525. On 2/26/2018, the DEEP, Bureau of Materials Management and Compliance Assurance, Storage Tank and PCB Enforcement Unit conducted an inspection. Based upon that inspection, it appears that you have failed to comply with Sections 22a-449(d) 101-113 of the Regulations of Connecticut State Agencies. Specifically:

*Regulation: CT state regulation (d)-1(d)*

**Violation Reason: A review of DEP records indicates that we do not have a registration form with current information.**

**Required Action: Please provide a completed registration through EZ-File for the facility and all unregistered UST systems.**

The violation(s) described above identify non-compliance with state and/or federal regulations. Since the on-site inspector has issued a warning letter you need not send in proof of compliance, but it is your responsibility to regain and stay in compliance with these regulations.

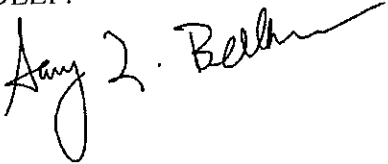
A. Other violations may exist; legal obligations. This Notice does not necessarily specify all violations of Connecticut environmental law or violations of any other legal requirements, which may exist at the aforementioned property. This Notice does not preclude the DEEP or other state, local or federal agencies from commencing any enforcement action regarding any such violations. Your facility may be inspected again pursuant to law and without additional prior notice to determine compliance with state and any applicable federal law. It is your responsibility to comply with all legal requirements, whether or not the DEEP notifies you of any violations or takes any enforcement action against you. Nothing in this Notice relieves you of other obligations under applicable federal, state and local law.

B. No assurance by Commissioner. No provision of this Notice and no action or inaction by the

Commissioner shall be construed to constitute an assurance by the Commissioner that actions you may take to address the violation alleged herein will result in compliance.

C. DEEP contact. Should you have any questions regarding the above, please contact the UST NOV Compliance Office via telephone at (860) 424-3886, via FAX at (860) 424-4061, or via email at [deep.ustnov@ct.gov](mailto:deep.ustnov@ct.gov). Please reference "Warning # **WLUST-GB18-0035**" in all correspondence.

For DEEP:

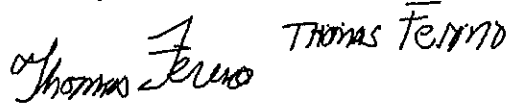


\_\_\_\_\_  
Signature of staff issuing warning letter

2/26/2018

Date

For Respondent:



\_\_\_\_\_  
Signature

CITY OF NEW LONDON

Name (Please Print)

Facility Owner

Title

2/26/2018

Date



**UST Compliance Inspection Checklist**  
 Connecticut Department of Energy and Environmental Protection  
 Storage Tank and PCB Enforcement Unit  
 79 Elm Street, Hartford, CT 06106  
 860-424-3374

Inspection Date: 2/26/2018

**GENERAL:**

<b>Site ID:</b>	95-1435	<b>Inspector</b>	Gary Bellmar
<b>Site Name</b>	NEW LONDON HIGH SCHOOL	<b>Reason</b>	Compliance
<b>Site Address</b>	490 JEFFERSON AVE NEW LONDON, CT 06320-2525	<b>Inspection Type</b>	Full Inspection

**Contacts**

Contact Type	Contact Information
Owner	CITY OF NEW LONDON, 134 WILLIAMS ST NEW LONDON, CT 06320, Phone: (860) 447-6000-, Email: mccoysk@newlondon.org
Registrant	CITY OF NEW LONDON, 134 WILLIAMS ST NEW LONDON, CT 06320

<b>Tank ID: A-1 - Currently In Use (10000 gallons) – Installed: 5/1/1970</b>			
<b>Construction</b>	Asphalt Coated or Bare Steel	<b>Life Expectancy</b>	15 years
<b>Construction Notes</b>		<b>Tank Options</b>	
<b>Corrosion Protection Type: BLANK</b>			
<b>Impressed Current System</b>		<b>Structure to soil voltage</b>	
<b>Compartment: a - Heating Oil(on-site consumption) (10000 gallons)</b>			
<b>Spill Prevention</b>	Spill Containment	<b>Overfill Prevention</b>	
<b>Product Notes</b>		<b>Spill Prevention Note</b>	
<b>Release Detection</b>	No release detection required		
<b>Piping – Installed: 5/1/1970</b>			
<b>Construction</b>	Other (Specify)	<b>Corrosion Protection Type</b>	Not Required
<b>Construction Notes</b>	steel thru PVC chase pipe	<b>Piping Options</b>	Single Walled, Containment Sumps @ Tanks, Metallic piping isolated from soil and water, Metallic fittings isolated from soil and water
<b>Piping Release Detection</b>			
<b>Pump Type</b>	American Suction (Check Valve is at Tank)	<b>Line Leak Detector</b>	
<b>Primary Method</b>			
<b>Tank ID: B-1 - Currently In Use (10000 gallons) – Installed: 1/1/1950</b>			
<b>Construction</b>	Asphalt Coated or Bare Steel	<b>Life Expectancy</b>	15 years
<b>Construction Notes</b>		<b>Tank Options</b>	
<b>Corrosion Protection Type: BLANK</b>			
<b>Impressed Current System</b>		<b>Structure to soil voltage</b>	
<b>Compartment: a - Heating Oil(on-site consumption) (10000 gallons)</b>			
<b>Spill Prevention</b>	Spill Containment	<b>Overfill Prevention</b>	
<b>Product Notes</b>		<b>Spill Prevention Note</b>	
<b>Release Detection</b>			
<b>Piping – Installed: 5/1/1970</b>			



<b>Construction</b>	Other (Specify)	<b>Corrosion Protection Type</b>	Not Required
<b>Construction Notes</b>	steel thru PVC chase pipe	<b>Piping Options</b>	Single Walled, Containment Sumps @ Tanks, Metallic piping isolated from soil and water, Metallic fittings isolated from soil and water
<b>Piping Release Detection</b>			
<b>Pump Type</b>	American Suction (Check Valve is at Tank)	<b>Line Leak Detector</b>	
<b>Primary Method</b>			

**Narrative Comments**

02/26/2018 Inspector: Gary Bellmar - This site lists two single wall asphalt coated steel 10K heating oil UST's ( one installed in 1950/1970 and one installed in 1970. both tanks are listed as currently in use. Location now has a single 20K UST heating oil tank that is DW and is monitored by a Veeder Root TLS 300C. All sensors are normal, sump and annular. High water alarm is active with 3.75 inches of water that should be removed by vacuum truck immediately. Piping sump has 1 - 3 inches of liquid that also needs to be removed by vacuum truck and disposed of as hazardous waste. Sensor for this sump was elevated from bottom of sump. This sensor needs to be re-positioned to the bottom of the sump containment pan. Please confirm that there is 3.75 inches of water in UST by using gas stick and water detection paste. Numerous violations are in place at this site. Annual Tank Notification needs to be updated on-line via EZFile to the State of CT DEEP within 30 days. If assistance is needed, contact Moises Torrent at the DEEP, 1-860-424-3343. Written Warning issued.

**Potential Violations**

*Regulation: CT state regulation (d)-1(d)*

**Violation Reason: A review of DEP records indicates that we do not have a registration form with current information.**  
**Required Action: Please provide a completed registration through EZ-File for the facility and all unregistered UST systems.**

*Regulation: CT state regulation (d)-1(e)(2)*

**Violation Reason: (d)-1 tank beyond life expectancy**

**Required Action: Permanently close UST**

**Applies To: TANK A-1 (Containing Heating Oil(on-site consumption) with Capacity of 10000 gallons)**

**Applies To: TANK B-1 (Containing Heating Oil(on-site consumption) with Capacity of 10000 gallons)**

Amy Z. Bell

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Inspector Signature

Thomas Ferraro

THOMAS FERRARO

---

Recipient Signature

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CITY OF NEW LONDON

Recipient Printed Name

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Facility Owner

Position/Title

Risk Management  
13 Masonic Street  
New London, CT 06320



Phone (860) 447-5218  
Fax (860) 447-5297

## CITY OF NEW LONDON

Gary Bellmar  
CT Department of Energy & Environmental Protection  
UST NOV Compliance Office  
Underground Storage Tank Program  
77 Elm Street  
Hartford, CT 06106-5127

March 26, 2018

Re: City of New London  
Underground Storage Tank Violations & Warning Letters

Mr. Bellmar:

I am writing to provide an update on the referenced underground storage tank (UST) violations and warning letters and request a time extension for compliance. The City has retained Paul Burgess, PE, LEP, Paul Burgess, LLC to assist us in UST compliance and closure. The following status summary is provided.

**New London Fire Dept. 297 Bank Street**  
**NOVUST-GB18-0026- Site 95-1428**  
**March 3, 2018**

Notice of Violation – 1,000 gallon fuel oil UST beyond life expectancy.  
Required Action- Permanently close UST

*The City plans to removed the UST or abandon it in place. This requires a UST removal or abandonment specification to be prepared, the project competitively bid and the project implemented.*

**Warning Letter # WLUST-GB18-004- Site 95-1428**  
EZ- File registration required for the UST.

*The City will complete the UST EZ- file registration after the UST removal or abandonment.*

**Harbor School 432 Montauk Ave.**  
**NOVUST-GB18-0022- Site 95-1408**  
**February 26, 2018**

Notice of Violation – 2,000 gallon fuel oil UST beyond life expectancy.  
Required Action- Permanently close UST

*The City plans to remove a 5,000 gallon UST, which was originally used in a dual fuel system. The City has determined that natural gas can be used without a fuel oil backup. The City is researching to determine if the*

*An Equal Opportunity Employer*

2,000 gallon fuel oil UST was previously removed. If not, it will be removed in conjunction with the current 5,000 gallon UST. This requires a UST removal specification to be prepared, the project competitively bid and the project implemented.

**Warning Letter # WLUST-GB18-0036- Site 95-1408**  
EZ- File Registration required for the UST.

*The City will complete the UST EZ- file registration after the UST(s) removal.*

**36 Waller St. (Current Benny Dover Middle School - Former NL Junior High, 134 William Street)**

**Warning Letter #WLUST-GB18-0034- Site 95-1410**  
**February 26, 2018**

EZ- File Registration required for the UST.

*The City is currently researching available UST information. It is anticipated the UST EZ- file registration indicating UST removal will be completed by May 1, 2018.*

**New London High School 490 Jefferson Ave.**  
**NOVUST-GB18-0021-Site 95-1435**  
**February 26, 2018**

Notice of Violation- Two fuel oil USTs @ 10,000 gallon beyond life expectancy.  
Required Action- Permanently close USTs.

*Fire Marshal Records suggest USTs removed in 1992. The City is conducting further research regarding the status of these USTs*

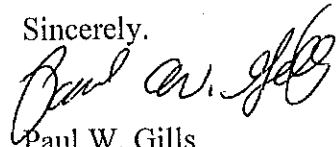
**Warning Letter WLUST-GB18-0035**  
EZ- File registration required for the USTs.

*The City is currently researching available UST information. It is anticipated the UST EZ- file registration indicating UST removals and for the existing 20,000 gallon fuel oil UST will be completed by May 1, 2018.*

*In addition, the City of working on correcting the water in the UST and sump.*

In summary, the City of New London requests an extension to July 1, 2018 to complete the budgeting, public bidding and removal of the Harbor School UST(s) and the Fire Headquarters UST. We will keep CTDEEP updated on this project as it progresses.

Sincerely,



Paul W. Gills  
Paul W. Gills CSP,ARM,ALCM  
Risk Manager  
City of New London  
13 Masonic Street  
New London, CT. 06320

## Gills, Paul

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**From:** Gills, Paul  
**Sent:** Wednesday, March 07, 2018 3:55 PM  
**To:** Mayor Passero; Tracy, Stephen; Gray, Don; Funk, Robert; Sear, Brian; Denoia, David; Barlow, William; Gautier Jr., Miguel; 'McCoy, Kathleen'; Fields, Steven; Kydd, Henry  
**Subject:** DEEP tank inspections-notice of violations-action plan for compliance  
**Attachments:** NLUSTDEEPviolations3718.pdf

Good afternoon all-

This email is to inform you of recent DEEP regulatory enforcement inspection actions by DEEP pertaining to city owned underground oil storage tanks.(UST) The inspections were precipitated by a significant oil leak and environmental remediation issue at the town of Newington. The leak involved 19,000 gallons of oil resulting in \$4million environmental remediation cost borne by the taxpayers. DEEP is conducting inspections of all Ct. municipal UST's registered with the state.

On 3/6/18 I ,Vern Skau and Director Sear met with DEEP Compliance specialist Gary Bellmar to discuss recent inspections and the DEEP UST filing requirements. The last time the city filed the required UST annual notifications was in 1987. We are out of compliance and must complete the filings as required.

The following locations were inspected and violations identified:

- 1.) 3/6/18-NLFD HQ 297 Bank st- 1k heating oil tank from 1956-not properly permanently closed. Inspector was unable to access fill pipe to determine if product is still in tank. No annual tank notification.
- 2.) 2/26/18-Harbor school 432 Montauk Ave-possible 1960 2.5k tank in ground. (unknown if tank was removed)Current 5k UST in place-no notification on file. Sump buried under large steel plate and fill bucket tarred over.
- 3.) 2/26/18-BDJMS 36 Waller st- unknown if 1960 10k tank has been removed . no annual tank filing-if tank is still in ground. Note-natural gas now used.
- 4.) 2/26/18-NLHS 490 Jefferson Ave- two 1950/1970 10k heating oil tanks registered-presumed removed/abandoned. (?) single 20k tank in place with monitoring system. High water alarm indicates 3.5" of water in tank. **Water needs to be removed immediately.** Sump has 1-2 " of contaminated liquid-needs to be removed. sensor needs to be re-positioned. No annual tank notification.

Actions required-

- 1.) Confirmed receipt of all inspections to DEEP(Gary Bellmore)-completed 3/7/18.
- 2.) NLHS-**immediately** remove water from tank, correct sensor position and remove liquid from sump. (Miguel to provide status.)
- 3.) Identify and retain environmental consultant to assist with city/NLPS tank inventory, condition assessment and annual tank notification filing. (TBD-**Priority**)
- 4.) Determine status of UST at NLFD HQ.-removal/closure documentation.(TBD)
- 5.) Determine status of 1960 2.5k UST at Harbor School-removal /closure documentation.(TBD)
- 6.) Determine status of 1960 10k UST at BDJMS-removal/closure documentation.(TBD)
- 7.) Determine status of two 1950/1970 10k UST-removal /closure documentation.(TBD)

***Compliance/corrective actions must be made to DEEP within 30 days. Targetdates-3/26/18 and 4/8/18.***

I recommend that a working group be established to oversee compliance consisting of Brian Sear, Vern Skau, Miguel Gauthier and myself . Additional information and status reports will be updated as we progress.

We must move quickly to resolve the above noted compliance issues to avoid costly fines. (\$25,000 per day)

Should you have questions, please let me know.

Regards,

*Paul W. Gills*

Paul W. Gills CSP,ARM,ALCM

Risk Manager

City of New London

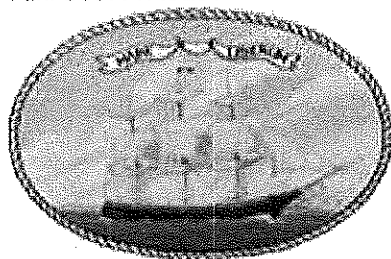
13 Masonic Street

New London,Ct. 06320

Tel. 860.437.6363

Cell 860.961.7866

Fax. 860.447.5297



## Gills, Paul

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**From:** paul@paulburgessllc.com  
**Sent:** Monday, May 21, 2018 2:49 PM  
**To:** Denoia, David; Miguel J. Gautier  
**Cc:** Gills, Paul; Sear, Brian  
**Subject:** [Fwd: Approval Notice for FilingID 40554]  
**Attachments:** ApprovedLetter.pdf

----- Original Message -----

Subject: Approval Notice for FilingID 40554

From: [eFiling@ct.gov](mailto:eFiling@ct.gov)

Date: Mon, May 21, 2018 1:59 pm

To: [paul@paulburgessllc.com](mailto:paul@paulburgessllc.com)

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The UST registrations for the 20,000 fuel oil (in use) and the 2@ 10,000 USTs (removed) for NLHS has been approved by CTDEEP (see attached). Please keep this document for your files.

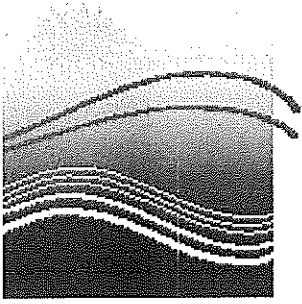
Please note the annual October 10th renewal requirement for all registered USTs. I can show Dave how to do this on EZ file.

Miguel- Once you provide me documentation that the 20,000 gal UST sump and monitoring system has been corrected, we can submit a compliance statement for this NOV.

Paul Burgess  
860 608 9820

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The EI Permit application for this UST submission 2337614 has been approved. It has been assigned an approved EINumber of 2337846.



Connecticut Department of  
**ENERGY &  
ENVIRONMENTAL  
PROTECTION**

79 Elm Street • Hartford, CT 06106-5127

[www.ct.gov/deep](http://www.ct.gov/deep)

Affirmative Action/Equal Opportunity Employer

## **Underground Storage Tank and PCB Enforcement Unit**

### **Notice of Application Approval**

CITY OF NEW LONDON  
490 JEFFERSON AVE  
NEW LONDON, CT06320-2525  
Attn: Miguel Gautier Jr.

**Re:** Application Number: 2337614      Received on: 05/17/2018

The Notification of Underground Storage Tanks submitted 05/17/2018 for Facility ID 95-1435, located at 490 JEFFERSON AVE, NEW LONDON, CT06320-2525 has been received by the Connecticut Department of Energy and Environmental Protection. All of the required information is found to be complete.

As a reminder, annual notification and payment is required by October 10 of each year and notifications regarding changes in information, closures, or new installations should continue to be submitted within thirty days of such event, along with any applicable fee, in accordance with the UST regulations.

If you have any questions, please email them to [deep.ustenforcement@ct.gov](mailto:deep.ustenforcement@ct.gov).

May, 21 2018  
Date

Lori Saliby  
Lori Saliby  
Supervising Environmental Analyst,  
Underground Storage Tank  
and PCB Enforcement Unit



## Gills, Paul

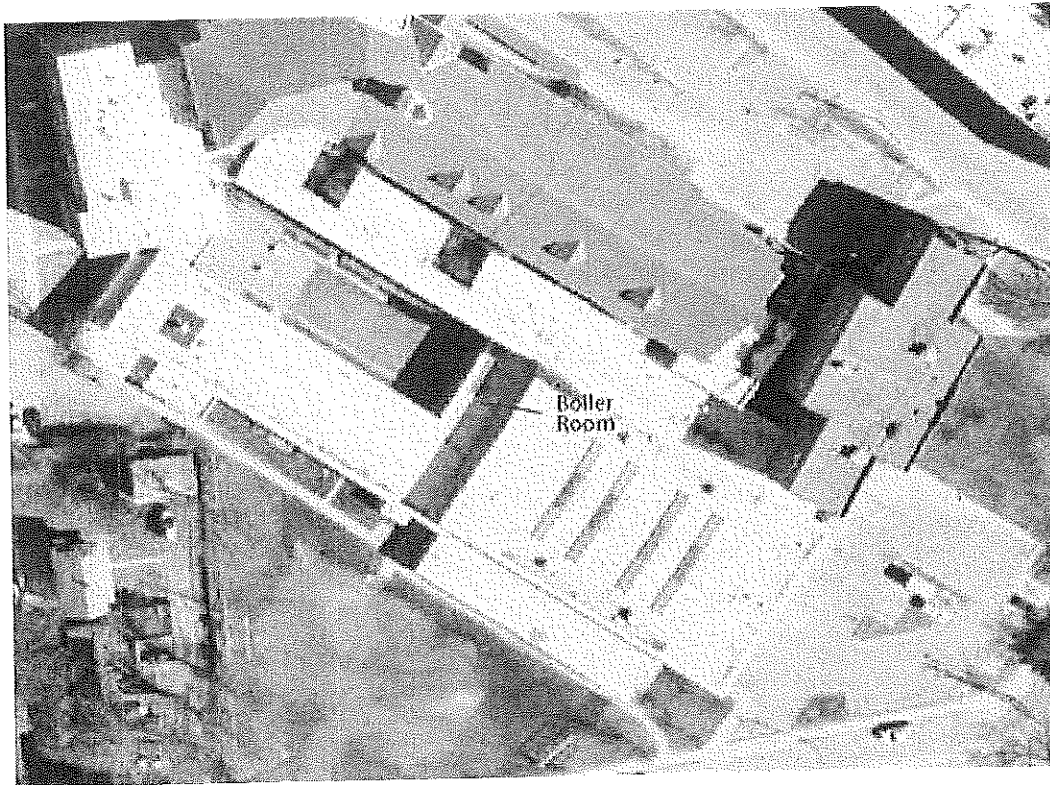
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**From:** Paul Burgess <paul@paulburgessllc.com>  
**Sent:** Monday, April 30, 2018 8:25 AM  
**To:** Skau, Vernon  
**Cc:** Gills, Paul; Denoia, David; Miguel J. Gautier  
**Subject:** BDMS and NLHS Tanks

Hi Vern-

To comply with the DEEP underground storage tank DEEP violations, we are still trying to confirm a couple of issues. Do you have any contact with Calvin Darrow? These are the questions.

1. **Benny Dover School-** DEEP records list a 10,000 gal fuel oil tank still in use. We know the school switched to gas around 2010. You provided me an email dated 10/3/2013 from Calvin stating "the oil tanks are not connected to boilers- technically abandoned in place". Would he recall where tank(s) were/are located? See photo below-



2. **High School-** Does he recall the location of the two oil tanks at NLHS before the existing 20,000 gal tank was installed? You provided me your fire information that the new 20,000 gal tank was installed in 1994. The records you provided me stated "oil tank removed from ground dated 6-23/92". Does he recall **two** tanks being removed and were they located in the same general area as the existing tank?

Thank in advance if you can assist in tracking this information down? If not- understood.

Thanks  
Paul Burgess



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## Gills, Paul

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**From:** Paul Burgess <paul@paulburgessllc.com>  
**Sent:** Monday, April 30, 2018 8:25 AM  
**To:** Miguel J. Gautier  
**Cc:** Gills, Paul; Denoia, David  
**Subject:** NL School UST Inspection

Miguel- Thanks for spending time with me on Friday to inspect several schools to get a better understanding of underground storage tank (UST) conditions.

The following comments/recommendation are provided:

### BDMS

1. We identified a new UST associated with the emergency generator on the southwest (rear) side of the building. The good news is this UST is exempt from registration, because it is used to fuel an emergency generator. It does need to comply with UST regs regarding design and installation standards. **If you can determine size and tank details and approx date of installation it would be helpful. Perhaps the Contractor that installed the generator would have information.**
2. Regarding the status of the former heating oil UST, we still need to do further research. I checked aerial photographs going back to 1965 and the courtyard was always enclosed. Doesn't make sense that an oil UST would have been at the location I suspected, unless I am missing something. A Fire Marshal 10/2013 email stated "*oil tanks not connected to boilers- technically abandoned*"  
**Can you check when the last delivery of fuel oil was at this school?**

### Jennings

1. As we found out, this school operates a dual fuel burner (gas & oil). An underground fuel oil UST was installed circa 2006 when the school was constructed. Kevin Monday(custodian) indicated the burner was fired once with fuel oil at that time. He recalled approximately 200 gallons of fuel oil may have been placed in the UST at that time.
2. The Veeder-Root monitoring system is not functioning properly.
3. As we discussed, if you could pursue the following:
  - **Try to find the as-built plans/shop drawings for this UST. The UST will require registration and I will need this info.**
  - **Could you contact Service Station Eqp (or equivalent) and have them fix the Veeder Root system and determine the design features of the UST. Please coordinate with me so I can be present.**

### NLHS

1. We observed the 20,000 gal fuel oil UST. The UST is not registered. We have Fire Marshal records about the UST and installation (6/30/1992) so we can register this tank. The DEEP had the following comments about this UST

Narrative Comments

02/26/2018 Inspector: Gary Bellmar - This site lists two single wall asphalt coated steel 10K heating oil UST in 1950/1970 and one installed in 1970, both tanks are listed as currently in use. Location now has a single 20 oil tank that is DW and is monitored by a Veeder Root TLS 300C. All sensors are normal, sump and annular. is active with 3.75 inches of water that should be removed by vacuum truck immediately. Piping sump has 1 liquid that also needs to be removed by vacuum truck and disposed of as hazardous waste. Sensor for this sump from bottom of sump. This sensor needs to be re-positioned to the bottom of the sump containment pan. Please there is 3.75 inches of water in UST by using gas stick and water detection paste. Numerous violations are in

If you could follow-up to get the water/waste removed and properly disposed, and have Service Station Eqp. correct the sensor and check other UST monitoring functions noted in the Violation. Please let me know when this is conducted so I can be onsite to get as much info as possible for the registration requirements.

2. There was no visual evidence of the two-10,000 gallon fuel oil USTs that are currently registered in the DEEP database as in use. We inspected the area near the current 20,000 gallon UST and the back of the building closest to the boiler room. A Fire Marshal record about these tanks is as follows:

*6-23-92*

*1330 hours*

*Oil Tank Removed from Ground*

*Temporary Tank still in back*

*Temp Tank to be changed 6-24-92*

I interpret this as documentation that these USTs were in the same location as the current 20,000 gal UST and they were removed. We can update DEEP UST registration to indicate that these USTs were removed.

Harbor School

1. You are in the process of having the remaining oil in the 5,000 gal UST fuel oil UST removed. This tank will be eliminated from use and be removed.
2. There is indication that a 2,000 gal fuel oil UST, currently registered in the DEEP database as in use-installed 1960, may remain buried onsite.
3. The specification for removal of the 5,000 gal UST should have a bid alternative to investigate the presence of the 2,000 gal UST and remove if identified.

Please let me know if there are questions and keep me up to date on the status of the follow-up items.

Thanks  
Paul Burgess  
860 608 9820



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## Gills, Paul

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**From:** Skau, Vernon  
**Sent:** Wednesday, March 21, 2018 12:31 PM  
**To:** Paul Burgess  
**Cc:** Gills, Paul  
**Subject:** RE: New London USTs  
**Attachments:** UST High School.pdf

So far this is what I have:  
I have researched the files for:  
High School – see attached forms – documents  
Nathan Hale – Nothing in the file  
UST File – Nothing found

Still have to research:  
Harbor – Jennings - Bennie Dover

More information to come

Vernon Skau, IAAI CFI  
Fire Marshal  
New London Fire Department  
289 Bank Street  
New London CT, 06320

(860) 447 - 5294

---

**From:** Paul Burgess [<mailto:paul@paulburgessllc.com>]  
**Sent:** Wednesday, March 21, 2018 7:08 AM  
**To:** Skau, Vernon  
**Cc:** Gills, Paul  
**Subject:** New London USTs

Hi Mr. Skau-

Thanks for spending the time with me last Thursday assisting my review of your files.

Did you have any luck finding further information in the archives?

If you did I can stop by and copy what you found.

Thanks

Paul Burgess  
860 608 9820



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FIRE MARSHAL'S BUREAU  
CITY OF NEW LONDON  
TANK INSTALLATION REPORT

Location: NEW LONDON HIGH SCHOOL Date: 7/9/92

Type of Tank: Underground  Aboveground

Construction of Tank:

Single Wall Steel  Fiberglass  Dbl. Wall

Contractor(s): FALVEY CONSTRUCTION, INC.

Address(s): 12 FIRETOWER ROAD Phone: 663-1695

KILLINGWORTH, CT

INSPECTION

Visual: Satisfactory  Unsatisfactory

Hydrostatic Test: Satisfactory  Unsatisfactory

Comments: UNDERGROUND TANK DOUBLE WALL - 10'-5-1/2" X

37'-5" 20,000 GAL. 5 LB AIR TEST-ALL CONNECTIONS AND

VALVES TESTED OK

Testing in Accordance with: NFPA 30  NFPA 31

Photographs Taken: YES  NO

Tank Manufacturer or Supplier: DOW CORNING

Serial #s of New Tanks:

- |                |    |
|----------------|----|
| 1. U.L. 630791 | 4. |
| 2.             | 5. |
| 3.             | 6. |

Removal of Tanks:

Visual: Satisfactory  Unsatisfactory

Soil: Samples Taken YES  NO

Photographs: Taken YES  NO

DEP Notified: YES  NO

Town Depts.: \_\_\_\_\_

Serial #: \_\_\_\_\_

Comments: \_\_\_\_\_

O/C  
TANKS

VALIDATION CERTIFICATE - STRUCTURAL WARRANTY

\*This checklist must be completed in its entirety by a trained O/C TANKS contractor to validate the 30 year structural warranty. For warranty details, see Publications "Single-Wall Fiberglass Tanks for Underground Petroleum Storage," Pub. No. 3-PE-6312 and "Double-Wall Fiberglass Tanks for Underground Petroleum Storage," Pub. No. 5-PE-16207.

Job Name NewLondon H.S. Coke Land Owner \_\_\_\_\_ Date 6-30-92  
Job Address Jefferson Ave. NewLondon Ct.  
Installation Contractor Fulvey Const. Corp. Foreman: Mathew Fulvey  
Owner Representative: ELISHA L. GALLOP Title P.E.  
THE WINTHROP GROUP

Installation Checklist

To be initialed by: Contractor Foreman Owner's Representative

A. Handling and Testing

- Single-wall tanks tested at 5 psi for 4', 6', 8' and 10' diameter tanks; 3 psi for 12' diameter tanks. Soapy water solution applied and the entire tank surface carefully inspected for air bubbles.
- Double wall tanks tested in strict conformance with "Test Instructions" label on tank (Label No. L.22.20). Do not connect the air hose directly to fitting in annular space.
- Hydrostatic test of secondary containment collar complete (fill collar with water, hold 12 hours, and check for leaks).

MDF \_\_\_\_\_

B. Bed & Backfill Material

Meets all ASTM C-33 requirements for quality and soundness. No more than 3% of backfill materials passes through a #8 sieve. Attach copy of backfill supplier sieve analysis.

Supplier Greiswald S&S  
Type 3/8" crushed (in accordance with installation specifications.)

MDF EPA  
MDF EPA  
MDF \_\_\_\_\_

- Pea Gravel—Clean naturally rounded aggregate, with particle size not less than 1/8" or more than 3/4" in diameter.
- Crushed Stone or Crushed Gravel—Washed crushed stone or gravel with angular particle size not less than 1/8" or more than 1/2" in diameter.
- Sieve analysis from a qualified soil engineer or from the supplier.

C. Hole Size

- Stable walls—4', 6', 8' and 10' diameter tanks—18" minimum (24" preferred) between adjacent tanks and between tanks and hole walls.
- Stable walls—12' diameter tanks—24" minimum between tanks and hole walls and 24" between adjacent tanks.
- Unstable walls—1/2 tank diameter minimum between tanks and hole walls; 18" minimum between adjacent tanks. (24" for 12' diameter tanks).

MDF EPA

D. Anchoring

- Hole flooding from high water table anticipated.
- Hole flooding from external surface water anticipated.
- Completed in accordance with Installation Instructions
- X Slab \_\_\_\_\_ Deadman
- Owner's representative aware of anchoring requirements.
- Not required.

MDF EPA

E. Installation Procedures

1. Minimum 12" level backfill bed of approved material.
2. Initial backfill—1st two 12" lifts pushed completely under tank bottoms between ribs and under end caps to eliminate all voids.
3. Completed backfilling to tops of tanks in uniform lifts.
4. Tanks not filled until backfilled to the tops of the tanks. Exception: wet holes. See O/C TANKS Publication 3-PE-6304.
5. Tanks completely filled with water or product after backfill is to the top of tanks.
6. Depth of bury/slab for traffic bonds.  
4'-10' diameter tanks: 36" of backfill, or 30" of backfill plus 6" of asphalt, or 18" of backfill plus 6" of reinforced concrete.  
12' diameter tanks: 38" of backfill plus 6" of asphalt or 38" of backfill plus 6" of reinforced concrete.
7. Filter fabric hole liner is recommended for the following installations:
  - a. Tidal condition or frequently changing water table
  - b. Unstable soils (muck or landfill)
  - c. Water condition with silty soil
 See installation instructions 3-PE-6304 for recommended brand name filter fabrics.
8. Reference O/C TANKS Publication 3-PE-6304 for complete installation instructions.

MDF EPA  
MDF EPA  
MDF \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



5-23-92

1330 hours

Oil Tank Removed from Ground

Temporary Tool still in back

Temp Tool to be changed 6-24-92

SECTION A

UNDERGROUND STORAGE FACILITY NOTIFICATION

7. FACILITY OWNER  
 8. TYPE OF OWNER  
 9. OPERATOR/CONTACT PERSON  
 10. TANK ID.

11. DATE OF INSTALLATION (Mo./Yr.)  
 12. EST. QUANTITY (if stored) (Gals.)  
 13. TYPE OF CONTENTS  
 14. CHEMICAL NAME OF PRINCIPAL SUBSTANCE (not trade name) (enter C.A.S. No. if known)

15. CONSTRUCTION MATERIALS  
 16. PROTECTION  
 17. INTEGRAL PIPING SYSTEM  
 18. MONITORING SYSTEM

19. FAILURE  
 20. COMMENTS

21. COMMENTS

22. CERTIFICATION

23. NAME (Type or Title)

24. OFFICIAL TITLE of owner or authorized representative

25. DATE SIGNED

1. FOR STATE USE ONLY  
 2. DATE RECEIVED  
 3. DATE ENTERED  
 4. AGENCY USE ONLY  
 5. DATE RECEIVED  
 6. DATE ENTERED  
 7. AGENCY USE ONLY  
 8. DATE RECEIVED  
 9. DATE ENTERED

10. STATE OF CONNECTICUT  
 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 UNDERGROUND STORAGE FACILITIES PROGRAM  
 HARTFORD, CONNECTICUT 06106  
 TEL: 554-4600

11. RECEIVED  
 12. MAY 7 1986

13. RECEIVED  
 14. MAY 7 1986

15. RECEIVED  
 16. MAY 7 1986

17. RECEIVED  
 18. MAY 7 1986

19. RECEIVED  
 20. MAY 7 1986

21. RECEIVED  
 22. MAY 7 1986

23. RECEIVED  
 24. MAY 7 1986

25. RECEIVED  
 26. MAY 7 1986

SECTION B

1. LOCATION  
 2. BUSINESS NAME AND MAILING ADDRESS  
 3. CITY OF NEW LONDON

4. NAME  
 5. ADDRESS

6. NAME  
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8. NAME  
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16. NAME  
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18. NAME  
 19. ADDRESS

SECTION C

20. DATE OF INSTALLATION (Mo./Yr.)

21. EST. QUANTITY (if stored) (Gals.)

22. TYPE OF CONTENTS

23. CHEMICAL NAME OF PRINCIPAL SUBSTANCE (not trade name) (enter C.A.S. No. if known)

24. CONSTRUCTION MATERIALS

25. PROTECTION

26. INTEGRAL PIPING SYSTEM

27. MONITORING SYSTEM

28. FAILURE

SECTION D

29. DATE OF INSTALLATION (Mo./Yr.)

30. EST. QUANTITY (if stored) (Gals.)

31. TYPE OF CONTENTS

32. CHEMICAL NAME OF PRINCIPAL SUBSTANCE (not trade name) (enter C.A.S. No. if known)

33. CONSTRUCTION MATERIALS

34. PROTECTION

35. INTEGRAL PIPING SYSTEM

36. MONITORING SYSTEM

37. FAILURE

SECTION E

38. DATE OF INSTALLATION (Mo./Yr.)

39. EST. QUANTITY (if stored) (Gals.)

40. TYPE OF CONTENTS

41. CHEMICAL NAME OF PRINCIPAL SUBSTANCE (not trade name) (enter C.A.S. No. if known)

42. CONSTRUCTION MATERIALS

43. PROTECTION

44. INTEGRAL PIPING SYSTEM

45. MONITORING SYSTEM

46. FAILURE

20. HAVE YOU ATTACHED SKETCH OF TANKS AND LOCATION? YES

21. COMMENTS:

22. CERTIFICATION: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my knowledge and belief the information is true, accurate and complete, and that I am the owner, or a duly authorized representative, of the facility to which this information is submitted.

23. NAME (Type or Title)

24. OFFICIAL TITLE of owner or authorized representative

25. DATE SIGNED

26. RECEIVED

27. RECEIVED

28. RECEIVED

29. RECEIVED

COPY 1: SEND TO DEP: 165 CAPITOL AVE. HARTFORD, CT 06106

RECEIVED  
 MAY 7 1986  
 HAZARDOUS MATERIALS  
 MANAGEMENT UNIT

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3-17-86

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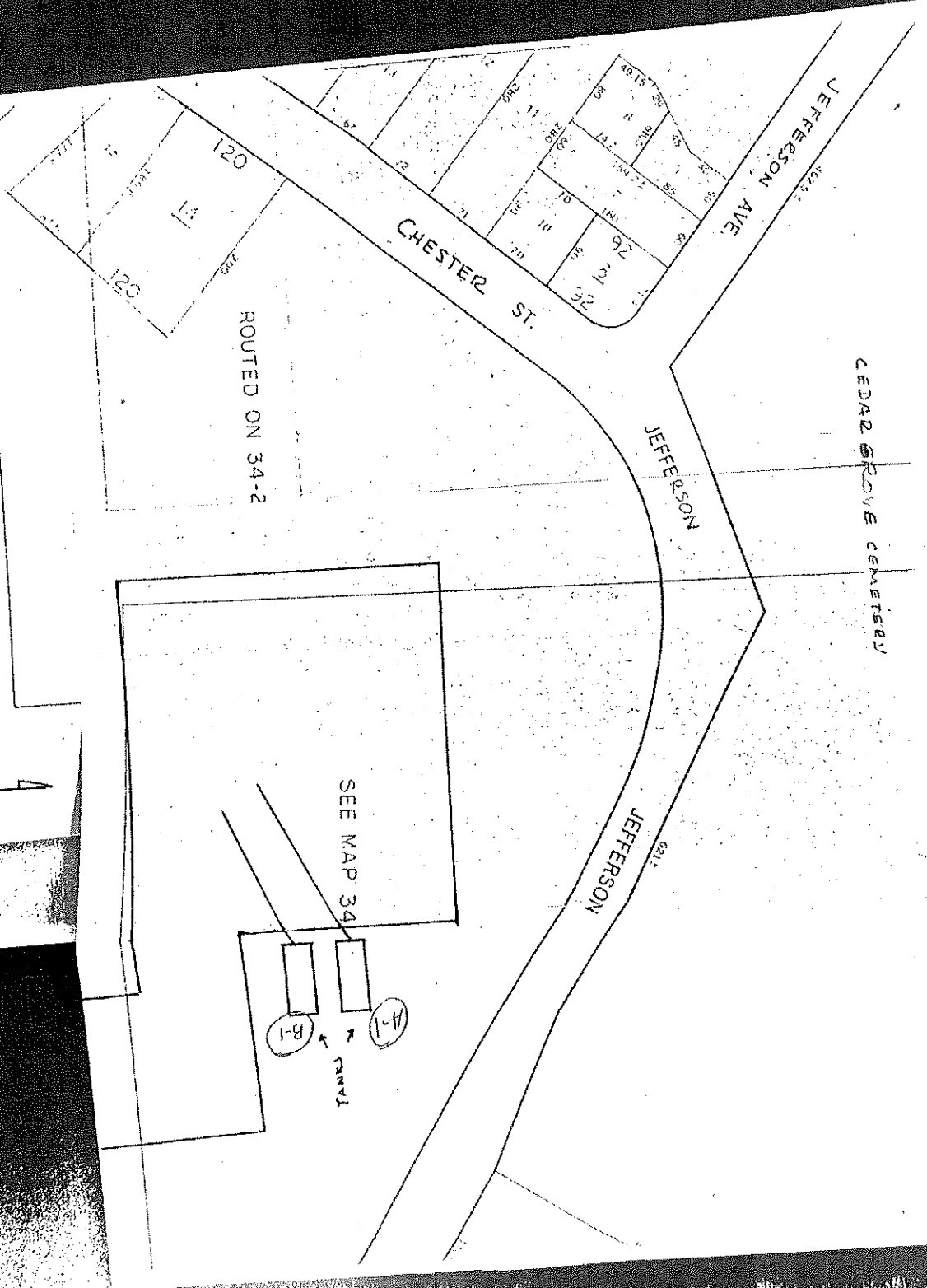
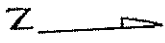
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# TAX MAP NO. 42

NEW LONDON SENIOR HIGH SCHOOL  
490 JEFFERSON AVE.



ROUTED ON 34-2

SEE MAP 34

A-1

B-1

SEE MAP 34

JEFFERSON AVE

CHESTER ST.

JEFFERSON

JEFFERSON

CEDAR GROVE CEMETERY

PROGRAM: USIT - U504ET1636  
 RUN DATE: 08-04-88  
 RUN TIME: 16:36  
 TOWN: 094-102

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 UNDERGROUND STORAGE FACILITIES TRACKING SYSTEM  
 DOCUMENT NUMBER CROSS REFERENCE  
 EXPIRATIONS FROM: 01-1980 THRU: 11-1988

SITE-ID: 095-01435 LATEST DOCUMENT NO: 87247162 GRID-X: 000001 GRID-Y: 000001 PROPRIETARY: N  
 LATEST NOTIFICATION NO: 003 BASIN: 002201 JOBDAY BROOK

LONGITUDE DEGREES: 072 MINUTES: 07 SECONDS: 22  
 LATITUDE DEGREES: 041 MINUTES: 21 SECONDS: 38

[LOCATION] NAME: NEW LONDON SR. HIGH SCHOOL [OWNER] NAME: CITY OF NEW LONDON  
 STREET: 00480 JEFFERSON AVE. STREET: 00111 UNION ST. BIG DEPT  
 INTERSECT STREET: CHESTER STREET CITY/STATE: NEW LONDON CT 06320-0000  
 CITY: NEW LONDON PHONE: 203-447-5250

[BUSINESS] NAME: NEW LONDON BOARD OF ED. [CONTACT] NAME: ALFRED SHAVER  
 STREET: 00000 WILLIAMS STREET STREET: 00111 UNION STREET CT 06320-0000  
 CITY/STATE: NEW LONDON CT 06320-0000 CITY/STATE: NEW LONDON  
 PHONE: 203-447-4735 PHONE: 203-447-5250

PREVIOUS NOTIFICATION/DOCUMENT NUMBERS:  
 001/87247160 002/87247161 003/87247162 004/87247060 005/87247062 006/87247063 007/87247015

T A N K D A T A

TANK	MM-YY	YRS	CAPACITY	USE	STORED	MM-YY	CONTENTS	CAS#	CONSTRUCT MATERIAL	[--PROTECTION--]	INTRL EXTRL PIPE	PIPING	MONITOR	EXPIRES	
														MM-YY	
E-1	01-50	15	10,000	U		00-00	OIL/PETRO		S	2	E	?	05-70	U	01-70

COMMENT:

FALVEY CONSTRUCTION CORP.

12 FIRE TOWER ROAD  
P.O. BOX 699  
KILLINGWORTH, CT 06419

TEL 203/663-1695  
FAX 203/663-2719

June 18, 1992

95-1435

CITY OF NEW LONDON  
Building Department  
111 Union Street  
New London, CT 06320

Attention: Building Inspector  
Fire Marshall

Re: New London High School - Code Compliance  
Jefferson Avenue  
New London, CT 06320

Gentlemen:

In reference to the above-captioned project, Falvey Construction Corporation will be performing the fuel tank replacement project at New London High School beginning June 22, 1992 and completing the project on July 10, 1992.  
The estimated key points in the project are as follows so that you may be at the site if interested or necessary.

- June 23, 1992 AM Tank Removal
- June 30, 1992 New tank testing & installation
- July 1 & 2, 1992 New piping installation & testing

If you have any questions or comments, please contact the writer at 203-663-1695.

Very truly yours,

*Matthew D. Falvey*

Matthew D. Falvey  
Manager

RECEIVED

JUN 25 1992

DE-Native Management Bureau  
OCSPD-Underground Storage Tanks  
Tank Substances

MDF/nja  
cc: Dept. of Environmental Protection  
Ref: FCC/VVE/NLHS/CT-O/GC:1  
File: VW3/nlhs/notify.dep

STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

95-1437  
NEW LONDON BOARD OF ED.  
0 WILLIAMS STREET  
NEW LONDON  
CT 06390

New London High School  
490 Jefferson Ave.  
New London CT

Dear UST owner/operator:

The following questionnaire should be completed as part of a joint state and federal compliance monitoring project. Please answer as accurately as possible all of the following which pertain to your particular UST site. Please be advised that the information herein provided will be compared with those data currently maintained as part of the Connecticut DEP/ Federal Environmental Protection Agency data management system. Please make as many copies of this form as needed.

1) If you own ONLY heating fuel tanks for on-site consumptive use, please check here and return this letter.

2) How many UST(s) are in service at this site in total (including heating fuel tanks for on-site consumptive use)? 2  
How many are heating fuel tanks? 1

Heating fuel tanks used for on-site consumption only are exempt from the rest of this survey. Use one row vertically for each tank/ container that is part of the facility being reported.

3) What are the tank I.D.'s? (as previously registered with CT DEP and EPA)	UST Registered		
4) What was the date of installation for each of your tanks?	UNKNOWN		
5) What do these tanks contain? C=hazardous materials G=gasoline, D=diesel fuel, W=waste oil	C	W	
6) What is the total capacity of these tanks (in gallons)?	1-K	6-K	
7) What type of UST(s) do you have? F= fiberglass, S=Steel, C= steel clad and cathodic protection O=other (please explain)	S	S	
8) Which of the following leak detection options are being used? a) inventory control (gauging / weekly reconciliation with water paste test) and annual failure determination b) double walled UST-interstitial monitoring c) automatic tank gauging (eg. Weeder root system) d) approved installation and monthly monitoring of ground water wells e) approved installation and monthly monitoring of "vapor sniffing" wells f) Manual tank gauging as defined in 22a-449(d)-104(e)2 g) for UST systems ≤ 2000 gallons 9) Do you have pressurized piping or suction piping? P = pressurized; S = suction	N/A	N/A	90

10) Do you perform release detection on piping?  
What kind and when?

No

UST systems MUST be upgraded accordingly or closed (including environmental sampling survey and remediation, if necessary) prior to December 22, 1998. For questions 11, 12, and 13, please put a 'P' for upgrades that have already been made and an 'F' for upgrades to be made prior to the 1998 deadline. (Please include projected date of compliance, eg., 11/97)

11) Spill protection provided by a catchment basin AND overfill protection provided by an automatic shutoff overfill alarm, or ball float valve ( See UST Regulations Sec.22a-449(d)-102(a)(5) )	None			
12) Corrosion protection for the tank and piping provided by: a) steel tank has corrosion resistant coating and cathodic protection	?	?		
b) tank made of noncorrodible material (such as fiberglass) (See UST Regulations Sec. 22a-449(d)-102(a)(10) )	?	?		
13) Corrosion protection for piping provided by: steel piping with a corrosion-resistant coating and cathodic protection (See UST Regulations Sec. 22a-449(d)-102(a)(10) )	?	?		

14) Will you be or are you now in compliance with the December 1998 federal and state deadline for spill, overfill, and corrosion protection? YES  NO  *Don't Know*

*If you decide not to upgrade your existing UST system with the items above, you MUST properly close the UST system. If you subsequently install a new UST system, the new installation must meet all the regulatory requirements for installations after December 22, 1998. Failure to legally upgrade or to close applicable UST systems (including submission of closure reports with sampling data) will be viewed as a serious violation of State and Federal environmental law.*

*Vaughn Clapp*  
Signature

*8/16/95*  
Date

*703-447-1435*  
Telephone

Please return this letter to:  
Department of Environmental Protection  
Waste Management Bureau  
79 Elm Street  
Hartford, CT 06106    ATTN: Kelly McShea

Please return this letter by:

**AUG 22 1995**

If you have any questions, please contact this office at (203) 424-3374.

## Gills, Paul

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**From:** Paul Burgess <paul@paulburgessllc.com>  
**Sent:** Wednesday, March 21, 2018 8:08 AM  
**To:** Miguel J. Gautier  
**Cc:** Gills, Paul  
**Subject:** School Underground Tanks  
**Attachments:** NL High UST.pdf; Harbor School UST.pdf; NL Jr High William St.pdf; Jennings UST.pdf

Mr. Gautier-

I spoke to you last week from Paul Gill's office. Yesterday I reviewed files at DEEP that are of some help (see attached)

Have you had any luck reviewing you tank records for:

- NL High School (Correspondence from Falvey Construction in 1992 references the planned removal of USTs)
- Harbor School
- Benny Dover (Attached information indicates this site may have been the site of NL Junior High School? Its address was 134 Williams, but it appears to be the same site as Benny Dover. I'm not sure when Benny Dover was built? Any records of the 10,000 gal tank being removed?

I have also attached a tank registration form (6/1991) I found in CTDEEP files for Jennings School (5,000 gal fuel oil ) installed 1985. Do you have records of removal?

Let me know if you have found any information. I will be in touch with you after the snow melts to arrange a meeting to inspect the schools in question.

Thanks

Paul Burgess, PE, LEP  
Paul Burgess, LLC  
860 608 9820



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