COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
PIEDMONT REGIONAL OFFICE
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L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

STATE WATER CONTROL BOARD
ENFORCEMENT ACTION - ORDER BY CONSENT
ISSUED TO
ZOTAS PETROLEUMS L.L.C.
FOR
Facility ID Nos.
4-015709, 4-037867, 4-015694, 4-015684, 4-015708, 4-015683, 4-017520 and 4-001752

SECTION A: Purpose

This is a Consent Order issued under the authority of Va. Code §§ 62.1-44.15(8a) and (8d) between the State Water Control Board and Zotas Petroleums L.L.C. for the purpose of resolving certain violations of the State Water Control Law and the applicable regulations.

SECTION B: Definitions

Unless the context clearly indicates otherwise, the following words and terms have the meanings assigned to them below:

1. "Board" means the State Water Control Board, a permanent citizens' board of the Commonwealth of Virginia, as described in Va. Code §§ 10.1-1184 and 62.1-44.7.

2. "Department" or "DEQ" means the Department of Environmental Quality, an agency of the Commonwealth of Virginia as described in Va. Code § 10.1-1183.

3. "Director" means the Director of the Department of Environmental Quality, as described in Va. Code § 10.1-1185.

4. "Form 7530" means the UST notification form used by DEQ to register and track USTs for proper operation, closure and ownership, in accordance with 9 VAC 25-580-70.

5. "Notice of Violation" or "NOV" means a type of Notice of Alleged Violation under Va. Code § 62.1-44.15.

6. "Order" means this document, also known as a "Consent Order" or "Order by Consent", a type of Special Order under the State Water Control Law.

7. "PRO" means the Piedmont Regional Office of DEQ, located in Glen Allen, Virginia.

8. "RCA" means Request for Corrective Action.

9. "Regulated Substance" means an element, compound, mixture, solution or substance that, when released into the environment, may present substantial danger to the public health or welfare, or the environment, as defined by Va. Code § 62.1-44.34:8 and 9 VAC 25-580-10.

10. "Regulations" means the Underground Storage Tanks: Technical Standards and Corrective Action Requirements, 9 VAC 25-580-10 *et seq.*

11. "State Water Control Law" means Chapter 3.1(§ 62.1-44.2 *et seq.*) of Title 62.1 of the Va. Code. Article 9 (Va. Code §§ 62.1-44.34:8 through 62.1-44.34:9) of the State Water Control Law addresses Storage Tanks.

12. "Store 611" means the USTs that are owned and operated by Zota and installed at 2500 West Hundred Road, in Chester, Virginia. Store #611 is further identified by DEQ Facility ID# 4-001752.

13. "Store #650" means the USTs that are owned and operated by Zota and installed at 9093 W. Broad Street, Richmond, Virginia. Store #650 is further identified by DEQ Facility ID# 4-015709.

14. "Store #659" means the USTs that are owned and operated by Zota and installed at 501 South Airport Drive, Richmond, Virginia. Store #659 is further identified by DEQ Facility ID# 4-037867.

15. "Store #660" means the USTs that are owned and operated by Zota and installed at 4024 W. Broad Street, Richmond, Virginia. Store #660 is further identified by DEQ Facility ID# 4-015694.

16. "Store #661" means the USTs that are owned and operated by Zota and installed at 9200 Midlothian Turnpike, Richmond, Virginia. Store #661 is further identified by DEQ Facility ID# 4-015684.

17. "Store #662" means the USTs that are owned and operated by Zota and installed at 7834 Parham Road, Richmond, Virginia. Store #662 is further identified by DEQ Facility ID# 4-015708.

18. "Store #663" means the USTs that are owned and operated by Zota and installed at 11531 Midlothian Turnpike, Richmond, Virginia. Store #663 is further identified by DEQ Facility ID# 4-015683.

19. "Store #668" means the USTs that are owned and operated by Zota and installed at 2200 W. Main Street, Richmond, Virginia. Store #668 is further identified by DEQ Facility ID# 4-017520.

20. "UST" means underground storage tank as defined in Va. Code § 62.1-44.34:8 and 9 VAC 25-580-10.

21. "Va. Code" means the Code of Virginia (1950), as amended.

22. "VAC" means the Virginia Administrative Code.

23. "Warning Letter" or "WL" means a type of Notice of Alleged Violation under Va. Code § 62.1-44.15.

24. "Zota" means Zotas Petroleums L.L.C. a limited liability company, and Zotas Petroleums Corporation a corporation, both authorized to do business in Virginia and its affiliates, partners, subsidiaries, and parents. Zota is a "person" within the meaning of Va. Code § 62.1-44.3.

SECTION C: Findings of Fact and Conclusions of Law

1. Zota is an owner and operator of USTs within the meaning of Va. Code § 62.1-44.34:8 and 9 VAC 25-580-10. The USTs are used to store gasoline, kerosene, and diesel, making Zota subject to the State Water Control Law and the Regulations, which require specific performance requirements for release detection, spill, overfill, and corrosion protection. Zota owns a number of USTs which are installed at various locations in Richmond, Virginia. Eight of those locations with a total of 34 USTs are subject to this Order. They are as follows:

   Store #611 (DEQ Facility ID# 4-001752) has 4 USTs that are installed at 2500 West Hundred Road, in Chester, Virginia.

   Store #650 (DEQ Facility ID# 4-015709) has 4 USTs that are installed at 9093 W. Broad Street, Richmond, Virginia.

   Store #659 (DEQ Facility ID# 4-037867) has 3 USTs that are installed at 501 South Airport Drive, Richmond, Virginia.

   Store #660 (DEQ Facility ID# 4-015694) has 5 USTs that are installed at 4024 W. Broad Street, Richmond, Virginia.

Store #661 (DEQ Facility ID# 4-015684) has 4 USTs that are installed at 9200 Midlothian Turnpike, Richmond, Virginia.

Store #662 (DEQ Facility ID# 4-015708) has 4 USTs that are installed at 7834 Parham Road, Richmond, Virginia.

Store #663 (DEQ Facility ID# 4-015683) has 7 USTs that are installed at 11531 Midlothian Turnpike, Richmond, Virginia.

Store #668 (DEQ Facility ID# 4-017520) has 3 USTs that are installed at 2200 W. Main Street, Richmond, Virginia.

STORE #611

2. On May 21, 2008, Department staff inspected Store #611 for conformity with the requirements of the State Water Control Law and the Regulations. At the time of the inspection, there were four USTs on-site: three 10,000 gallon gasoline USTs and one 10,000 gallon diesel UST; all owned by Zota. DEQ staff observed the following:

    - There were discrepancies between the registered facility information and operational status on the 7530 Notification Form, including the method of corrosion protection for the piping and the method of release detection.
    - Records of the proper operation of the cathodic protection equipment were not available.
    - Release detection had not been performed and no records were available.
    - The type of overfill protection had not been identified.
    - The corrosion prevention system had not been maintained.
    - The spill prevention buckets were filled with liquid and debris.
    - Financial responsibility had not been demonstrated based on review of the current documentation.

STORE #650

3. On June 30, 2008, Department staff inspected Store #650 for conformity with the requirements of the State Water Control Law and the Regulations. At the time of the inspection, there were four USTs on-site: three 10,000 gallon gasoline USTs and one 10,000 gallon diesel UST; all owned by Zota. DEQ staff observed the following:

- There were discrepancies between the registered facility information and operational status on the 7530 Notification Form, including the method of corrosion protection for the piping and the method of release detection.

- Records of the proper operation of the cathodic protection equipment were not available.

- Records of recent compliance with release detection requirements were not available.

- Financial responsibility had not been demonstrated based on review of the current documentation.

STORE #659

4. On June 5, 2008, Department staff inspected Store #659 for conformity with the requirements of the State Water Control Law and the Regulations. At the time of the inspection, there were three USTs on-site: two 12,000 gallon gasoline USTs and one 12,000 gallon diesel UST; all owned by Zota. DEQ staff observed the following:

    - The spill prevention buckets were filled with liquid and debris.

    - The sumps were filled with an unidentified liquid and the liquid sensor alarms were triggered. DEQ had not received a report of a suspected release.

    - Records of recent compliance with release detection requirements were not available.

    - Financial responsibility had not been demonstrated based on review of the current documentation.

STORE #660

5. On February 29, 2008, Department staff inspected Store #660 for conformity with the requirements of the State Water Control Law and the Regulations. At the time of the inspection, there were five USTs on-site: three 10,000 gallon gasoline USTs; one 10,000

gallon diesel UST; and, one 1,000 gallon used oil tank all owned by Zota. DEQ staff observed the following:

- Records of recent compliance with release detection requirements were not available.
- Financial responsibility had not been demonstrated based on review of the current documentation.

STORE #661

6. On May 29, 2008, Department staff inspected Store #661 for conformity with the requirements of the State Water Control Law and the Regulations. At the time of the inspection, there were four USTs on-site: three 10,000 gallon gasoline USTs and one 10,000 gallon diesel UST; all owned by Zota. DEQ staff observed the following:

    - The spill prevention buckets were filled with liquid and debris.
    - Records of recent compliance with release detection requirements were not available.
    - Financial responsibility had not been demonstrated based on review of the current documentation.

STORE #662

7. On May 19, 2008, Department staff inspected Store #662 for conformity with the requirements of the State Water Control Law and the Regulations. At the time of the inspection, there were four USTs on-site: three 10,000 gallon gasoline USTs and one 10,000 gallon diesel UST; all owned by Zota. DEQ staff observed the following:

    - There were discrepancies between the registered facility information and operational status on the 7530 Notification Form, including the method of release detection and the type of overflow equipment.
    - The spill prevention buckets were filled with liquid and debris.
    - Records of recent compliance with release detection requirements were not available.
    - Tank observation wells were not secured.

- Steel piping was in contact with the ground and was not protected from corrosion.

- Financial responsibility had not been demonstrated based on review of the current documentation.

STORE #663

8. On May 7, 2008, Department staff inspected Store #663 for conformity with the requirements of the State Water Control Law and the Regulations. At the time of the inspection, there were three active 10,000 gallon gasoline USTs on-site; all owned by Zota. DEQ staff observed the following:

    - Records of recent compliance with release detection requirements were not available.

    - Financial responsibility had not been demonstrated based on review of the current documentation.

STORE #668

9. On May 29, 2008, Department staff inspected Store #668 for conformity with the requirements of the State Water Control Law and the Regulations. At the time of the inspection, there were three active gasoline USTs on-site with capacities of 12,000, 8000, and 2000 gallons; all owned by Zota. DEQ staff observed the following:

    - There were discrepancies between the registered facility information and operational status on the 7530 Notification Form; including the method of overfill prevention and documentation of the form of corrosion protection.

    - Records of the proper operation of the cathodic protection equipment were not available.

    - Mandatory records regarding corrosion protection were not available.

    - The submersible turbine pumps were filled with liquid and debris with all grades of piping submerged and not protected from corrosion.

- Records of recent compliance with release detection requirements were not available.

- Financial responsibility had not been demonstrated based on review of the current documentation.

- The sumps were filled with an unidentified liquid and the liquid sensor alarms were triggered. DEQ had not received a report of a suspected release.

- The spill prevention buckets were filled with liquid and debris.

10. Immediately after each of the inspections listed in Section C2 through C9 above, the Department issued an RCA to Zota, allowing an additional 30 days to bring the Stores into compliance and provide the Department with the required documentation. Zota failed to meet each of the RCA response deadlines.

11. Pursuant to 9 VAC 25-580-70, an owner or operator of a UST system must submit an amended UST notification form (7530-2) to DEQ within 30 days of any change in ownership, tank status, tank/piping systems, or substance stored, including the method of overflow prevention and documentation of the form of corrosion protection for the tanks and piping. Zota failed to submit a modified registration form for Store #s 611, 650, 662, and 668.

12. 9 VAC 25-590-40 requires owners or operators of UST systems to demonstrate financial responsibility for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases in the per-occurrence amounts stated in 9 VAC 25-590-40. Pursuant to 9 VAC 25-590-160, evidence of financial assurance mechanisms used to demonstrate financial responsibility must be maintained at the UST site or at the owner or operator's place of work in the Commonwealth and be made available upon request. Zota failed to secure and submit to DEQ a demonstration of financial responsibility for Store #s 611, 650, 659, 660, 661, 662, 663, and 668.

13. Pursuant to 9 VAC 25-580-180, release detection records, including results of any sampling, testing, or monitoring must be maintained for at least one year, either at the facility and immediately available for inspection or at a readily available alternative site and available for inspection upon request, in accordance with 9 VAC 25-580-120. Pursuant to 9 VAC 25-580-140(1), USTs must be monitored for releases at least every 30 days in accordance with the requirements of that subsection. Zota failed to provide records to DEQ demonstrating compliance with release detection requirements for Store #s 611, 650, 659, 660, 661, 662, 663, and 668.

14. Pursuant to 9 VAC 25-580-50 and 9 VAC 25-580-60, to prevent spilling associated with product transfer to the UST system, regulated UST systems must comply with spill prevention equipment requirements specified in subsection (3)(a)(1) of 9 VAC 25-580-50. Zota failed to maintain spill prevention equipment that will prevent release of product to the environment at Store #s 611, 661, 662, 668, and 659.

15. Pursuant to 9 VAC 25-580-60, to prevent spilling and overfilling associated with product transfer to the UST system, regulated UST systems must comply with spill and overfill prevention equipment requirements specified in subsection 3 of 9 VAC 25-580-50. Pursuant to 9 VAC 25-580-80, owners and operators must ensure that releases due to spilling or overfilling do not occur. Zota failed to demonstrate compliance with this requirement at Store #s 611, 662 and 668.

16. Pursuant to 9 VAC 25-580-50(2) and 9 VAC 25-580-60(3), UST piping that routinely contains regulated substances and is in contact with the ground must be protected from corrosion. 9 VAC 25-580-90 states that corrosion protection systems must be operated and maintained so as to provide continuous protection to metal components of the tanks and piping that routinely contain regulated substances and are in contact with the ground. Pursuant to 9 VAC 25-580-90, all cathodic protection systems must be tested by a qualified cathodic protection tester within six months of installation and at least every three years thereafter, and UST systems using impressed current cathodic protection systems must also be inspected every 60 days to ensure the equipment is running properly. Owners and operators must maintain results of the last two tests required for all cathodic protection systems and the last three inspections required for impressed current systems. In addition, 9 VAC 25-580-120(3), requires that these records must be kept either at the UST site and be immediately available for inspection, or at a readily available alternative site and be provided for inspection upon request. Zota failed to demonstrate compliance with piping corrosion protection at Store #s 611, 650, 662, and 668.

17. Pursuant to 9 VAC 25-580-160(6)(h), monitoring wells must be clearly marked and secured to avoid unauthorized access and tampering. Zota failed to secure the UST observation wells at Store # 662.

18. On January 5, 2009, the Department issued Notice of Violation No. 08-09-PRO-572 to Zota for violations listed in C.3 – C.17, above. The Department met with Zota on March 4, 2009 to review and discuss the NOV. Zota provided documentation that Store #614 was sold and Zota submitted an adjusted registration form resolving compliance issues at that facility.

19. On May 29, 2009, the Department issued Notice of Violation No. 09-04-PRO-588 to Zota for violations listed in C.2 and C.16, above. The operational violations have been resolved through appropriate testing and repairs; however an adjusted registration form and financial assurance are still outstanding.

20. On September 16, 2009 Zota provided an adjusted registration form and documentation that Store #660 was sold resolving compliance issues at that facility.

21. Based on the above information, the Board concludes that Zota has violated the State Water Control Law and Regulations, as described in paragraphs C.2 through C.17, above.

22. In order for Zota to return to compliance, DEQ staff and representatives of Zota have agreed to the Schedule of Compliance, which is incorporated as Appendix A of this Order.

SECTION D: Agreement and Order

Accordingly, by virtue of the authority granted it in Va. Code §§ 62.1-44.15(8a) and (8d), the Board orders Zota, and Zota agrees to:

1. Perform the actions described in Appendix A of this Order; and

2. Pay a civil charge of $53,100 in settlement of the violations cited in this Order. Payments shall be made in accordance with the following schedule:

Due Date	Amount
October 15, 2009	$5,000
April 15, 2010	$5,000
October 15, 2010	$5,000
April 15, 2011	$7,000
October 15, 2011	$7,000
January 15, 2012	$7,000
April 15, 2012	$8,550
October 15, 2012	$8,550

Payments shall be made by check, certified check, money order or cashier's check payable to the "Treasurer of Virginia," and delivered to:

Receipts Control
Department of Environmental Quality
Post Office Box 1104

Richmond, Virginia 23218

Zota shall include its Federal Employer Identification Number(s) with the civil charge payment and shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Petroleum Storage Tank Fund (VPSTF).

SECTION E: Administrative Provisions

1. The Board may modify, rewrite, or amend this Order with the consent of Zota for good cause shown by Zota, or on its own motion pursuant to the Administrative Process Act, Va. Code §§ 2.2-4000 *et seq.*, after notice and opportunity to be heard.

2. This Order addresses and resolves only those violations specifically identified in Section C of this Order. This Order shall not preclude the Board or the Director from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the facility; or (3) taking subsequent action to enforce the Order.

3. For purposes of this Order and subsequent actions with respect to this Order only, Zota admits the jurisdictional allegations, findings of fact, and conclusions of law contained herein.

4. Zota consents to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Order.

5. Zota declares it has received fair and due process under the Administrative Process Act and the State Water Control Law and it waives the right to any hearing or other administrative proceeding authorized or required by law or regulation, and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Board to modify, rewrite, amend, or enforce this Order.

6. Failure by Zota to comply with any of the terms of this Order shall constitute a violation of an order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Board or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.

7. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.

8. Zota shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or such other occurrence. Zota shall show that such circumstances were beyond its control and not due to a lack of good faith or diligence on its part. Zota shall

notify the DEQ Regional Director verbally within 24 hours and in writing within three business days when circumstances are anticipated to occur, are occurring, or have occurred that may delay compliance or cause noncompliance with any requirement of the Order. Such notice shall set forth:

a. the reasons for the delay or noncompliance;

b. the projected duration of any such delay or noncompliance;

c. the measures taken and to be taken to prevent or minimize such delay or noncompliance; and

d. the timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director verbally within 24 hours and in writing within three business days, of learning of any condition above, which the parties intend to assert will result in the impossibility of compliance, shall constitute a waiver of any claim to inability to comply with a requirement of this Order.

9. This Order is binding on the parties hereto, their successors in interest, designees and assigns, jointly and severally.

10. This Order shall become effective upon execution by both the Director or his designee and Zota. Nevertheless, Zota agrees to be bound by any compliance date which precedes the effective date of this Order.

11. This Order shall continue in effect until:

(a) Zota petitions the Director or his designee to terminate the order after it has completed all of the requirements of the Order and the Director or his designee approves the termination of the Order; or

(b) the Director or Board terminates the Order in his or its sole discretion upon 30 days' written notice to Zota.

Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve Zota from its obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. Any plans, reports, schedules or specifications attached hereto or submitted by Zota and approved by the Department pursuant to this Order are incorporated into this Order. Any non-compliance with such approved documents shall be considered a violation of this Order.

13. The undersigned representative of Zota certifies that he or she is a responsible official authorized to enter into the terms and conditions of this Order and to execute and legally bind Zota to this document. Any documents to be submitted pursuant to this Order shall also be submitted by a responsible official of Zota.

14. This Order constitutes the entire agreement and understanding of the parties concerning settlement of the violations identified in Section C of this order, and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Order.

15. By its signature below, Zota voluntarily agrees to the issuance of this Order.

And it is so ORDERED this _____ day of _____, 2009.

_____

Richard F. Weeks, Regional Director
Department of Environmental Quality

Zotas Petroleums L.L.C. voluntarily agrees to the issuance of this Order.

Date: 10/9/09 By: Sashi J Z

Mr. Sashi Zota

Federal Employer Identification Number: 26-1619681

Commonwealth of Virginia
City/County of Henrico

The foregoing document was signed and acknowledged before me this 9 day of October, 2009, by SHASHI J ZOTA, who is member/manager of Zotas Petroleums L.L.C., on behalf of the company.

Notary Public

7039385
Registration No.

My commission expires: My Commission Expires January 31, 2010

Notary seal:

APPENDIX A
SCHEDULE OF COMPLIANCE

Zota must:
For all Stores

1. Within 30 days of the issuance of this Order, submit documentation to the Department demonstrating compliance with financial responsibility regulations for all Stores owned by Zota.

Store #611 (DEQ Facility ID# 4-00-1752)

2. Within 30 days of the issuance of this Order, amend and submit to the Department a corrected 7530 Registration form suitable for approval.

3. Beginning the first month after execution of this Order and continuing for 1 year thereafter, submit to the Department copies of monthly release detection testing and results no later than the 15th of each month.

Store #650 (DEQ Facility ID# 4-015709)

4. Within 30 days of the issuance of this Order, amend and submit to the Department a corrected 7530 Registration form suitable for approval.

5. Within 30 days of the issuance of this Order, install, test, and/or repair the necessary equipment to conduct adequate release detection.

6. Beginning the first month after execution of this Order and continuing for 1 year thereafter, submit to the Department copies of monthly release detection testing and results no later than the 15th of each month.

7. Within 30 days of the issuance of this Order, submit to the Department copies of passing cathodic protection system test results conducted in accordance with 9 VAC 25-580-90.

Store #659 (DEQ Facility ID# 4-037867

8. Within 30 days of the issuance of this Order, install, test, and/or repair the necessary equipment to conduct adequate release detection.

9. Beginning the first month after execution of this Order and continuing for 1 year thereafter, submit to the Department copies of monthly release detection testing and results no later than the 15th of each month.

10. Within 30 days of the issuance of this Order, remove the liquid and debris from the sump pumps and ensure that the liquid sensor alarms are working properly.

Store #661 (DEQ Facility ID# 4-015684)

11. Within 30 days of the issuance of this Order, install, test, and/or repair the necessary equipment to conduct adequate release detection.

12. Beginning the first month after execution of this Order and continuing for 1 year thereafter, submit to the Department copies of monthly release detection testing and results no later than the 15th of each month.

Store #662 (DEQ Facility ID# 4-015708)

13. Within 30 days of the issuance of this Order, amend and submit to the Department a corrected 7530 Registration form suitable for approval.

14. Within 30 days of the issuance of this Order, install, test, and/or repair the necessary equipment to conduct adequate release detection.

15. Beginning the first month after execution of this Order and continuing for 1 year thereafter, submit to the Department copies of monthly release detection testing and results no later than the 15th of each month.

16. Within 30 days of the issuance of this Order, secure the tank observation wells.

17. Within 30 days of the issuance of this Order, install and/or repair the necessary equipment to provide adequate corrosion protection for the system piping.

18. Within 30 days of the issuance of this Order, submit to the Department documentation of adequate overfill prevention.

Store #663 (DEQ Facility ID# 4-015683)

19. Within 30 days of the issuance of this Order, install, test, and/or repair the necessary equipment to conduct adequate release detection.

20. Beginning the first month after execution of this Order and continuing for 1 year thereafter, submit to the Department copies of monthly release detection testing and results no later than the 15th of each month.

Store #668 (DEQ Facility ID# 4-017520

Store #668 is currently in litigation after the landowner took control of the business and USTs. Zota may or may not regain control of the USTs and as such the following requirements must be completed as follows:

21. Within 30 days of the courts decision, amend and submit to the Department a corrected 7530 Registration form suitable for approval.

22. In the event that Zota retains ownership of the tanks, then within 30 days of the courts decision, install, test, and/or repair the necessary equipment to conduct adequate release detection.

23. In the event that Zota retains ownership of the tanks, then beginning the first month after the courts decision and continuing for 1 year thereafter, submit to the Department copies of monthly release detection testing and results no later than the 15th of each month.

24. In the event that Zota retains ownership of the tanks, then within 30 days of the courts decision, submit to the Department copies of passing cathodic protection system test results conducted in accordance with 9 VAC 25-580-90.