COMPLIANCE EVALUATION INSPECTION REPORT
FOR
UNDERGROUND STORAGE TANKS
EPA Region 6 Federal Form

FID #:	0335LA	INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post	Tribal Land:	Chitimacha Tribe of Louisiana

Physical Address:	585 Ralph Darden Memorial Parkway		**Phone:**	(337) 923-4973	
City, State, Zip:	Charenton, LA 70523		**County**	Saint Mary	
Mailing Address:	585 Ralph Darden Memorial Parkway	Charenton		LA	70523
	(Address)	**(City)**		**(State)**	(Zip)
Facility Representative Title and E-mail:	Julie Burgess - julieb@chitimacha.gov, Facility Manager				

UST Operator:	Chitimacha Tribe of Louisiana	**Phone:**	(337) 923-4973	**Fax:**	----------
Mailing Address:	155 Chitimacha Loop	Charenton		LA	70523
	(Address)	**(City)**		**(State)**	(Zip)
UST Contact:	John Armstrong	**Phone:**	(337) 578-4279	**Fax:**	----------
Mailing Address:	----------	----------	----------	----------	
	(Address)	**(City)**		**(State)**	(Zip)
UST Owner:	Same as Operator	**Phone:**	----------	**Fax:**	----------
Mailing Address:	----------	----------	----------	----------	
	(Address)	**(City)**		**(State)**	(Zip)
Contact Name and E-mail:	Julie Burgess - julieb@chitimacha.gov		**Phone Number:**		

Facility Land Tribally Owned: Yes ☑ No ☐ **Facility Privately Owned/Leased on Tribal Land:** Yes ☐ No ☑

Lead Inspector: Mikaela Brown

Additional Inspector(s) and Others present: Robert Glynn, EPA; David Hayes, ITEC; Julie Burgess, Store Manager; Billy Mora, Fire Chief

Summary of Findings and Facility Comments:

Facility maintained well.

Spill buckets have residual water from recent rains. Diesel STP sump has residual water from recent rain. Facility management said they will address issue.

Note: All questions are to be answered. If unable to determine, write 'unknown' and explain in narrative. Use narrative / summary of findings area to describe all areas of concern in greater detail.

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Start Time (miltary time): 0900 End Time (miltary time): 1010

Compliance Performance Measures (CPM) in TCR

Overall (TCR):	☑ YES	☐ NO
Spill Prevention:	☑ YES	☐ NO
Overfill Prevention:	☑ YES	☐ NO
Corrosion Protection:	☑ YES	☐ NO
Release Detection:	☑ YES	☐ NO

Type of Inspection:

☑ CEI

☐ Follow Up

☐ Compliance Assistance

Compliance Performance Measures (CPM) Not in TCR

Operator Training:	☑ YES	☐ NO
Financial Responsibility:	☑ YES	☐ NO
Walkthroughs:	☑ YES	☐ NO

Comments:

Printed Name, Title	Mikaela Brown, UST Inspector in Training	
Inspector Signature	MIKAELA BROWN	Digitally signed by MIKAELA BROWN Date: 2025.07.09 11:42:02 -05'00'
Peer Review by:	Joshua Ridley	(Date) 6/24/25
Supervisors Name, Title	Diana Greiner, UST & RCRA Grants Section Supervisor	
Supervisors Signature	DIANA GREINER	Digitally signed by DIANA GREINER Date: 2025.07.09 13:52:54 -05'00'

Note: All questions are to be answered. If unable to determine, write 'unknown' and explain in narrative. Use narrative / summary of findings area to describe all areas of concern in greater detail.

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Section A Registration Requirements **Further Explanation Attached** ☑

1. Are all New and Existing Petroleum UST systems registered? (280.22(a) Yes ☑ No ☐ N/A ☐

TANK NO.	SIZE of TANK (GALLONS)	PRODUCT STORED	TANK TYPE SW / DW	STATUS Active or TC	Compartment or Manifold	INSTALL DATE	UPGRADE DATE
1A	15,000	E10 gas	FRP DW	Active	☑ Compartment ☐ Manifold 1B	5/31/2014	N/A
1B	5,000	Premium	FRP DW	Active	☑ Compartment ☐ Manifold 1A	5/31/2014	N/A
2A	8,000	Diesel	FRP DW	Active	☑ Compartment ☐ Manifold 2B	5/31/2014	N/A
2B	7,000	Reg gas - no eth	FRP DW	Active	☑ Compartment ☐ Manifold 2A	5/31/2014	N/A
					☐ Compartment ☐ Manifold		
					☐ Compartment ☐ Manifold		
					☐ Compartment ☐ Manifold		
					☐ Compartment ☐ Manifold		
					☐ Compartment ☐ Manifold		
					☐ Compartment ☐ Manifold		

Latitude:	Longitude:	Number of Dispenser's:	GPS Measured At:
29.8686604	-91.541537	5x2	Input Tank # fill-port. 1

Section A Comments:

Facility has 5 dispensers with 2 sides numbered 1/2, 3/4, 5/6, 7/8, 9/10.
Dispenser 9/10 is ethanol-free.

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Compliance Performance Measures (CPM) in Technical Compliance Rate (TCR)

CPM - Corrosion Protection

Section B Standards for New Underground Storage Tanks

(Tanks installed after 12/22/88)

Further Explanation in Narrative ☐
Section B Not Applicable ☐

1. **Tank Construction:**	**UST- 9c.a**	☐ SW ☑ DW		
a. Is each tank properly designed and constructed to prevent corrosion in any portion of the tank that routinely contains product?(280.20(a))		☑ Yes	☐ No	☐ N/A
b. If installed after 4/11/16 is tank secondarily contained?	280.20	☐ Yes	☐ No	☑ N/A
2. **What is the corrosion protection method for the tanks?**	**UST- 9c.a**			
a. Fiberglass reinforced plastic-FRP (280.20(a)(1))		☑ Yes	☐ No	☐ N/A
b. Tank constructed of metal and cathodically protected e.g. galvantic - STI-P3, metal tank with impressed current system (280.20(a)(2)) Specify: N/A		☐ Yes	☐ No	☑ N/A
c. Metal-fiberglass-reinforced-plastic composite (ACT-100) (280.20(a)(3))		☐ Yes	☐ No	☑ N/A
d. Records available to document that Corrosion Protection is not necessary. (280.20(a)(4))		☐ Yes	☐ No	☑ N/A
e. Other corrosion protection (280.20(a)(5)) Specify: N/A				
3. **Have repairs been conducted on any tank?** ☐ **Yes** ☑ **No** **Tank #:** N/A **Repair Date:** N/A				
a. Were repairs to tanks conducted in accordance with accepted codes and standards? (280.33(a))		☐ Yes	☐ No	☑ N/A
b. Were repairs to fiberglass-reinforced tanks conducted by manufacturer's authorized representatives or in accordance with accepted codes and standards? (280.33(b))		☐ Yes	☐ No	☑ N/A
c. Were the repaired tanks tightness tested within 30 days of the completion of the repair (280.33(d)) unless inspected, monitored or otherwise tested? (280.33(d)(1, 2, 3))		☐ Yes	☐ No	☑ N/A

Section B Comments:

Section C Upgrading Existing Tanks to New System Standards

(Tanks installed on or before 12/22/88)

Further Explanation in Narrative ☐
Section C Not Applicable ☑

1 Do the Existing Tank(s) comply with one of the following requirements:	UST- 9c.a			
a. Are all existing tanks upgraded to meet the standards or do they already meet the stardards for New UST systems?(280.21)		☐ Yes	☐ No	☐ N/A
If yes, specify tank type:				
b. Are all existing tanks upgraded with cathodic protection?(280.21(b))If yes, complete		☐ Yes	☐ No	☐ N/A
2. What method of corrosion protection is used for each tank?	**UST- 9c.e**			
a. Metal tank retrofitted with interior lining (280.21(b)(1)) Date Lining Installed:		☐ Yes	☐ No	☐ N/A
b. Is lining inspected periodically? (280.21(b)(1)(ii)) Date of Last Lining Inspection:		☐ Yes	☐ No	☐ N/A
c. Metal tank retrofitted with cathodic protection (280.21(b)(2)) Type of CP:		☐ Yes	☐ No	☐ N/A
d. If tank >10 years old when CP was added, was a tank integrity test performed? (280.21(b)(2)(i))	**UST- 9c.e**	☐ Yes	☐ No	☐ N/A

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FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

Type of integrity test performed: Date:

e. Internal Lining combined with cathodic protection (280.21(b)(3)) If CP was not installed at same time as the lining, complete section C.2.d above. ☐ Yes ☐ No ☐ N/A

f. Other corrosion protection. Specify: ☐ Yes ☐ No ☐ N/A

Section C Comments:

Section D Standards for New/Existing UST Piping System

(Piping installed after 04/11/2016 must be secondarily contained) **Further Explanation in Narrative** ☐

(Piping installed after 12/22/88) **Section D Not Applicable** ☐

1a. For piping installed after 04/11/2016, is it secondarily contained?(280.20) ☐ Yes ☐ No ☑ N/A

1b. For piping installed before 04/11/2016 indicate double / single wall ☑ Double Wall ☐ Single Wall

2. Is piping that routinely contains regulated substances and is in contact with the ground or water designed, constructed, and protected to prevent corrosion? (280.20(b) new/ 280.21(c) existing) **UST-9c.a** ☑ Yes ☐ No ☐ N/A

3. What method of corrosion protection is used for the piping? **UST-9c.a**

a. Fiberglass-reinforced plastic piping -FRP (280.20(b)(1)) ☑ Yes ☐ No ☐ N/A

b. Non-metallic flexible piping (280.20(b)(4)) Type: ☐ Yes ☐ No ☑ N/A

c. Constructed of metal and cathodically protected e.g. coated w/dielectric material, metal piping with anodes, or metal piping with impressed current system. (280.20(b)(2))
Specify: N/A ☐ Yes ☐ No ☑ N/A

d. Metal piping without additional corrosion protection measures. (280.20(b)(3))
Specify: N/A ☐ Yes ☐ No ☑ N/A

e. Records available to document Corrosion Protection is not necessary. (280.20(b)(3)(ii)) ☐ Yes ☐ No ☑ N/A

4. Are all **metal components (flexible connectors, submersible turbine pumps)** that routinely contain regulated substances and are in contact with the ground or water designed, constructed, and protected to prevent corrosion? **UST-9c.a** ☑ Yes ☐ No ☐ N/A

a. Constructed of metal and cathodically protected e.g. coated w/dielectric material, metal componets protected with anodes or an impressed current system, contained in dry sumps. (280.20(b))
Specify: dry sumps ☑ Yes ☐ No ☐ N/A

b. Metal piping components without additional corrosion protection measures. (280.20(b)(3)(ii))
Specify: N/A ☐ Yes ☐ No ☑ N/A

5. Are all impact valves (shear valves) properly installed (moving parts unobstructed, shear valve properly anchored)? (NFPA 30A Chapter 6 Paragraph 3.9) ☑ Yes ☐ No ☐ N/A

6. Have repairs been made to any piping? ☐ Yes ☑ No Associated tank # N/A Date of repair N/A

a. Were any metal pipe sections or fittings that released product replaced? (280.22(c)) ☐ Yes ☐ No ☑ N/A

b. Were fiberglass pipes and fittings repaired in accordance with manufacturer's specifications? (280.33(c)) ☐ Yes ☐ No ☑ N/A

c. Was the repaired piping tightness tested within 30 days of the completion of the repair (280.33(d)) unless inspected, monitored or otherwise tested? (290.33(d)(1, 2, 3)) ☐ Yes ☐ No ☑ N/A

d. Was 50 percent or more of the piping replaced with DW piping during the repair? ☐ Yes ☐ No ☑ N/A

Section D Comments:

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
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Section E Spill and Overfill for New/Existing UST Systems

Further Explanation in Narrative ☑
Section E Not Applicable ☐

(UST systems installed after 12/22/88 are considered new)

1. Is each tank equipped with Spill Prevention Equipment to prevent a release of product when the transfer hose is detached from the fill pipe? (280.20(c)(1)(i); 280.20(d)) **9a.a** ☑ Yes ☐ No ☐ N/A

   a. Does the spill prevention equipment have liquid tight sides and bottom (not cracked or broken)? (280.20(c)(1)(i)) **UST 9a.a** ☑ Yes ☐ No ☐ N/A

   b. Spill equipment construction ☐ DW ☑ SW

   c. For double walled spill buckets, is the spill prevention equipment interstitially monitored? **UST 9a.b** ☐ Yes ☐ No ☑ N/A

   d. If not interstitially monitored or if single wall, has the spill prevention equipment been tested within the last 3 years? (Required after 10/13/15 for new/replaced; by 10/13/18 for existing. (280.35) Date: 02/16/2024 Method: hydrostatic ☑ Yes ☐ No ☐ N/A

   e. Is the spill bucket free of liquids, so that it will contain any overfill? ☐ Yes ☑ No ☐ N/A

   f. Has the spill bucket check been conducted every 30 days? (280.36(a)(1)(i) **Required by 10/13/2018** Unless exception used, explain in comments **UST 9a.b** ☑ Yes ☐ No ☐ N/A

   g. Has the spill prevention equipment been repaired/replaced since the previous inspection? Replace / Repair/ Test Date: N/A ☐ Yes ☑ No ☐ N/A

2. Is each tank equipped with Overfill Prevention Equipment? (280.20(c)(1)(ii)). **UST-9b.a** ☑ Yes ☐ No ☐ N/A

3. Is the Overfill Prevention Equipment designed to: **UST-9b.a**

   a. Automatically shut off flow to the tank when the tank is no more than 95% full? e.g. **butterfly valve** (280.20(c)(1)(ii)(A)) (device not tampered with or inoperable) ☑ Yes ☐ No ☐ N/A

   b. Alert transfer operator when tank is no more than 90 % full by restricting flow into the tank **(ball float valve)** or triggering a high-level alarm **(overfill alarm)**? (Is the alarm near the fill port? Does it work? If No, explain in Comments) (280.20(c)(1)(ii)(B)) ☐ Ball Float ☐ Alarm ☐ Yes ☐ No ☑ N/A

   c. Restrict the flow 30 minutes prior to overfilling or alert the operator one minute before overfilling? (280.20(c)(1)(ii)(C)) ☐ Yes ☐ No ☑ N/A

   d. If ball float valves are used, is the piping system pressurized. Ball float valves are not allowed for use on suction piping delivery systems (PEI/RP100-2005, Chapter 7.3.3 for **New Systems**; PEI/RP100-2005, Chapter 7.3.3 for **Existing Systems**) ☐ Yes ☐ No ☑ N/A

4. Alternative type of Spill or Overfill Prevention Equipment being used? (280.20(c)(2)ii)) Specify: N/A ☐ Yes ☐ No ☑ N/A

5. Has overfill equipment been inspected within the past 3 years? Required after 10/13/15 for new/ replacement installation, 10/13/18 for existing installations (280.35) Date: 02/16/2024 ☑ Yes ☐ No ☐ N/A

Section E Comments:

Spill buckets have residual water from recent rains. Facility management said they will address issue.

SECTION F (installed after 4/11/2016)

Section F Under-Dispenser Containment) (UDC) **Further Explanation in Narrative** ☐
(Dispensers installed after 4/11/2016) **UST-9d.a** **Section F Not Applicable** ☑

1. For dispensers installed after 4/11/2016 (280.20(f)) or those installed after 10/18/15with IM:

   a. Is each new dispenser at a new facility equipped with UDC? ☐ Yes ☐ No ☐ N/A

   b. Is each new dispenser at an existing facility where new pipe (50% or greater) was added to connect the new dispenser to the existing system equipped with UDC? ☐ Yes ☐ No ☐ N/A

   C. Is each replacement dispenser at an existing facility where piping (50% or greater) that connects the dispenser to the existing piping is replaced equipped with UDC? ☐ Yes ☐ No ☐ N/A

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

2. Does each UDC sump subject to the 4/11/2016 UDC requirements or installed utilizing IM after 10/13/15 have liquid-tight sides and bottom, and is it maintained free of storm water, debris and regulated substances? (280.20(f)) ☐ Yes ☐ No ☐ N/A

3. If UDC is being used for IM, have the UDC's been tested within 3 (three) years? (Effective for new UDC 4/11/2016 and existing UDC's No Later Than 10/13/18) ☐ Yes ☐ No ☐ N/A

Section F Comments:

SECTION G (installed after 4-11-2016)

Section G Submersible Turbine Pump (STP) Secondary Containment

UST 9d.a

Further Explanation in Narrative ☐
Section G Not Applicable ☑

1. For submersible turbine pumps installed after 4/11/16 (280.20)
   a. Is each new STP at a new facility equipped with liquid tight containment? ☐ Yes ☐ No ☐ N/A
   b. Is each new STP at an existing facility where a new pipe run was added to connect the new STP to the system equipped with liquid tight containment? (280.35(a)(1)) ☐ Yes ☐ No ☐ N/A
   c. Is each replacement STP at an existing facility, where 50% or more of the piping is replaced that connects the STP to the system, equipped with liquid tight containment? (280.35(a)(1)) ☐ Yes ☐ No ☐ N/A
2. Does each STP containment sump subject to the 10/13/2015 STP Secondary Containment requirements have liquid-tight sides and bottom, and maintained free of storm water, debris, and regulated substances? (303.D.5.b) ☐ Yes ☐ No ☐ N/A
3. Are the STP sumps used for piping Interstitial Monitoring? ☐ Yes ☐ No ☐ N/A
4. Have STP containment sumps used for IM been tightness tested in the last 3 years (10/13/15 new, No Later Than 10/13/18 existing) **UST-9d.d** ☐ Yes ☐ No ☐ N/A

Section G Comments:

Diesel STP sump has residual water from recent rain. Facility management said they will address issue.

Section H Operation and Maintenance of Corrosion Protection Systems

Further Explanation in Narrative ☐
Section H Not Applicable ☑

1. Is the corrosion protection system continuously operated and maintained to provide corrosion protection to metal components of external portions of the tanks and piping that routinely contain regulated substance and are in contact with the ground or water? (280.31(a)) UST - 9c.c ☐ Yes ☐ No ☐ N/A
2. Are the cathodic protection systems inspected by qualified testers?(280.31(b)) ☐ Yes ☐ No ☐ N/A
3. Was the cathodic protection system tested within six months after installation? (280.31(b)(1)) Date: ☐ Yes ☐ No ☐ N/A **UST-9c.b**
4. Is the system tested at least every three years? (280.31(b)(1)) Date: **UST-9c.c and 9c.d** ☐ Yes ☐ No ☐ N/A
5. Does the inspection meet the requirements of a code of practice developed by a nationally recognized association? (280.31(b)(2)) ☐ Yes ☐ No ☐ N/A
6. As outlined in 280.31(b), does the facility have copies of the last two CP inspections? (280.31(d)(2)) ☐ Yes ☐ No ☐ N/A
7. If the UST system has an impressed current, is the rectifier inspected every 60 days (280.31c) **UST-9c.d** ☐ Yes ☐ No ☐ N/A
8. As outlined in EPA regulations, does the facility have copies of the last three rectifier inspections? ((280.31(d)(1)) **(CPM requires 2, must have last 2: UST-9c.d)** ☐ Yes ☐ No ☐ N/A

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

9. Was the cathodic protection system tested within six months of a repair?(280.33(e)) 9c.b ☐ Yes ☐ No ☐ N/A

Section H Comments:

SOC - Release Detection

Section I Release Detection Requirements for UST System

Further Explanation in Narrative ☐
Section I Not Applicable ☐

9d.a & 9d.b (Must have records 10 of 12 months, which incliudes 2 most current months)

1.	Does the facility perform a method of release detection? Check "No" if no release detection conducted (280.40(a))	☑ Yes ☐ No ☐ N/A
2.	Is the method of release detection capable of detecting a release from any portion of the tank that routinely contains product? (280.40(a)(1))	☑ Yes ☐ No ☐ N/A
3.	Is the release detection system installed, calibrated, operated, and maintained in accordance with the manufacturer's instructions including routine maintenance, etc.?(280.40(a)(2))	☑ Yes ☐ No ☐ N/A
4.	Does the release detection system meet the performance standards outlined in 280.43 or 280.44? (Check third party certification against equipment or method present)((280.40(a)(3))	☑ Yes ☐ No ☐ N/A
5.	Are all USTs monitored at least every 30 days for releases? (280.41 (a)).	☑ Yes ☐ No ☐ N/A
6.	Is UST systems subject to the 4/11/16 Secondary Containment Requirements: (Interstitial Montoring)	☐ Yes ☑ No
	a. Portions of UST system using IM: ☐ Tanks ☐ Piping ☐ Spill Buckets	
	b. Are monthly records available to verify no leaks to interstice or the environment from tanks?	☐ Yes ☐ No ☑ N/A
	c. Are monthly records available to verify no leaks to interstice, sump or the environment from piping? 9d.d	☐ Yes ☐ No ☑ N/A
7.	Has Annual testing/inspection of release detection equipment (ATG, probes/sensors, ALLD - simulating lead, vacuum/pressure guages, hand held equipment) been conducted? (280.40(a)(3) required No Later Than 10/13/18 **(UST9d.c 3yr records: RD Ck& ALLD simulating leak)**	☑ Yes ☐ No ☐ N/A

Section I Comments:

Section J Release Detection Record Keeping

Further Explanation in Narrative ☐
Section J Not Applicable ☐

1.	As outlined in 280.34 does the facility maintain all written performance claims and documentation provided by the release detection vendor for 5 years? (280.45(a))	☑ Yes ☐ No ☐ N/A
2.	As outlined in 280.34, does the facility maintain all monitoring results, sampling records, equipment testing, calibration and maintenance records, or leak detection equipment repair records for at least one year? (280.45(b) and (c)) Specify: Binder on site **UST-9d.a**	☑ Yes ☐ No ☐ N/A
3.	As outlined in 280.43(c), are all tank tightness-testing records retained until the next test is conducted? ((280.45(b))	☐ Yes ☐ No ☑ N/A
4.	As outlined in 280.34, are schedules of required calibration and maintenance for release detection equipment retained for 5 years from date of installation? ((280.45(c))	☐ Yes ☐ No ☑ N/A
5.	Are records available to verify water levels in the tanks are checked monthly to 1/8th inch? (280.43(a)(6) 9d.a	☑ Yes ☐ No ☐ N/A

Section J Comments:

Note: All questions are to be answered. If unable to determine, write 'unknown' and explain in narrative. Use narrative / summary of findings area to describe all areas of concern in greater detail.

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

Section K Release Reporting

Further Explanation in Narrative ☐
Section K Not Applicable ☑

	Suspected Releases	UST 9d.e	
1.	When a release detection method indicates that a release may have occurred; has the facility notified EPA/State of a suspected release? (280.40(b) and 280.50(c))	**S-D4**	☐Yes ☐No ☐N/A
2.	Has the facility notified the department of any other suspected release (regulated substance discovered, unusual operating conditions)? (280.50(a) or (b))		☐Yes ☐No ☐N/A
3.	Facility has resolved suspected releases in accordance with procedures outlined in 280.52?	**S-D4**	☐Yes ☐No ☐N/A
	Spills and Overfills		
1.	Has the facility reported, investigated, and cleaned-up any spills and overfills as required by 280.52 through 280.67		☐Yes ☐No ☐N/A

Section K Comments:

Section L Release Detection Methods for Tanks

9d.a

Further Explanation in Narrative ☐
Section L Not Applicable ☐

(Fill out only the applicable sections, all others can remain blank)

☐ 1. Inventory Control with Tank Tightness Testing (280.41(a)(1)) UST 9d.a INSTALLED ON or BEFORE 4/11/16

a.	Are inputs, withdrawals, amounts in tank recorded daily or on each operating day? (280.43(a)(1))	☐Yes ☐No ☐N/A
b.	Is the measuring equipment capable of measuring the level of the product over the full range of the tank's height to the nearest one-eighth of an inch? (280.43(a)(2))	☐Yes ☐No ☐N/A
c.	Are inputs reconciled with delivery receipts? (280.43(a)(3))	☐Yes ☐No ☐N/A
d.	Are deliveries made through a drop tube which extends to within 1foot of bottom? (280.43(a)(4))	☐Yes ☐No ☐N/A
e.	Are measurements of water level made to the nearest 1/8 inch at least once a month?(280.43(a)(6))	☐Yes ☐No ☐N/A
f.	Is the TTT conducted every 5 years as required and is TTT method capable of detecting a 0.1 gal/hr leak rate from any portion of the tank routinely containing product? (280.41(a)(1))	☐Yes ☐No ☐N/A
	Date of Last Tank Tightness Test:	
g.	TTT conducted following the manufacturer's instructions or third party certification. (280.43(c))	☐Yes ☐No ☐N/A
h.	Within the 10 year time frame for using IC/TTT? (280.41(a)(1)) Expiration Date:	☐Yes ☐No ☐N/A

☐ 2. Manual Tank Gauging (MTG) (tanks <2000 gal) (281.43(b)) 9d.a Deadline date:

a.	If tank is >550 gal and < 2000 gal, is tank tightness being conducted every 5 years? (280.41(a)(1)) Date of last tank tightness test:	☐Yes ☐No ☐N/A
b.	Tank size is appropriate for using MTG (280.43(b))	☐Yes ☐No ☐N/A
c.	Method is being conducted properly (280.43(b)(1) through (5))	☐Yes ☐No ☐N/A
d.	No liquid is added to or taken out of tank during test. (280.43(b)(1))	☐Yes ☐No ☐N/A
e.	Equipment is capable of 1/8-in measurement (280.43(b)(3))	☐Yes ☐No ☐N/A
f.	Within the 10 year time frame for using MTG/TTT for tanks between 550 and 2000 gallons? (280.41(a)(1)) Expiration Date:	☐Yes ☐No ☐N/A

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

☑ **3. Automatic Tank Gauging (ATG) (280.40(a)&280.43(d))** **9d.a** **INSTALLED ON or BEFORE 4/11/16**

Make and Model: Veeder Root TLS 450 | Probe Type: Magentostrictive

a. Is the ATG capable of detecting a leak of 0.2 gal/hr leak rate? (280.43(d)(1)) **S-D3** ☑ Yes ☐ No ☐ N/A

b. As the sole method of release detection, the ATG must test the tank at least once per month in a manner that can detect a 0.2 gal/hr release with a pd > 0.95 and a pfa < 0.05 (280.40(a)(3)) ☑ Yes ☐ No ☐ N/A **S-D3**

c. The ATG will generate a hard copy which contains the following:

i. the time and date of the test ☑ Yes ☐ No ☐ N/A

ii. the tank identification ☑ Yes ☐ No ☐ N/A

iii. the qualitative result either "pass" or "fail" ☑ Yes ☐ No ☐ N/A

d. Type of test conducted CSLD

☐ **4. External Release Detection Devices** **9d.a** **INSTALLED ON or BEFORE 4/11/16**

a. General Requirements for Release Detection Devices

i. Do the RDDs meet the general requirements for construction? (280.43(e)(1) &(6) and (f)(7)-(8) ☐ Yes ☐ No ☐ N/A

ii. RDDs screened from 1 ft below the surface throughout the entire excavation zone? (280.43(e) & (f)) ☐ Yes ☐ No ☐ N/A

iii. Are the RDDs sealed and locked? (280.43(e)(7) and (f)(8)) ☐ Yes ☐ No ☐ N/A

iv. Are the RDDs installed in backfill? (280.43(e)(1) and 280.43(f)(2)) Type of backfill: ☐ Yes ☐ No ☐ N/A

v. Are RDDs in the correct number and properly positioned? (280.43(e)(6) and (f)(7)) ☐ Yes ☐ No ☐ N/A

vi. Does the facility have the paperwork to confirm that the release detection method was properly assessed? (280.45(a) Required After Oct 13, 2018 ☐ Yes ☐ No ☐ N/A

☐ **b. Vapor Monitoring (280.43(e))** **9d.a** **INSTALLED ON or BEFORE 4/11/16**

i. Is the regulated substance (or tracer) sufficiently volatile to allow vapors to be detected by the monitoring device? (280.43(e)(2)) ☐ Yes ☐ No ☐ N/A

ii. Vapor monitoring is not affected by high ground water, rainfall, etc. (280.43(e)(3) ☐ Yes ☐ No ☐ N/A

iii. Does background concentration in excavation zone interfere with method used? (280.43(e)(4)) ☐ Yes ☐ No ☐ N/A

iv. Is the monitoring device designed and operated to detect any significant increase in concentration above background? (280.43(e)(5)) ☐ Yes ☐ No ☐ N/A

☐ **c. Groundwater Monitoring (280.43(f))** **9d.a** **INSTALLED ON or BEFORE 4/11/16**

i. Is regulated substance immiscible in water and have a specific gravity less than one? (280.43(f)(1) ☐ Yes ☐ No ☐ N/A

ii. Water in the monitoring well is never more than 20 feet from the ground surface? (280.43(f)(2)) ☐ Yes ☐ No ☐ N/A

iii. Does RDD prevent migration of soils into RDD, and can regulated substance enter RDD in both low and high water conditions? (280.43(f)(3)) ☐ Yes ☐ No ☐ N/A

iv. If RDD installed in native soil, is hydraulic conductivity greater than 0.01 cm/sec? (280.43(f)(2) ☐ Yes ☐ No ☐ N/A

v. Can continuous monitoring device or manual method detect 1/8-in of free product? (280.43(f)(6)) ☐Yes ☐No ☐N/A

☐ **5. Interstitial Monitoring (280.43(g)) 9d.a** REQUIRED FOR TANKS INSTALLED AFTER 4/11/16

a. Describe the UST system which uses IM e.g. double walled tank, secondary barrier:
Explain: ☐Yes ☐No ☐N/A

b. Can the method detect a release through the inner wall of the tank? (280.43(g)(1) or (3)) **S-D2** ☐Yes ☐No ☐N/A

c. Continuous interstitial monitoring by an automatic leak sensing device that signals to the operator the presence of any regulated substance in the space or sump (701.A.6.a)
Method: ☐Yes ☐No ☐N/A

OR

ii. Manual interstitial monitoring every 30 days by means of a procedure capable of detecting the presence of any regulated substance in the interstitial space or sump (701.A.6.a)
Specify Method: ☐Yes ☐No ☐N/A

☐ **6. Statistical Inventory Reconciliation(SIR)(280.43(h)) 9d.a** **For Tanks INSTALLED ON OR BEFORE 4/11/16**

a. Can the SIR method detect a release of 0.2gal/hr from any portion of the UST System that routinely contains product with a pd > 0.95 and a pfa < 0.05? (280.43(h)(1)) ☐Yes ☐No ☐N/A

b. Did the owner/operator receive the monthly report(s) from the SIR provider/ vendor within the 30 day monitoring period? (280.43(h)) ☐Yes ☐No ☐N/A

c. Did the SIR analysis report include the following information:

i. the name of the SIR provider and the name and version of the SIR method; ☐Yes ☐No ☐N/A

ii the name and address of the facility at which the analysis was performed; ☐Yes ☐No ☐N/A

iii. a description of the UST system for which the analysis was performed; ☐Yes ☐No ☐N/A

iv. a quantitative statement, in gallons/hr, for each UST system monitored for the month, of the leak threshold, minimum detectable leak rate, and the indicated leak rate; ☐Yes ☐No ☐N/A

v. a qualitative statement of "pass," "fail," or "inconclusive" for each UST system monitored ☐Yes ☐No ☐N/A

d. Method Name: Version:

☐ **7. Other Method: (280.43(h))** Specify Method:

a. Method can detect 0.2 gal/hr leak rate or a release of 150 gal within a month; & meet the 95/5 probability requirement. (280.43(h)) **OR** ☐Yes ☐No ☐N/A

b. EPA has approved the method as being as effective as Tank Tightness testing, ATG, vapor monitoring, ground water monitoring, or interstitial monitoring and operator complies with any conditions imposed by the agency. (280.43(h)) ☐Yes ☐No ☐N/A

Section L Comments:

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

Section M Methods of Release Detection for Piping

Section M Not Applicable ☐
Further Explanation in Narrative ☐

Is release detection performed on the UST system's piping? (280.41(b)) ☑ Yes ☐ No ☐ N/A
Check Box to the right and the appropriate piping system below: pressurized or suction.

☑ **1. Pressurized Piping** **9d.a**

a. Which of the following methods of leak detection does the facility use for pressurized piping? (280.41(b)(1))

i. Automatic Line Leak Detectors (ALLD) installed (one of the following methods is required on all pressurized lines, regardless of line leak detection method used) (280.41(b)(1)(ii)) ☑ Yes ☐ No ☐ N/A

MODEL: Red Jacket — **MECHANICAL** ☑ **ELECTRONIC** ☐

1. Automatic flow restrictor, or ☑ Yes ☐ No ☐ N/A
2. Automatic shutoff, or ☐ Yes ☐ No ☑ N/A
3. Continuous audible or visual alarm ☐ Yes ☐ No ☑ N/A
4. Is a test conducted every 12 months on the line leak detector which simulates a leak according to manufacturer's requirements? (280.44(a)) Date of last test: 02/14/2025 ☑ Yes ☐ No ☐ N/A
5. Are records available for performance test for previous 2 years. (starting 10/13/18, 3 years of records required, which includes current test.) **9d.c** ☑ Yes ☐ No ☐ N/A
6. If Electronic, a 3gal/hr test with a PASS or other rate as specified by Manufacturer annually. (Not acceptable after 10/13/2018) ☐ Yes ☐ No ☑ N/A

AND

ii. One other method (280.44(b)) (Only appliable if installed on or before 4/11/2016, must use IM afterwards.)

1. A line tightness test conducted every 12 months (280.44(b)); Date of last test: 9d.b 02/14/2025 ☑ Yes ☐ No ☐ N/A
2. Is LTT method capable of detecting a 0.1 gal/hr leak rate from any portion of the piping routinely containing product? (280.44(b)) ☑ Yes ☐ No ☐ N/A
3. If Electronic, is a 0.1 test with PASS conducted annually (280.44(b)) ☐ Yes ☐ No ☑ N/A

OR

4. Monthly monitoring? (280.44(c)) Specify Type: N/A ☐ Yes ☐ No ☑ N/A
5. If Electronic, is a 0.2 test with PASS conducted monthly (280.44(b)) ☐ Yes ☐ No ☑ N/A

REQUIRED FOR Piping INSTALLED or REPLACED (>50% TOTAL) AFTER 4/11/16

b. Is Interstitial Monitoring Secondary Containment requirements used (303.D.2.f.i), by either:

i. Continuous interstitial monitoring by an automatic leak sensing device that signals to the operator the presence of any regulated substance in the interstitial space or sump (701.B.4) **Must have monthly documentation.** Specify Method: N/A ☐ Yes ☐ No ☑ N/A

OR

ii. Manual interstitial monitoring every 30 days by means of a procedure capable of detecting the presence of any regulated substance in the interstitial space or sump (701.B.4) Specify Method: N/A ☐ Yes ☐ No ☑ N/A

c. For piping subject to the 4/11/16 Secondary Containment requirements, is all piping interstitial space and/or are all sumps maintained free of water, debris, or anything that could interfere with the leak detection capabilities? (701.B.4.a) ☐ Yes ☐ No ☑ N/A

☐ **2. Suction Piping**

a. Which of the following leak detection methods does the facility use for suction piping? (280.44(b))

i. (Safe Suction) No release detection is required if piping is sloped to drain product back into tank **and** only one check valve is present and located directly below or as close as practicable to the suction pump (280.41(b)(2) - must have documentation ☐ Yes ☐ No ☐ N/A

OR ii. Line tightness test every 3 years? (280.41(b)(2)) Date of last test: ☐ Yes ☐ No ☐ N/A

OR iii. Monthly monitoring? (280.41(b)(2)) Specify Type: ☐ Yes ☐ No ☐ N/A

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

Section M Comments:

Section N Requirements for Temporary Closure (280.70)

Further Explanation in Narrative ☐

Section N Not Applicable ☑

1.	For UST systems in temporary closure; has the facility:		
	a. If greater than 1 inch of liquids remain, is monthly release detection conducted? (280.70(a)) Specify Type of RD performed tanks and piping: ☐	**9d.a**	☐Yes ☐No ☐N/A
	b. If applicable, is the Cathodic Protection being maintained? (280.70(a))	**9c.c**	☐Yes ☐No ☐N/A

Section N Comments:

NON-Significant Operational Compliance Components

Section O Temporary Closure Continued

Further Explanation in Narrative ☐

Not Applicable ☑

1.	For UST systems temporarily closed for 3 months or more, did the owner/operator:	
	a. Leave vent line open and functional? (280.70(b)(1))	☐Yes ☐No ☐N/A
	b. Cap and secure all other lines, pump, manways, and ancillary equipment? (280.70(b)(2))	☐Yes ☐No ☐N/A
	c. Notify the E.P.A of the temporary closure status (UST-REG-01 form)? (280.70(b)(1))	☐Yes ☐No ☐N/A
	d. Perform a tank tightness test within five days after the system was brought back into service after being in temporary closure 3 months or more? (903.E)	☐Yes ☐No ☐N/A
2.	For any non-upgraded UST system that has been temporarily closed for more than 12 months, has the owner/operator permanently closed the system? ((280.70(c))	☐Yes ☐No ☐N/A

Section O Comments:

Section P Additional Paperwork Requirements

Not Applicable ☑

Further Explanation in Narrative ☐

1.	Is the information on the Notice of Registration form current and accurate? (280.22))	☑Yes ☐No ☐N/A
2.	Has an amended Registration form been submitted within 30 days of acquiring a UST? (280.22))	☐Yes ☐No ☑N/A
3.	Is a copy of the current registration form kept on-site or at the nearest staffed facility? (Not Required.)	☑Yes ☐No ☐N/A
4.	Has the owner/operator submitted the following information to the department:	
	a. Registration form for all UST systems, including installation certification and installer verification for new tank systems (280.22)	☐Yes ☐No ☑N/A
	b. Reports of all releases, suspected releases, spills and overfills, and confirmed releases (280.34(a)(2)) **9c.e**	☐Yes ☐No ☑N/A

Note: All questions are to be answered. If unable to determine, write 'unknown' and explain in narrative. Use narrative / summary of findings area to describe all areas of concern in greater detail.

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

c. Descriptions of corrective action plans, site characterizations, free product removal investigation of soil and groundwater cleanup, and corrective action plan (280.34(a)(3))	☐ Yes ☐ No ☑ N/A
d. Notification before permanent closure or change-in-service (280.34(a)(5) & .71(a)	☐ Yes ☐ No ☑ N/A
e. If new ownership, has a notification of ownership change been submitted within 30 days of acquiring a UST? (280.22(b))	☐ Yes ☐ No ☑ N/A
f. Has notification of a change of storage to regulated substances blended wih greater than 10% ethanol or greater than 20% biodiesel been provided to agency 30 days before beginning storage? (280.32(b))	☐ Yes ☐ No ☑ N/A
5. Has the owner/operator maintained the following documents:	
a. Results of site assessment conducted at permanent closure (280.34(a)(5)	☐ Yes ☐ No ☑ N/A
b. Documentation of UST system repairs (280.34(b)(3))	☐ Yes ☐ No ☑ N/A
c. Documentation of the type and construction of the tanks, piping, leak detection equipment, corrosion protection equipment, and spill and overfill protection equipment?	☐ Yes ☐ No ☑ N/A
d. Assessment of suitability for groundwater or vapor monitoring as release detection method. Retain while in use. (Copy of assessment must be available as of 10/13/18) (280.45(a))	☐ Yes ☐ No ☑ N/A
e. Three year testing of release prevention equipment and containment sumps, and inspection and/or testing (Overfill protection devices). Retain for three years. (280.35(c)(1) **UST-/9a.b/9b.b/9d.c/9d.d**	☑ Yes ☐ No ☐ N/A
f. Annual testing of release detection equipment. Retain for 3 years. (280.45(b)(1) 9d.a	☑ Yes ☐ No ☐ N/A
g. Checklists for Monthly walk thru inspections. Checklists contain dates, findings and actions taken. Retain for 1 year. 280.36(b) **UST `12**	☑ Yes ☐ No ☐ N/A
h. Annual walk thru insp. checklists for sumps/equip. Retain 1 year.280.36(b) **UST-12**	☑ Yes ☐ No ☐ N/A
6. Was the facility able to provide the records in a timely fashion as required by the inspector? (280.34(c)	☑ Yes ☐ No ☐ N/A
Section P Comments:	

Section Q General Requirements

Not Applicable ☐
Further Explanation in Narrative ☐

1. Are the products being stored compatible with the materials or liner in the UST system? (280.32)	☑ Yes ☐ No ☐ N/A
2. Documentation of compatibility for fuel with >10% ethanol, >20% biodiesel, or another fuel designation by implementing agency. Retain as long as fuel is used. (280.32(b)(2))	☐ Yes ☐ No ☑ N/A
Section Q Comments:	

Section R Financial Responsibility

UST- 11

Not Applicable ☑
Further Explanation in Narrative ☐

1. Can the owner/operators demonstrate financial responsibility for taking corrective action, including 3rd party liability? i.e: how is he going to pay for the cleanup of a release? (280.94 -280.99)Records - 280.111 What type of financial responsibility is used? Explain:	☑ Yes ☐ No ☐ N/A
2. If Insurance, list company and contact: ACE American Insurance/ CHUBB	Policy Number: G2481094A 009
3. Insurance Mailing Address: 1515 Wymcoop Street	
Contact Number: Not listed	E-mail: Not listed
Effective Date of Coverage: 7/23/24	Expiration Date on Policy: 7/23/25
Retroactive Date:	Confirmed Released Policy: ☑ Suspected Release Policy: ☐

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

4. Financial Assurance Documentaion

a. Copy of Signed Certification of Financial Responsibility available and current. ☑Yes ☐No ☐N/A

b. Copy of signed Certitficate of Insurance or Endorsement. ☑Yes ☐No ☐N/A

Section R Comments:

Section S Physical Documents Obtained

Not Applicable ☑
Further Explanation in Narrative ☐

If any documents, printouts or other materials were obtained from the facility, owner or operator explain below what was obtained and add to Inspection Packect and document in attachments.

Section S Comments:

Section T Additional Comments

Not Applicable ☑

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Tribal Land:	Chitimacha Tribe of Louisiana

Operator Training

DESIGNATED CLASS A AND CLASS B UST OPERATORS FOR THIS FACILITY: UST -10 ☐ N/A

Class A UST Operator:	Billy J Mora	**Date Certified:**	06/19/2018
Trainer Contact Information	EPA		
Class B UST Operator:	Billy J Mora	**Date Certified:**	06/19/2018
Trainer Contact Information	EPA		
Class C UST Operator:	Jessica Brown	**Date Certified:**	05/01/2025
Trainer Contact Information	EPA		
Class C UST Operator:	Keisha Butad	**Date Certified:**	05/01/2025
Trainer Contact Information	EPA		

Comments on Operator Training:

Digital Image Log

FID #:	0335LA		INSPECTION DATE(S):	05/07/2025
FACILITY NAME:	Trading Post		Camera type and ID	

Image #	File #	Date ##/##/####	Time	AM / PM	Orientation N/E/S/W/Down	Photographer	Description
1				AM ☐ PM ☐			No Images Taken
2				AM ☐ PM ☐			
3				AM ☐ PM ☐			
4				AM ☐ PM ☐			
5				AM ☐ PM ☐			
6				AM ☐ PM ☐			
7				AM ☐ PM ☐			
8				AM ☐ PM ☐			
9				AM ☐ PM ☐			
10				AM ☐ PM ☐			
11				AM ☐ PM ☐			
12				AM ☐ PM ☐			
13				AM ☐ PM ☐			
14				AM ☐ PM ☐			

I certify that the digital images for this inspection were taken and archived according to EPA standard operating procedures and protocols. The digital images have not been altered and are a fair and accurate representation of observations made during the inspection.

I certify that the digital media has been in my possession throughout the inspection trip and that I transferred the digital images to a CD-R. ☐ Yes ☐ No

Inspector: _____

Inspector Signature:_____

Inspection Packet

- [x] A0: Final Inspection Report
- [ ] A1: Facility Diagram Attachment
- [ ] A2: Digital Images Attachment
- [x] A3: Observation Report
- [ ] A4:

Note: All questions are to be answered. If unable to determine, write 'unknown' and explain in narrative. Use narrative / summary of findings area to describe all areas of concern in greater detail.

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UST/SOLID WASTE SECTION (6LCRPU)
1201 Elm Street
DALLAS, TX 75270
Tel: 214-665 -
FAX: 214-665-

Attn:

INSPECTOR OBSERVATION REPORT
FOR INDIAN COUNTRY UST SYSTEMS

OWNER AND/OR OPERATOR		FACILITY	
NAME: Chitimacha Tribe of Louisiana		NAME: Trading Post	FID# 0335LA
ADDRESS: 155 Chitimacha Loop		ADDRESS: 585 Ralph Darden Memorial Parkway	
CITY,STATE,ZIP: Charenton LA 70523		CITY,STATE,ZIP: Charenton, LA 70523	
CONTACT PERSON: Julie Burgess		PERSON(s) PRESENT: Same as operator	
TEL: 337 923-7487	EMAIL: julie.b@chitimacha.gov	TEL:	EMAIL:

☐ No deficiencies observed at the conclusion of this inspection.

☒ The above named facility was inspected by a duly authorized representative of the United States Environmental Protection Agency (EPA). The following are the inspector's observations and/or recommended actions, with milestones to be met:

- facility is well maintained
- records on ~~site~~ SHE & well organized
-

You can fax the documents to (214) 665- Attn: If you have any questions at all, please contact me at @epa.gov
or you can call me at (214) 665 - .

Name of Owner/Operator representative:
Julie Burgess
(Please print)
Julie Burgess
(Signature)

Name of EPA Representative:
Mikaela Brown
(Please Print)
Mikaela Brown
(Signature)
Date of Inspection: 5/7/25 Start Time: 0900 (Military Time)
Completion Time: 1010 (Military Time)

Note: All questions are to be answered. If unable to determine, write 'unknown' and explain in narrative. Use narrative / summary of findings area to describe all areas of concern in greater detail.