

Compliance Evaluation Inspection Report

Navajo State Park Marina July 2024

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop St.
Denver, CO 80202



Submitted by:

Eastern Research Group.
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EPA Contract No. 68HERC21D0007
Task Order 68HERC23F0460

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: July 23, 2024

Date and Time of Inspection: June 19, 2024, at 8:50 am MST

Weather: Sunny, 65° Fahrenheit

Facility Contact/Owner: [REDACTED] / Navajo State Park

Owner Address: 1526 County Road 982
Arboles, CO 81121

Facility Address: 1526 County Road 982
Arboles, CO 81121

Facility Phone: [REDACTED]

Facility ID Number: 1010038

Reason for Inspection: Compliance Inspection

Inspector(s): [REDACTED], ERG (Lead)

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1. NARRATIVE

The Region 8 (R8) office of the Environmental Protection Agency (EPA) requested multiple facilities be inspected on tribal lands. Eastern Research Group (ERG) under EPA's Contract No. 68HERC21D0007, Task Order 68HERC23F0460, provided assistance to EPA in preparing for, conducting the inspection, and preparing this inspection report. ERG inspected the Navajo State Park Marina in Arboles, Colorado on June 19, 2024. The facility was last inspected on November 3, 2021.

Mr. [REDACTED], contract inspector, contacted Mr. [REDACTED], Manager, on May 29, 2024, via telephone to notify the facility about the inspection. The inspection verified compliance with the federal underground storage tank (UST) requirements of Resource Conservation and Recovery Act (RCRA) Subtitle I under 40 CFR Part 280.

Upon arrival at the facility, Mr. [REDACTED] introduced himself as a contract inspector for EPA, presented his credentials, and provided an in-brief to facility personnel to explain the purpose of the inspection. Mr. [REDACTED] gathered records, interviewed Mr. [REDACTED], and conducted a walkthrough of the site including access ports and dispensers. Mr. [REDACTED] concluded with an exit brief and had Mr. [REDACTED] sign the Notice of Inspection. Mr. [REDACTED] took photographs during the inspection.

UST System Description

The Navajo State Park Marina, located at 1526 County Road 982 in Arboles, CO, has one UST installed in 2005. According to the previous EPA inspection report and observations made during the inspection, Tank 1 has a 12,000-gallon capacity and contains regular unleaded gasoline. The tank is fiberglass-reinforced plastic (FRP) jacketed steel construction. The dispensing system for each tank is pressurized piping with double-walled flex plastic construction. Mr. [REDACTED] completed an EPA Region 8 UST Compliance Inspection Checklist for the UST while on site which is included in Attachment A. Photograph #2 in Attachment B shows an overview of the UST system.

UST System Records

The listing of documents reviewed for the Navajo State Park Marina inspection included the following:

1. UST Leak Detection Records and Inventory
2. Automatic Tank Gauge and Line Leak Detector Test Records
3. Spill and Overfill Protection Test Records
4. Insurance Coverage Certification
5. Operator Training Records

The facility maintains all records off site. Mr. [REDACTED] provided the records for the UST during the inspection.

Tank Release Detection

Releases from the tank is detected by a Veeder-Root TLS-350 monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tank. Attachment C contains a compilation of the ATG continuous statistical leak detection test results for January, May, and June 2024. Photograph #1 in Attachment B shows the monitoring system interface, and Attachment C also includes a current system status report printed on the day of the inspection. Mr. [REDACTED] also provided a passing test record for the ATG system performed by a contractor in June 2023 (see Attachment D).

Piping Release Detection

The tank was installed with pressurized double-walled flex plastic piping. The piping is attached to a submersible turbine pump (STP), which is equipped with an electronic line leak detector (LLD). The LLD was observed on the STP and had a passing test record based on contractor testing in June 2023 (see Attachment E). The shear valves, liquid sensors, and E-stop at the tank and shed were tested in June 2023 and passed. These results are included in Attachment F. A 0.1 gph annual line tightness test was conducted by the Veeder-Root in March 2024 and passed. The line tests for the UST are included in Attachment C. Photograph #3 in Attachment B shows the STP.

Spill/Overfill Prevention

The fill pipe for the UST has a spill bucket surrounding the pipe. Photograph #2 in Attachment B shows the fill port for the UST. The spill bucket was dry and in good condition. There is an external audible overfill alarm on the outside of the shed in close proximity to the fill port. The overfill alarm was tested as part of the ATG certification in June 2023 and is included in Attachment D. Mr. [REDACTED] tested the overfill alarm during the inspection and an audible alarm sounded. Testing was conducted on the spill bucket in June 2023. Attachment G includes the passing test record for the spill bucket.

Corrosion Protection

The tanks are FRP jacketed steel tank construction with flexible plastic piping. They do not require cathodic protection.

Operator Training

Operator training records were provided for [REDACTED] who is a Class A and Class B operator. There are no designated Class C operators. not provided during the inspection. The certificates are included in the Navajo State Park UST Fuel System handout included in Attachment H.

Walkthrough Inspections

Walkthrough inspection records were not provided during the inspection. The annual compliance inspection from June 2023 is included in Attachment I.

Financial Assurance

The State of Colorado Petroleum Tank Fund invoice for the UST is included in Attachment H. The facility is self-insured for the deductible.

Physical Inspection

During the site visit, the Mr. [REDACTED] reviewed documents on site and observed the fill port, The STP access port, two dispensers, and the ATG monitoring interface for the UST on site. Photograph #1 in Attachment B shows the interface for the Veeder-Root TLS-350 ATG system, which did not have any monitoring or leak alarms at the time of the inspection. Mr. [REDACTED] also observed the spill bucket and fill pipe for the UST. The drop tube and spill bucket were in good condition. Mr. [REDACTED] also observed the STP sump. The sump was dry and appeared in good condition. The access port for ATG probe was also present, and no issues were noted for these during the inspection.

There were two dispensers on site, one at the marina and one by the shed. The dispenser at the marina was opened as part of the inspection. There were three transition sumps observed on land and two transition sumps observed on the dock. The dispenser had sump containment and a liquid sump sensor present. The marina dispenser and transition sumps appeared in good condition and no issues were noted at the time of the inspection (see Photograph #10, Attachment B).

One monitoring well was observed at the tank field during the inspection. The vent line is located north of the UST, and no obstructions or concerns were noted for the vent line at the time of the inspection.

2. SUMMARY

The facility has one tank with FRP jacketed steel construction. Tank 1 has a 12,000-gallon capacity and contains regular unleaded gasoline. Passing monthly leak detection test records were available for January, May, and June 2024. An annual certification for the ATG system was also provided after the inspection. There are two pump dispensers on site that operate with pressurized double-walled flex piping. The STP for the pressurized piping is equipped with an electronic LLD which passed in June 2023. The fill port for each UST is equipped with a spill bucket and an external audible overfill alarm as the spill and overfill prevention equipment. The spill bucket and overfill alarm passed operational tests in June 2023. The spill bucket was clean and in good condition. Cathodic protection testing is not required. Certified operators are designated for Class A and B but there are no designated Class C operators. Training records were provided during the inspection. Monthly walkthrough inspection records were not provided but an annual compliance inspection was provided. The State of Colorado Petroleum Tank Fund invoice for the UST was provided. The facility is self-insured for the deductible. Attachment J contains the Notice of Inspection signed by Mr. [REDACTED]. Mr. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

Inspector Signature: [REDACTED] Date: 2024.07.23 20:28:48 -04'00' **Date:** July 23, 2024