

U.S. Environmental Protection Agency, Region 8 UST Compliance Evaluation Inspection

Minot Air Force Base

June 2024

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
WJC Building, 1200 Pennsylvania Ave., NW
Washington DC, 20004



Submitted by:

Abt Associates, Inc.
Task Order #68HERC22Q011

Prepared by:

[REDACTED]
EPA Contractor

[REDACTED]
8/15/24

Date

COMPLIANCE EVALUATION INSPECTION REPORT

U.S. Environmental Protection Agency (USEPA), Region 8

Facility Owner: Minot Air Force Base (AFB)
320 Peacekeeper Place, Minot, ND 58705

Owner Contact: [REDACTED], Chief, Environmental Management, 5 CES/CEAN
445 Peacekeeper Place, Minot AFB, ND 58705-5006
[REDACTED]

Facility Name: F-8
Parshall, ND 58770

Facility Contact: [REDACTED], Biological Scientist, Storage Tank Program
5 CES/CEIEC, Minot AFB, ND
[REDACTED] [REDACTED]

Latitude/Longitude: [REDACTED]

NAICS/SIC: 92810 – National Security

Federal Facility: Yes

Facility ID 3010044

Date of Inspection: June 3, 2024

Inspector & Facility Representatives:

Facility: In addition to Mr. [REDACTED]:
[REDACTED]
[REDACTED], Fuel Program Lead
[REDACTED]

EPA: [REDACTED], EPA contractor, [REDACTED]

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1. INTRODUCTION

The Region 8 office of the U.S. Environmental Protection Agency (USEPA) requested an inspection under the Federal Facilities Inspection Initiative of sixteen missile facilities on tribal lands managed by Minot Air Force Base (AFB), focused on compliance with the Underground Storage Tank (UST) regulations promulgated under Subtitle I of the Resource Conservation and Recovery Act. [REDACTED], a subcontractor for Abt Associates, Inc., under EPA's Federal Facilities Enforcement Office (FFEO) contract, Task Order #68HERC22Q011 conducted this inspection on June 3, 2024 ("the Inspection").

The facilities were last inspected by EPA in October 2021 and were selected for inspection by EPA as a routine re-inspection. The inspections were coordinated with Mr. [REDACTED], Storage Tank Program Manager, which required security clearances in advance of the inspection, and coordination with two security details throughout the inspections to minimize delays in accessing and leaving each missile facility. To further expedite the inspections, Mr. [REDACTED] emailed copies of cathodic protection records, an operator training record, and annual inspection records.

Inspection participants, identified above, met at approximately 9:00 on the morning of June 3, 2024. Business cards and agency credentials were provided. An in-briefing at Minot AFB was used to explain the purpose and scope of the inspection, to offer the opportunity for a close-out briefing and a claim of confidentiality. Although a photograph pass was requested well in advance of the inspection, one was not processed, so this inspection report includes no photographs. When one of the two 2-man security details arrived, Mr. [REDACTED] confirmed the inspection schedule with them, and three vehicles were driven to E-8, followed by the remaining facilities: the first vehicle carried one of the two security details; the second vehicle

carried Messrs. [REDACTED]; and the final vehicle was driven by the contract inspector.

2. FACILITY DESCRIPTION

The UST inspections requested by EPA on the Fort Berthold tribal lands are located at a subset of facilities within three arrays of Minot AFB missile facilities, designated as Echo, Fox and Hotel. Each of the missile arrays consists of a central Missile Alert Facility (MAF), which controls ten widely dispersed Launch Facilities (LFs). Each MAF is manned and has two USTs: a 14,300-gallon UST, and a 2,500-gallon UST. Each of the LFs is unmanned and has a 4,000-gallon UST.

LF F-8 and the other fifteen UST systems located on tribal lands and subject to these inspections store diesel fuel for emergency generators. Each facility has a Veeder-Root TLS-350 automatic tank gauge (ATG) monitoring the tank(s), with communication to its MAF. The UST at each of the LFs is non-metallic and double-walled, with non-discriminating interstitial monitoring by the ATG. Piping at each of the LFs is also non-metallic and double-walled.

All sites are protected from corrosion by impressed current. However, as indicated in the table below, the only site that requires cathodic protection is the MAF designated as H-1, since only H-1 has a tank or piping that is metallic.

**Underground Storage Tank and Piping Details for the
Minot Air Force Base Facility**

Site	Facility ID	Inspection Date	Material Stored	Capacity (gal)	Installation Date	Tank Construction Material	Piping Construction Material
E-8	3010053	06/03/2024	Diesel	4,000	7/1997	FRP DW	Flex DW
E-9	3010054	06/03/2024	Diesel	4,000	7/1997	FRP DW	Flex DW
E-10	3010051	06/03/2024	Diesel	4,000	7/1997	FRP DW	Flex DW
F-7	3010052	06/03/2024	Diesel	4,000	6/1997	FRP DW	Flex DW
F-8	3010044	06/03/2024	Diesel	4,000	10/1996	FRP DW	Flex DW
F-9	3010045	06/03/2024	Diesel	4,000	10/1996	FRP DW	Flex DW
F-10	3010014	06/03/2024	Diesel	4,000	10/1996	FRP DW	Flex DW
H-1	3010033	06/04/2024	Diesel	14,300	6/1963	Steel SW	Steel SW
			Diesel	2,500	6/1998	FRP DW	Flex DW
H-3	3010046	06/04/2024	Diesel	4,000	8/1996	FRP DW	Flex DW
H-4	3010005	06/03/2024	Diesel	4,000	9/1996	FRP DW	Flex DW
H-5	3010047	06/04/2024	Diesel	4,000	9/1996	FRP DW	Flex DW
H-6	3010048	06/04/2024	Diesel	4,000	9/1996	FRP DW	Flex DW
H-7	3010049	06/04/2024	Diesel	4,000	9/1996	FRP DW	Flex DW
H-8	3010050	06/04/2024	Diesel	4,000	9/1996	FRP DW	Flex DW
H-9	3010056	06/04/2024	Diesel	4,000	9/1996	FRP DW	Flex DW
H-10	3010024	06/04/2024	Diesel	4,000	9/1996	FRP DW	Flex DW

- DW – Double-Walled
- Flex – Flexible Plastic
- FRP – Fiberglass Reinforced Plastic
- SW – Single-Walled



3. FACILITY WALKTHROUGH

The facility walkthrough encompassed inspecting the condition of the UST fill port and the status of the ATG, which is located approximately ten feet below ground in a vault with a diesel fuel pump, day tank and generator. The tank-top sump was not accessible for inspection since facility representatives were not equipped to remove the bolts securing the steel lid to it. As a result, it was not possible to independently confirm sump and piping composition or condition.

Releases from the tank are detected by a Veeder-Root TLS-350 monitoring system that conducts automatic tank gauging of the tank and monitors the interstitial space of the tank. The Veeder-Root TLS-350 monitoring the F-8 UST system was in alarm for a sump sensor.

Facility representatives have maintained that the piping connecting the UST and the pump for the generator qualifies for release detection exemption as safe suction. However, it was observed that the piping connecting the pump with the UST runs up the generator vault wall approximately six feet before running through the vault wall to the UST. Accordingly, it appears that the below-grade piping may not be sloped so that the contents of the pipe will drain back into the storage tank if the suction is released, which is one of the criteria at 40 CFR § 280.42 (b)(1)(ii)(B) for exemption from piping release detection. Facility representatives provided “as-built” specifications for these tank systems, which confirm that all piping runs in contact with soil are sloped toward the tank.

The pavement around the fill port was not pitched to shed rain and snow melt. Surrounding the fill pipe was a 15-gallon single-wall spill bucket, with a few inches of water in it. No flapper valve was observed in the fill pipe.

Attachment A is a completed EPA Region 8 UST Compliance Inspection Checklist for the UST at F-8.

4. REVIEW OF UST SYSTEM RECORDS

Spill/Overfill Prevention

Facility representatives provided a record indicating that the spill bucket passed an integrity test on April 21, 2022 (Attachment B).

Facility representatives provided a record indicating that the overfill alarm passed inspection on August 30, 2023 (Attachment C).

Tank Release Detection

Thirty-day tank leak detection records were requested for the twelve months prior to the inspection. No records were provided.

Piping Release Detection

As indicated above, piping operates with safe suction and requires no release detection.

Corrosion Protection

According to the state registration, the tank is constructed of DW FRP, and the piping is constructed of DW Flex plastic. Thus, neither requires cathodic protection. Verification was not possible, since facility representatives were not equipped to open the tank-top sump.

Operations and Maintenance

Since the facility receives diesel fuel deliveries at intervals greater than thirty days, walkthrough inspections are required only in advance of deliveries. Although records of the last fuel deliveries and their associated walkthroughs were requested, the facility provided records of annual inspections only.

Facility representatives provided an operator training record, dated May 28, 2024 (Attachment D).

- The facility provided no listing of the personnel who are required to be trained. Therefore, it is not possible to determine whether the required training was provided to all the individuals required to be trained.
- Six individuals are listed with the status of “not started” for B training, so these individuals apparently did not receive the required training.

Facility representatives provided an operator training record, dated June 10, 2024.

- Mr. [REDACTED], who participated in the EPA inspection, is not listed on either record as being trained, or needing to be trained.
- Mr. [REDACTED], who conducted spill bucket integrity tests of USTs at E-8, -9 and -10 in June 2021 (Attachment B) is not listed on either record as being trained.

Neither record includes the date that the individual assumed UST duties.

Financial Assurance

The facility is a federal facility and is self-insured.

ATTACHMENTS (separate files):

A: Inspection Checklist

B: Spill Bucket Integrity Test

C: Overfill Alarm Test

D: Operator Training Records

