

Compliance Evaluation Inspection Report

Utter Stop
June 2023

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 68HERC22F0492

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: June 28, 2023

Date and Time of Inspection: May 16, 2023 at 08:00 am CDT

Weather: Overcast, 58° Fahrenheit

Facility Contact/Owner: [REDACTED]

Owner Address: 201 Main Ave East
Rolla, ND 58367

Facility Address: 1 Utter Stop Road
Belcourt, ND 58316

Facility Phone: (701) 477-3696

Facility ID Number: 3050002

Reason for Inspection: Compliance Inspection

Inspector(s): [REDACTED], ERG

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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 68HERC22F0492, provided assistance to EPA in preparing for, conducting the inspection, and preparing this inspection report. ERG inspected the Utter Stop facility in Belcourt, North Dakota on May 16, 2023. The facility was last inspected on September 16, 2020.

Mr. [REDACTED], contract inspector, contacted Ms. [REDACTED] [REDACTED], to notify the facility about the inspection on April 21, 2023 prior to the inspection and e-mailed Ms. [REDACTED] a request for documents on May 1, 2023. 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 Ms. [REDACTED], Office Manager, and [REDACTED], General Manager, to explain the purpose of the inspection. Mr. [REDACTED] concluded with an exit brief to inform the facility of areas of concern identified during the inspection and had Ms. [REDACTED] sign the Notice of Inspection. Mr. [REDACTED] took photographs during the inspection.

UST System Description

The Utter Stop facility, located at 1 Utter Stop Road in Belcourt, ND, has two USTs. According to the previous EPA inspection report and observations made during the inspection, Tank 1 has a 15,000-gallon capacity and stores regular unleaded gasoline. Tank 2 has a 12,000-gallon capacity and stores premium unleaded gasoline. The tanks were installed in 1994 and are fiberglass-reinforced plastic (FRP) constructed USTs. The dispensing system for each of the tanks is pressurized piping with flexible plastic construction. Mr. [REDACTED] completed an EPA Region 8 UST Compliance Inspection Checklist for the USTs while on site which is included in Attachment A. Photograph #9 in Attachment B shows an overview of the UST system.

UST System Records

The listing of documents reviewed for the Utter Stop inspection included the following:

1. UST Leak Detection and Testing Records
2. Piping Release Detection and Testing Records
3. UST Inventory
4. Operator Training Records
5. Financial Assurance Records
6. UST Certificate of Registration

The facility maintains all records on site. Ms. [REDACTED] provided the records before the UST during the inspection.

Tank Release Detection

Releases from the tanks are detected by a Tank Sentinel TS 750 monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tank. Attachment C contains a compilation of the ATG test results for the last 12 months showing passing results for all tanks. Attachment C also contains the printout from the ATG monitoring system while on site. Photograph #1 in Attachment B shows the monitoring system interface. The monitoring system indicated all functions were normal. An annual ATG certification was conducted by Premium Petroleum Services on 10/26/2022 and the ATG system passed and the results are included in Attachment D.

Piping Release Detection

All tanks were installed with pressurized double-walled flexible plastic piping. Mr. [REDACTED] observed mechanical automatic line leak detectors (ALLDs) on both submersible turbine pumps (STPs) during the inspection. Premium Petroleum Service conducted functionality tests for the ALLDs on 07/14/2021 and both ALLDs passed. Premium Petroleum Service conducted an annual line tightness test for both piping runs on 10/25/2022. Attachment E includes the passing testing records for the ALLD functionality tests and the annual line tightness tests.

Spill/Overfill Prevention

The fill pipes for the USTs have spill buckets surrounding the pipes. Photographs #2 and #3 in Attachment B show the fill ports for the USTs. The Utter Stop uses an audible external overfill alarm located in close proximity to the tank field. The spill bucket for Tank 1 contained about ½ inch of fuel. The spill bucket for Tank 2 appeared to be clean and in good condition. Ms. [REDACTED] was unable to provide hydrostatic testing results for the spill buckets. The external overfill alarm was believed to be tested on 07/14/2021 with the ALLD functionality tests. The high-level alarm was tested as part of the annual ATG certification which was conducted by Premium Petroleum Services on 10/26/2022 which is included in Attachment D. Attachment F contains the overfill alarm operation test record.

Corrosion Protection

According to facility documentation, Tank 1 and Tank 2 are single-walled FRP tanks with double-walled flexible plastic piping. Cathodic protection is not required.

Operator Training

Ms. [REDACTED] had operator training certification records at the time of the inspection. Ms. [REDACTED] is a Class A and Class B operator. There are no designated Class C operators. Training records are provided in Attachment G.

Walkthrough Inspections

Ms. [REDACTED] provided monthly walkthrough inspection records at the time of the inspection for the past 12 months but the walkthrough only involves checking the automatic line leak detector. Attachment H contains the completed monthly walkthrough inspection checklists.

Financial Assurance

Ms. [REDACTED] provided a Certificate of Registration that expires on 06/30/2023 showing it is part of the petroleum tank release compensation fund which is included in Attachment I. No documentation was provided on the coverage of the deductible.

Physical Inspection

During the site visit, Mr. [REDACTED] reviewed documents on site and observed the fill ports, STPs, and one dispenser sump, and the ATG monitoring interface for the two USTs on site. Photograph #1 in Attachment B shows the interface for the Tank Sentinel TS 750 monitoring system. Attachment C includes an inventory report for the USTs. Mr. [REDACTED] also observed the spill bucket and fill pipe for the two USTs. An audible external overfill alarm was observed in close proximity to the tank field. The spill bucket for Tank 1 contained about ½ inch of fuel. The spill bucket for Tank 2 appeared to be clean and in good condition. Mr. [REDACTED] also observed the STP for both USTs. Mechanical ALLDs were observed on the STPs. The junction boxes associated with the STPs were in good condition. The ATG probes were also present in the STP sump for each of the tanks, and no issues were noted for these during the inspection.

There were four pump dispensers on site and one of these were opened as part of the inspection. Dispenser piping was entering the secondary containment as shown in Photograph #7 in Attachment B. Mr. [REDACTED] did not observe signs of leaks at the time of the inspection.

No monitoring wells were observed at the tank field during the inspection. Vent lines are located in the tank field and no obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

Tank 1 has a 15,000-gallon capacity and stores regular unleaded gasoline. Tank 2 has a 12,000-gallon capacity and stores premium unleaded gasoline. Tank 1 and Tank 2 are FRP constructed tanks and were installed in 1994. Passing leak detection results were provided for both tanks for the previous 12 months. An annual certification for the ATG system was provided during the inspection. There are four dispensers on site that operate with pressurized flexible plastic piping so cathodic protection is not required. Passing testing records for the ALLD functionality tests and the annual line tightness tests were provided. STPs for the tanks have mechanical ALLDs. No visible signs of a leak were observed. An audible external overfill alarm was observed in close proximity to the tank field. The spill bucket for Tank 1 contained about ½ inch of fuel. The spill bucket for Tank 2 appeared to be clean and in good condition. No hydrostatic testing results for the spill buckets was provided. Tank 1 and Tank 2 are single-walled FRP tanks with double-walled flexible plastic piping. Cathodic protection is not required. Ms. [REDACTED] is a Class A and Class B operator. There were no designated Class C operators. Monthly walkthrough inspection records were provided for the past 12 months but only involved checking the ALLD. The facility provided a Certificate of Registration that expires on 06/30/2023 showing it is part of the petroleum tank release compensation fund. No documentation was provided concerning the deductible. Attachment J contains the Notice of Inspection signed by Ms. [REDACTED]. Mr. [REDACTED] provided a copy to Ms. [REDACTED] and left the premises.

Inspector Signature: Joseph Watson Digitally signed by Joseph Watson
Date: 2023.06.28 22:34:26 -04'00' Date: 06/28/2023