

## UST Inspection Report

### Browning School Maintenance Facility

**Date of Report:** August 30, 2023

**Inspection Date & Time:** July 19, 2023, at 12:30 p.m. Mountain Daylight Time (MDT)

**Weather:** Sunny, ~ 70 degrees Fahrenheit

**Facility Owner:** Browning Public Schools

**Facility Owner Address:** 129 1<sup>st</sup> Avenue SE  
Browning, Montana 59417

**Facility Address:** 105 NE Boundary Street  
Browning, Montana 59417

**Facility Phone:** 406-338-2952

**Facility Representative:** [REDACTED]

**EPA Facility ID Number:** 2010072

**Reason for Inspection:** Routine compliance inspection

**Inspector(s):** Marta Grabowski, EPA  
Roberta Person, EPA

### UST System Description

The Browning School Maintenance Facility (Facility) is a public school with a maintenance facility located on the Blackfeet Reservation in Browning, Montana. The fuel at this Facility is used for maintenance vehicles and it is not sold to the public. The Environmental Protection Agency's (EPA) Facility records indicate that the Facility has two underground storage tanks (UST) that were installed in November 1986. Tank 1 is 8,000 gallons, STI-P3 construction and stores unleaded gasoline. Tank 2 is 8,000 gallons, jacketed steel construction and stores diesel. Facility piping for Tank 1 and Tank 2 is steel and operates with safe suction.

### Inspection Narrative

On July 19, 2023, the EPA UST program personnel conducted an inspection at Browning School Maintenance Facility in Browning, Montana. The EPA last inspected the Facility on November 5, 2020, and they selected it for routine re-inspection. Ms. Grabowski spoke with the Facility operator on July 10, 2023, to schedule the inspection, and she also sent a follow-up email (see Attachment A). The Facility operator indicated that he wanted to put the maintenance facility tanks into temporary closure.

The EPA inspection team arrived at the Facility at approximately 12:30 p.m. MDT. They were met by a Facility representative. Ms. Grabowski addressed introductions and the Notice of Inspection (NOI) form (see Attachment B) at the previous Facility, which is under the same ownership. EPA inspectors conducted a physical inspection of the UST system as well as a review of Facility records. The EPA inspectors took photographs of UST system components and records during the inspection (see Attachment C). Copies of operation and maintenance records provided by the Facility are in Attachment D.

### **Tank Leak Detection**

Tank leak detection is conducted by a Gilbarco EMC automatic tank gauge (ATG). The Facility representative provided printouts from the ATG console showing Continuous Statistical Leak Detection (CSLD) tests for both tanks. Monthly CSLD test results are summarized in the table below. At the time of inspection, the gasoline tank (Tank 1) was in low product alarm on the ATG console, and the inventory noted it contained approximately 6 inches of product. Annual functionality testing for the automatic tank gauge (ATG) was conducted and passed on March 29, 2023.

| <b>Tank</b> | 6/23 | 5/23 | 4/23 | 3/23 | 2/23 | 1/23 | 12/22 | 11/22 | 10/22 | 9/22 | 8/22 | 7/22 |
|-------------|------|------|------|------|------|------|-------|-------|-------|------|------|------|
| 1 -gasoline | IV   | IV   | IV   | IV   | IV   | NR   | NR    | NR    | NR    | NR   | NR   | NR   |
| 2 - diesel  | P    | P    | P    | P    | P    | NR   | P     | P     | P     | P    | P    | P    |

P = Pass  
F = Fail

IV = Invalid  
NR = No Record

### **Piping Leak Detection**

According to EPA records, Facility piping operates under safe suction, so there are no piping leak detection requirements for the Facility.

### **Cathodic Protection**

The STI-P3 tanks and steel piping are cathodically protected using a sacrificial anode system. A passing cathodic protection (CP) test dated March 2, 2022, was provided by the Facility after the inspection.

### **Periodic Testing/Inspection of Spill and Overfill Prevention Equipment**

According to Facility records provided via email after the inspection, the spill buckets were hydrostatically tested and passed on March 2, 2022. According to EPA records, the flapper valves were replaced and passed testing on April 5, 2022. The UST system had not received any fuel deliveries since approximately June 2021 according to ATG inventory viewed at the time of inspection.

### **Periodic Operation & Maintenance (O&M) Walkthrough Inspections**

Records of monthly walkthrough inspections for the past 12 months were not provided at the time of EPA's inspection. No monthly walkthrough documentation existed dated later than April 2022. An annual walkthrough inspection was conducted on March 29, 2023, by the Facility's service provider. On July 20, 2023, after the EPA inspection, documentation of a monthly and annual walkthrough from July 2023 was emailed to the EPA inspector.

### **Operator Training**

Class A and Class B operator training certificates were provided at the time of inspection. There was no record of Class C operator training.

### **Financial Responsibility**

Browning School uses the Montana petroleum tank release cleanup fund as its financial responsibility mechanism. The Facility representative provided a copy of the Montana certificate of financial responsibility as well as a Montana UST operating permit.

### **Physical Observations**

The inspection team viewed the spill buckets/fill pipes, dispensers and the ATG console. The Tank 1 spill bucket contained some liquid. Flapper valves were observed in both fill pipes. The ATG console showed a low product alarm for Tank 1. Handwritten fuel logs show that the diesel fuel is still being pumped as of July 18, 2023, and the regular gasoline was last pumped on June 26, 2022.

### **Inspection Conclusions and Recommendations**

At the end of the inspection, Ms. Grabowski filled out an Onsite Deficiency Identification Form (see Attachment E), which represents the EPA staff's initial compliance recommendations at the time of the inspection. Prior to departing the Facility, Ms. Grabowski stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment F). Ms. Grabowski provided the Facility manager with the NOI form and retained a carbon copy for recordkeeping.

### **Inspection Report Attachments**

- A. Record of communication for scheduling the inspection
- B. Notice of Inspection
- C. Photo log
- D. Facility O&M Documents
- E. Onsite Deficiency Identification Form
- F. Inspection checklist

### **Signature**

Lead Inspector

**MARTA GRABOWSKI** Digitally signed by MARTA GRABOWSKI  
Date: 2023.08.30 16:13:51 -06'00'

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Marta Grabowski

Date of signature