

Compliance Evaluation Inspection Report

Common Cents

June 2024

Submitted to:

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



Submitted by:

Eastern Research Group.
14555 Avion Parkway, Suite 200
Chantilly, VA 20151

EPA Contract No. 68HERC21D0007
Task Order 68HERC23F0460

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: June 11, 2024

Date and Time of Inspection: May 1, 2024, at 8:40 am MST

Weather: Rainy and cloudy, 50° Fahrenheit

Facility Contact/Owner: [REDACTED] / Moyle Petroleum Co.

Owner Address: 2504 W Main St,
Rapid City, SD 57702

Facility Address: 2628 BIA Hwy 27
Porcupine, SD 57752

Facility Phone: [REDACTED]

Facility ID Number: 4070047

Reason for Inspection: Compliance Inspection

Inspector(s): [REDACTED], ERG (Lead)
[REDACTED], ERG
[REDACTED], ERG
[REDACTED], Oglala Sioux Tribe UST Coordinator

TABLE OF CONTENTS

1.	NARRATIVE	1
2.	SUMMARY	4

ATTACHMENTS

ATTACHMENT A:	EPA REGION 8 UST COMPLIANCE CHECKLIST
ATTACHMENT B:	PHOTOGRAPH LOG
ATTACHMENT C:	TANK LEAK DETECTION RECORDS AND INVENTORY
ATTACHMENT D:	ATG CERTIFICATION
ATTACHMENT E:	SPILL & OVERFILL PREVENTION TESTING RECORDS
ATTACHMENT F:	CATHODIC PROTECTION TESTING RECORDS
ATTACHMENT G:	OPERATOR TRAINING RECORDS
ATTACHMENT H:	WALKTHROUGH INSPECTION RECORDS
ATTACHMENT I:	FINANCIAL ASSURANCE DOCUMENTATION
ATTACHMENT J:	NOTICE OF INSPECTION

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 Common Cents facility in Porcupine, South Dakota on May 1, 2024. The facility was last inspected on June 15, 2021.

Mr. [REDACTED], contract inspector, contacted [REDACTED], representative of Common Cents, via phone on March 29, 2024, 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, the inspection team [REDACTED] introduced themselves to Mr. [REDACTED]. Mr. [REDACTED] stated he was a contract inspector for EPA, presented his credentials, and provided an in-brief. Common Cents provided several records to the inspection team via email prior to the inspection. The inspection team gathered records on site, interviewed Mr. [REDACTED], and conducted a walkthrough of the site including access ports for the UST and the 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 Common Cents facility, located at 2628 BIA Hwy 27 in Porcupine, SD, has one UST. According to the previous EPA inspection report and observations made during the inspection, the UST was constructed in August 1997 with single-walled STI-P3 construction and single-walled steel piping. The UST has a 12,000-gallon capacity and holds regular unleaded gasoline. The dispensing system for the UST is European safe suction piping. The inspection team completed an EPA Region 8 UST Compliance Inspection Checklist for the UST while on site which is included in Attachment A. Photographs from the inspection are included in Attachment B.

UST System Records

The listing of documents reviewed for the Common Cents inspection included the following:

1. UST Leak Detection Records and Inventory
2. Tank Gauging Test Records
3. Spill and Overfill Protection Test Records
4. Cathodic Protection Test Records
5. Operator Training Certificates
6. Walkthrough Inspection Records
7. Financial Assurance Records

The facility maintains records on site. Records were provided prior to the inspection via email and during the inspection by Mr. [REDACTED].

Tank Release Detection

Releases from the tank are detected by a Gilbarco Veeder-Root EMC Basic monitoring system and associated in-tank probe that conducts automatic tank gauging (ATG) of the tank.

Attachment C contains a compilation of the ATG continuous statistical leak detection test results from January 2023 through April 2024. The tank had passing leak detection records for each of the past 12 months. Attachment C also includes a tank inventory from the day of the inspection. PDQ Service LLC tested the performance of the ATG probe in June 2023. Attachment D includes the passing test record for the ATG system.

Piping Release Detection

Piping for the UST includes European safe suction pumping with a check valve located just below the dispenser pump. It does not require leak detection. Photographs #4 and #6 in Attachment B show the dispensers with suction pumps and check valves present.

Spill/Overfill Prevention

The fill pipe for the UST has a spill bucket surrounding the pipe and a flapper valve in the drop tube for overfill prevention. Photographs #2 and #3 in Attachment B show the fill port and spill bucket for the UST. The spill bucket had approximately 1 inch of water present at the time of the inspection. PDQ Service LLC conducted hydrostatic testing on the spill bucket and performance testing on the flapper valve in June 2021. Attachment E shows the passing test records for the spill and overfill prevention equipment.

Corrosion Protection

The tank is single-walled STI-P3 construction, and cathodic protection testing records were provided from 2022 and 2023. The UST passed cathodic protection tests during both tests. Attachment F includes the cathodic protection testing records from 2022 and 2023.

Operator Training

Mr. [REDACTED] is the Class A and B operator for Common Cents, and there are multiple Class C operators trained for the facility. Mr. [REDACTED] provided a training certificate for the Class A and B operator training from the South Dakota Petroleum and Propane Marketers Association, and a training log was kept on site to record who had completed Class C operator training. Attachment G includes Mr. [REDACTED]'s training certificate and the Class C operator training log.

Walkthrough Inspections

Common Cents completed monthly and annual walkthrough inspections every month and recorded observations digitally. Monthly and annual walkthrough records were provided for January 2023 to April 2024. The inspection team noted that there was one instance in January 2023 where the person conducting the walkthrough observed the north pump with a "small leak at the coupler". The walkthrough inspection the following month did not note a leak, though no corrective actions were recorded to address the small leak. Attachment H includes the monthly and annual walkthrough inspection records provided.

Financial Assurance

Common Cents is registered with the state of South Dakota and covered under the state trust fund, which covers facilities using a fee on each gallon of fuel sold. The state fund notification shows that the facility covers the \$10,000 deductible using self-insurance. No self-insurance records were provided. Attachment I includes the notification of inclusion in the state trust fund.

Physical Inspection

During the site visit, the inspection team reviewed documents on site and observed the fill port, the dispensers, and the ATG monitoring interface for the UST on site. Photograph #1 in Attachment B shows the interface for the Gilbarco Veeder-Root EMC Basic ATG system. Attachment C includes an inventory report for the UST that Mr. [REDACTED] printed during the inspection to verify operation. The inspection team also observed the spill bucket and fill pipe for the UST. The spill bucket had approximately 1 inch of water present at the time of the inspection (see Photographs #2 and #3, Attachment B). There were two double-sided dispensers on site. The inspection team observed both dispensers and did not observe signs of leaks from the dispenser at the time of the inspection. Suction pumps and check valves were also observed in the dispensers. The inspection team observed the ATG probe as well. In the access port for the ATG probe, the inspection team noted that there was an additional plastic line with a hole in the top that appeared to be attached to the UST (see Photograph #5, Attachment B). Mr. [REDACTED] was uncertain if the plastic piping connected to the UST.

No monitoring wells were observed near the UST during the inspection. The vent line is located between the dispensers, 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 single-walled STI-P3 construction that was installed in August 1997. The tank has a 12,000-gallon capacity and contains unleaded gasoline. Passing monthly leak detection test records were available for the previous 12 months, and a contractor certified the ATG system in June 2023. There are two dispensers located on site, and European safe suction piping is used with single-walled steel construction. The inspection team verified the presence of suction pumps and check valves in the dispensers. The fill port for the UST is equipped with a spill bucket as the spill prevention equipment and a flapper valve for overfill prevention. Passing test records from June 2021 were provided for spill and overfill prevention. Cathodic protection testing records were provided for 2022 and 2023 for the tank and piping, which both showed passing tests. Mr. [REDACTED] serves as the Class A and B operator, and there are multiple Class C operators at Common Cents. Training records were provided for the operators. Common Cents provided monthly and annual walkthrough inspection records during the inspection. One walkthrough record from January 2023 did note a leaking coupler at a dispenser pump, but no other concerns were noted. Common Cents is registered with the state of South Dakota and is covered under the state trust fund. The facility marked that it is self-insured to cover the \$10,000 deductible, but no records were provided for the self-insurance. Attachment J contains the Notice of Inspection signed by Mr. [REDACTED]. Mr. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

 Digitally signed by 
Inspector Signature: _____ Date: 2024.06.11 19:24:36 -04'00' **Date:** June 11, 2024