UST Inspection Report

Gus Stop Express

Date of Report:	October 18, 2024
Inspection Date & Time:	September 10, 2024, at 11:30 a.m. Central Daylight Time (CDT)
Weather:	Sunny, 85 degrees Fahrenheit
Facility Owner:	G.F. Buche Co.
Facility Owner Address:	102 S. Main Street Wagner, South Dakota 57380
Facility Address:	118 W. 2nd Street Mission, South Dakota 57555
Facility Phone:	(605) 856-4418
Facility Representative:	[redacted]
EPA Facility ID Number:	4080018
Reason for Inspection:	Routine compliance inspection
Inspection Team:	[redacted] Person, Inspector, EPA UST Program [redacted], Inspector, EPA UST Program [redacted], Rosebud Sioux Tribe UST Coordinator

UST System Description

The Gus Stop Express (Facility) is a privately-owned gas station and convenience store located in Mission, South Dakota. The fuel at this Facility is sold to the public. The Environmental Protection Agency's Facility records indicate that the Facility has three, steel underground storage tanks (UST) that were installed in June 1972. Tank 1 has a 10,000-gallon capacity and stores unleaded plus fuel. Tank 2 has a 6,000-gallon capacity and stores E-10 regular unleaded fuel. Tank 3 has a 4,000-gallon capacity and stores ethanol free unleaded fuel. Piping for all tanks is pressurized, double-walled flex plastic.

Inspection Narrative

On September 10, 2024, the EPA UST program personnel conducted an inspection at Gus Stop Express in Mission, South Dakota. The EPA last inspected the Facility on August 5, 2021, and they selected it for routine re-inspection. [redacted] spoke with the Facility representative, and sent a follow-up email, on August 23, 2024, to schedule the inspection and provide inspection details (see Attachment A).

The inspection team arrived at the Facility at 11:30 a.m. CDT and were met by the Facility representative. Ms. Person introduced herself and presented inspector credentials. Ms. Person filled out a Notice of Inspection (NOI) (see Attachment B) and requested a signature from the Facility representative. Ms. Person explained that the NOI serves as documentation of consent for the EPA to conduct an inspection. In addition, she said that she would provide the NOI to the Facility at the end of the inspection. EPA inspectors conducted a physical inspection of the UST system as well as a review of Facility records. Photographs of UST system components taken during the inspection are in Attachment C. Copies of operation and maintenance records are in Attachment D.

Tank Leak Detection

Tank leak detection equipment consists of an automatic tank gauge (ATG), which conducts continuous statistical leak detection (CSLD) tests. The Facility representative had the monthly release detection slips for the past three months, since the convenience store was opened. The EPA inspector was able to print a history for the past twelve months from the console. The ATG probes and floats were functioning normally, as evidenced by passing annual operability testing conducted on September 4, 2024.

Piping Leak Detection

Piping leak detection is satisfied by mechanical line leak detectors (MLLD) and annual line tightness testing. Records of annual line tightness testing and annual line leak detector testing were available onsite, showing passing tests conducted on September 4, 2024.

Cathodic Protection

The Facility is equipped with an impressed current Cathodic protection (CP) system. The Facility representative was not aware of the system and could not locate the rectifier. There were no records of testing for the system onsite. The EPA inspector was able to find the rectifier and explained to the operator how to read the rectifier. The rectifier was reading 10 volts and 1.5 amperes at the time of inspection. There was no log of the rectifier operation available at the time of inspection.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

Triennial testing records of spill buckets and overfill prevention devices (flapper valves) were maintained onsite. The spill buckets passed a hydrostatic test on September 21, 2022, and the overfill prevention valves passed an inspection on September 18, 2023.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Records of monthly walkthrough inspections from January 2024 to September 2024 were provided at the time of inspection. An annual walkthrough inspection was conducted during the compliance inspection on September 10, 2024.

Operator Training

A certificate for Class A operator training certificate was maintained onsite at the time of inspection as well as Class C training documentation. The Class B operator certificate was observed immediately following the inspection.

Financial Responsibility

In South Dakota, financial coverage for regulated UST systems is provided through the South Dakota Petroleum Release Compensation Fund. Each UST facility is responsible for the deductible. A completed financial responsibility (FR) form was maintained onsite.

Physical Observations

The EPA inspector viewed the spill buckets/fill pipes, dispensers, tank top sumps, ATG console and rectifier. Flapper valves were observed in each fill pipe and spill buckets were clean and dry. EPA noted several inches of fuel in the dispenser island #1/2 containment sump. No active releases were visible and the operator noted the fuel was not there during the testing that had occurred on September 4, 2024. The rectifier for the impressed current system was located behind a stack of boxes near the ATG console. The rectifier was on at the time of inspection. At the end of the inspection, the Facility representative noted that a service provider would be contacted immediately to investigate the source of the fuel in the containment sump. Following the inspection, Ms. Person followed up with the Class A operator and learned that the fuel had been removed from the under-dispenser containment sump and that it had likely been released during a filter change event.

Inspection Conclusions and Recommendations

At the end of the inspection, Ms. Person filled out an Onsite Deficiency Identification Form (see Attachment E). Prior to departing the Facility, Ms. Person stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment F). Ms. Person provided the Facility representative with the NOI form and the deficiency form and retained carbon copies of each form 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

R Person

Person, [redacted]
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[redacted] Person | Date of signature