

Compliance Evaluation Inspection Report

South Dakota Department of Transportation Eagle Butte
May 2024

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 14, 2024

Date and Time of Inspection: May 14, 2024 at 7:50 am MST

Weather: Rainy, 55° Fahrenheit

Facility Contact/Owner: Andrew Schuler

Owner Address: 700 East Broadway Avenue
Pierre, SD 57501

Facility Address: 24155 US Highway 212
Eagle Butte, South Dakota 57625

Facility Phone: (605) 964-4361

Facility ID Number: 4020005

Reason for Inspection: Compliance Inspection

Inspector(s): [REDACTED], ERG (Lead)

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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 South Dakota Department of Transportation (SDDOT) Eagle Butte facility in Eagle Butte, South Dakota on May 14, 2024. The facility was last inspected on June 30, 2021.

Ms. [REDACTED], contract inspector, contacted Mr. [REDACTED] (605) 964-4361, representative of SDDOT, to notify the facility about the inspection on April 29, 2024 prior to 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, Ms. [REDACTED] introduced herself as a contract inspector for EPA, presented her credentials, and provided an opening conference to Mr. [REDACTED] and Mr. [REDACTED]. Ms. [REDACTED] concluded with an exit brief to discuss preliminary observations from the inspection and had Mr. [REDACTED] sign the Notice of Inspection (NOI). Ms. [REDACTED] took photographs during the inspection.

UST System Description

The SDDOT Eagle Butte facility is a highway maintenance shop and depot, located at 24155 US Highway 212 Eagle Butte, South Dakota 57625 in Eagle Butte, SD. Fuel stored at this Facility is used to operate highway maintenance vehicles and is not sold to the public. The Facility is located on the Cheyenne River Indian Reservation.

According to the facility representatives and observations made during the inspection, the facility has two composite USTs installed in October 2022. Tank 1 has a capacity of 2,500 gallons and contains unleaded gasoline. Tank 2 has a capacity of 3,000 gallons and contains diesel. Tank 1 and Tank 2 are double-walled steel with a fiberglass reinforced plastic (FRP) jacket construction. The dispensing system for each tank is pressurized piping with double-walled flexible plastic construction.

Ms. [REDACTED] completed an EPA Region 8 UST Compliance Inspection Checklist for the USTs while on site which is included in Attachment A. Photograph #1 in Attachment B shows the dispensers and an overview of the UST system.

UST System Records

The listing of documents reviewed for the SDDOT Eagle Butte inspection included the following:

1. Notification for Underground Storage Tanks
2. UST Leak Detection Records
3. UST Compliance Testing Records
4. UST Walkthrough Checklist (monthly and annual)
5. Documentation of Financial Responsibility

6. Class A/B Operator Training Certificates

The facility maintains all records on site. Mr. [REDACTED] and Mr. [REDACTED] provided the records for the USTs during the inspection.

Tank Release Detection

Releases from the tanks are detected by a Veeder Root TLS-450 monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Continuous statistical leak detection (CSLD) tests passed for Tank 1 and Tank 2 during the previous 12 months. Photograph #2 in Attachment B shows the monitoring system interface. Attachment C contains a compilation of the ATG CSLD leak test results for the last 12 months. Attachment D contains a passing test record for the ATG system performed by a contractor in October 2023.

The submersible turbine pump (STP) sumps, dispenser sumps, and interstitial space of both Tank 1 and Tank 2 are equipped with liquid sump sensors. A liquid sensor functionality test was performed in October 2023 and showed that the sensors for the STP sumps, dispenser sumps, and interstitial space for both Tank 1 and Tank 2 are in good operating condition. The liquid sump sensors for the USTs were observed at the base of each STP sump and dispenser sump. The liquid sump sensor status for each tank is included in attachment C for the past 12 months which showed the status was normal except for October 2023 which was not provided during the inspection. Photographs #4 and #6 show the STP sumps for Tank 1 and Tank 2 with liquid sump sensors. The tanks were installed in October 2022 and integrity tests of the STP and dispenser containment sumps have not yet been conducted.

Piping Release Detection

All tanks were installed with pressurized double-walled flexible plastic piping. Ms. Forsmark observed electronic automatic line leak detectors (ALLDs) on the STPs during the inspection. American Electric performed a line leak detector performance test in October 2023. Attachment D includes the passing testing records for the leak detectors.

Spill/Overfill Prevention

Spill and overfill prevention equipment tests were not provided. The tanks were installed in October 2022 and spill bucket tests have not yet been conducted. Photographs #3 and #5 in Attachment B show the fill ports for Tank 1 and Tank 2. During the physical inspection, butterfly valves were noted in the fill pipes.

Corrosion Protection

According to facility documentation and observations, both tanks are jacketed with FRP and the piping is flexible plastic; therefore, corrosion protection is not required.

Operator Training

Certificates for the Class A and B operator were available during the inspection. Mr. [REDACTED] is

designated as both Class A and Class B operator with a certificate dated March 30, 2016. Additionally, other employees' certificates were available for review. There are no other attendants that require training at the Facility.

Walkthrough Inspections

Records of the monthly and annual walkthrough inspections were available and completed. The monthly and annual walkthrough inspections are included in Attachment E.

Financial Assurance

In South Dakota, financial coverage for owners/operators of regulated USTs is provided through the South Dakota Petroleum Release Compensation Fund. Mr. [REDACTED] had a copy of the letter from the state indicating facility coverage. They are self-insured for the deductible. Attachment F includes the letter indicating financial coverage and self-insurance for SD DOT Eagle Butte.

Physical Inspection

During the site visit, Ms. [REDACTED] reviewed documents onsite and observed the fill ports, STP sumps, both of the dispensers and associated dispenser sumps, and the ATG monitoring interface for the two USTs onsite. Photograph #2 in Attachment B shows the interface for Veeder Root TLS-450 Plus ATG system. Ms. [REDACTED] observed the spill bucket and fill pipe for the two USTs. The spill buckets for Tank 1 and Tank 2 were dry and in good condition at the time of the inspection. Ms. [REDACTED] also observed the STP sumps for each of the two USTs. Both STP sumps were dry, ALLDs were observed on the STPs, and the sump sensors were observed at the bottom of the sumps. Photographs #4 and #6 in Attachment B show the STP sumps and associated components for Tanks 1 and 2.

The facility has two double-sided pump dispensers, and both were opened as part of the inspection. The dispensers are equipped with sumps dispenser liquid sump sensors were observed within each dispenser sump. Ms. [REDACTED] did not observe signs of leaks at the time of the inspection. Photographs #7 through #10 in Attachment B show the piping and sumps beneath each dispenser.

No monitoring wells were observed at the tank field during the inspection. Vent lines are located north of the USTs against one of the garages. No obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has two USTs installed in October 2022. Tank 1 has a 2,500-gallon capacity, contains unleaded gasoline fuel, and is double-walled composite (steel with FRP jacket) construction. Tank 2 has a 3,000-gallon capacity, contains diesel fuel, and is double-walled composite (steel with FRP jacket) construction. Passing monthly monitoring leak detection test records were available for the previous 12 months for Tank 1 and Tank 2, except for October 2023 which was missing. The facility representative provided the Notification for Underground Storage Tanks installed following the previous EPA Inspection, included as Attachment G. The annual certification for the ATG system was provided during the inspection. There are two double-sided dispensers on site that operate with pressurized flexible plastic piping, and each dispenser has a containment sump. The STPs had ALLDs and the STP sumps were equipped with liquid sump sensors which were observed at the bottom of each sump. The liquid sump sensor status for each tank was not provided for October 2023 during the inspection. The fill port for each UST is equipped with a spill bucket and a butterfly valve in the drop tube as the spill and overfill prevention equipment. Testing records were not provided for the spill buckets or butterfly valves during the inspection. Cathodic protection testing records were not required as the tanks are composite steel with FRP jacket and the piping was flexible plastic. The facility has Class A and B certified operators and certifications were provided for review during the inspection. There are no other attendants that require training at the Facility. Monthly and annual walkthrough inspection records were provided during the inspection. The SD DOT Eagle Butte has financial coverage through the South Dakota Petroleum Release Compensation Fund and the facility has general liability insurance to cover the deductible. Attachment H contains the NOI signed by Mr. [REDACTED] at the end of the inspection. Ms. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

Inspector Signature

[REDACTED]

Date: June 14, 2024