

Compliance Evaluation Inspection Report

Azure Store
June 2023

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 68HERC22F0492

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: June 23, 2023

Date and Time of Inspection: May 16, 2023 at 2:00 pm CDT

Weather: Partly Cloudy, 72° Fahrenheit

Facility Contact/Owner: [REDACTED]

Owner Address: 3653 BIA Rd #10
Belcourt, North Dakota 58316

Facility Address: 3653 BIA Rd #10
Belcourt, North Dakota 58316

Facility Phone: NA

Facility ID Number: 3050005

Reason for Inspection: Compliance Inspection

Inspector(s): [REDACTED], ERG

TABLE OF CONTENTS

1.	NARRATIVE	1
2.	SUMMARY	4

ATTACHMENTS

ATTACHMENT A:	EPA REGION 8 UST COMPLIANCE CHECKLIST
ATTACHMENT B:	PHOTOGRAPH LOG
ATTACHMENT C:	PURCHASE OF BUSINESS AGREEMENT
ATTACHMENT D:	TANK CAPACITY CHART
ATTACHMENT E:	SPILL AND OVERFILL PREVENTION RECORDS
ATTACHMENT F:	GALVANIC CATHODIC PROTECTION SYSTEM EVALUATION
ATTACHMENT G:	CERTIFICATE OF REGISTRATION
ATTACHMENT H:	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 68HERC22F0492, provided assistance to EPA in preparing for, conducting the inspection, and preparing this inspection report. ERG inspected the Azure Store facility in Belcourt, North Dakota on May 16, 2023. The facility was last inspected on September 16, 2020.

Mr. [REDACTED], contract inspector, contacted Mr. [REDACTED], owner of Azure Store, to notify the facility about the inspection on April 25, 2023 prior to the inspection and e-mailed him 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 Mr. [REDACTED] to explain the purpose of the inspection. Mr. Watson concluded with an exit brief to inform the facility of areas of concern identified during the inspection and had Mr. T [REDACTED] sign the Notice of Inspection. Mr. [REDACTED] took photographs during the inspection.

UST System Description

The Azure Store facility, located at 3653 BIA Rd #10 in Belcourt, ND, has two USTs. According to the previous EPA inspection report and observations made during the inspection, Tank 1 has a 1,000-gallon capacity and stores regular unleaded gasoline. Tank 2 has a 1,000-gallon capacity and stores regular unleaded gasoline. The two USTs were installed in 1998. Both tanks are single-walled STI-P3 constructed USTs. The dispensing system for each of the tanks is safe suction piping with single-walled fiberglass-reinforced plastic (FRP) construction. Mr. Watson 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 an overview of the UST system. Mr. [REDACTED] recently purchased the facility on October 21, 2021 and was still in the process of getting the facility ready to open. Attachment C contains the Purchase of Business Agreement.

UST System Records

The listing of documents reviewed for the Azure Store inspection included the following:

1. Certificate of Registration
2. Tank Capacity Chart
3. Galvanic Cathodic Protection System Evaluation
4. Purchase of Business Agreement
5. UST Spill and Overfill Prevention Records

The facility maintains all records off site. Mr. [REDACTED] provided the records for the UST during the inspection.

Tank Release Detection

Release detection for the tanks is conducted by manual tank gauging but manual tank gauging has not been conducted since the facility was purchased. Mr. [REDACTED] asked Mr. [REDACTED] to demonstrate how he would manually gauge the tanks. He lowered the stick into Tank 1 and measured 12.0 inches of fuel in the tank. Mr. [REDACTED] wiped the stick and lowered the stick into Tank 1 and again measured 12.0 inches of fuel in the tank. Tank 2 contained 2.5 inches of fuel or approximately 15.5 gallons and Tank 1 contained approximately 12 inches of fuel or 39 gallons of fuel based on the tank capacity chart. Attachment D contains the tank capacity chart.

Piping Release Detection

The tanks were installed with safe suction single-walled FRP piping. The piping operates at less than atmospheric pressure, has only one check valve located directly below the dispenser pump, and the slope of piping allows product to drain back into the tank when suction is released. Photograph #7 in Attachment B shows the piping configuration in the dispenser.

Spill/Overfill Prevention

The fill pipes for the USTs have spill buckets surrounding the pipes. Flapper valves are located in the fill pipe. Photographs #5 and #6 in Attachment B show the fill ports for the USTs. Both spill buckets appear corroded. Reiter Oil & Gas performed a hydrostatic test on the spill buckets and functionality tests on the flapper valves on 07/19/2021 and they passed. Attachment E contains the spill bucket hydrostatic test results and the flapper valve functionality test results.

Corrosion Protection

According to facility documentation, both tanks are single-walled STI-P3 tanks with FRP piping. Reiter Oil & Gas performed a galvanic cathodic protection system evaluation on 07/29/2021 on both tanks and both tanks passed. Attachment F contains the cathodic protection system evaluation.

Operator Training

The Azure Store was not operating and did not have any designated operators at the time of the inspection.

Walkthrough Inspections

The Azure Store was not operating and did not have any monthly or annual walkthrough inspection records at the time of the inspection.

Financial Assurance

The Azure Store provided a Certificate of Registration showing it is part of the petroleum tank release compensation fund. The certificate is provided in Attachment G. The Azure Store is self-insured for the deductible.

Physical Inspection

During the site visit, Mr. [REDACTED] reviewed documents on site and observed the fill ports and one dispenser sump. Mr. [REDACTED] also observed the spill bucket and fill pipe for the two USTs. Both spill buckets were dry but appeared corroded. Tank 2 contained 2.5 inches of fuel or approximately 15.5 gallons and Tank 1 contained approximately 12 inches of fuel or 39 gallons of fuel based on the tank capacity chart.

There were two pump dispensers on site, and one of these was opened as part of the inspection to verify the safe suction configuration. 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 between the USTs and no obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

Tank 1 has a 1,000-gallon capacity and stores regular unleaded gasoline. Tank 2 has an 1,000-gallon capacity and stores regular unleaded gasoline. The two USTs were installed in 1998. Both tanks are single-walled STI-P3 constructed USTs. Leak detection monitoring has not been conducted on the tanks since the facility was purchased by Mr. [REDACTED] in 2021. The Azure store was last operated in 2019. Tank 2 contained 2.5 inches of fuel or approximately 15.5 gallons and Tank 1 contained approximately 12 inches of fuel or 39 gallons of fuel based on the tank capacity chart. There are two dispensers on site that operate with safe suction FRP piping. Mr. [REDACTED] also observed the spill bucket for the two USTs. Both spill buckets appeared corroded. Reiter Oil & Gas performed a hydrostatic test on the spill buckets and functionality tests on the flapper valves on 07/19/2021 and they passed. Reiter Oil & Gas performed a galvanic cathodic protection system evaluation on 07/29/2021 on both tanks and both tanks passed. The facility was not operational and did not have any trained operators at the time of the inspection. The Azure Store provided a Certificate of Registration showing it is part of the petroleum tank release compensation fund. The Azure Store is self-insured for the deductible. Attachment H contains the Notice of Inspection signed by Mr. [REDACTED]. Mr. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

Joseph Watson

Digitally signed by Joseph
Watson
Date: 2023.06.23 20:20:35 -04'00'

Inspector Signature: _____ Date: 06/23/2023