

Compliance Evaluation Inspection Report

Pine Ridge Oil Company 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 14, 2024

Date and Time of Inspection: April 30, 2024, at 8:30 am MST

Weather: Partly cloudy, 52° Fahrenheit

Facility Contact/Owner: [REDACTED] / Yamani, LLC

Owner Address: 102 E Main St
Pine Ridge, SD 57770

Facility Address: 102 E Main St
Pine Ridge, SD 57770

Facility Phone: [REDACTED]

Facility ID Number: 4070019

Reason for Inspection: Compliance Inspection

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

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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 68HERC23F0460, provided assistance to EPA in preparing for, conducting the inspection, and preparing this inspection report. ERG inspected the Pine Ridge Oil Company facility in Pine Ridge, South Dakota on April 30, 2024. The facility was last inspected on June 17, 2021.

Mr. [REDACTED], contract inspector, contacted Mr. [REDACTED], Manager of Pine Ridge Oil Company, on March 28, 2024, via telephone 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, Mr. [REDACTED] introduced himself as a contract inspector for EPA, presented his credentials, and provided an in-brief to facility personnel to explain the purpose of the inspection. The inspection team [REDACTED] gathered records, interviewed Mr. [REDACTED], and conducted a walkthrough of the site including access ports and 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 Pine Ridge Oil Company facility, located at 102 E Main St in Pine Ridge, SD, has four USTs installed in January 1996. According to the previous EPA inspection report and observations made during the inspection, Tank 1 has a 10,000-gallon capacity and contains diesel. Tank 2 has a 10,000-gallon capacity and contains unleaded premium gasoline. Tank 3 has a 10,000-gallon capacity and contains unleaded regular gasoline. Tank 4 has a 4,000-gallon capacity and contains red (dyed) diesel. Tanks 1, 2, and 3 are single-walled STI-P3 construction, and Tank 4 is double-walled STI-P3 construction. The dispensing system for each tank is pressurized piping with double-walled fiberglass-reinforced plastic (FRP) construction. The inspection team completed an EPA Region 8 UST Compliance Inspection Checklist for the USTs while on site which is included in Attachment A. Photograph #10 in Attachment B shows an overview of the UST systems.

UST System Records

The listing of documents reviewed for the Pine Ridge Oil Company inspection included the following:

1. UST Leak Detection Records and Inventory
2. Automatic Tank Gauge and Line Leak Detector Test Records
3. Spill and Overfill Protection Test Records
4. Cathodic Protection Records
5. Training Records
6. Walkthrough Inspection Records

The facility maintains all records on site. Mr. [REDACTED] provided the records for the USTs during and as follow-up to the inspection.

Tank Release Detection

Releases from the tanks are detected by a Veeder-Root TLS 350R monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Attachment C contains a compilation of the ATG continuous statistical leak detection test results for each month from April 2023 to March 2024. The leak tests passed for each tank during the previous 12 months, though no leak test was available for the month of April 2024. Additionally, while leak detection records were available during each calendar month, some of the records were closer to 50 or 60 days apart (e.g., passing record on September 1, 2023, and the next passing record not until October 27, 2023, for Tank 1). Photograph #1 in Attachment B shows the monitoring system interface, and Attachment C also includes a current system status report printed in the morning on the day of the inspection. Mr. [REDACTED] also provided a passing test record for the ATG system performed by a contractor in February 2024 (see Attachment D).

Piping Release Detection

All tanks were installed with pressurized double-walled FRP piping. The piping is attached to submersible turbine pumps (STPs), which are all equipped with mechanical line leak detectors (LLDs). The LLDs were observed on each of the STPs, and all had passing test records based on contractor testing in February 2024. The contractor also performed line tightness testing for each of the tanks in February 2024, and each had a passing record. Attachment D includes the testing records for the LLDs and the line tightness testing. Photographs #6 through #9 in Attachment B show the STPs for Tanks 1 through 4, respectively.

Spill/Overfill Prevention

The fill pipes for the USTs have spill buckets surrounding the pipes and flapper valves in the drop tubes. Photographs #2 (Tank 2), #3 (Tank 1), #4 (Tank 3), and #5 (Tank 4) in Attachment B show the fill ports for the respective USTs. The spill buckets and drop tubes generally appeared in good condition. The spill bucket on Tank 3 showed some residual water, and the spill bucket for Tank 4 had what appeared to be some residual product. Their contractor conducted testing on the spill buckets and flapper valves as spill and overfill prevention equipment in February 2024. Attachment E includes the passing test records for the spill buckets and flapper valves.

Corrosion Protection

The tanks are single-walled STI-P3 construction, and Pine Ridge Oil Company provided cathodic protection testing records from 2018 and 2021. The USTs passed cathodic protection tests in 2018, but Tank 4 failed the initial cathodic protection tests in March 2021. The testing records stated that the cause of the failed test for Tank 4 was an electrical isolation issue on the tank vent line. The tanks were re-tested in May 2021, and the records showed that all tanks passed the cathodic protection test at that time. Attachment F includes the cathodic protection testing records from 2018 and the two from 2021.

Operator Training

Mr. [REDACTED] provided training records for Class A, B, and C operators. Mr. [REDACTED] was trained as a Class A and B operator, and multiple Class C operators were trained, with certifications reviewed on site. Attachment G includes the training record for Mr. [REDACTED] and an example certification record for one of the Class C operators [REDACTED].

Walkthrough Inspections

Pine Ridge Oil Company had monthly walkthrough inspection records for May 2023 through April 2024, which were completed by Mr. [REDACTED]. The monthly walkthrough record did show a gap in July 2023 for visual check of the Tank 3 and 4 spill buckets as well as a gap in checking release detection equipment in August 2023 for Tanks 1, 2, and 3. Annual walkthrough inspection records are addressed by contractor testing records, with the most recent contractor testing occurring in February 2024. Attachment H includes available monthly walkthrough inspection records.

Financial Assurance

Pine Ridge Oil Company did not provide documentation to show financial assurance for their USTs on site.

Physical Inspection

During the site visit, the inspection team reviewed documents on site and observed the fill ports, STP access ports, two of the dispensers, and the ATG monitoring interface for the four USTs on site. Photograph #1 in Attachment B shows the interface for the Veeder-Root TLS 350R ATG system, which did not have any monitoring or leak alarms at the time of the inspection. The inspection team also observed the spill buckets and fill pipes for the four USTs. The drop tubes and spill buckets were in good condition, and the inspection team only observed residual water in the Tank 3 spill bucket and some residual product in Tank 4 spill bucket. The inspection team also observed the STP sumps for each of the four USTs. The STPs had mechanical LLDs present and liquid sump sensors were also observed in the sumps. The sumps were dry and appeared in good condition. Access ports for ATG probes were also present for each of the tanks, and no issues were noted for these during the inspection.

There were five double-sided pump dispensers and two single-sided pump dispensers on site. Three of the dispensers, 9/10, 11/12, and 7, were opened as part of the inspection. Dispensers had sump containment and liquid sump sensors present. Dispensers 11/12 appeared in good condition and no issues were noted at the time of the inspection (see Photograph #11, Attachment B). Dispensers 9/10 had approximately one inch of what appeared to be water mixed with red diesel in the sump (see Photograph #12, Attachment B). The liquid sump sensor in dispensers 9/10 was elevated above the liquid line and had not alarmed. Mr. [REDACTED] placed the liquid sump sensor at the bottom of the sump, and an alarm report was printed from the ATG system to show that the liquid was detected, and that the sump sensor was operating. The piping in dispensers 9/10 did not appear to be actively leaking at the time of the inspection. The inspection team did not note issues with dispenser 7 at the time of the inspection.

No monitoring wells were observed at the tank field during the inspection. Vent lines are located east of the USTs along the building, and no obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has three tanks with single-walled STI-P3 construction and Tank 4 with double-walled STI-P3 construction. Tank 1 has a 10,000-gallon capacity and contains diesel. Tank 2 has a 10,000-gallon capacity and contains unleaded premium gasoline. Tank 3 has a 10,000-gallon capacity and contains unleaded regular gasoline. Tank 4 has a 4,000-gallon capacity and contains red diesel. Passing monthly leak detection test records were available for the calendar months of April 2023 to March 2024 for all four tanks. An annual certification for the ATG system was also provided during the inspection. There are five double-sided pump dispensers and two single-sided pump dispensers on site that operate with pressurized double-walled FRP piping. The STPs for the pressurized piping are equipped with mechanical LLDs which passed operational tests and line tightness testing in February 2024. The fill port for each UST is equipped with a spill bucket and a flapper valve in the drop tube as the spill and overfill prevention equipment. The spill bucket and flapper valve passed operational tests in February 2024. The inspection team only observed residual water in the Tank 3 spill bucket and some residual product in Tank 4 spill bucket. Dispensers 9/10 had approximately one inch of what appeared to be water mixed with red diesel in the sump. Cathodic protection testing records for the tanks were available from 2018 and 2021. Cathodic protection testing in March 2021 showed that Tank 4 failed due to a low voltage, but re-testing the tanks in May 2021 showed that all four tanks passed the cathodic protection tests. Certified operators are designated for Class A, B, and C, and training records were provided during the inspection. Monthly walkthrough inspection records were provided for the months May 2023 through April 2024, and annual walkthrough inspections were completed as part of the annual contractor equipment testing. Pine Ridge Oil Company did not provide documentation for financial assurance to cover the USTs on site. Attachment I contains the Notice of Inspection signed by Mr. [REDACTED]. Mr. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

Inspector Signature:

[REDACTED]

Digitally signed by

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Date: June 14, 2024