

UST Inspection Report

Allstop

Date of Report: October 17, 2024

Inspection Date & Time: September 11, 2024, at 10:55 a.m. Central Daylight Time (CDT)

Weather: Sunny, 80 degrees Fahrenheit

Facility Owner: [REDACTED]

Facility Owner Address: P.O. Box 21
Mission, South Dakota 57555

Facility Address: 311 Frontage Road (BIA Hwy 1)
Rosebud, South Dakota 57570

Facility Phone: [REDACTED]

Facility Representative: [REDACTED]

EPA Facility ID Number: 4080030

Reason for Inspection: Routine compliance inspection

Inspection Team: [REDACTED] Inspector, EPA UST Program
[REDACTED] Inspector, EPA UST Program
[REDACTED] Rosebud Sioux Tribe UST Coordinator

UST System Description

The Allstop (Facility) is a privately-owned gas station and convenience store located in Rosebud, South Dakota. The fuel at this Facility is sold to the public. The Environmental Protection Agency's Facility records indicate that the Facility has two STI-P3 underground storage tanks (UST) that were installed in November 1999. Tank 1 has a 12,000-gallon capacity and Tank 2 has a 6,000-gallon capacity. Both tanks store gasoline. Piping for all tanks is pressurized, double-walled flex plastic and was upgraded in 2013 along with the dispensers, according to the Facility representative.

Inspection Narrative

On September 11, 2024, the EPA UST program personnel conducted an inspection at Allstop in Rosebud, South Dakota. The EPA last inspected the Facility on August 4, 2021, and they selected it for routine re-inspection. Ms. [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 10:55 a.m. CDT and were met by the Facility representative. Ms. [REDACTED] introduced herself and presented inspector credentials. Ms. [REDACTED] filled out a Notice of Inspection (NOI) (see Attachment B) and requested a signature from the Facility representative. Ms. [REDACTED] 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 is conducted by a Tank Sentinel (TS) 750 automatic tank gauge (ATG), which performs 0.2 gph leak tests using the in-tank probe. 30-day leak test records from October 2023 to September 2024 were maintained onsite at the time of the inspection. The February-March 2023 tests were invalid for Tank 1 due to a documented probe issue, which was later resolved. Annual operability testing of the ATG console was conducted and passed on November 6, 2023.

Piping Leak Detection

Piping leak detection is satisfied by mechanical line leak detectors (MLLD) and annual line tightness testing. Additionally, sump sensors in each tank top sump and under dispenser containment (UDC) sump continuously monitor for leaks in the double-walled piping. Records of annual line tightness testing and annual line leak detector testing were available onsite, showing passing tests conducted on November 6, 2023.

Cathodic Protection

Cathodic protection (CP) testing for the tanks was conducted and passed on November 6, 2023, and on August 3, 2021. Both records were maintained onsite.

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 tests were conducted and passed on November 6, 2023.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Records of monthly walkthrough inspections from September 2023 to August 2024 were provided at the time of inspection, except for December 2023, which was not documented. An annual walkthrough inspection was conducted and documented on November 15, 2023.

Operator Training

A certificate for Class A/B operator training was maintained onsite at the time of inspection. Additionally, EPA records include a Class A/B certificate for a second individual. No class C documentation was available at the time of 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 provided to EPA during the inspection.

Physical Observations

The EPA inspector viewed the spill buckets/fill pipes, dispensers, tank top sumps and ATG console. Flapper valves were observed in each fill pipe. MLLDs were present in both tank top sumps, and sump sensors were positioned correctly in each tank top and UDC sump. The test boots in both tank top sumps were tight, so EPA advised the Facility representative to have their service provider loosen the boots during the next service.

Inspection Conclusions and Recommendations

At the end of the inspection, Ms. [REDACTED] filled out an Onsite Deficiency Identification Form (see Attachment E), which represents the EPA staff's initial compliance recommendations at the time of the inspection. Prior to departing the Facility, Ms. [REDACTED] stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment F). Ms. [REDACTED] provided the Facility representative with the NOI form and the deficiency form and retained carbon copies of both forms 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

[REDACTED]

[REDACTED]

Date of signature