Compliance Evaluation Inspection Report

7-2-11 #41
August 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:	August 14, 2024
Date and Time of Inspection:	June 18, 2024, at 8:50 am MST
Weather:	Sunny, 66° Fahrenheit
Facility Contact/Owner:	[redacted] / UPOP Holdings, LLC
Owner Address:	309 East Paces Ferry Road Atlanta, GA 30305
Facility Address:	435 Goddard Avenue Ignacio, CO 81137
Facility Phone:	[redacted]
Facility ID Number:	1010006
Reason for Inspection:	Compliance Inspection
Inspector(s):	[redacted], ERG (Lead)

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ATTACHMENTS

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 7-2-11 #41 facility in Ignacio, Colorado on June 18, 2024. The facility was last inspected on November 3, 2021.

Mr. [redacted], contract inspector, contacted Mr. [redacted], President, on June 6, 2024, via telephone to notify the facility about the inspection. Ms. [redacted], from FuelHub Services, provided compliance documentation on June 17th for the facility. 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. Mr. [redacted] gathered records, interviewed Ms. [redacted], Manager, and conducted a walkthrough of the site including access ports and dispensers. Mr. [redacted] concluded with an exit brief and had Ms. [redacted] sign the Notice of Inspection. Mr. [redacted] took photographs during the inspection.

UST System Description

The 7-2-11 #41 facility, located at 435 Goddard Avenue in Ignacio, CO, has four USTs. Tanks 2 through 4 were installed in March 1983. Tank 1 was installed in June 1999. According to the previous EPA inspection report and observations made during the inspection, Tank 2 and Tank 4 are manifolded tanks each having a 6,000-gallon capacity and contain regular unleaded gasoline. Tank 3 has a 6,000-gallon capacity and contains diesel. Tank 4 has a 6,000-gallon capacity and contains premium unleaded gasoline. Tanks 2 through 4 are STI-P3 cathodically protected steel construction. Tank 1 is fiberglass-reinforced plastic (FRP) construction. The dispensing system for each tank is pressurized piping with double-walled FRP construction. Mr. [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 an overview of the UST system.

UST System Records

The listing of documents reviewed for the 7-2-11 #41 inspection included the following:

1. UST Leak Detection Records and Inventory
2. Automatic Tank Gauge and Line Leak Detector Testing Records
3. Spill Protection Testing Records
4. Operator Training Records
5. Walkthrough Inspection Records

The facility maintains all records on and off site. Ms. [redacted] provided the records for the USTs before the inspection.

Tank Release Detection

Releases from the tanks are detected by a Veeder-Root TLS-350 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 July 2023 to June 2024. The leak tests passed for each tank during the previous 12 months, though no leak test results were available for the month of December 2023, January 2024, and February 2024 for Tanks 2 and 4. Photograph #9 in Attachment B shows the monitoring system interface, and Attachment C also includes a current system status report printed on the day of the inspection. Ms. [redacted] also provided a passing test record for the ATG system performed by a contractor, but the test report was not dated (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 electronic line leak detectors (LLDs). The LLDs were observed on three STPs, and all had passing test records based on contractor testing that was not dated. Containment sump integrity testing and liquid sensor functionality testing was conducted, and the equipment passed but there was no dates on the testing records. Attachment E includes the testing records for the LLDs, containment sump integrity testing, and liquid sensor functionality testing. An annual line tightness test was conducted by the monitoring system on 8/30/2023 and all lines passed and is included in Attachment C. Photographs #2, #3, and #4 in Attachment B show the STPs for Tanks 3, 1, and 2, respectively.

Spill/Overfill Prevention

The fill pipes for the USTs have spill buckets surrounding the pipes and flapper valves in the drop tubes. Photographs #5 (Tank 3), #6 (Tank 1), #7 (Tank 2), and #8 (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 buckets for all tanks were dry and in good condition except for the spill bucket for Tank 4 which had about two inches of product. Testing was conducted on the spill buckets but there is no date on the test records. No testing results were provided for the flapper valves. Attachment E includes the passing test records for the spill buckets.

Corrosion Protection

Three of the tanks are STI-P3 construction with FRP piping. No cathodic protection testing documentation was provided during the inspection.

Operator Training

Ms. [redacted] provided training records for Class A, B, and C operators. Mr. [redacted] was trained as a Class A and B operator, and [redacted] was trained as a Class C operator. Attachment F includes the training records.

Walkthrough Inspections

7-2-11 #41 had monthly walkthrough inspection records for June 2023 through May 2024 except for November 2023 which was not provided. Annual walkthrough inspection records are addressed by testing records. Attachment G contains the monthly walkthrough inspection records.

Financial Assurance

No financial assurance documentation was provided during the inspection.

Physical Inspection

During the site visit, the Mr. [redacted] reviewed documents on site and observed the fill ports, STP access ports, one of the dispensers, and the ATG monitoring interface for the four USTs on site. Photograph #9 in Attachment B shows the interface for the Veeder-Root TLS-350 ATG system, which did not have any monitoring or leak alarms at the time of the inspection. Mr. [redacted] also observed the spill buckets and fill pipes for the four USTs. The drop tubes and spill buckets were in good condition except for the spill bucket for Tank 4 which had about two inches of product. Mr. [redacted] also observed the sumps for each of the four USTs. Tank 2 and Tank 4 are manifolded. The STPs had electronic 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.

There were two double-sided pump dispensers on site. One of the dispensers were opened as part of the inspection. Dispenser 1/2 appeared in good condition and no issues were noted at the time of the inspection (see Photograph #10, Attachment B).

One monitoring well was observed at the tank field during the inspection. Vent lines are located on the north side of the building, and no obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has four tanks, Tanks 2 through 4 are STI-P3 cathodically protected steel construction. Tank 1 is FRP construction. Tank 2 and Tank 4 are manifolded tanks each having a 6,000-gallon capacity and contain regular unleaded gasoline. Tank 3 has a 6,000-gallon capacity and contains diesel. Tank 4 has a 6,000-gallon capacity and contains premium unleaded gasoline. Passing monthly leak detection test records were available for the calendar months of July 2023 through June 2024, though no leak test results were available for the month of December 2023, January 2024, and February 2024 for Tanks 2 and 4. An annual certification for the ATG system was also provided during the inspection but was not dated. There are two double-sided pump dispensers on site that operate with pressurized double-walled FRP piping. The STPs for the pressurized piping are equipped with electronic LLDs which passed operational testing, but no date of the testing was provided and line tightness tests in August 2023. 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 passed testing, but no date was provided for the testing and no testing records were provided for the flapper valves. The spill buckets and drop tubes generally appeared in good condition. The spill buckets for all tanks were dry and in good condition except for the spill bucket for Tank 4 which had about two inches of product. Cathodic protection testing records were not provided. 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 June 2023 through May 2024 except for November 2023 which was not provided. Annual walkthrough inspections were completed as part of the annual compliance inspection but testing dates were not provided. No financial assurance documentation was provided. Attachment H contains the Notice of Inspection signed by Ms. [redacted]. Mr. [redacted] provided a copy to Ms. [redacted] and left the premises.

Inspector Signature: [redacted] **Date:** August 14, 2024