

Compliance Evaluation Inspection Report

Kyle Grocery
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 20, 2024

Date and Time of Inspection: April 29, 2024, at 10:30 am MST

Weather: Sunny and clear, 65° Fahrenheit

Facility Contact/Owner:

[REDACTED]

Owner Address:

545 Main St
Kyle, SD 57752

Facility Address:

545 Main St
Kyle, SD 57752

Facility Phone:

[REDACTED]

Facility ID Number:

4070021

Reason for Inspection:

Compliance Inspection

Inspector(s):

[REDACTED]

, ERG (Lead)

[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 Kyle Grocery facility in Kyle, South Dakota on April 29, 2024. The facility was last inspected on June 15, 2021.

Mr. [REDACTED], contract inspector, contacted Ms. [REDACTED], representative of Kyle Grocery, on March 27, 2024, to notify the facility about the inspection prior to the inspection team's arrival. 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.

Initially, Mr. [REDACTED] and Mr. [REDACTED] arrived at the facility to begin the inspection and introduced themselves to [REDACTED] and [REDACTED], representatives for Kyle Grocery. Mr. [REDACTED] provided an in-brief and notified them that Mr. [REDACTED] had travel delays, and he would return later in the day to close out the inspection. Mr. [REDACTED] and Mr. [REDACTED] gathered records, interviewed Mr. [REDACTED] and Mr. [REDACTED], and conducted a walkthrough of the site including access ports for the UST. Mr. [REDACTED] and Mr. [REDACTED] departed at approximately 12:30 pm and notified Kyle Grocery that they would return with Mr. [REDACTED] later in the day. At approximately 3:20 pm, the inspection team [REDACTED] returned to Kyle Grocery. Mr. [REDACTED] stated he was a contract inspector for EPA and presented his credentials. The inspection team finished gathering records and conducting the walkthrough at that time. 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 Kyle Grocery facility, located at 545 Main St in Kyle, SD, has one UST. According to the previous EPA inspection report and observations made during the inspection, the UST was constructed in 1994 with single-walled STI-P3 construction and single-walled steel piping. The UST has a 9,500-gallon capacity and holds regular unleaded gasoline. The dispensing system for the UST is pressurized piping. The inspection team completed an EPA Region 8 UST Compliance Inspection Checklist for the UST while on site which is included in Attachment A. Photograph #4 in Attachment B shows an overview of the UST.

UST System Records

The listing of documents reviewed for the Kyle Grocery inspection included the following:

1. UST Leak Detection Records and Inventory
2. Tank Gauging and Line Leak Detector Test Records
3. Spill and Overfill Protection Test Records
4. Cathodic Protection Test Records
5. Operator Training Certificates
6. Walkthrough Inspection Records
7. Financial Assurance Records

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

Tank Release Detection

Releases from the tank are detected by a Gilbarco EMC monitoring system and associated in-tank probe that conducts automatic tank gauging (ATG) of the tank. Attachment C contains a compilation of the ATG static leak test results printed from the ATG system for the previous 12 months. The tank had passing leak detection records for each of the months. Attachment C also includes a tank inventory from the day of the inspection. Grimms Pump and Industrial Supply tested the performance of the ATG probe in December 2023. Attachment D includes the passing test record for the ATG system.

Piping Release Detection

The UST was installed with pressurized single-walled steel piping. The submersible turbine pump (STP) is equipped with a mechanical line leak detector (LLD), and Kyle Grocery conducts annual line tightness testing for piping release detection. Grimms Pump and Industrial Supply tested the LLD and conducted line tightness testing in December 2023. Attachment D includes the passing test records for the LLD test and the line tightness test. Photograph #1 in Attachment B shows the STP observed during the inspection.

Spill/Overfill Prevention

The fill pipe for the UST has a spill bucket surrounding the pipe, and Kyle Grocery has an overfill alarm for overfill prevention. Photographs #2 and #3 in Attachment B show the fill port for the UST. The spill bucket and drop tube appeared in good condition. Grimms Pump and Industrial Supply conducted hydrostatic testing on the spill bucket and performance testing on the overfill alarm in December 2023. Attachment E shows the passing test records for the spill and overfill prevention equipment.

Corrosion Protection

The tank is single-walled STI-P3 construction, and cathodic protection testing records were provided from 2018 and 2021. The UST passed cathodic protection tests in 2018, but the piping under the dispenser failed the tests in June 2021. Repairs were made, and then in September 2021, the tank was retested and passed. Attachment F includes the cathodic protection testing records from 2018 and 2021.

Operator Training

Kyle Grocery has a Class A operator, Class B operator, and seven Class C operators trained. The inspection team reviewed training certificates onsite. The Class A operator is [REDACTED], and the Class B operator is [REDACTED]. Appendix G includes an example training certificate for each operator class.

Walkthrough Inspections

Kyle Grocery completed monthly and annual walkthrough inspection records using EPA R8 checklists. Monthly walkthrough records were available for January 2022 to April 2024, and annual walkthrough records were available for 2021 to 2023. Attachment H includes the monthly and annual walkthrough inspection records collected on site.

Financial Assurance

Kyle Grocery is registered with the state of South Dakota and covered under the state trust fund, which covers facilities using a fee on each gallon of fuel sold. Mr. [REDACTED] also provided a general commercial liability insurance policy for Kyle Grocery, which has a limit of \$1,000,000 per occurrence. Attachment I includes the notification of inclusion in the state trust fund as well as a copy of the commercial insurance policy.

Physical Inspection

During the site visit, the inspection team reviewed documents on site and observed the fill ports, the STP, the dispensers, and the ATG monitoring interface for the UST on site. Photograph #5 in Attachment B shows the interface for the Gilbarco EMC ATG system. Attachment C includes an inventory report for the USTs that Mr. [REDACTED] had printed during the inspection to verify operation. The inspection team also observed the spill bucket and fill pipe for the UST. The spill bucket was dry and in good condition, with some moderate corrosion, at the time of the inspection (see Photographs #2 and #3, Attachment B). The tank also had an access port for the STP, and no issues were noted (see Photograph #1, Attachment B). There were two double-sided dispensers on site. Mr. [REDACTED] inspected dispenser 3/4 and did not observe signs of leaks from the dispenser at the time of the inspection. The inspection team did observe the ATG probe, and no issues were noted. The inspection team asked Mr. [REDACTED] about the location of the overfill alarm, and Mr. [REDACTED] stated that the overfill alarm is located inside the store building.

No monitoring wells were observed at the tank field during the inspection. The vent line is located adjacent to the tank, and no obstructions or concerns were noted for the vent line at the time of the inspection.

2. SUMMARY

The facility has one tank with single-walled STI-P3 construction that was installed in 1994. The tank has a 9,500-gallon capacity and contains unleaded gasoline. Passing monthly leak detection test records were available for the previous 12 months, and a contractor certified the ATG system in December 2023. There are two dispensers located on site, and pressurized piping is used with single-walled steel construction. Kyle Grocery provided passing test records from December 2023 for the mechanical LLD present on the STP as well as for a line tightness test. The fill port for the UST is equipped with a spill bucket as the spill prevention equipment and an overfill alarm for overfill prevention. Passing test records from December 2023 were provided for spill and overfill prevention. Cathodic protection testing records were provided for 2018 and 2021 for the tank and piping. Initial cathodic protection testing in June 2021 showed that the dispenser failed the voltage test, but the equipment was repaired and retested in September 2021, which showed a passing test. Kyle Grocery has a Class operator, Class B operator, and multiple Class C operators, and training certificates were available on site for each operator at the time of the inspection. Kyle Grocery provided monthly and annual walkthrough inspection records during the inspection. Kyle Grocery is registered with the state of South Dakota and is covered under the state trust fund. The facility also provided a copy of their commercial liability insurance which showed coverage including the self-service gas operation up to \$1,000,000 per occurrence. Attachment J contains the Notice of Inspection signed by Mr. [REDACTED] on behalf of [REDACTED]. Mr. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

Digitally signed by [REDACTED]
Date: 2024.06.20 21:32:37 -04'00'

Inspector Signature: _____ **Date:** June 20, 2024