

Compliance Evaluation Inspection Report

South Dakota Department of Transportation Isabel
July 2024

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop St.
Denver, CO 80202



Submitted by:

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EPA Contract No. 68HERC21D0007
Task Order 68HERC22F0492

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: July 8, 2024

Date and Time of Inspection: May 15, 2024 at 9:35 AM MST

Weather: Cloudy, 55° Fahrenheit

Facility Contact/Owner: [REDACTED]

Owner Address: 700 East Broadway Avenue
Pierre, South Dakota 57501

Facility Address: 201 Hillview Road
Isabel, South Dakota 57633

Facility Phone: [REDACTED]

Facility ID Number: 4020025

Reason for Inspection: Compliance Inspection

Inspector(s): [REDACTED], ERG (Lead)

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Attachment D:	Equipment Testing Records
Attachment E:	Monthly and Annual Walkthrough Inspections
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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 68HERC22F0492, provided assistance to EPA in preparing for, conducting the inspection, and preparing this inspection report. ERG inspected the South Dakota Department of Transportation (SD DOT) Isabel located in Isabel, South Dakota on May 15, 2024. The facility was last inspected on June 29, 2021.

██████████, contract inspector for EPA, contacted Mr. ██████████ ██████████, representative of SD DOT, to notify the facility about the inspection on April 26, 2024, prior to 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, Ms. ██████████ introduced herself as a contract inspector for EPA, presented her credentials, and provided an in-brief to Mr. ██████████ and Mr. ██████████. Ms. ██████████ concluded with an exit brief to inform the facility of preliminary observations identified during the inspection and had Mr. ██████████ sign the Notice of Inspection. Ms. ██████████ took photographs during the inspection.

UST System Description

SD DOT Isabel (facility) is a highway maintenance shop and depot, located immediately north of Isabel, SD, along County Road 1D, about 500 feet west of State Highway 65. Fuel stored at this facility is used to operate highway maintenance vehicles. The facility is located on the Cheyenne River Indian Reservation.

According to the previous EPA inspection report and observations made during the inspection, the facility has two fiberglass-reinforced plastic (FRP) installed in October 2006. Tank 1 has a capacity of 3,000 gallons and contains diesel. Tank 2 has a capacity of 1,000 gallons and contains unleaded gasoline. The dispensing system for each of the tanks is European Safe Suction and is constructed using FRP.

Ms. ██████████ 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 the dispensers and an overview of the UST system.

UST System Records

The listing of documents reviewed for the SD DOT Isabel inspection included the following:

1. UST Leak Detection Records
2. South Dakota Certificate of Financial Assurance
3. Facility Monthly and Annual Walkthrough Inspections

The facility maintains all records on site. Mr. ██████████ provided the records for the UST during the inspection.

Tank Release Detection

The facility uses a Veeder Root TLS-450 monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Mr. [REDACTED] provided the last 12 months of passing leak detection results. Attachment C contains a compilation of the ATG leak test results for the last 12 months. Photograph #2 in Attachment B shows the monitoring system interface. The annual ATG certification was conducted in October 2023 and the system passed. Attachment D includes the ATG certification.

Piping Release Detection

Piping leak detection is not required because this facility has safe suction piping. This was confirmed during the physical site inspection.

Spill/Overfill Prevention

Spill and overfill prevention equipment tests were provided for review during the inspection. The spill buckets were replaced in October 2021 and tested subsequently after the replacement. Both spill buckets passed the integrity test. Overfill prevention is conducted by an overfill alarm that was last tested in June 2021 and passed. The overfill alarm was observed and passed the inspection. Photographs #3 and #4 in Attachment B show the fill ports for the two USTs. Attachment D includes the spill and overfill prevention test results.

Corrosion Protection

Cathodic Protection (CP) is not required as the tanks and piping are constructed of FRP.

Operator Training

Certificates for the Class A and Class B operator were presented during the inspection. [REDACTED] and [REDACTED] are the Class A and Class B designated operators. There are no designated Class C operators.

Walkthrough Inspections

Records of the monthly and annual walkthrough inspections were available for review during the inspection. Attachment E includes the monthly and annual walkthrough inspection records.

Financial Assurance

In South Dakota, financial coverage for owners/operators of regulated USTs is provided through the South Dakota Petroleum Release Compensation Fund. Mr. [REDACTED] had a copy of the letter from the state indicating facility coverage. They are self-insured for the deductible. Attachment F includes the South Dakota certificate of financial assurance for the facility.

Physical Inspection

During the site visit, Ms. [REDACTED] reviewed documents on site and observed the fill ports, both dispensers, and the ATG monitoring interface for the two USTs on site. Photograph #2 in Attachment B shows the interface for Veeder Root TLS-450 ATG system. Ms. [REDACTED] also

observed the spill bucket and fill pipe for the two USTs. The spill buckets for Tank 1 and Tank 2 were clean and in good condition at the time of the inspection. The 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 two double-sided pump dispensers on site, one for diesel and one for gasoline, and both dispensers were opened as part of the inspection. The safe suction system was observed, and Ms. [REDACTED] did not observe signs of leaks at the time of the inspection. Photographs #5 through #8 in Attachment B show the safe suction systems and piping in each dispenser.

No monitoring wells were observed at the tank field during the inspection. Vent lines are located east of the USTs against the main garage, and no obstructions or concerns were noted for the vent lines at the time of the inspection. The external overfill alarm was observed.

2. SUMMARY

The facility has two tanks installed in October 2006. Tank 1 has a capacity of 3,000 gallons and contains diesel. Tank 2 has a capacity of 1,000 gallons and contains unleaded gasoline. Passing monthly monitoring leak detection test records were available for the previous 12 months for both USTs. There are two double-sided dispensers on site that operate with safe suction piping and are constructed with FRP piping. The fill port for both USTs is equipped with a spill bucket and overfill prevention is conducted by an overfill alarm. Testing records were provided for the spill buckets during the inspection. Cathodic protection is not required for Tank 1 or Tank 2 because they are FRP tanks with FRP piping. Class A and B certified operators are designated, and training records were provided during the inspection. The facility does not have any Class C designated operators. Monthly and annual walkthrough inspection records were provided during the inspection. The SD DOT Isabel has financial coverage through the South Dakota Petroleum Release Compensation Fund and the facility is self-insured to cover the deductible. Attachment G contains the Notice of Inspection signed by Mr. [REDACTED] following the inspection. Ms. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

Inspector Signature:

[REDACTED]

Date: July 8, 2024