

UST Inspection Report

Farmers Union Oil – Lodge Grass

Date of Report: August 22, 2025

Inspection Date & Time: July 22, 2025, at ~2:45 p.m. MDT

Weather: Sunny, 85 degrees Fahrenheit

Facility Owner: Farmer's Union Oil Company

Facility Owner Address: P.O. Box 560
Lodge Grass, Montana 59050

Facility Address: Old Highway 87
Lodge Grass, Montana 59050

Facility Phone: 406-639-2413

EPA Facility ID Number: 2020001

Reason for Inspection: Routine compliance inspection

Inspector(s): [REDACTED] Person, EPA (lead)
[REDACTED] Grabowski, EPA

UST System Description

Farmers Union Oil – Lodge Grass (Facility) is a privately-owned gas station located on the Crow Reservation in Lodge Grass, Montana. The fuel at this Facility is sold to the public. The Environmental Protection Agency's (EPA) Facility records indicate that the Facility has two STI-P3 underground storage tanks (USTs), which were installed in 1998. Tank 1 has a capacity of 10,000 gallons and is used to store unleaded gasoline. Tank 2 is an 8,000-gallon tank compartmentalized to store both premium unleaded gasoline and clear diesel fuel. Facility piping is pressurized and constructed with double-walled fiberglass reinforced plastic materials.

Inspection Narrative

On July 22, 2025, the EPA conducted an inspection at Farmers Union Oil – Lodge Grass in Lodge Grass, Montana. The EPA last inspected the Facility on June 28, 2022, and selected it for routine re-inspection. On July 8, 2025, the EPA contacted the Facility operator to schedule the inspection. The inspection was initially scheduled for July 25, 2025, but the operator was able to accommodate an earlier date when requested.

The EPA inspector arrived at the Facility at approximately 2:45 p.m. The EPA inspector introduced herself and presented inspector credentials. The Facility representative consented to the inspection. The EPA inspector conducted a physical inspection of the UST system as well as a review of Facility records. Copies of operation and maintenance records are in Attachment A. Photographs of UST system components taken during the inspection are in Attachment B.

Tank Leak Detection

Tank leak detection consists of a Veeder Root TLS-350 automatic tank gauge (ATG) system. Ms. Edwards provided 12 months of passing release detection monitoring for all three tank compartments. The annual ATG operation inspection was performed on April 9, 2025, and all equipment passed.

Piping Leak Detection

Lines are all equipped with electronic line leak detectors (ELLDs). The ELLDs were tested and passed on April 9, 2025. The service provider noted that the periodic and annual line tests were disabled in the ATG system, therefore a line tightness test was performed and passed on April 9, 2025. The service provider re-enabled the system to perform the monitoring and an annual line tightness test via the ELLD was performed and recorded in the system on April 11, 2025.

Cathodic Protection

The USTs are both constructed of cathodically protected steel. The operator provided passing test records dated February 3, 2021, and February 29, 2024.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

The spill buckets and overfill prevention devices were inspected/tested and pass on February 29, 2024.

Periodic O&M Walkthrough Inspections

Records of the monthly and annual walkthrough inspections for the last twelve months were available at the time of the inspection.

Operator Training

Certificates for the Class A and B operator were present during the inspection. [REDACTED] Edwards is designated as both Class A and Class B operator. Ms. Edwards also maintained training records for her Class C operators.

Financial Responsibility

On-site records indicate that the Facility is enrolled in the Montana Petro Fund to meet the financial responsibility coverage requirements. The Facility has the required documentation for the state fund available onsite.

Physical Observations

The EPA inspectors viewed the tank top sumps, spill buckets, fill ports and dispensers. The sumps and the unleaded spill buckets were clean, intact and functional. Flapper valves were present in each of the drop tubes. The diesel spill bucket contained liquid, which was removed following the inspection. The operator provided a photo of the cleaned spill bucket on August 5, 2025.

Conclusion

At the end of the inspection, Ms. Person filled out an Onsite Deficiency Identification Form (see Attachment C), which represents the EPA staff's initial compliance recommendations at the time of the inspection. Ms. Person provided the onsite deficiency form to the operator and retained the carbon copy for recordkeeping. On August 5, 2025, the EPA received the requested documentation for both listed deficiencies. Prior to departing the Facility, Ms. Person stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment D).

Inspection Report Attachments

- A. Facility O&M records
- B. Photo log
- C. Onsite Deficiency Form
- D. Inspection checklist

Signature

Lead Inspector



 PERSON
2025.08.22 08:26:30 -06'00'

 Person

Date of signature