

Compliance Evaluation Inspection Report

Buche's Gus Stop 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 4:20 pm MST

Weather: Rainy and partly cloudy, 56° Fahrenheit

Facility Contact/Owner: [REDACTED] / GF Buche Co.

Owner Address: 102 South Main Ave
Wagner, SD 57380

Facility Address: 22285 SD Hwy 44
Wanblee, SD 57577

Facility Phone: [REDACTED]

Facility ID Number: 4070017

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 Buche's Gus Stop facility in Wanblee, South Dakota on April 29, 2024. The facility was last inspected on June 15, 2021.

Mr. [REDACTED], contract inspector, contacted Ms. [REDACTED], representative of Buche's Gus Stop, on April 8, 2024, via telephone to notify the facility about the inspection on April 29, 2024. 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 operator, Ms. [REDACTED] to explain the purpose of the inspection. The inspection team [REDACTED] gathered records, interviewed Ms. [REDACTED] and facility representatives, and conducted a walkthrough of the site including access ports and dispensers for the USTs. 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 Buche's Gus Stop facility, located at 22285 SD Hwy 44 in Wanblee, SD, has a two-compartment UST that was constructed in November 1995. According to the previous EPA inspection report and observations made during the inspection, each tank has a 6,000-gallon capacity, contains regular unleaded gasoline, and has single-walled STI-P3 construction. The dispensing system for each tank is pressurized piping with flexible plastic construction. While the piping appeared to be double walled during the inspection, this was not verified. Mr. [REDACTED] and 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 the dispensers and an overview of the UST system. Attachment C includes the recent notification form sent to the state regarding change in ownership to GF Buche Co.

UST System Records

The listing of documents reviewed for the Buche's Gus Stop inspection included the following:

1. State Ownership Change Notification Form
2. UST Leak Detection Records and Inventory
3. Tank Gauging and Line Leak Detector Test Records
4. Spill and Overfill Prevention Records
5. Cathodic Protection Records
6. Walkthrough Inspection Records
7. Financial Assurance Correspondence

The facility maintains all records on site, except for the financial assurance documentation for covering the state trust fund deductible. The corporate office for GF Buche Co located in Wagner, SD maintains the insurance documentation. Ms. [REDACTED] provided the records for the UST during the inspection.

Tank Release Detection

Releases from the tanks are detected by a Veeder-Root TLS 4C monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Attachment D contains a compilation of the ATG continuous statistical leak detection test results for the months since January 2023. Leak tests had passing records for both tanks at least once per calendar month during the previous 12 months. Mr. [REDACTED] noted that the leak detection records were available during each calendar month, but that the records were sometimes closer to 50 days apart (e.g., passing record on June 9, 2023, and the next passing record not until July 31, 2023, for Tank 1). Photograph #2 in Attachment B shows the monitoring system interface, and Attachment D also includes a current inventory report printed during the inspection to ensure proper monitoring system operation. Ms. [REDACTED] also provided a passing test record for the tank gauging system performed by a contractor in February 2024 (see Attachment E).

Piping Release Detection

All tanks were installed with pressurized flexible plastic piping, which appeared to be double walled based on visual observation. The piping is equipped with submersible turbine pump (STP) sumps and mechanical line leak detectors (LLDs). UST Testing Services Inc conducted testing on the LLDs and also performed line tightness testing on the piping in February 2024. Attachment E includes the passing test records for the LLDs as well as passing line tightness testing records. The dispenser sumps appeared to have liquid sump sensors, but there was no indication that Buche's Gus Stop was using them for leak monitoring. Photographs #4 and #5 in Attachment B show the STP sumps for Tank 1 and Tank 2, respectively. The STP sumps had some residual water accumulated around low spots in the sump.

Spill/Overfill Prevention

The fill pipes for the USTs have spill buckets surrounding the pipes and flapper valves in the drop tubes. Photographs #6 through #8 (Tank 1) and #9 and #10 (Tank 2) in Attachment B show the fill ports and spill buckets for the respective USTs. The spill bucket for Tank 1 had approximately three inches of water present at the time of the inspection. UST Testing Services Inc. conducted testing on the spill buckets and flapper valves as spill and overfill prevention equipment in February 2024. Attachment F includes the passing test records for the spill buckets and flapper valves.

Corrosion Protection

According to facility documentation, both tanks are single-walled STI-P3 construction and require cathodic protection, and the piping is flexible plastic construction. Ms. [REDACTED] provided a record of the previous two cathodic protection tests for the tanks from February 2024 and June 2021. The exact voltage readings were not included in the records, so the inspection team was

unable to verify the passing tests. Attachment G includes the cathodic protection testing records available on site from the previous two tests.

Operator Training

Buche's Gus Stop had training records for one operator at each of the Class A, B, and C levels. Ms. [REDACTED] is certified as the Class A operator, [REDACTED] is a Class B operator, and [REDACTED] is a Class C operator. Mr. [REDACTED] noted that additional staff working in the building should be trained as Class C operators in order to respond in case of emergencies. Photograph #3 in Attachment B shows the three training certificates posted on the wall inside the Buche's Gus Stop building.

Walkthrough Inspections

Buche's Gus Stop only had one month of walkthrough inspections recorded in the past 12 months, which was for February 2024. Annual walkthrough records were not available at the time of the inspection. Attachment H includes the available recorded monthly walkthrough for February 2024.

Financial Assurance

Buche's Gus Stop provided a letter of correspondence between a state representative and Mr. [REDACTED] regarding coverage under the state trust fund for owners of USTs in South Dakota (see Attachment I). Ms. [REDACTED] stated that the parent company, GF Buche Co., may have insurance coverage or another financial mechanism to cover the \$10,000 deductible for the state program, and that the GF Buche Co. contact would have more information. Buche's Gus Stop did not provide documentation for covering the \$10,000 deductible during the inspection.

Physical Inspection

During the site visit, Mr. [REDACTED] and Mr. [REDACTED] reviewed documents on site and observed the fill ports, STP sumps, one of the two dispenser sumps, and the ATG monitoring interface for the two-compartment UST on site. Photograph #2 in Attachment B shows the interface for the Veeder-Root TLS 4C ATG system. Attachment D includes tank inventory reports that Mr. [REDACTED] printed during the inspection to verify operation. Mr. [REDACTED] and Mr. [REDACTED] observed the spill bucket and fill pipe for the two tanks. The spill bucket for Tank 1 contained approximately three inches of water, and the spill bucket for Tank 2 had only about an inch or less of water. Both spill buckets were otherwise in good condition. Flapper valves were present in each of the fill pipes. Mr. [REDACTED] and Mr. [REDACTED] also observed the STP sumps for each of the two tanks. Both of the STP sumps contained residual water at low points in the sump, but otherwise appeared in good condition. The LLDs were also observed on each of the STPs. 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, and one of these, dispenser 3/4, was opened as part of the inspection. The dispenser had what appeared to be a liquid sump sensor in the containment area, but there was no indication that Buche's Gus Stop was actively using sump monitoring for the dispensers. Mr. [REDACTED] and Mr. [REDACTED] did not observe signs of leaks at the

time of the inspection. Photographs #11 and #12 in Attachment B show the piping beneath the dispenser.

No monitoring wells were observed at the tank field during the inspection. Vent lines are located on top of the sheltered area above the dispensers, and no obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has a two-compartment UST system installed in November 1995. Both tanks have a 6,000-gallon capacity each, contain regular unleaded gasoline, and is a single-walled STI-P3 construction. Passing monthly monitoring leak detection test records were available for each calendar month during the previous 12 months for both tanks. The ATG system was also certified by a contractor in February 2024. There are two double-sided dispensers on site that operate with pressurized flexible plastic piping. STPs for the tanks are equipped with mechanical LLDs which had passing test records from February 2024. Buche's Gus Stop also has passing test records of line tightness testing available most recently for February 2024. The fill port for each tank is equipped with a spill bucket and a flapper valve in the drop tube as the spill and overfill prevention equipment. Passing test records from February 2024 were available for the spill bucket and flapper valve. Cathodic protection testing records for the tanks was available from the previous two tests, although the on-site records did not include voltage readings in order to verify the test results. Buche's Gus Stop had training records for one operator at each of the Class A, B, and C levels. There was only one monthly walkthrough inspection record provided at the time of the inspection for February 2024, and no annual walkthrough inspection records were provided during the inspection. Buche's Gus Stop is registered with the state of South Dakota and is covered under the state trust fund. The facility did not provide documentation for covering the state trust fund deductible. Attachment J contains the Notice of Inspection signed by Ms. [REDACTED]. Mr. [REDACTED] provided a copy to Ms. [REDACTED] and left the premises.

Digitally signed by [REDACTED]

Date: 2024.06.20 22:27:53 -04'00'

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