

Compliance Evaluation Inspection Report

Piedra Peak Plaza July 2024

Submitted to:

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



Submitted by:

Eastern Research Group.
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EPA Contract No. 68HERC21D0007
Task Order 68HERC23F0460

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: July 24, 2024

Date and Time of Inspection: June 19, 2024, at 11:00 am MST

Weather: Clear and sunny, 80° Fahrenheit

Facility Contact/Owner: [REDACTED] / [REDACTED]

Owner Address: 53 County Road 982
Arboles, CO 81121

Facility Address: 53 County Road 982
Arboles, CO 81121

Facility Phone: [REDACTED]

Facility ID Number: 1010018

Reason for Inspection: Compliance Inspection

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

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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 Piedra Peak Plaza facility in Arboles, Colorado on June 19, 2024. The facility was last inspected on November 3, 2021.

Mr. [REDACTED], contract inspector, contacted Ms. [REDACTED], Facility Manager of Piedra Peak Plaza, via telephone to notify the facility about the inspection on May 29, 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, 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], and conducted a walkthrough of the site including access ports and dispensers. Mr. Watson 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 Piedra Peak Plaza facility, located at 53 County Road 982 in Arboles, CO, has three USTs. According to the previous EPA inspection report and observations made during the inspection, Tank 1 has a 10,000-gallon capacity and contains regular unleaded gasoline. Tank 2 has a 3,000-gallon capacity and contains premium unleaded gasoline. Tank 3 has a 3,000-gallon capacity and contains diesel. The three USTs are single-walled steel construction, and the dispensing system for each tank is pressurized piping with single-walled fiberglass-reinforced plastic (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 #10 in Attachment B shows dispensers and an overview of the UST systems.

UST System Records

The listing of documents reviewed for the Piedra Peak Plaza inspection included the following:

1. UST Leak Detection Records and Inventory
2. Automatic Tank Gauge and Line Leak Detector Testing Records
3. Overfill Prevention Testing Records
4. Cathodic Protection Records
5. Operator Training Records
6. Walkthrough Inspection Records
7. Insurance Coverage Certification

The facility maintains all records on site. Ms. [REDACTED] provided the records for the USTs during and as follow-up to the inspection.

Tank Release Detection

Releases from the tanks are detected by a Veeder-Root Simplicity 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 test results for the previous 12 months. The leak tests passed for each tank during the previous 12 months except for October and December 2023 which had missing records. Photograph #1 in Attachment B shows the monitoring system interface, and Attachment C also includes a current inventory report printed in the morning on the day of the inspection. Ms. [REDACTED] also provided a passing test record for the ATG system performed by a contractor in November 2022. The monitor had an active 'Annual Test Needed' alarm for all tanks as shown in the inventory printout in Attachment C.

Piping Release Detection

All tanks were installed with pressurized single-walled FRP piping. The piping is attached to submersible turbine pumps (STPs), which are all equipped with mechanical line leak detectors (LLDs). The LLDs were observed on each of the STPs, and all had passing test records based on contractor testing in October 2023. The contractor also performed line tightness testing for each of the tanks in October 2023, and each had a passing record. Attachment D includes the testing records for the LLDs and the line tightness testing. Photographs #4 and #7 in Attachment B show the STPs for Tanks 1 and 3, respectively.

Spill/Overfill Prevention

The fill pipes for the USTs have spill buckets surrounding the pipes and flapper valves in the drop tubes. Photographs #3 (Tank 1), #5 (Tank 2), and #6 (Tank 3) in Attachment B show the fill ports for the respective USTs. The spill buckets and drop tubes generally appeared in good condition. Attachment E includes passing performance testing for the overfill prevention.

Corrosion Protection

Piedra Peak Plaza uses a Guardian rectifier Model GA40-5-4-B for corrosion protection on each of the USTs. Photograph #2 in Attachment B shows the rectifier interface. The rectifier is checked approximately monthly by an operator with the current and voltage recorded. Based on facility records, the rectifier typically runs with a current of 0.5 amps and a voltage of 5.5 volts, which was consistent with observations during the inspection. Ms. [REDACTED] also provided the previous two cathodic protection testing records occurring in November 2022 and April 2020. The testing records showed passing tests with current and voltage settings similar to those observed during the inspection. Attachment F includes the facility rectifier inspection logs as well as the previous two cathodic protection testing reports.

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 two Class C operators were employed at Piedra Peak Plaza. Attachment G includes the training records for Mr. [REDACTED] and two of the Class C operators ([REDACTED] and [REDACTED]).

Walkthrough Inspections

Piedra Peak Plaza had monthly walkthrough inspection records for 2023 through June 2024. Attachment H includes monthly and annual walkthrough inspection records.

Financial Assurance

Piedra Peak Plaza maintains commercial general liability insurance for \$1,000,000 for each occurrence which lists the USTs. Attachment I includes the certificate of liability insurance.

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 three USTs on site. Photograph #1 in Attachment B shows the interface for the Veeder-Root Simplicity ATG system, which had an ‘Annual Test Needed’ alarm for all tanks at the time of the inspection. Mr. [REDACTED] also observed the spill buckets and fill pipes for the three USTs. The drop tubes and spill buckets were in good condition and spill buckets were dry overall. Mr. [REDACTED] also observed the STPs for each of the three USTs. The STPs had mechanical LLDs present and did not show signs of leaking or spills in the surrounding soil. 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 both of these dispensers were opened as part of the inspection. The dispensers appeared in good condition (see Photographs #8 and #9, Attachment B).

No monitoring wells were observed at the tank field during the inspection. Vent lines are located north of the USTs along the building, and no obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has three tanks with single-walled steel construction. Tank 1 has a 10,000-gallon capacity and contains regular unleaded plus gasoline. Tank 2 has a 3,000-gallon capacity and contains premium unleaded gasoline. Tank 3 has a 3,000-gallon capacity and contains diesel. Passing monthly leak detection test records were available for the previous 12 months for all three tanks except for October and December 2023 which had missing records. An annual certification for the ATG system was also provided during the inspection from November 2022. There are two double-sided dispensers on site that operate with pressurized single-walled FRP piping. The STPs for the pressurized piping are equipped with mechanical LLDs which passed operational tests and line tightness testing in October 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 flapper valve passed operational tests in November 2022. Piedra Peak Plaza operates with a rectifier for corrosion protection on the tanks. The previous two cathodic protection testing records for the three tanks were available and showed passing results. Piedra Peak Plaza also provided monthly inspection logs of the rectifier to ensure it is operating. 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 each month in 2023 through June 2024. The facility has general liability insurance that covers the USTs. Attachment J 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: July 24, 2024