Compliance Evaluation Inspection Report

Herman's Service
July 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 68HERC22F0492

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report:	July 9, 2024
Date and Time of Inspection:	May 16, 2024 at 8:35 AM MST
Weather:	Sunny, 58° Fahrenheit
Facility Contact/Owner:	[redacted]
Owner Address:	711 Main Street Timber Lake, South Dakota 57656
Facility Address:	711 Main Street Timber Lake, South Dakota 57656
Facility Phone:	[redacted]
Facility ID Number:	4020014
Reason for Inspection:	Compliance Inspection
Inspector(s):	[redacted], ERG (Lead)

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ATTACHMENTS

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 Herman's Service located in Timber Lake, South Dakota on May 16, 2024. The facility was last inspected on June 30, 2021.

[redacted], contract inspector for EPA, contacted Mr. [redacted], the owner and representative of Herman's Service, to notify the facility about the inspection on April 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, Ms. [redacted] introduced herself as a contract inspector for EPA, presented her credentials, and provided an in-brief to Mr. [redacted], to explain the purpose of the inspection. Following the inspection, Ms. [redacted] concluded with an exit brief to inform the facility of preliminary observations identified during the inspection and had Mr. [redacted] sign the Notice of Inspection (NOI). Ms. [redacted] took photographs during the inspection.

UST System Description

Herman's Service (facility) is a privately owned gas station with a convenience store located at 711 Main Street, Timber Lake, SD 57656. The fuel at this facility is sold to the public. 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 one polyethylene-jacketed steel jacketed underground storage tank (UST) with three compartments installed in September 1998. The compartments will be referred to as Tank 1, Tank 2, and Tank 3 for the purpose of this report. Tank 1 has a capacity of 1,000 gallons and contains diesel. Tank 2 has a capacity of 1,000 gallons and contains diesel. Tank 3 has a capacity of 1,000 gallons and contains unleaded gasoline. The facility piping is fiberglass reinforced plastic (FRP) and is a safe suction system.

Ms. [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.

UST System Records

The listing of documents reviewed for the Herman's Service inspection included the following:

1. Interstitial Monitoring Records
2. Operator Certification records
3. Monthly and Annual Walkthrough Inspections
4. Letter of Credit
5. UST Compliance Testing Records

The facility maintains their records on site. Mr. [redacted] provided the records for the USTs during the inspection.

Tank Release Detection

Tank leak detection consists of manual interstitial monitoring. The UST compartments have a common interstice. Mr. [redacted] had 12 months of passing monitoring records on site. The interstitial monitoring records are included in Attachment C.

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

The facility's overfill prevention is provided by butterfly valves valve in the drop tubes. The overfill prevention equipment test from August 29, 2021 was provided for review during the inspection. All three tanks passed the test. The spill bucket integrity test from August 29, 2021 was reviewed and all three spill buckets passed the test. Mr. [redacted] performed these tests. Photographs #2 through #4 in Attachment B show the fill ports for the respective USTs. The UST overfill equipment test results and the spill bucket integrity tests from August 2021 are included in Attachment D.

Corrosion Protection

Cathodic Protection (CP) is not required as the tank is double-walled, polyethylene-jacketed and the piping is FRP.

Operator Training

A certificate for the Class A and B operator was presented during the inspection. [redacted] is both the Class A and Class B designated operator. There are no other attendants that require training at the facility.

Walkthrough Inspections

Records of the monthly and annual walkthrough inspections were available at the time of the inspection. The walkthrough inspections are included in Attachment E.

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 and a letter of credit on file included in Attachment F.

Physical Inspection

During the site visit, Ms. [redacted] reviewed documents on site and observed the fill ports and both dispensers for the UST on site. Ms. [redacted] observed the spill bucket and fill pipe for the three tanks. The spill buckets for Tank 1 and Tank 2 contained approximately one inch of water.

The spill bucket for Tank 3 was dry and in good condition at the time of the inspection. The facility has two double-sided pump dispensers, and both dispensers were opened as part of the inspection. The dispensers are a safe suction system and are not equipped with sumps or liquid sump sensors. 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 system and the piping for the unleaded gasoline dispenser and diesel dispenser.

The interstitial monitoring port was observed west of the UST fill ports. Monitoring wells were not observed around the UST tank field. Vent lines are located west of the UST against the garage. No obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has a polyethylene-jacketed steel jacketed UST with three compartments installed in September 1998. Tank 1 has a capacity of 1,000 gallons and contains diesel. Tank 2 has a capacity of 1,000 gallons and contains diesel. Tank 3 has a capacity of 1,000 gallons and contains unleaded gasoline. The facility uses interstitial monitoring as the method of release detection for the tanks and the last 12 months of passing leak detection records were provided for review during the inspection. There are two double-sided dispensers on site that operate with FRP piping and a safe suction system. Overfill prevention tests from August 2021 were provided for review and overfill prevention passed for all three tanks. The spill bucket tests from August 2021 were provided for review during the inspection. All three spill buckets passed the integrity test. A Class A and B certified operator is designated, and training records were provided during the inspection. Monthly and annual walkthrough inspection records were provided during the inspection. The facility has financial coverage through the South Dakota Petroleum Release Compensation Fund and the facility has a letter of credit to cover the deductible. Attachment G contains the NOI signed by Mr. [redacted] at the end of the inspection. Ms. [redacted] provided a copy to Mr. [redacted] and left the premises.

Inspector Signature: [redacted] **Date:** July 9, 2024