Compliance Evaluation Inspection Report

Eagle 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 68HERC22F0492

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report:	June 14, 2024
Date and Time of Inspection:	May 14, 2024 at 9:00 am MST
Weather:	Cloudy, 57° Fahrenheit
Facility Contact/Owner:	[redacted]
Owner Address:	3435 West Main Street Rapid City, SD 57702
Facility Address:	24327 US-212 Eagle Butte, SD 57625
Facility Phone:	(605) 964-2226
Facility ID Number:	4020028
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 the Eagle Stop facility in Eagle Butte, South Dakota on May 14, 2024. The facility was last inspected on June 30, 2021.

[redacted], contract inspector for EPA, contacted Ms. [redacted] (605) [redacted], representative of Eagle Stop, 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. [redacted] introduced herself as a contract inspector for EPA, presented her credentials, and provided an in-brief to Ms. [redacted]. Following the inspection, Ms. [redacted] concluded with an exit brief to inform the facility of preliminary observations identified during the inspection and had Ms. [redacted] sign the Notice of Inspection. Ms. [redacted] took photographs during the inspection.

UST System Description

Eagle Stop (facility) is a privately owned gas station with a convenience store located 24327 US-212, Eagle Butte, SD. 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 two double-walled fiberglass reinforced plastic (FRP) tanks installed in October 2017. The first tank is a 12,000-gallon tank with two compartments identified as Tank 1 and Tank 2. Tank 1 is a 5,000-gallon compartment containing diesel fuel. Tank 2 is a 7,000-gallon compartment which contains unleaded fuel. Tank 3 is a 12,000-gallon tank containing E10 unleaded fuel. The dispensing system for each of the tanks is pressurized piping with double-walled flexible plastic construction.

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 Eagle Stop inspection included the following:

1. UST Leak Detection Records
2. UST Inventory and Alarms Report
3. Monthly and Annual Walkthrough Inspections
4. Insurance Coverage Certification
5. UST Compliance Testing Records

The facility maintains all records on site. Ms. [redacted] provided the records for the UST during the inspection.

Tank Release Detection

The facility uses a Veeder Root TLS-300 monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Ms. [redacted] provided the passing continuous statistical leak detection (CSLD) results for June 2023 through September 2023 and January 2024 through April 2024. Ms. [redacted] was unable to produce leak detection results for October 2023, November 2023, and December 2023. Passing leak detection results for May were not provided during the inspection. Attachment C contains a compilation of the ATG CSLD leak detection test results for June 2023 through September 2023 and January 2024 through April 2024. Photograph #2 in Attachment B shows the monitoring system interface. Attachment D contains a passing test record for the ATG system performed by a contractor in January 2024.

Piping Release Detection

Piping leak detection is provided by interstitial monitoring via sump sensors and automatic line leak detectors (ALLDs). The sensor tests, line leak detector tests, and sump tests were conducted in January 2024. Ms. Forsmark observed mechanical ALLDs on all three submersible turbine pumps (STPs) during the inspection. Attachment D includes the passing testing records on the ALLDs and line tightness tests from January 2024. The double-walled piping is equipped with STP sumps and dispenser sumps which are both equipped with liquid sump sensors. Photograph #4 in Attachment B shows the STP sump for Tank 1with approximately two inches of water in the bottom. The liquid sump sensor was not observed in the lowest point of the STP sump for Tank 1. Photograph #6 in Attachment B shows the STP sump for Tank 2 with approximately one inch of water in the bottom. The liquid sump sensor was not observed in the lowest point of the STP sump for Tank 2. Photograph #8 in Attachment B shows the STP sump for Tank 3. The STP sump for Tank 3 was observed dry and the liquid sump sensor was observed at the lowest point of the STP sump.

Spill/Overfill Prevention

Spill bucket tests were not provided. Overfill prevention tests were not provided. During the physical inspection, butterfly valves were noted in the fill pipes. Photographs #3 #5, and #7 in Attachment B show the fill ports for Tank 1, Tank 2, and Tank 3, respectively.

Corrosion Protection

According to facility documentation and observations, the tanks are FRP construction, and the piping is flexible plastic construction; therefore, corrosion protection is not required.

Operator Training

Certificates for the Class A and B operators were available during the inspection. Ms. [redacted] is the designated Class A operator and [redacted] is a Class A & B operator. Certificates for the employees trained as Class C operators were available for review and included in Attachment E.

Walkthrough Inspections

Records of the monthly and annual walkthrough inspections were available. Attachment F includes copies of the monthly and annual walkthrough inspections.

Financial Assurance

In South Dakota, financial coverage for owners/operators of regulated USTs is provided through the South Dakota Petroleum Release Compensation Fund. Ms. [redacted] had a copy of the letter from the state indicating facility coverage. They are self-insured for the deductible. Attachment G includes the commercial insurance certification for the facility.

Physical Inspection

During the site visit, Ms. [redacted] reviewed documents on site and observed the fill ports and spill buckets, STP sumps, two of the three dispenser sumps, and the ATG monitor interface for the three USTs. Photograph #2 in Attachment B shows the interface for the Veeder Root TLS-300 ATG system. Attachment H includes inventory and alarm reports for the USTs that Ms. [redacted] printed during the inspection to verify operation. The spill buckets for Tank 1 contained approximately one inch of water while the spill buckets for Tanks 2 and 3 were clean and in good condition. Ms. [redacted] also observed the STP sumps for each of the three USTs. The STP sumps for Tank 1 and Tank 2 had approximately 1-2 inches of water. The STP sump for Tank 3 was dry-clean and in good condition. Mechanical ALLDs were observed on the STPs for each tank.

There were three double-sided pump dispensers on site, and two of the dispensers, dispenser 1/2 and 5/6, were opened as part of the inspection. The dispensers are equipped with sumps and liquid sump sensors were observed at the base of each sump. Ms. [redacted] did not observe signs of leaks at the time of the inspection. Photographs #10 and #12 in Attachment B show the piping and sump beneath the dispenser. The sump for dispensers 1/2 contained approximately two inches of water

No monitoring wells were observed at the tank field during the inspection. Vent lines are located east of the USTs adjacent to a light pole, and no obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has two tanks installed in 2017. The first tank is a 12.000-gallon tank with two compartments identified as Tank 1 and Tank 2. Tank 1 is a 5,000-gallon compartment containing diesel fuel. Tank 2 is a 7,000-gallon compartment which contains unleaded fuel. Tank 3 is a 12,000-gallon tank containing E10 unleaded fuel. The tanks are double walled FRP construction. Passing leak detection results for June 2023 through September 2023 and January 2024 through April 2024 were provided; however, leak detection results for October 2023, November 2023, and December 2023 were missing. An annual certification for the ATG system was provided during the inspection. There are three double-sided dispensers on site that operate with pressurized flexible plastic piping, and each dispenser has a containment sump. The STPs for the tanks have mechanical ALLDs. Passing ALLD and line tightness tests from January 2024 were provided. The STP sumps are equipped with liquid sump sensors and Tank 1 and Tank 2's STP sumps contained approximately 1 – 2 inches of water. The liquid sump sensors for Tanks 1 and 2 were not observed sitting at the lowest point of each sump. The fill port for each UST is equipped with a spill bucket and a butterfly valve in the drop tube as the spill and overfill prevention equipment. Passing spill bucket test records were provided during the inspection. The tanks are FRP construction and the piping are made of FRP is flexible plastic construction; therefore, corrosion protection is not required.. The facility has designated Class A, B, and C certified operators and training records were provided during the inspection. Monthly and annual walkthrough inspection records were provided during the inspection. Eagle Stop is covered under the state trust fund. The facility has general liability insurance to cover the deductible. Attachment I contains the Notice of Inspection signed by Ms. [redacted]. Ms. [redacted] provided a copy to Ms. [redacted] and left the premises.

Inspector Signature: [redacted] **Date:** June 14, 2024

UNDERGROUND STORAGE TANK INSPECTION REPORT 2024

Eagle Stop (4020028)

ADDENDUM

Page 4 under **Summary**, incorrectly states that, "Passing spill bucket test records were provided during the inspection." Spill bucket test records were not provided during the inspection, which is correctly stated on Page 2 of the report.

Page 13 of the UST Inspection Checklist contains an erroneous date next to *Overfill prevention device(s) functionality test*. Overfill prevention tests were not provided during the inspection, which is correctly stated on Page 2 of the report.

EPA Reviewer's Signature: MARTA GRABOWSKI Digitally signed by MARTA GRABOWSKI Date: 2024.08.14 12:42:13 -06'00'