

UST Inspection Report

Browning School Transportation Facility

Date of Report: August 30, 2023

Inspection Date & Time: July 19, 2023, at 11:20 a.m. Mountain Daylight Time (MDT)

Weather: Sunny, ~ 65 degrees Fahrenheit

Facility Owner: Browning Public Schools

Facility Owner Address: 129 1st Avenue SE
Browning, Montana 59417

Facility Address: 829 SW Boundary Street
Browning, Montana 59417

Facility Phone: [REDACTED]

Facility Representative: [REDACTED]

EPA Facility ID Number: 2010001

Reason for Inspection: Routine compliance inspection

Inspector(s): Marta Grabowski, EPA
Roberta Person, EPA

UST System Description

The Browning School Transportation Facility (Facility) is a public school with a transportation facility located on the Blackfeet Reservation in Browning, Montana. The fuel at this Facility is used for fleet vehicles and it is not sold to the public. The Environmental Protection Agency's (EPA) Facility records indicate that the Facility has three, STI-P3 underground storage tanks (UST) that were installed in July 1992. Tank 1 is 8,000 gallons and stores unleaded gasoline. Tank 2 is 8,000 gallons and stores diesel. Tank 3 is 1,000 gallons and stores waste oil. Facility piping for Tank 1 and Tank 2 is double-walled and pressurized with fiberglass reinforced plastic (FRP) construction. Tank 3 uses double-walled plastic flex piping with a gravity drain system.

Inspection Narrative

On July 19, 2023, the EPA UST program personnel conducted an inspection at Browning School Transportation Facility in Browning, Montana. The EPA last inspected the Facility on November 5, 2020, and they selected it for routine re-inspection. Ms. Grabowski spoke with the Facility operator on July 10, 2023, to schedule the inspection, and she also sent a follow-up email (see Attachment A).

The EPA inspection team arrived at the Facility at 11:20 a.m. MDT. They were met by a Facility representative. Ms. Grabowski introduced herself and presented her inspector credentials. Ms. Grabowski filled out a Notice of Inspection (NOI) (see Attachment B) and she requested the representative's signature. Ms. Grabowski explained that the NOI serves as documentation of consent for the EPA to conduct an inspection. In addition, she said that she would provide the NOI to the Facility at the end of the inspection. EPA inspectors conducted a physical inspection of the UST system as well as a review of Facility records. The EPA inspectors took photographs of UST system components and records during the inspection (see Attachment C). Copies of operation and maintenance records provided by the Facility are in Attachment D.

Tank Leak Detection

Tank leak detection is conducted by a Veeder Root TLS-350 automatic tank gauge (ATG). The Facility representative provided printouts from the ATG console showing passing Continuous Statistical Leak Detection (CSLD) results for all tanks for 11 out of the past 12 months. No CSLD records existed for January 2023. Annual functionality testing for the automatic tank gauge (ATG) system was conducted and passed on March 29, 2023.

Piping Leak Detection

Piping for Tank 1 and Tank 2 is equipped with electronic line leak detectors (ELLD) and uses annual line tightness testing. Annual line tightness testing and annual line leak detector testing was conducted and passed on March 29, 2023. Piping for the waste oil tank is gravity-driven and the transition sump is equipped with a liquid sensor designed to detect leaks. The sensor was tested and passed on March 29, 2023.

Cathodic Protection

The Facility is equipped with an impressed current system of cathodic protection (CP). At the time of inspection, the rectifier was powered on and the Facility staff maintained a monthly voltage log. The most recent cathodic protection test on file during the inspection was dated September 26, 2018, and a passing CP test dated March 2, 2022, was emailed to EPA later that day.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

According to Facility records, the overfill alarm was tested on March 29, 2023, and had passing results for each tank; the spill buckets were hydrostatically tested on March 2, 2022; however, the diesel spill bucket failed hydrostatic testing. EPA records show that the diesel spill bucket was replaced on March 23, 2022.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Records of monthly walkthrough inspections for the past 12 months were not provided at the time of EPA's inspection. No monthly walkthrough documentation existed dated later than April 2022. An annual walkthrough inspection was conducted on March 29, 2023, by the Facility's service provider. After the EPA inspection, documentation of a monthly and annual walkthrough from July 2023 was emailed to the EPA inspector.

Operator Training

Class A and Class B operator training certificates were provided at the time of inspection. There was no record of Class C operator training.

Financial Responsibility

Browning School uses the Montana petroleum tank release cleanup fund as its financial responsibility mechanism. The Facility representative provided a copy of the Montana certificate of financial responsibility as well as a Montana UST operating permit.

Physical Observations

The inspection team viewed the spill buckets/fill pipes, sumps, dispensers, ATG console and rectifier. All spill buckets were clean and dry and the overfill alarm annunciator was visible. Under dispensers were dry. The rectifier was powered on, and the ATG console showed "all functions normal."

Inspection Conclusions and Recommendations

At the end of the inspection, Ms. Grabowski filled out an Onsite Deficiency Identification Form (see Attachment E), which represents the EPA staff's initial compliance recommendations at the time of the inspection. Prior to departing the Facility, Ms. Grabowski stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment F). Ms. Grabowski provided the Facility manager with the NOI form and retained a carbon copy for recordkeeping.

Inspection Report Attachments

- A. Record of communication for scheduling the inspection
- B. Notice of Inspection
- C. Photo log
- D. Facility O&M Documents
- E. Onsite Deficiency Identification Form
- F. Inspection checklist

Signature

Lead Inspector

MARTA GRABOWSKI Digitally signed by MARTA GRABOWSKI
Date: 2023.08.30 16:17:35 -06'00'

Marta Grabowski

Date of signature