

Compliance Evaluation Inspection Report

Ute Mountain Travel Center August 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
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EPA Contract No. 68HERC21D0007
Task Order 68HERC23F0460

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: August 8, 2024

Date and Time of Inspection: June 17, 2024, at 8:10 am MST

Weather: Sunny, 62° Fahrenheit

Facility Contact/Owner: [REDACTED] / Ute Mountain Ute Indian Tribe

Owner Address: P.O. Box JJ
Towaoc, CO 81334

Facility Address: 1 Mike Washington Road
Towaoc, CO 81334

Facility Phone: [REDACTED]

Facility ID Number: 1020003

Reason for Inspection: Compliance Inspection

Inspector(s): [REDACTED], ERG (Lead)
[REDACTED], Ute Mountain Reservation - Environmental
Programs Manager

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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 Ute Mountain Travel Center in Towaoc, Colorado on June 17, 2024. The facility was last inspected on December 3, 2021.

Mr. [REDACTED], contract inspector, contacted Ms. [REDACTED], Manager of Ute Mountain Travel Center, on May 29, 2024, via telephone to notify the facility. 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. [REDACTED] provided monthly inspection records and assisted with the inspection. 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 Ute Mountain Travel Center, located at 1 East Mike Washington Road in Towaoc, CO, has six USTs installed in 2000. 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 an 10,000-gallon capacity and contains regular unleaded gasoline. Tank 3 has a 10,000-gallon capacity and contains premium unleaded gasoline. Tank 4 has a 4,000-gallon capacity and contains diesel. Tank 5 has a 10,000-gallon capacity and contains diesel. Tank 6 has a 10,000-gallon capacity and contains diesel. The tanks are single-walled fiberglass-reinforced plastic (FRP) construction. The dispensing system for each tank is pressurized piping with double-walled flex plastic construction. Mr. [REDACTED] completed an EPA Region 8 UST Compliance Inspection Checklist for the USTs while on site which is included in Attachment A. Photographs #9, #12, and #17 in Attachment B shows an overview of the UST systems including dispensers.

UST System Records

The listing of documents reviewed for the Ute Mountain Travel Center inspection included the following:

1. UST Leak Detection Records and Inventory
2. Automatic Tank Gauge and Line Leak Detector Test Records
3. Piping Release Detection Records
4. Spill and Overfill Protection Test Records
5. Operator Training Records

6. Walkthrough Inspection Records

The facility maintains records on and off site. Mr. J. [REDACTED] and Ms. [REDACTED] provided the records for the USTs during the inspection.

Tank Release Detection

Releases from the tanks are detected by a Veeder-Root TLS-450 Plus monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Attachment C contains a compilation of the ATG leak detection test results for each month from July 2023 to June 2024 with no records available for Tank 5 in August and September 2023. The time between passing tests in the logs provided were as long as 57 days such as the test results for Tank 1 where there was a passing test result 4 September 2023 and then on 31 October 2023. Photograph #1 in Attachment B shows the monitoring system interface, and Attachment C also includes a current system status report printed in the morning on the day of the inspection. A passing test record for the ATG system performed by a contractor in June 2024 is included in Attachment D.

Piping Release Detection

All tanks were installed with pressurized double-walled flex plastic 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 June 2024. The contractor also performed line tightness testing for each of the tanks in June 2024, and each had a passing record. Attachment E includes the testing records for the LLDs and the line tightness testing. Photographs #4 (Tank 1), #5 (Booster Pump), and #6 (Tank 3), Photographs #9 (Tank 2), #10 (Tank 4), #14 (Tank 6), and #15 (Tank 5) in Attachment B show the STPs for Tanks 1 through 6. Attachment E also contains monthly liquid sump sensor status reports for each tank for the previous 12 months.

Spill/Overfill Prevention

The fill pipes for the USTs have spill buckets surrounding the pipes and flapper valves in the drop tubes for Tanks 5 and 6. Tanks 1 through 4 utilize ball float valves as overfill prevention devices. Photographs #3 (Tank 1), #7 (Tank 3), and #8 (Tank 2), Photographs #11 (Tank 4), #13 (Tank 5), and #16 (Tank 6) in Attachment B show the fill ports for the respective USTs. The spill buckets and drop tubes generally appeared in good condition except for the spill bucket on Tank 4 which was cracked. The spill bucket on Tank 1, Tank 3, and Tank 6 contained approximately ½ inch of water each while the spill bucket for Tank 2 and Tank 4 contained about one inch of water. Their contractor conducted testing on the spill buckets, flapper valves, and ball float valves in June 2024. Attachment F includes the passing test records for the spill buckets and the overfill prevention devices except the spill bucket for Tank 4 which was cracked.

Corrosion Protection

The tanks are single-walled FRP construction, and the piping is double-walled flex plastic construction. Cathodic protection is not required.

Operator Training

Class A/B operator training records were not provided during the inspection. Class C operator training records were provided for [REDACTED] and [REDACTED] and are included in Attachment G.

Walkthrough Inspections

The Ute Mountain Travel Center had monthly walkthrough inspection records for the past 12 months which were completed by Mr. [REDACTED]. Annual walkthrough inspections are addressed as part of the monthly walkthrough inspection records. Attachment H includes a sample of the monthly walkthrough inspection records.

Financial Assurance

The Ute Mountain Travel Center did not provide documentation to show financial assurance for their USTs on site.

Physical Inspection

During the site visit, Mr. [REDACTED] reviewed documents on site and observed the fill ports, STP access ports, four of the dispensers, and the ATG monitoring interface for the six USTs on site. Photograph #1 in Attachment B shows the interface for the Veeder-Root TLS-450 Plus ATG system. Mr. [REDACTED] also observed the spill buckets and fill pipes for the six USTs. The drop tubes and spill buckets were in good condition except for the spill bucket on Tank 4 which was cracked. Mr. [REDACTED] observed water in the spill buckets for all tanks except Tank 5. Mr. [REDACTED] also observed the STP sumps for each of the six USTs. The STPs had mechanical LLDs present and liquid sump sensors were also observed in the sumps. The sumps for all tanks appeared dry and appeared in good condition. 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 eleven double-sided pump dispensers on site. Dispensers 3/4, 11/12, 12/13, and 13/14 were opened as part of the inspection. Dispensers had sump containment and liquid sump sensors present. Mr. [REDACTED] did not note issues with dispensers at the time of the inspection.

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

2. SUMMARY

The facility has six tanks with FRP construction. Tank 1 has a 10,000-gallon capacity and contains regular unleaded gasoline. Tank 2 has an 10,000-gallon capacity and contains regular unleaded gasoline. Tank 3 has a 10,000-gallon capacity and contains premium unleaded gasoline. Tank 4 has a 4,000-gallon capacity and contains diesel. Tank 5 has a 10,000-gallon capacity and contains diesel. Tank 6 has a 10,000-gallon capacity and contains diesel. Passing monthly leak detection test records were available for the calendar months of July 2023 to June 2024 for all six tanks except for missing results for Tank 5 in August and September 2023. An annual certification for the ATG system was also provided during the inspection from June 2024. There are eleven double-sided pump dispensers on site that operate with pressurized double-walled flex plastic piping. The STPs for the pressurized piping are equipped with mechanical LLDs which passed operational tests and line tightness testing in June 2024. The fill port for each UST is equipped with a spill bucket. Tanks 5 and 6 utilize a flapper valve in the drop tube and Tanks 1 through 4 utilize a ball float valve in the vent line as the overfill prevention equipment. The spill bucket, flapper valves, and ball float valves passed operational tests in June 2024 except for the Spill Bucket for Tank 4 which was cracked. The spill bucket on Tank 1, Tank 3, and Tank 6 contained approximately ½ inch of water each while the spill bucket for Tank 2 and Tank 4 contained about one inch of water. Certified operator training records were provided during the inspection for Class C operators only. Monthly walkthrough inspection records were provided for the previous 12 months. Annual walkthrough inspections are addressed as part of the monthly walkthrough inspection records. The facility did not provide documentation for financial assurance to cover the USTs on site. Attachment I contains the Notice of Inspection signed by Ms. [REDACTED]. Mr. [REDACTED] provided a copy to Ms. [REDACTED] and left the premises.

Inspector Signatur

[REDACTED]

Date: August 8, 2024