

UST Inspection Report

Wind River Smoke Shop

Date of Report: May 15, 2025

Inspection Date & Time: April 15, 2025, at 3:00 p.m. Mountain Daylight Time (MDT)

Facility Owner: Northern Arapaho Tribe of the Wind River Reservation

Facility Owner Address: 533 Ethete Road
Ethete, WY 82510

Facility Address: 10369 Highway 789
Riverton, WY 82501

Facility Phone: (307) 857-9451

Facility Representative: [REDACTED]

EPA Facility ID Number: 6010041

Reason for Inspection: Routine compliance inspection

Inspection Team: [REDACTED] Person, Inspector, EPA UST Program
[REDACTED], EPA

UST System Description

The Wind River Smoke Shop (Facility) is a Tribally-owned gas station and convenience store located in Riverton, Wyoming. The fuel at this Facility is sold to the public. The Environmental Protection Agency's Facility records indicate that the Facility has four (4) fiberglass reinforced plastic (FRP) underground storage tanks (UST) that were installed in October 1993. Tank 1 has a 7,000-gallon capacity and stores regular unleaded fuel. Tank 2 has a 5,000-gallon capacity and stores premium unleaded fuel. Tank 3 and Tank 4 are each 10,000-gallon capacity and store diesel. Piping for all tanks is pressurized and constructed of FRP material.

Inspection Narrative

On April 15, 2025, the EPA UST program personnel conducted an inspection at Wind River Smoke Shop in Riverton, Wyoming. The EPA last inspected the Facility on July 14, 2022, and it was selected for routine re-inspection, based in a three-year inspection cycle. The EPA inspector spoke with the Facility representative and sent a follow-up letter on March 26, 2025, to schedule the inspection and provide inspection details (see Attachment A).

The inspection team arrived at the Facility at 3:00 p.m. MDT and were met by the Facility representative, as well as [REDACTED] (Class C operator), [REDACTED], [REDACTED], and [REDACTED] (Northern Arapaho Tribe environmental department). The EPA inspector introduced

herself and presented inspector credentials. The Facility representative consented to the inspection. The EPA inspection team conducted a physical inspection of the UST system as well as a review of Facility records. Photographs of UST system components taken during the inspection are in Attachment D. Copies of operation and maintenance records are in Attachment B.

Tank Leak Detection

Tank leak detection equipment consists of an automatic tank gauge (ATG), which conducts monthly static tests. The Facility representative had some of the passing tests printed, however the EPA inspector was able to print a history for the past twelve months from the console. Twelve months of passing records were available for Tank 1 and Tank 2. Tank 3 history showed missing/invalid tests intermittently since August 2024. This is likely due to low levels of fuel in the tank since the dispensers were damaged in an accident. Tank 4 was missing passing tests for August, September and October 2024 due to low fuel levels. At the time of inspection, the operator could not provide records of the annual ATG functionality test. On April 29, 2025, the EPA received documentation that the ATG passed a functionality test conducted on April 25, 2025.

Piping Leak Detection

Piping leak detection is satisfied by mechanical line leak detectors (MLLD) and annual line tightness testing. A line tightness test from August 2023 was provided via email during the inspection. A failing line tightness test for the lines associated with Tank 3 that were damaged during the August 2024 vehicular accident was also provided. No additional test records were available at the time of the inspection. On April 29, 2025, the EPA received documentation that the lines and mechanical line leak detectors for the piping associated with Tanks 1, 2, and 4 all passed a test conducted on April 25, 2025.

Cathodic Protection

The Facility's UST system is constructed of FRP materials, therefore cathodic protection is not required.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

Triennial testing records of spill buckets and overfill prevention devices (flapper valves) were not available at the time of inspection. On April 29, 2025, the EPA received documentation that the spill buckets for Tanks 2, 3, and 4 passed an integrity test conducted on April 29, 2025. Tank 1 spill bucket failed this test. The overfill prevention devices for all four tanks passed inspection on April 28, 2025.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Records of monthly and annual walkthrough inspections for the last twelve months were provided at the time of inspection.

Operator Training

A certificate for Class A and B operator training was maintained onsite at the time of inspection as well as Class C training documentation.

Financial Responsibility

The Facility uses private insurance to satisfy the requirements for financial responsibility coverage. No documentation of the insurance coverage has been provided.

Physical Observations

The EPA inspector viewed the spill buckets/fill pipes, selected dispensers, tank top sumps, and the ATG console. Flapper valves were observed in each fill pipe and spill buckets were clean and dry. The tank top sumps were in good condition. Dispenser 3 / 4 was opened, and the inspector noted that the metal flex connector was in contact with the soil and starting to corrode. Tank 3 was noted as currently containing fuel, but both attached dispensers were out of service. The piping connection in the STP sump for Tank 3 was buried, but the piping is currently empty. Tank 4 and the associated dispensers were still in service.

Inspection Conclusions and Recommendations

At the end of the inspection, Ms. Person filled out an Onsite Deficiency Identification Form (see Attachment C). Prior to departing the Facility, Ms. Person stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment D). Ms. Person provided the Facility representative with the deficiency form and retained carbon copies of each form for recordkeeping. Following the inspection, EPA received additional records that are detailed in each section above and included in Attachment B.

Inspection Report Attachments

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

Signature

Lead Inspector



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 Person

Date of signature