

UST Inspection Report

Town Pump Browning

Date of Report: August 28, 2023

Inspection Date & Time: July 19, 2023, at 3:20 p.m. Mountain Daylight Time (MDT)

Weather: Sunny, ~ 80 degrees Fahrenheit

Facility Owner: Town Pump, Inc.

Facility Owner Address: 600 S. Main Street
Butte, Montana 58702

Facility Address: 304 SE Boundary Street
Browning, Montana 59417

Facility Phone: 406-338-7866

Facility Representative: [REDACTED]

EPA Facility ID Number: 2010045

Reason for Inspection: Routine compliance inspection

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

UST System Description

The Town Pump Browning (Facility) is a privately-owned gas station and convenience store located on the Blackfeet Reservation in Browning, Montana. The fuel at this Facility is sold to the public. The Environmental Protection Agency's (EPA) Facility records indicate that the Facility has six, double-walled, fiberglass reinforced plastic (FRP) underground storage tanks (UST). Tank identifiers, capacities, and products stored are as follows:

Tank ID	4888	2465	2463	2467	4860	2466	4859
Capacity	12,000	12,000	12,000	12,000	12,000	5,000	10,000
Product	Unleaded	Unleaded	Premium	Diesel	Diesel	Diesel	Red dye

Tank 2466 and Tank 4859 are compartments of a single tank; however, they will be referred to as tanks throughout this report. The two 12,000-gallon unleaded tanks are manifolded together, and the two 12,000-gallon diesel tanks are manifolded together. Facility piping is double-walled, pressurized flexible plastic.

Inspection Narrative

On July 19, 2023, the EPA UST program personnel conducted an inspection at Town Pump Browning in Browning, Montana. The EPA last inspected the Facility on November 5, 2020, and they selected it for routine re-inspection. Ms. Grabowski sent an email to a Town Pump, Inc. representative on July 6, 2023, to announce the inspection. She also spoke with a Facility representative on June 10, 2023, and left a verbal message for the store manager (see Attachment A).

The EPA inspection team arrived at the Facility at 3:20 p.m. MDT. They were met by the Facility's Class C Operator and the Facility Manager. Ms. Grabowski introduced herself and presented her inspector credentials. She filled out a Notice of Inspection (NOI) (see Attachment B) and requested the manager's signature. Ms. Grabowski explained that the NOI serves as documentation of consent for the EPA to conduct an inspection. In addition, Ms. Grabowski said that she would provide the NOI to the Facility at the end of the inspection. The EPA inspectors conducted a physical inspection of the UST system. Review of Facility records began prior to the on-site inspection because the records were provided to the EPA ahead of time by a Town Pump, Inc. representative. The EPA inspectors took photographs of UST system components 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 achieved via statistical inventory reconciliation (SIR) in conjunction with a Veeder Root TLS350 automatic tank gauge (ATG). All tanks had 12 months of passing continual reconciliation (CR) leak detection results on file, except for an inconclusive result for the unleaded tanks in March 2023 due to a malfunctioning probe. Annual functionality testing for the automatic tank gauge (ATG) was conducted and passed on July 7, 2023.

Piping Leak Detection

Piping leak detection is achieved by electronic automatic line leak detectors (ELLD) and SIR. All lines had 12 months of passing CR leak detection results on file. The ELLDs passed annual functionality testing on July 7, 2023. The STP sumps for several tanks, and the piping transition sumps, were also equipped with liquid sensors, which are designed to alarm in the presence of liquid. Those sumps passed hydrostatic testing on July 7, 2023, and the sensors passed annual testing on July 7, 2023.

Cathodic Protection

Cathodic Protection (CP) is not required at this Facility as the tanks and piping are constructed with non-corrosive material.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

According to Facility records, the spill buckets were hydrostatically tested on July 7, 2023, and the overfill prevention equipment was tested on July 14, 2021. All spill prevention and overfill prevention equipment passed.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Electronic records of monthly walkthrough inspections for the last 12 months were provided prior to EPA's inspection. Annual walkthrough requirements are also checked monthly.

Operator Training

A Class A and a Class B operator training certificate were provided electronically prior to EPA's inspection, in addition to a list of Class C operators and their training completion dates.

Financial Responsibility

Town Pump Browning uses the Montana petroleum tank release cleanup fund as its financial responsibility mechanism. The Town Pump, Inc. representative provided a copy of the Montana operating permit (exp. April 2025) and certification of financial responsibility.

Physical Observations

The inspection team viewed the spill buckets/fill pipes, STP sumps, three dispenser cabinets, a piping transition sump and the ATG console. Spill buckets for Tank 4888, Tank 2467, Tank 4860 and Tank 4859 contained liquid. Flapper valves were observed in all fill pipes. ELLDs were present for Tank 4859, Tank 2466, Tank 2467, Tank 2463 and Tank 2465. Two sumps did not contain ELLDs due to manifolded lines. EPA inspectors viewed the inside of diesel dispenser #17, dispenser #1 and dispenser #8, which were all dry. The transition sump contained a significant amount of liquid; however, the sump sensor was raised and not in alarm. The EPA inspectors advised the facility operator to remove the liquid to protect sump components. The spill buckets/fill pipes for Tank 2467, Tank 4860 and Tank 2466 had new concrete pads that were installed July 18 and 19, 2023, according to the Facility representative.

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 E). Ms. Grabowski provided the Facility manager with the NOI form and the deficiency form and retained carbon copies 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

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Date: 2023.08.28 10:21:38 -06'00'

Marta Grabowski

Date of signature