

UST Inspection Report

Ute Petroleum C-Store

Date of Report: July 28, 2023

Inspection Date & Time: June 27, 2023, at 8:00 a.m. Mountain Daylight Time (MDT)

Weather: Sunny, ~ 70 degrees Fahrenheit

Facility Owner: Ute Indian Tribe

Facility Owner Address: P.O. Box 190
Fort Duchesne, Utah 84026

Facility Address: 7250 US-40
Fort Duchesne, Utah 84026

Facility Phone: [REDACTED]

Facility Representative: [REDACTED]

EPA Facility ID Number: 5040013

Reason for Inspection: Routine compliance inspection

Inspector(s): Marta Grabowski, EPA
[REDACTED], EPA

UST System Description

The Ute Petroleum C-Store (Facility) is a Tribally-owned gas station and convenience store located on the Uintah and Ouray Reservation in Fort Duchesne, Utah. The fuel at this Facility is sold to the public. The Environmental Protection Agency's (EPA) Facility records indicate that the Facility has four, single-walled fiberglass reinforced plastic (FRP) underground storage tanks (UST) installed in 1998. Each tank has a capacity of 15,000 gallons. Tank 1 and Tank 2 store regular unleaded fuel. Tank 3 stores premium unleaded fuel, and Tank 4 stores diesel fuel. Facility piping is double-walled, pressurized flexible plastic.

Inspection Narrative

On June 27, 2023, the EPA UST program personnel conducted an inspection at Ute Petroleum C-Store in Fort Duchesne, Utah. The Ute Indian Tribe GAP Coordinator joined EPA on-site. The EPA last inspected the Facility on August 7, 2019, and they selected it for routine re-inspection. Ms. Grabowski made a phone call to the Facility Operator on June 6, 2023, and sent a follow-up letter via email to schedule the inspection (see Attachment A).

The EPA inspection team arrived at the Facility at 8:00 a.m. MDT. They were met by the Facility Operator. 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 operator'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 during the inspection (see Attachment C). Copies of operation and maintenance records provided by the Facility at the time of inspection are in Attachment D.

Tank Leak Detection

Tank leak detection is conducted by a Veeder Root TLS-300 Automatic Tank Gauge (ATG). The ATG performs Continuous Statistical Leak Detection (CSLD). Tank leak test histories printed at the time of inspection showed passing CSLD tests for Tanks 1, 2, and 4 from July 2022 to June 2023. Tank 3 had passing tests except for February 2023 to April 2023. No current annual functionality testing for the automatic tank gauge (ATG) was provided. According to Facility documents, the most recent ATG functionality test was conducted in September 2021.

Tank	7/22	8/22	9/22	10/22	11/22	12/22	1/23	2/23	3/23	4/23	5/23	6/23
1-RUL	P	P	P	P	P	P	P	P	P	P	P	P
2-RUL	P	P	P	P	P	P	P	P	P	P	P	P
3-PUL	P	P	P	P	P	P	P	NR	NR	NR	P	P
4-diesel	P	P	P	P	P	P	P	P	P	P	P	P

P – Pass; F – Fail; IV – Invalid; NR – No record

Piping Leak Detection

Piping leak detection is achieved by mechanical automatic line leak detectors (MLLD) and annual line tightness testing. The most recent annual MLLD functionality test and annual line tightness on file at the Facility were from 2021. Additionally, copies of the 2020 annual test results were provided to EPA at the time of inspection. Each submersible turbine pump (STP) sump is also equipped with a sensor, which is designed to continuously monitor the sump for the presence of liquid. At the time of inspection, the sump sensor for Tank 3 was in alarm, and both the Tank 3 STP sump and the Tank 1 STP sump contained liquid. The liquid in the Tank 1 STP sump gave off an odor indicating it was fuel.

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 paperwork provided by the Facility, the spill buckets were hydrostatically tested on August 26, 2020; however, the test was not conducted properly and two of the spill buckets did not pass. The Facility operator also provided test results for the flapper valves, dated August 26, 2020; however, only 3 of 4 flapper valves passed. A review of EPA records conducted after the onsite inspection indicated that spill buckets and overfill valves were tested and passed in April 2021. The 2021 passing test records were not maintained onsite or provided by the Facility during the inspection.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Records of monthly walkthrough inspections for 2022 were provided by the Facility at the time of inspection. No monthly walkthrough records were provided for 2023. An annual walkthrough inspection record, dated February 2023, was provided to EPA.

Operator Training

Class A operator training certification was maintained onsite. There was no documentation of Class B or Class C trained operators at the time of inspection.

Financial Responsibility

Proof of financial responsibility for the underground storage tanks was not provided at the time of inspection.

Physical Observations

The inspection team viewed the spill buckets/fill pipes, tank-top sumps, two dispensers and the ATG console. Butterfly valves were present in each fill port. The spill buckets for Tanks 1 and 4 contained liquid. Both the Tank 3 STP sump and the Tank 1 STP sump contained liquid, and the liquid in the Tank 1 STP sump gave off an odor indicating it was fuel. All of the STP sumps were equipped with sensors, and the sensor in the Tank 3 sump was in alarm at the time of inspection. Despite being partially submerged, the sensor in the Tank 1 sump was not in alarm.

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 the deficiency form and retained carbon copies of both forms 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: 2023.07.28 13:34:03 -06'00'

Marta Grabowski

Date of signature