

UST Inspection Report

South Dakota Department of Transportation in McIntosh

Date of Report: October 27, 2023

Inspection Date & Time: September 27, 2023, at 1:00 p.m. MDT

Weather: Sunny, ~68 degrees Fahrenheit

Facility Owner: South Dakota DOT

Facility Owner Address: 700 E. Broadway Avenue
Pierre, SD 57501

Facility Address: 106 Highway 12 North
McIntosh, SD 57641

Facility Phone: 605-273-4430

Facility Representatives: James Brooks, Arlen Halverson

EPA Facility ID Number: 4040016

Reason for Inspection: Routine Compliance Inspection

Inspector(s): Andy Woodward, EPA
Marta Grabowski, EPA

UST System Description

South Dakota Department of Transportation in McIntosh (Facility) is a state-owned fueling station located within the boundary of the Standing Rock Reservation, South Dakota. The fuel at this Facility is only for the private use of state-owned highway maintenance and emergency management vehicles. The Environmental Protection Agency's records indicate that the Facility has two fiberglass reinforced plastic (FRP) underground storage tanks (UST), which were installed on January 7, 2021. The first tank (Tank 1) is 2,000 gallons and contains regular unleaded. The second tank (Tank 2) is 3,000 gallons and contains diesel. The Facility piping is a pressurized system with double-walled, flexible plastic (FP) construction.

Inspection Narrative

On September 27, 2023, the EPA UST program personnel conducted an inspection at the Facility in McIntosh, South Dakota. The EPA last inspected the Facility on November 2, 2020, and it was selected for routine reinspection. On September 19, 2023, Andy Woodward spoke to the Facility manager to schedule the inspection and asked for a list of UST documents to be available for the inspectors to review (see Attachment A).

The EPA inspectors arrived at the Facility at approximately 1:00 p.m. Mountain Daylight Time (MDT). Andy Woodward introduced himself and presented his inspector credentials. He filled out a Notice of Inspection (NOI) (see Attachment B) and requested a signature. Andy explained that the NOI serves as documentation of consent for the EPA to conduct an inspection. He stated that he would provide the NOI to them at the end of the inspection. The EPA inspectors began with a physical inspection of the UST system, followed by a review of the Facility UST records. EPA inspectors took photographs of the UST system components during the inspection (see Attachment C). A Facility representative assisted with the physical inspection.

Tank Leak Detection

Tank leak detection consists of interstitial monitoring sensors and a Veeder Root TLS-450 automatic tank gauge (ATG) system. The Facility representative provided the last twelve months of printouts from the system console for both tanks. Normal monthly tank sensor readings and passing tank leak detection tests from October 2022 through September 2023 were physically observed for both tanks. The tanks' ATG was tested on October 19, 2022, by TNA Electric LLC.

Piping Leak Detection

The Facility's piping is equipped with electrical automatic line leak detectors (ELLD) and requires interstitial monitoring for leak detection. Facility documents indicate monthly sump sensor readings were operating in normal status with no activated alarms. Line leak detection test for the ELLD's, were performed by TNA Electric LLC on September 29, 2022. All sump sensors were tested on November 2, 2022 (see Attachment D).

Cathodic Protection

This Facility does not require cathodic protection because the tanks are fiberglass reinforced plastic, and the piping is flexible plastic.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

New double-wall spill buckets and overfill alarms were installed and put into operation on January 7, 2021.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Documentation of monthly walkthrough inspections from October 2022 through September 2023 were completed and available for review. Current annual walkthrough inspections were unavailable at the time of the inspection.

Operator Training

The Facility provided class A/B operator training certificates for Arlen Halverson from South Dakota Department of Environmental Quality (DEQ) dated December 9, 2020. Class C operator training records were not available at the time of inspection.

Financial Responsibility

The Facility is covered by the South Dakota Petroleum Release Compensation Fund.

Physical Observations

EPA inspectors viewed the spill buckets, overfill alarm, tank sumps, submersible turbine pumps, automatic tank gauges, vent lines and ATG console. All appear to be functional and intact.

Conclusion

At the conclusion of the inspection, Ms. Grabowski notified the Facility that it was out of compliance and filled out an Onsite Deficiency Identification Form (see Attachment E), addressing the areas of non-compliance and the recommended corrective actions required to be taken. These items were identified from the inspection checklist (see Attachment F). Mr. Woodward completed the NOI form and the Facility representative signed and received a copy. The EPA Inspectors thanked them for their time and left the premises.

Inspection Report Attachments

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

Signature

Lead Inspector

Andy Woodward

Date of signature