

Compliance Evaluation Inspection Report

Farmers Union Oil Co. Highway 212 July 2024

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop St.
Denver, CO 80202



Submitted by:

Eastern Research Group.
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EPA Contract No. 68HERC21D0007
Task Order 68HERC22F0492

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: July 8, 2024

Date and Time of Inspection: May 15, 2024 at 7:30 AM MST

Weather: Rain, 53° Fahrenheit

Facility Contact/Owner: Farmer's Union Oil Co.

Owner Address: 111 Main Street
Dupree, South Dakota 57623

Facility Address: HWY 212
Dupree, South Dakota 57623

Facility Phone: [REDACTED]

Facility ID Number: 4020029

Reason for Inspection: Compliance Inspection

Inspector(s): [REDACTED], ERG (Lead)

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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 68HERC22F0492, provided assistance to EPA in preparing for, conducting the inspection, and preparing this inspection report. ERG inspected the Farmers Union Oil Dupree located in Dupree, South Dakota on May 15, 2024. The facility was last inspected on June 29, 2021.

██████████, contract inspector for EPA, contacted Mr. ██████████ ██████████, representative of Farmers Union Oil Co, to notify the facility about the inspection on April 26, 2024, prior to the inspection. Mr. ██████████ stated he would be out of town on the day of the inspection and ██████████ would be the facility representative. 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, Ms. ██████████ introduced herself as a contract inspector for EPA, presented her credentials, and provided an in-brief to Mr. ██████████, to explain the purpose of the inspection. Following the inspection, Ms. ██████████ concluded with an exit brief to inform the facility of preliminary observations identified during the inspection and had Mr. ██████████ sign the Notice of Inspection (NOI). Ms. ██████████ took photographs during the inspection.

UST System Description

Farmers Union Oil Co Highway 212 (facility) is a privately owned gas station with a convenience store located at 170 US-212, Dupree, SD 57623. The fuel at this facility is sold to the public. The facility is located on the Cheyenne River Indian Reservation.

According to the previous EPA inspection report and observations made during the inspection, the facility has three STI-P3 underground storage tanks (USTs) installed in November 1989. Tank 1 has a capacity of 4,000 gallons and contains unleaded gasoline. Tank 2 has a capacity of 4,000 gallons and contains diesel. Tank 3 has a capacity of 4,000 gallons and contains E10 gasoline. The facility piping is fiberglass reinforced plastic (FRP) and is a safe suction system.

Ms. ██████████ completed an EPA Region 8 UST Compliance Inspection Checklist for the USTs while on site which is included in Attachment A. Photograph #1 in Attachment B shows the dispensers and an overview of the UST system.

UST System Records

The listing of documents reviewed for the Farmer's Union Oil Co. inspection included the following:

1. UST Leak Detection Records
2. Cathodic Protection Records
3. Insurance Coverage Certification
4. UST Compliance Testing Records

The facility maintains their records on site. Mr. [REDACTED] provided the records for the UST during the inspection.

Tank Release Detection

The facility uses a Veeder-Root TLS4B monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Mr. [REDACTED] was unable to provide any leak detection results and neither he nor the convenience store attendant knew how to print results from the ATG. Mr. [REDACTED] stated that the ATG was not working for approximately 6 months, and they were “sticking the tanks”; however, the tank measurements were not recorded during this period. Photograph #2 in Attachment B shows the monitoring system interface.

Piping Release Detection

Piping leak detection is not required because this facility has safe suction piping. This was confirmed during the physical inspection.

Spill/Overfill Prevention

The facility’s overfill prevention is provided by an automatic shutoff in the drop tubes. The overfill prevention equipment tests from June 30, 2021 were provided for review during the inspection. All three tanks failed the test. The spill bucket integrity tests from June 2021 were reviewed and all three spill buckets failed the test. Mr. [REDACTED] stated that the spill buckets were replaced following the test. However, documentation showing the replacement was not provided. Photographs #3 through #5 in Attachment B show the fill ports for the respective USTs. The UST overfill equipment test results and the spill bucket test from June 2021 are included in Attachment C.

Corrosion Protection

The facility requires cathodic protection (CP) for the USTs as they are single-walled STI-P3 USTs. CP tests from June 2021 were provided for review during and following the inspection. The passing CP tests for all three USTs are included in Attachment D.

Operator Training

Certificates for the Class A, B and C operators were presented during the inspection. [REDACTED] is both the Class A and Class B designated operator. [REDACTED] is the designated Class C operator.

Walkthrough Inspections

Records of the monthly and annual walkthrough inspections were not available at the time of the inspection.

Financial Assurance

In South Dakota, financial coverage for owners/operators of regulated USTs is provided through the South Dakota Petroleum Release Compensation Fund. Mr. [REDACTED] had a copy of the letter from the state indicating facility coverage. They are self-insured for the deductible. Attachment E includes the commercial insurance certification for the facility.

Physical Inspection

During the site visit, Ms. [REDACTED] reviewed documents on site and observed the fill ports, two of the three dispensers, and the ATG monitoring interface for the three USTs on site. Photograph #2 in Attachment B shows the interface for the Veeder-Root TLS4B ATG system. Ms. [REDACTED] observed the spill bucket and fill pipe for the three USTs. The spill buckets for all three USTs were dry and in good condition at the time of the inspection.

The facility has three double-sided pump dispensers, and two of the dispensers were opened as part of the inspection. The dispensers are a safe suction system and are not equipped with sumps or liquid sump sensors. Ms. [REDACTED] did not observe signs of leaks at the time of the inspection. Photographs #6 through #9 in Attachment B show the piping beneath dispenser 3/4 and dispenser 5/6.

Monitoring wells were observed around the UST tank field. Vent lines are located south of the USTs at the edge of the grass. No obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has three STI-P3 USTs installed in November 1989. Tank 1 has a capacity of 4,000 gallons and contains unleaded gasoline. Tank 2 has a capacity of 4,000 gallons and contains diesel. Tank 3 has a capacity of 4,000 gallons and contains E10 gasoline. The facility representative was unable to provide any tank leak detection records during the inspection. Neither he nor the convenience store attendant knew how to print results from the ATG. Mr. [REDACTED] stated that the ATG was not working for approximately 6 months, and while they were “sticking the tanks”. Tank measurements were not recorded during this period. There are three double-sided dispensers on site that operate with FRP piping and a safe suction system. Overfill prevention tests from June 2021 were provided for review and overfill prevention failed for all three tanks. These spill bucket tests from June 2021 were provided for review during the inspection. All three spill buckets failed the integrity test. Mr. [REDACTED] stated that the spill buckets were replaced following the test, but he did not provide documentation of the replacement. The passing cathodic protection test was provided for June 2021. The 2024 cathodic protection test was scheduled to be done the day of the inspection. Class A, B and C certified operators are designated, and training records were provided during the inspection. Monthly and annual walkthrough inspection records were not provided during the inspection. The facility has financial coverage through the South Dakota Petroleum Release Compensation Fund and the facility has general liability insurance to cover the deductible. Attachment F contains the NOI signed by Mr. [REDACTED] at the end of the inspection. Ms. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

Inspector Signature: [REDACTED]

Date: July 8, 2024