

Compliance Evaluation Inspection Report

White Mesa Travel Center July 2024

Submitted to:

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



Submitted by:

Eastern Research Group.
14555 Avion Parkway, Suite 200
Chantilly, VA 20151

EPA Contract No. 68HERC21D0007
Task Order 68HERC23F0460

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: July 24, 2024

Date and Time of Inspection: June 17, 2024, at 12:30 pm MST

Weather: Sunny, 83° Fahrenheit

Facility Contact/Owner: [REDACTED] / Ute Mountain Indian Tribe

Owner Address: P.O. Box JJ
Towaoc, CO 81334

Facility Address: 1400 U.S. 191
Blanding, UT 84511

Facility Phone: [REDACTED]

Facility ID Number: 5050001

Reason for Inspection: Compliance Inspection

Inspector(s): [REDACTED], ERG (Lead)
[REDACTED], Ute Mountain Reservation - Environmental
Programs Manager

TABLE OF CONTENTS

1.	NARRATIVE	1
2.	SUMMARY	4

ATTACHMENTS

ATTACHMENT A:	EPA REGION 8 UST COMPLIANCE CHECKLIST
ATTACHMENT B:	PHOTOGRAPH LOG
ATTACHMENT C:	TANK LEAK DETECTION RECORDS & INVENTORY
ATTACHMENT D:	ATG CERTIFICATION
ATTACHMENT E:	PIPING LEAK DETECTION RECORDS
ATTACHMENT F:	SPILL & OVERFILL PREVENTION TESTING RECORDS
ATTACHMENT G:	WALKTHROUGH INSPECTION RECORDS
ATTACHMENT H:	PETROLEUM STORAGE TANK FUND DOCUMENTAITON
ATTACHMENT I:	NOTICE OF INSPECTION

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 68HERC23F0460, provided assistance to EPA in preparing for, conducting the inspection, and preparing this inspection report. ERG inspected the White Mesa Travel Center facility in Blanding, Utah on June 17, 2024. The facility was last inspected on November 2, 2021.

Mr. [REDACTED], contract inspector, contacted Ms. [REDACTED], Manager of Ute Mountain Travel Center, on May 29, 2024, via telephone to notify the facility about the inspection because I was not able to contact anyone at the White Mesa Travel Center. 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, Mr. [REDACTED] introduced himself as a contract inspector for EPA, presented his credentials, and provided an in-brief to facility personnel to explain the purpose of the inspection. Mr. [REDACTED] gathered records, interviewed Ms. [REDACTED], and conducted a walkthrough of the site including access ports and dispensers. Mr. [REDACTED] provided monthly inspection records and assisted with Mr. [REDACTED] concluded with an exit brief and had Ms. [REDACTED] sign the Notice of Inspection. Mr. [REDACTED] took photographs during the inspection.

UST System Description

The White Mesa Travel Center, located at 15051 CO 172 in Blanding, UT, has three USTs installed in 1999. According to the previous EPA inspection report and observations made during the inspection, Tank 1 has a 12,000-gallon capacity and contains regular unleaded gasoline. Tank 2 has an 8,000-gallon capacity and contains premium unleaded gasoline. Tank 3 has a 4,000-gallon capacity and contains diesel. The tanks are single-walled fiberglass-reinforced plastic (FRP) construction. The dispensing system for each tank is pressurized piping with double-walled FRP construction. Mr. [REDACTED] completed an EPA Region 8 UST Compliance Inspection Checklist for the USTs while on site which is included in Attachment A. Photograph #9 in Attachment B shows an overview of the UST systems.

UST System Records

The listing of documents reviewed for the White Mesa Travel Center inspection included the following:

1. UST Leak Detection Records and Inventory
2. Automatic Tank Gauge and Line Leak Detector Test Records
3. Piping Release Detection Records
4. Spill and Overfill Protection Test Records
5. Operator Training Records
6. Walkthrough Inspection Records

The facility maintains all records on site. Mr. [REDACTED] and Ms. [REDACTED] provided the records for the USTs during the inspection.

Tank Release Detection

Releases from the tanks are detected by a Gilbarco EMC monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Attachment C contains a compilation of the ATG leak detection test results for each month from July 2023 to June 2024 with an invalid reading for Tank 1 in May 2024. Photograph #1 in Attachment B shows the monitoring system interface, and Attachment C also includes a current system status report printed in the morning on the day of the inspection. A passing test record for the ATG system performed by a contractor in March 2023 is included in Attachment D.

Piping Release Detection

All tanks were installed with pressurized double-walled FRP piping. The piping is attached to submersible turbine pumps (STPs), which are all equipped with mechanical line leak detectors (LLDs). The LLDs were observed on each of the STPs, and all had passing test records based on contractor testing in March 2023. The contractor also performed line tightness testing for each of the tanks in March 2023, and each had a passing record. Attachment E includes the testing records for the LLDs and the line tightness testing. Photographs #2, #3, #6 and #7 in Attachment B show the STPs for Tanks 3 through 1, respectively. As shown in Photograph #2 in Attachment B, the copper tube connected to the mechanical LLD for Tank 3 was broken off and there was fuel in the sump and the liquid sump sensor had been raised above the fuel level. Mr. [REDACTED] stated that they have been trying to get their contractor out for two months to fix the copper tube.

Spill/Overfill Prevention

The fill pipes for the USTs have spill buckets surrounding the pipes and flapper valves in the drop tubes. Photographs #4 (Tank 3), #5 (Tank 2), and #8 (Tank 1) in Attachment B show the fill ports for the respective USTs. The spill buckets and drop tubes generally appeared in good condition. The spill bucket on Tank 3 contained about ½ inch water and the spill bucket for Tank 2 contained about one inch of water. Their contractor conducted testing on the spill buckets and overfill alarm as spill and overfill prevention equipment in March 2023. Photograph #11 in Attachment B shows the external overfill alarm located on the south side of the building in close proximity to the fill ports. Mr. [REDACTED] tested the alarm and the external audible alarm sounded. Attachment E includes the passing test records for the spill buckets and the overfill alarm.

Corrosion Protection

The tanks are single-walled FRP construction, and the piping is double-walled FRP construction. Cathodic protection is not required.

Operator Training

Operator training records were not available for personnel on site.

Walkthrough Inspections

The White Mesa Travel Center had monthly walkthrough inspection records for the past 12 months which were completed by Mr. [REDACTED]. Annual walkthrough inspections are addressed as

part of the monthly walkthrough inspection records. Attachment G includes available monthly walkthrough inspection records.

Financial Assurance

The White Mesa Travel Center did not provided documentation to show financial assurance for their USTs on site. They provided an uncompleted 2022 Petroleum Storage Tank Fund Facility Throughput Declaration which is used to calculate the fees for the petroleum storage tank fund which is included in Attachment H.

Physical Inspection

During the site visit, Mr. [REDACTED] reviewed documents on site and observed the fill ports, STP access ports, one of the dispensers, and the ATG monitoring interface for the three USTs on site. Photograph #1 in Attachment B shows the interface for the Gilbarco EMC ATG system, which had a 'Paper Out' error message at the time of the inspection. Mr. [REDACTED] also observed the spill buckets and fill pipes for the four USTs. The drop tubes and spill buckets were in good condition, and Mr. [REDACTED] observed water in the Tank 3 and Tank 2 spill buckets. Mr. [REDACTED] also observed the STP sumps for each of the three USTs. The STPs had mechanical LLDs present and liquid sump sensors were also observed in the sumps. The sumps for Tank 1 and Tank 2 were dry and appeared in good condition. The copper tube connected to the mechanical LLD for Tank 3 was broken off and there was fuel in the sump and the liquid sump sensor had been raised above the fuel level. Access ports for ATG probes were also present for each of the tanks, and no issues were noted for these during the inspection.

There were three double-sided pump dispensers on site. Dispensers 1/2 was opened as part of the inspection. Dispensers had sump containment and liquid sump sensors present. Mr. [REDACTED] did not note issues with dispensers at the time of the inspection.

No monitoring wells were observed at the tank field during the inspection. Vent lines are located north of the USTs, and no obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has three tanks with FRP construction. Tank 1 has a 12,000-gallon capacity and contains regular unleaded gasoline. Tank 2 has an 8,000-gallon capacity and contains premium unleaded gasoline. Tank 3 has a 4,000-gallon capacity and contains diesel. Passing monthly leak detection test records were available for the calendar months of July 2023 to June 2024 for all three tanks with an invalid result for Tank 1 in May 2024. An annual certification for the ATG system was also provided during the inspection from March 2023. There are three double-sided pump dispensers on site that operate with pressurized double-walled FRP piping. The STPs for the pressurized piping are equipped with mechanical LLDs which passed operational tests and line tightness testing in March 2023. The fill port for each UST is equipped with a spill bucket and a flapper valve in the drop tube as the spill and overfill prevention equipment. The facility uses an external overfill alarm as the primary overfill prevention method. The spill bucket and overfill alarm passed operational tests in March 2023. The spill bucket on Tank 3 contained about ½ inch water and the spill bucket for Tank 2 contained about one inch of water. Cathodic protection is not required. Certified operator training records were not provided during the inspection. Monthly walkthrough inspection records were provided for the previous 12 months. Annual walkthrough inspections are addressed as part of the monthly walkthrough inspection records. The facility did not provide documentation for financial assurance to cover the USTs on site. Attachment I contains the Notice of Inspection signed by Ms. [REDACTED]. Mr. [REDACTED] provided a copy to Ms. [REDACTED] and left the premises.

Inspector Signature: [REDACTED]

Date: July 24, 2024