

Compliance Evaluation Inspection Report

Thriftway #274
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 23, 2024

Date and Time of Inspection: June 18, 2024, at 11:00 am MST

Weather: Sunny, 70° Fahrenheit

Facility Contact/Owner: [REDACTED] / Thriftway Marketing

Owner Address: 501 Airport Road Suite 100
Farmington, NM 87401

Facility Address: 15051 CO 172
Ignacio, CO 81137

Facility Phone: [REDACTED]

Facility ID Number: 1010012

Reason for Inspection: Compliance Inspection

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

TABLE OF CONTENTS

1.	NARRATIVE	1
2.	SUMMARY	4

ATTACHMENTS

ATTACHMENT A:	EPA REGION 8 UST COMPLIANCE CHECKLIST
ATTACHMENT B:	PHOTOGRAPH LOG
ATTACHMENT C:	MONITORING SYSTEM DOCUMENTATION
ATTACHMENT D:	TANK LEAK DETECTION RECORDS & INVENTORY
ATTACHMENT E:	WALKTHROUGH INSPECTION RECORDS
ATTACHMENT F:	PIPING LEAK DETECTION RECORDS & ATG CERTIFICATION
ATTACHMENT G:	SPILL & OVERFILL PREVENTION TESTING RECORDS
ATTACHMENT H:	OPERATOR TRAINING RECORDS
ATTACHMENT I:	ANNUAL COMPLIANCE INSPECTION
ATTACHMENT J:	FINANCIAL ASSURANCE DOCUMENTATION
ATTACHMENT K:	INSTALLATION PERMIT
ATTACHMENT L:	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 Thriftway #274 facility in Ignacio, Colorado on June 18, 2024. The facility was last inspected on November 3, 2021.

Mr. [REDACTED], contract inspector, contacted Mr. [REDACTED], Compliance Manager, on May 29, 2024, via telephone to notify the facility about the inspection. 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 Mr. [REDACTED], and conducted a walkthrough of the site including access ports and dispensers. Mr. [REDACTED] concluded with an exit brief and had Mr. [REDACTED] sign the Notice of Inspection. Mr. [REDACTED] took photographs during the inspection.

UST System Description

The Thriftway #274 facility, located at 15051 CO 172 in Ignacio, CO, has four USTs installed in September 1988. According to the previous EPA inspection report and observations made during the inspection, Tank 1 and Tank 2 are manifolded tanks each having a 6,000-gallon capacity and contain regular unleaded gasoline. Tank 3 has a 6,000-gallon capacity and contains premium unleaded gasoline. Tank 4 has a 6,000-gallon capacity and contains diesel. The tanks are fiberglass-reinforced plastic (FRP) jacketed steel construction. The dispensing system for each tank is pressurized piping with double-walled flex plastic 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 #8 in Attachment B shows an overview of the UST systems.

UST System Records

The listing of documents reviewed for the Thriftway #274 inspection included the following:

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

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

Tank Release Detection

Releases from the tanks are detected by a ProGauge MagLink LX monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks.

Documentation for the monitoring system is included in Attachment C. Attachment D contains a compilation of the ATG continuous statistical leak detection test results for each month from October 2022 to September 2023. The monthly walkthrough inspection records are included in Attachment E. The walkthrough inspection records contain tank leak detection records for each month. The leak tests passed for each tank during the previous 12 months, though no leak test was available for the month of March 2024 for Tanks 1 and 4. Photograph #1 in Attachment B shows the monitoring system interface, and Attachment D also includes a current system status report printed on the day of the inspection. Mr. [REDACTED] also provided a passing test record for the ATG system performed by a contractor in September 2023 (see Attachment C).

Piping Release Detection

All tanks were installed with pressurized double-walled flex plastic 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 September 2023. Line tightness testing for each of the product lines was conducted in September 2023, and each had a passing record. Attachment F includes the testing records for the LLDs and the line tightness testing. Photographs #6 and #7 in Attachment B show the STPs for Tanks 2 and 3, respectively.

Spill/Overfill Prevention

The fill pipes for the USTs have spill buckets surrounding the pipes and flapper valves in the drop tubes. Photographs #2 (Tank 1), #3 (Tank 2), #4 (Tank 3), and #5 (Tank 4) in Attachment B show the fill ports for the respective USTs. The spill buckets and drop tubes generally appeared in good condition. The spill buckets for all tanks were dry and in good condition. Testing was conducted on the spill buckets and flapper valves as spill and overfill prevention equipment in May 2022. Attachment G includes the passing test records for the spill buckets and flapper valves.

Corrosion Protection

The tanks are FRP jacketed steel construction with flexible plastic piping, so they do not require cathodic protection.

Operator Training

Mr. [REDACTED] provided training records for Class A, B, and C operators. Mr. [REDACTED] was trained as a Class A and B operator, and multiple Class C operators were trained, with certifications reviewed on site. Attachment H includes the training record for Mr. [REDACTED] and an example certification record for one of the Class C operators.

Walkthrough Inspections

Thriftway #274 had monthly walkthrough inspection records for July 2023 through June 2024, which were completed by Mr. [REDACTED]. Annual walkthrough inspection records are addressed by testing records. Attachment I includes a UST Annual Compliance Inspection checklist.

Financial Assurance

Thriftway #274 provided a commercial insurance policy covering the UST system on site which is included in Attachment J.

Physical Inspection

During the site visit, the Mr. [REDACTED] reviewed documents on site and observed the fill ports, STP access ports, two of the dispensers, and the ATG monitoring interface for the four USTs on site. Photograph #1 in Attachment B shows the interface for the ProGauge MagLink LX ATG system, which did not have any monitoring or leak alarms 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. Mr. [REDACTED] also observed the sumps for each of the four USTs. Tank 1 and Tank 2 are manifolded. The STPs had mechanical LLDs present and liquid sump sensors were also observed in the sumps. The sumps were dry and appeared in good condition. Access ports for ATG probes were also present. The facility is installing three new USTs north of the existing tank system (see Photographs #10 and #11, Attachment B). The installation permit for the USTs is included in Attachment K.

There were six double-sided pump dispensers on site. Two of the dispensers were opened as part of the inspection. Dispensers had sump containment and liquid sump sensors present. Dispensers 1/2 and 11/12 appeared in good condition and no issues were noted at the time of the inspection (see Photographs #10 and #11, Attachment B).

No monitoring wells were observed at the tank field during the inspection. Vent lines are located east 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 four tanks with FRP jacketed steel construction. Tank 1 and Tank 2 are manifolded tanks each having a 6,000-gallon capacity and contain regular unleaded gasoline. Tank 3 has a 6,000-gallon capacity and contains premium unleaded gasoline. Tank 4 has a 6,000-gallon capacity and contains diesel. Passing monthly leak detection test records were available for the calendar months of July 2023 through June 2024 except for March 2024 for Tanks 1 and 4. An annual certification for the ATG system was also provided during the inspection. Three new USTs are being constructed on site north of the existing tank field. There are six double-sided pump dispensers on site that operate with pressurized double-walled flex plastic piping. The STPs for the pressurized piping are equipped with mechanical LLDs which passed operational tests and line tightness testing in September 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 spill bucket and flapper valve passed operational tests in May 2022. The spill buckets were clean and in good condition. Cathodic protection testing is not required. Certified operators are designated for Class A, B, and C, and training records were provided during the inspection. Monthly walkthrough inspection records were provided for the months July 2023 through June 2024, and annual walkthrough inspections were completed as part of the annual compliance inspection. Thriftway provided a commercial insurance policy covering the UST system on site. Attachment L contains the Notice of Inspection signed by Mr. [REDACTED]. Mr. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

Inspector Signature:

[REDACTED]

Date: July 23, 2024