

Compliance Evaluation Inspection Report

Locken Oil 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 9, 2024

Date and Time of Inspection: May 15, 2024 at 12:50 PM MST

Weather: Cloudy, 61° Fahrenheit

Facility Contact/Owner: [REDACTED]

Owner Address: PO Box 204
Isabel, South Dakota 57633

Facility Address: 301 Main Street
Isabel, South Dakota 57633

Facility Phone: [REDACTED]

Facility ID Number: 4020031

Reason for Inspection: Compliance Inspection

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

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Attachment D:	Equipment Testing Records
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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 Locken Oil located in Isabel, South Dakota on May 15, 2024. The facility was last inspected on June 29, 2021.

██████████, contract inspector for EPA, contacted Mr. ██████████ ██████████, the owner and representative of Locken Oil, to notify the facility about the inspection on April 26, 2024 prior to 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, 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

Locken Oil (facility) is a privately owned gas station with a convenience store located at 301 Main Street, Isabel, SD 57633. 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 June 1997. Tank 1 has a capacity of 1,000 gallons and contains E10 gasoline. Tank 2 has a capacity of 1,000 gallons and contains unleaded gasoline. Tank 3 has a capacity of 1,000 gallons and contains diesel. 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 Locken Oil inspection included the following:

1. Statistical Reconciliation Inventory records
2. Operator Certification records
3. Monthly and annual walkthrough inspections
4. Cathodic protection tests
5. Insurance Coverage Certification
6. UST Compliance Testing Records

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

Tank Release Detection

The facility uses statistical inventory reconciliation (SIR) as the method of release detection for the tanks. SIR analysis is provided by Total SIR of Reidsville, North Carolina. Mr. [REDACTED] was able to provide the last 12 months of passing leak detection results. SIR results from June 2023 through May 2024 are included in Attachment C.

Piping Release Detection

Piping leak detection is not required because this facility has European Safe Suction piping. This was confirmed during the physical site inspection.

Spill/Overfill Prevention

The facility's overfill prevention is provided by flapper valves in the drop tubes. The Overfill Prevention Equipment tests from January 17, 2022 were provided for review during the inspection and all three tanks failed the test. The facility installed new drop tubes with flapper valves in August 2022; however, documentation of the installation and subsequent tests were not provided during the inspection. The spill bucket integrity tests from January 2022 were reviewed and all three spill buckets passed the test. Photographs #2 through #4 in Attachment B show the fill ports for the respective USTs. The UST overfill equipment test results and the spill bucket test from January 2022 are included in Attachment D.

Corrosion Protection

The facility requires cathodic protection (CP) for the USTs as they are single-walled steel construction. CP for the tanks is provided by sacrificial anode systems. Copies of the last two CP tests from August 2017 and August 2021 were provided for review during inspection. The passing CP tests for all three USTs are included in Attachment E.

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 available at the time of the inspection. The walkthrough inspections are included in Attachment F.

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.

Physical Inspection

During the site visit, Ms. [REDACTED] reviewed documents onsite and observed the fill ports and both dispensers for the two USTs onsite. Ms. [REDACTED] observed the spill bucket and fill pipe for

the three USTs. The spill buckets Tank 1 and Tank 2 were dry and in good condition at the time of the inspection. The spill bucket for Tank 3 contained approximately one inch of water.

The facility has two double-sided pump dispensers, and both 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 #5 through #8 in Attachment B show the safe suction system and the piping for dispenser 1/2 and dispenser 3/4.

Monitoring wells were not observed around the UST tank field. Vent lines are located southeast of the USTs against the store. 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 June 1997. Tank 1 has a capacity of 1,000 gallons and contains E10 gasoline. Tank 2 has a capacity of 1,000 gallons and contains unleaded gasoline. Tank 3 has a capacity of 1,000 gallons and contains diesel. The facility uses SIR as the method of release detection for the tanks and the last 12 months of passing leak detection results were provided for review during the inspection. There are two double-sided dispensers on site that operate with FRP and a safe suction system. Overfill prevention tests from January 2022 were provided for review and overfill prevention failed for all three tanks. The spill bucket tests from January 2022 were provided for review during the inspection. All three spill buckets passed the integrity test. The last two cathodic protection tests were provided for August 2017 and August 2021. Class A, B and C certified operators are designated, and training records were provided during the inspection. Monthly and annual walkthrough inspection records were 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 G 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 9, 2024