

Compliance Evaluation Inspection Report

Farmers Union Oil Co. Main Street 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 68HERC22F0492

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Report: July 8, 2024

Date and Time of Inspection: May 14, 2024, at 1:15 PM MST

Weather: Cloudy, 60° Fahrenheit

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

Owner Address: PO Box 70
Dupree, South Dakota 57623

Facility Address: 111 D Street
Dupree, South Dakota 57623

Facility Phone: [REDACTED]

Facility ID Number: 4020020

Reason for Inspection: Compliance Inspection

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

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Attachment D:	Equipment Testing Records
Attachment E:	Cathodic Protection Testing Records
Attachment F:	Commercial Insurance Certification
Attachment G:	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 68HERC22F0492, provided assistance to EPA in preparing for, conducting the inspection, and preparing this inspection report. ERG inspected the Farmers Union Oil Main Street located in Dupree, South Dakota on May 14, 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. 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. Main Street (facility) is a privately owned gas station with a convenience store located at 111 D Street, 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 four STI-P3 underground storage tanks (USTs) installed in April 1988. Tank 1 has a capacity of 4,000 gallons and contains dyed diesel. Tank 2 has a capacity of 4,000 gallons and contains E10 gasoline. Tank 3 has a capacity of 2,000 gallons and contains dyed diesel. Tank 4 has a capacity of 4,000 gallons and contains diesel. The facility piping for each tank is fiberglass reinforced plastic (FRP) safe suction.

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 and the day following the inspection.

Tank Release Detection

The facility uses a Gilbarco EMC Plus monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Photograph #2 in Attachment B shows the monitoring system interface. Mr. [REDACTED] provided leak detection results for June 2023 through January 2024, March 2024, and May 2024. Mr. [REDACTED] was unable to find the test results from February 2024 and April 2024 during the inspection. Tank 1 failed the leak detection tests in July 2023 and August 2023 due to low tank levels and in December 2023, January 2024, and March 2024 due to invalid fuel levels. Tank 2 failed the leak detection tests in June 2023, August 2023, and October 2023 due to low tank levels. Tank 4 failed the failed the leak detection tests in July 2023, October 2023, November 2023, and March 2024 due to low tank levels. Attachment C contains a compilation of the ATG static leak test results.

Piping Release Detection

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

Spill/Overfill Prevention

The facility's overfill prevention is provided by audible alarm. Overfill prevention equipment tests from May 15, 2024, were provided for review following the inspection. Overfill alarms failed for all four tanks. The facility had overfill alarm tests conducted on May 15, 2024, the day following the inspection and the overfill alarms failed for all four tanks. Spill bucket tests from May 15, 2024 were provided for review the day following the inspection. All four spill buckets passed the integrity test. Photographs #3 through #6 in Attachment B show the fill ports for the respective USTs. The overfill prevention test results and the spill bucket integrity test results from May 2024 are included in Attachment D.

Corrosion Protection

The facility requires cathodic protection (CP) for the USTs as they are single-walled STI-P3 tanks. CP tests from February 2024 were provided for review during and following the inspection. The passing CP tests for all four USTs are included in Attachment E.

Operator Training

Certificates for the Class A and Class B operator were presented during the inspection. Mr. [REDACTED] is both the Class A and Class B designated operator. There were no records for Class C operator training.

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. The facility is self-insured for the deductible. Attachment F includes the financial assurance 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 associated dispenser sumps, and the ATG monitoring interface for the four USTs on site. Photograph #2 in Attachment B shows the interface for V Gilbarco EMC ATG system. Ms. [REDACTED] observed the spill bucket and fill pipe for the four USTs. The spill buckets for Tank 1 and Tank 2 were dry and in good condition at the time of the inspection. The spill buckets for Tank 3 and Tank 4 contained approximately two inches of water.

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 #7 through #10 in Attachment B show the piping beneath dispensers 3/4 and dispensers 5/6.

No monitoring wells were observed at the tank field during the inspection. Vent lines are located west of the USTs against one of the garages. No obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has four STI-P3 USTs installed in April 1988. Tank 1 has a capacity of 4,000 gallons and contains dyed diesel. Tank 2 has a capacity of 4,000 gallons and contains E10 gasoline. Tank 3 has a capacity of 2,000 gallons and contains dyed diesel. Tank 4 has a capacity of 4,000 gallons and contains diesel. Monthly monitoring leak detection test records were available for June 2023 through January 2024, March 2024, and May 2024. Tanks 1, 2, and 4 failed intermittently due to low fuel levels or invalid fuel levels. The results from February 2024 and April 2024 were unable to be located for review during the inspection. There are three double-sided dispensers on site that operate with FRP and a safe suction system. Overfill alarm tests from May 2024 were provided for review. Overfill alarms failed for all four tanks. Spill bucket integrity tests from May 2024 were provided for review the day following the inspection. All four spill buckets passed the integrity test. The passing cathodic protection test was provided for February 2024; however, the facility did not have test records for the previous test (2021). Class A and B certified operators are designated, and training records were provided during the inspection. Class C operator training records were not able to be 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 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 8, 2024