

UST Inspection Report

Glacier Way C-Store

Date of Report: August 28, 2023

Inspection Date & Time: July 18, 2023, at 9:00 a.m. Mountain Daylight Time (MDT)

Weather: Sunny, ~ 55 degrees Fahrenheit

Facility Owner: [REDACTED]

Facility Owner Address: P.O. Box 1777
Browning, MT 59417

Facility Address: 99 Hwy 464
Browning, MT 59417

Facility Phone: (406) 338-4464

Facility Representative: [REDACTED]

EPA Facility ID Number: 2010004

Reason for Inspection: Routine compliance inspection

Inspector(s): Marta Grabowski, EPA
Roberta Person, EPA
[REDACTED], training

UST System Description

The Glacier Way C-Store (Facility) is a privately-owned gas station and convenience store located on the Blackfeet Reservation in Browning, Montana. The fuel at this Facility is sold to the public. The Environmental Protection Agency's (EPA) Facility records indicate that the Facility has three double-walled, fiberglass reinforced plastic (FRP) underground storage tanks (UST) which were installed in September 1996. Tank 1 is 20,000 gallons and contains unleaded gasoline. Tank 2 is 15,000 gallons and contains diesel. Tank 3 is 10,000 gallons and contains premium unleaded gasoline. Facility piping is double-walled, pressurized flex plastic.

Inspection Narrative

On July 18, 2023, the EPA UST program personnel conducted an inspection at Glacier Way C-Store in Browning, Montana. The EPA last inspected the Facility on November 5, 2020, and they selected it for routine re-inspection. Ms. Grabowski spoke with Facility representatives, on July 5, 2023, and July 12, 2023, to schedule the inspection. She also sent a follow-up email (see Attachment A).

The EPA inspection team arrived at the Facility at 9:00 a.m. MDT. They were met by the Facility representatives. Ms. Grabowski introduced herself and presented her inspector credentials. Ms.

Grabowski filled out a Notice of Inspection (NOI) (see Attachment B) and she requested a signature. Ms. Grabowski explained that the NOI serves as documentation of consent for the EPA to conduct an inspection. In addition, she said that she would provide the NOI to the Facility at the end of the inspection. EPA inspectors conducted a physical inspection of the UST system as well as a review of Facility records. Ms. Person took photographs of UST system components during the inspection (see Attachment C). Copies of operation and maintenance records are in Attachment D.

Tank Leak Detection

Tank leak detection is conducted by a Gilbarco EMC automatic tank gauge (ATG), which performs continuous statistical leak detection (CSLD). At the time of the inspection, the Facility representatives provided 12 months of passing CSLD tests for each tank. Annual operability testing of the ATG system was conducted and passed on July 17, 2023. Each tank is also equipped with a liquid sensor for interstitial monitoring. Monthly liquid sensor status reports were provided, and all three tank interstice sensors passed annual testing on July 17, 2023.

Piping Leak Detection

Piping leak detection is achieved by mechanical automatic line leak detectors (MLLD) and annual line tightness testing. The MLLDs passed annual functionality testing on July 17, 2023, and all lines passed annual line tightness testing on July 17, 2023. The submersible turbine pump (STP) sumps and under dispenser containment (UDC) sumps are also equipped with liquid sensors for interstitial monitoring. Monthly liquid sensor status reports were provided, and all sump sensors passed annual testing on July 17, 2023.

Cathodic Protection

Cathodic protection (CP) is not required at this Facility as the tanks and piping are constructed with non-corrosive material.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

Spill buckets were hydrostatically tested on July 17, 2023. The unleaded spill bucket and the diesel spill bucket failed testing. The premium spill bucket passed. Overfill prevention devices (ball float valves) were also tested on July 17, 2023. The ball float valve for the diesel tank failed testing and will have to be replaced with an acceptable overfill prevention device. Ball float valves for the regular unleaded and premium unleaded tanks passed.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

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

Operator Training

Class A and Class B operator training certificates were provided by the Facility representatives. No Class C operator training documentation was provided at the time of the inspection.

Financial Responsibility

The Facility uses the Montana petroleum tank release cleanup fund as its financial responsibility mechanism. The EPA observed a state operating permit onsite, which expires on December 20, 2023. A certificate of financial responsibility was not provided at the time of inspection. EPA records include a

certificate of financial responsibility; however, it is signed by the previous Facility operator who no longer works there and therefore not valid.

Physical Observations

The inspection team viewed the spill buckets/fill pipes, tank-top sumps, two UDC sumps and the ATG console. Spill buckets for all tanks were clean and dry. Fill pipes did not have flapper valves, as the Facility uses ball float valves for overfill prevention. All sump sensors were correctly positioned, and each STP sump was equipped with an MLLD.

Inspection Conclusions and Recommendations

At the end of the inspection, Ms. Grabowski filled out an Onsite Deficiency Identification Form (see Attachment E), which represents the EPA staff's initial compliance recommendations at the time of the inspection. Prior to departing the Facility, Ms. Grabowski stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment F). Ms. Grabowski provided the Facility representative with the NOI form and the deficiency form and retained carbon copies of both forms for recordkeeping.

Inspection Report Attachments

- A. Record of communication for scheduling the inspection
- B. Notice of Inspection
- C. Photo log
- D. Facility O&M Documents
- E. Onsite Deficiency Identification Form
- F. Inspection checklist

Signature

Lead Inspector

MARTA GRABOWSKI Digitally signed by MARTA GRABOWSKI
Date: 2023.08.28 09:41:56 -06'00'

Marta Grabowski

Date of signature