

UST Inspection Report

Gus Stop

Date of Report: October 18, 2024

Inspection Date & Time: September 10, 2024, at 12:57 p.m. Central Daylight Time (CDT)

Weather: Sunny, 90 degrees Fahrenheit

Facility Owner: G.F. Buche Co.

Facility Owner Address: 102 S. Main Street
Wagner, South Dakota 57380

Facility Address: 620 2nd Street
Mission, South Dakota 57555

Facility Phone: [REDACTED]

Facility Representative: [REDACTED]

EPA Facility ID Number: 4080031

Reason for Inspection: Routine compliance inspection

Inspection Team: [REDACTED] Inspector, EPA UST Program
[REDACTED] Inspector, EPA UST Program
[REDACTED] Rosebud Sioux Tribe UST Coordinator

UST System Description

The Gus Stop (Facility) is a privately-owned gas station and convenience store located in Mission, South Dakota. The fuel at this Facility is sold to the public. The Environmental Protection Agency's Facility records indicate that the Facility has three, fiberglass reinforced plastic (FRP) underground storage tanks (UST) that were installed in June 1998. Tanks 1 and 2 each have a 12,000-gallon capacity and store gasoline. Tank 3 has a 4,000-gallon capacity and stores diesel fuel. Piping for all tanks is pressurized, double-walled flex plastic.

Inspection Narrative

On September 10, 2024, the EPA UST program personnel conducted an inspection at Gus Stop in Mission, South Dakota. The EPA last inspected the Facility on August 5, 2021, and they selected it for routine re-inspection. Ms. [REDACTED] spoke with the Facility representative, and sent a follow-up email, on August 23, 2024, to schedule the inspection and provide inspection details (see Attachment A).

The inspection team arrived at the Facility at 12:57 p.m. CDT and were met by the Facility representative. Ms. [REDACTED] introduced herself and presented inspector credentials. Ms. [REDACTED] filled out a Notice of Inspection (NOI) (see Attachment B) and requested a signature from the Facility representative. Ms. [REDACTED] 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. Photographs of UST system components taken during the inspection are in Attachment C. Copies of operation and maintenance records are in Attachment D.

Tank Leak Detection

Tank leak detection equipment consists of an OPW EECO 1500 automatic tank gauge (ATG), which normally conducts static leak tests; however, the leak test function was not working at the time of inspection. Furthermore, 30-day leak test records were not available for any of the last 12 months. The ATG probes and floats were functioning normally, as evidenced by passing annual operability testing conducted on September 4, 2024.

Piping Leak Detection

Piping leak detection is satisfied by mechanical line leak detectors (MLLD) and annual line tightness testing. Records of annual line tightness testing and annual line leak detector testing were available onsite, showing passing tests conducted on September 4, 2024.

Cathodic Protection

Cathodic protection (CP) is not required at the Facility. The portion of tanks and piping that are in contact with soil are constructed from non-corrodible materials.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

Triennial testing records of spill buckets and overfill prevention devices (flapper valves) were not maintained onsite. According to EPA records, including an invoice dated July 14, 2022, two spill buckets/overfill valves were replaced after failed tests. The third spill bucket and valve had passed testing (according to test reports received by EPA on January 6, 2022) and did not need to be replaced at that time.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Records of monthly walkthrough inspections from January 2024 to September 2024 were provided at the time of inspection. An annual walkthrough inspection was conducted during the compliance inspection on September 10, 2024.

Operator Training

A certificate for Class A/B operator training was maintained onsite at the time of inspection as well as Class C training documentation.

Financial Responsibility

In South Dakota, financial coverage for regulated UST systems is provided through the South Dakota Petroleum Release Compensation Fund. Each UST facility is responsible for the deductible. A completed financial responsibility (FR) form was maintained onsite.

Physical Observations

The EPA inspector viewed the spill buckets/fill pipes, dispensers, tank top sumps and ATG console. Flapper valves were observed in each fill pipe and spill buckets were clean and dry. EPA attempted to access leak test records from the ATG console but was unable to do so. Error messages on the console stated, "Tank 2 has never passed a leak test," and "Tank 3 has never passed a leak test." The Facility representative suspected that the ATG setup had gotten disrupted during a past service call.

Inspection Conclusions and Recommendations

At the end of the inspection, Ms. [REDACTED] filled out an Onsite Deficiency Identification Form along with an UST Field Citation Form for Expedited Settlement (see Attachment E). The Field Citation cited a violation of 40 C.F.R. 280.41(a)(1) for failure to monitor tanks for releases at least every 30 days. Prior to departing the Facility, Ms. [REDACTED] stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment F). Ms. [REDACTED] provided the Facility representative with the NOI form, the deficiency form, and the Field Citation and retained carbon copies of each form 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 and Field Citation Form
- F. Inspection checklist

Signature

Lead Inspector

[REDACTED]

[REDACTED]

Date of signature