

Compliance Evaluation Inspection Report

Timber Lake Service 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
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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 16, 2024 at 7:50 AM MST

Weather: Partly Cloudy, 53° Fahrenheit

Facility Contact/Owner: [REDACTED]

Owner Address: 824 Main Street
Timber Lake, South Dakota 57656

Facility Address: 824 Main Street
Timber Lake, South Dakota 57656

Facility Phone: [REDACTED]

Facility ID Number: 4020017

Reason for Inspection: Compliance Inspection

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

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ATTACHMENTS

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Attachment B:	Photograph Log
Attachment C:	Cathodic Protection Test
Attachment D:	Monthly and Annual Walkthrough Inspections
Attachment E:	Facility Letter of Credit
Attachment F:	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 Timber Lake Service located in Timber Lake, South Dakota on May 16, 2024. The facility was last inspected on June 30, 2021.

██████████, contract inspector for EPA, contacted Mr. ██████████ ██████████, the owner and representative of Timber Lake Service, 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. ██████████. 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. Ms. ██████████ took photographs during the inspection.

UST System Description

Timber Lake Service (facility) is a privately-owned gas station located at 824 Main St, Timber Lake, SD 57656. The facility is located on the Cheyenne River Indian Reservation. Fuel stored at this facility is sold to the public.

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 September 1990. Tank 1 has a capacity of 2,000 gallons and contains unleaded gasoline. Tank 2 has a capacity of 2,000 gallons and contains E10 gasoline. Tank 3 has a capacity of 2,000 gallons and contains diesel. Tank 4 has a capacity of 2,000 gallons and contains diesel. The dispensing system for each of the tanks is European Safe Suction and is constructed using single-walled FRP.

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 Timber Lake Service inspection included the following:

1. UST Leak Detection Records
2. Cathodic Protection Test Records
3. Letter of Credit
4. Facility Monthly and Annual Walkthrough Inspections

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

Tank Release Detection

The facility uses an EDW Autostik Series 940 monitoring system and associated in-tank probes that conduct automatic tank gauging (ATG) of the tanks. Mr. [REDACTED] provided the last 12 months of passing leak detection results. Passing ATG Operational Testing was not provided during the inspection. Photograph #2 in Attachment B shows the monitoring system interface.

Piping Release Detection

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

Spill/Overfill Prevention

Spill and overfill prevention equipment tests were not provided for review during the inspection. The previous spill bucket and overfill prevention equipment test was conducted in October 26, 2020. The tanks are equipped with spill buckets during the physical inspection, butterfly valves were noted in the fill pipes. Photographs #3 through #6 in Attachment B show the fill ports for the four USTs.

Corrosion Protection

Cathodic Protection (CP) is required for the tanks and is provided by a sacrificial anode system. A copy of the last CP test was available on the site dated May 3, 2023. The most recent CP test result is included in Attachment C.

Operator Training

Certificates for the Class A and Class B operator were presented during the inspection. [REDACTED] is the Class A and Class B designated operator. Mr. [REDACTED] maintained a list of Class C trained operators with certificates from the State of South Dakota.

Walkthrough Inspections

Records of the monthly and annual walkthrough inspections were available for review during the inspection. Attachment D includes the monthly and annual walkthrough inspection records.

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 as well as a letter of credit on file. Attachment E includes the letter of credit for the facility.

Physical Inspection

During the site visit, Ms. [REDACTED] reviewed documents onsite and observed the fill ports, both dispensers, and the ATG monitoring interface for the four USTs on site. Photograph #2 in

Attachment B shows the interface for the EDW Autostik ATG system. Ms. [REDACTED] also observed the spill bucket and fill pipe for the four USTs. The spill buckets for all four USTs were dry and in good condition at the time of the inspection. The access ports for ATG probes were also present for each of the tanks, and no issues were noted for these during the inspection.

There were two double-sided pump dispensers on site, one for diesel and one for gasoline/E10, and both dispensers were opened as part of the inspection. The safe suction system was observed, and Ms. [REDACTED] did not observe signs of leaks at the time of the inspection. Photographs #7 through #10 in Attachment B show the safe suction systems and piping in each dispenser.

A monitoring well was observed at the tank field during the inspection. Vent lines are located northeast of the USTs against the convenience store, and no obstructions or concerns were noted for the vent lines at the time of the inspection.

2. SUMMARY

The facility has four USTs installed in September 1990. Tank 1 has a capacity of 2,000 gallons and contains unleaded gasoline. Tank 2 has a capacity of 2,000 gallons and contains E10 gasoline. Tank 3 has a capacity of 2,000 gallons and contains diesel. Tank 4 has a capacity of 2,000 gallons and contains diesel. Passing monthly monitoring leak detection test records were available for the previous 12 months for all four USTs. There are two double-sided dispensers on site that operate with safe suction and are constructed with FRP piping. The fill port for both USTs is equipped with a spill bucket and overfill prevention and the drop tubes are equipped with butterfly valves. Testing records were for the spill buckets and overfill prevention were not provided during the inspection. Cathodic protection is required for all four USTs and copies of the last two CP tests were available for review. Certified operators are designated, and training records were provided during the inspection. Monthly and annual walkthrough inspection records were provided during the inspection. The Timber Lake Service has financial coverage through the South Dakota Petroleum Release Compensation Fund and has a letter of credit on file to cover the deductible. Attachment F contains the Notice of Inspection signed by Mr. [REDACTED] following the inspection. Ms. [REDACTED] provided a copy to Mr. [REDACTED] and left the premises.

Inspector Signature: [REDACTED]

Date: July 9, 2024