UNDERGROUND STORAGE TANK INSPECTION REPORT
Battlefield Express C-Store

Date of Report:	April 10, 2013
Inspection Date & Time:	April 10, 2013 at 8:50 AM MDT
Weather:	Partly Cloudy, 25° Fahrenheit
Facility Owner:	Stockton Oil Company
Facility Owner Address:	1607 4th Avenue North Billings, Montana 59102
Facility Address:	Highway 212 & Interstate 90 Crow Agency, MT 59022
Facility Phone:	(406) 638-4452
Facility ID Number:	2020002
Reason for Inspection:	Enforcement Inspection
Inspector(s):	Gary Wang, EPA (Lead)
Facility Representative(s):	Becky Wilson

Narrative: On April 10, 2013, the Environmental Protection Agency's (EPA) Underground Storage Tank Program personnel conducted an inspection at the Battlefield Express C-Store in Crow Agency, Montana. The facility was last inspected by the EPA on March 29, 2010 and was selected for inspection by the EPA as a routine re-inspection. A phone call was made to Becky Wilson (facility manager) on March 28, 2013 to confirm the facility's inspection date. The EPA was the lead and only representative present during the facility's inspection.

Gary Wang, arrived at Battlefield Express C-Store at 8:50 AM Mountain Daylight Time and was received by manager and facility representative, Becky Wilson. I presented my inspector credentials and requested Ms. Wilson's signature on the Notice of Inspection (NOI) form for permission to conduct the inspection. I explained to Ms. Wilson that the NOI was a document that states that the EPA was given consent to inspect the premise, and does not state what was found during the inspection. I told Ms. Wilson that she would receive a copy of the NOI document, along with any findings, at the end of the inspection.

Battlefield Express C-Store is a privately owned gas station and convenience store located on the Crow Indian Reservation in Crow Agency, Montana. The fuel at this facility is sold to the public. Ms. Wilson confirmed that the facility has three tanks. After contacting the Stockton Oil Company head office in Billings, MT, she confirmed that the tanks were double-walled fiberglass reinforced plastic. According the facility file, the tanks were installed in June 1999. Tank 1 is 10,000 gallons and contains unleaded gasoline. Tank 2 is 10,000 gallons and is compartmentalized into a 6,000 gallon compartment containing unleaded plus gasoline (Tank 2-1) and a 4,000 gallon compartment containing unleaded premium

gasoline (Tank 2-2). Tank 3 is 10,000 gallons and is compartmentalized into a 6,000 gallon compartment containing highway diesel (Tank 3-1) and a 4,000 gallon compartment containing dyed diesel (Tank 3-2). The records indicated that the piping is double-walled Environ Geoflex flex piping and is a pressurized system.

Ms. Wilson showed that the facility uses a Gilbarco EMC automatic tank gauging (ATG) system with continuous statistical leak detection (CSLD) as the method of leak detection for the tanks. The monthly leak detection records for the facility's tanks were taken from the ATG's tank leak history and are shown in Table 1.

Table 1: 12 Month Tank Leak Detection Records

	Apr. 2013	Mar. 2013	Feb. 2013	Jan. 2013	Dec. 2012	Nov. 2012	Oct. 2012	Sept. 2012	Aug. 2012	July 2012	June 2012	May 2012
Tank 1 (Unleaded)	P	P	P	P	P	P	P	P	P	P	P	P
Tank 2-1 (Plus)	P	P	P	P	P	P	P	P	P	P	P	P
Tank 2-2 (Premium)	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Tank 3-1 (Diesel)	P	P	P	P	P	P	P	P	P	P	P	P
Tank 3-2 (Dyed Diesel)	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR

P = Pass; NR = No Record

Ms. Wilson also supplied a binder showing records of monthly tank leak detection results, tank inventory, and sensor status. Both the printouts from the ATG's tank leak detection history and the printouts in the binders did not have any tank leak detection results for the unleaded premium gasoline, and dyed diesel compartments during the past 12 months. The facility also uses interstitial monitoring for tank leak detection. Although the premium unleaded tank did not show CSLD, the interstitial monitoring records provided evidence of adequate tank leak detection for the tank. No record of passing CSLD or interstitial monitoring was available for the dyed diesel tank.

Corrosion protection was not required for the tank and piping because the materials are fiberglass reinforced plastic and flex plastic respectively. The facility uses sump sensors as leak detection for the piping. Liquid status on the ATG showed that the sump sensors for all the STP sumps were normal.

The facility has an operating permit, valid until January 6, 2015 from the Montana Department of Environmental Quality. The operating permit enables access to the State Fund, thus satisfying its financial responsibility

A physical inspection of the facility was also conducted to verify the information provided. The spill buckets for the unleaded plus and unleaded premium compartments contained some water on the bottom, which may have resulted from recent snow melt from the previous two days, but were generally clean and intact. The spill bucket for the unleaded gasoline was dry, but contained dirt and debris The spill buckets

for the diesel compartment was filled with dirt and product to the lip of the fill port cap, above the top of the fill port. The spill bucket for the dyed diesel compartment was filled with product. The sumps for all the tank compartments were dirty and contained mud and water. Sump sensors were visible in all the sumps, but were positioned high and did not alarm with the water and mud in the tank. I told Ms. Wilson that the spill buckets and sumps need to be cleaned. I also informed her that the sumps were positioned too high and needed to be positioned closer to the bottom of the sump. No overflow protection were visible in the fill ports, however, records indicated that ball float valves were used for overflow protection.

The following violations were noted at the facility during the site inspection:

40 CFR 280.41(a) – Failure to monitor tanks every 30 days.
40 CFR 280.30(a) – Failure to take necessary precautions to prevent overfill/spillage during the transfer of products
40 CFR 280.41(b)(1)(ii) – Failure to have annual line tightness or perform monthly monitoring on pressurized piping

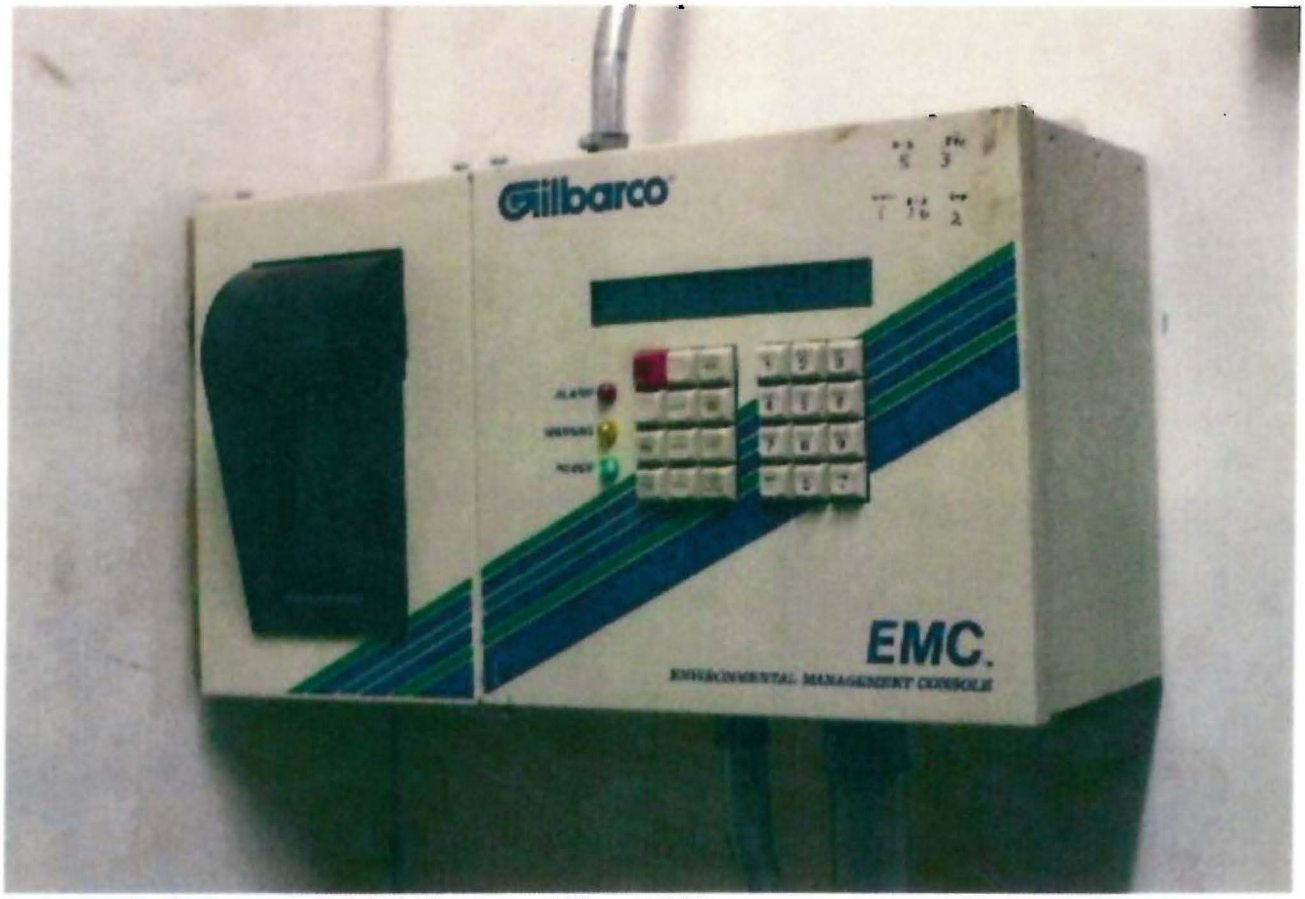
Summary: Battlefield Express C-Store is a privately owned gas station and convenience store located on the Crow Indian Reservation in Crow Agency, Montana. The facility has three double-walled fiberglass reinforced plastic tanks installed in June 1999. Tank 1 is 10,000 gallons and contains unleaded gasoline. Tank 2 is 10,000 gallons and is compartmentalized into a 6,000 gallon compartment containing unleaded plus gasoline and a 4,000 gallon compartment containing unleaded premium gasoline. Tank 3 is 10,000 gallons and is compartmentalized into a 6,000 gallon compartment containing highway diesel and a 4,000 gallon compartment containing dyed diesel. Passing CSLD tank leak detection records were available for the unleaded gas, unleaded premium, and diesel tanks. Although no CSLD tests were available for the unleaded plus tank, interstitial monitoring was available for its tank leak detection. No CSLD leak detection tests or interstitial monitoring was indicated for the dyed diesel tank. The piping is double-walled Environ Geoflex flex piping and is a pressurized system. The sump sensors, used for pipe leak detection, were positioned high in the sumps and the sumps were muddy and contained water. Some of the spill buckets were filled with fuel and dirt. The facility uses the State Fund for its financial responsibility mechanism. I gave Ms. Wilson the Notice of Inspection and the Violation and Compliance Identification forms, explained the violations to her, and outlined what was necessary for the facility to be in compliance. I answered any additional questions Ms. Wilson had and left the premise afterwards.

Inspector Signature: _____ **Date:** 9/26/13

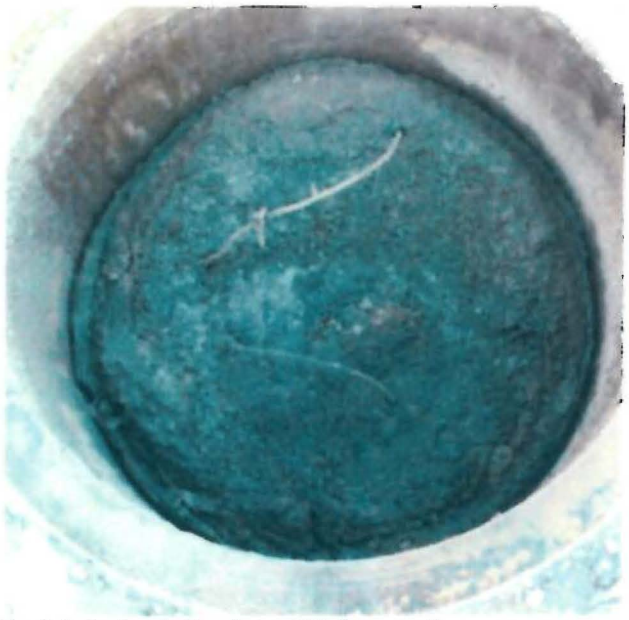
Attachments:

(1) Site Photos
(2) Notice of Inspection
(3) Violation and Compliance Identification Form
(4) ATG Tank Leak Test Results
(5) UST Inspection Notes
(6) Conversation Record for Scheduled UST Inspection

Battlfield Express C-Store (2020002) Facility Photos – pictures taken on 4/10/2013



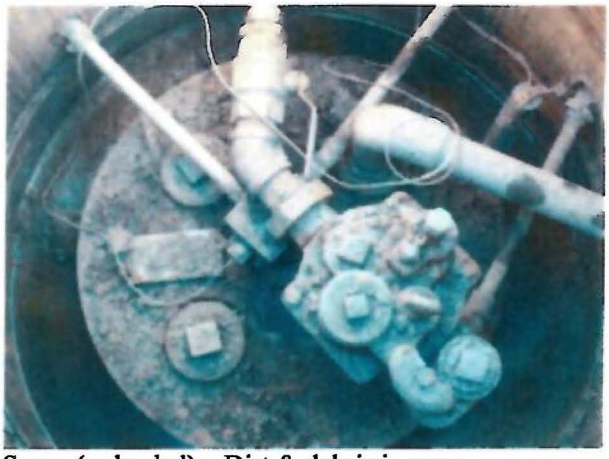
Automatic Tank Gauge at Battlefield Express – Gilbarco EMC



Tank 1 (unleaded) – Interstitial sensor?

TANK 1 (UNLEADED)

Spill bucket (unleaded) – Old tags and debris in spill bucket.



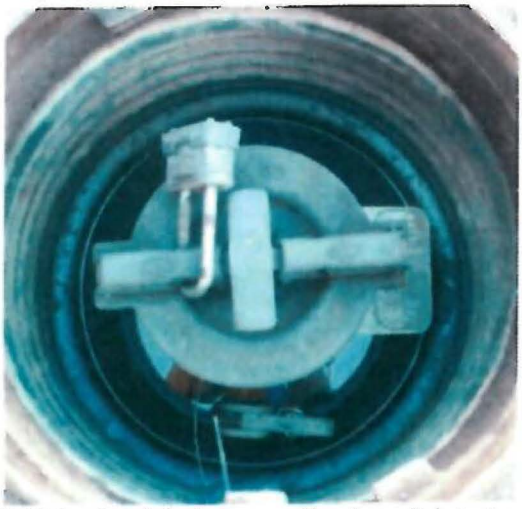
Sump (unleaded) – Dirt & debris in sump

Fill port (unleaded) – records indicate ball floats for overfill protection

Sump sensor placed higher up in sump.

ATG Probe (unleaded) – wires are intact

TANK 2, COMPARTMENT 1 (Unleaded Plus)



Spill bucket (plus) –generally clean & intact, some water in sump may be result of recent snowmelt

Sump (plus) – Dirt & debris in sump; access to interstitial sensor for Tank 2 is in upper left of photo

Fill port (plus) – records indicate ball floats for overfill protection

Sump sensor placed higher up in sum, water is visible in sump.

ATG Probe (plus) – wires are intact

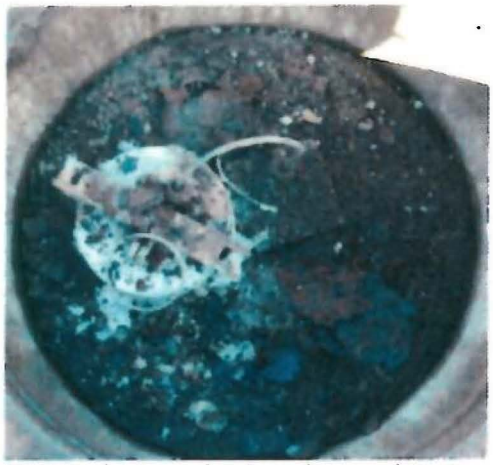
TANK 2, COMPARTMENT 2 (Unleaded Premium)

Spill bucket (premium) – clean & intact, some water in sump may be result of recent snowmelt

Sump (premium) – Dirt & debris in sump;

Fill port (premium) – records indicate ball floats for overfill protection

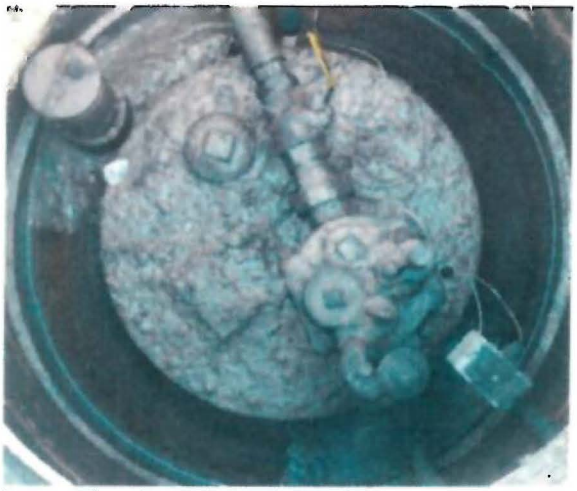
Sump shows dirt and debris



ATG Probe (premium) – wires are intact

TANK 3, COMPARTMENT 1 (Diesel)

Spill bucket (diesel) –Intact, product found in spill bucket. Product in spill bucket was too full to open fill cap.

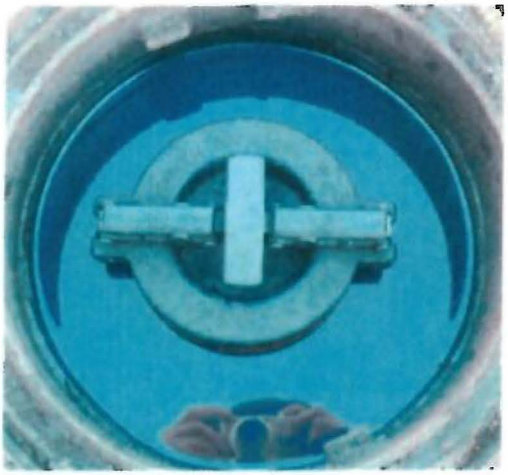


Sump (diesel) – Dirt & debris in sump; access to interstitial sensor for Tank 3 is in upper left of photo (but Tank 3's interstitial sensors in ATG machine's liquid status)

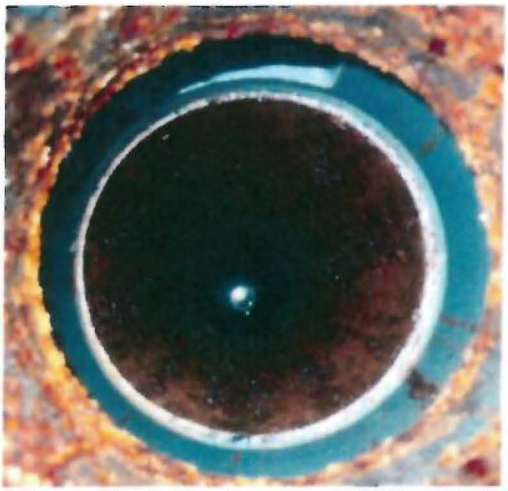
ATG Probe (diesel) – wires are intact

Sump sensor placed higher up in sum, water is visible in sump

TANK 3, COMPARTMENT 2 (Dyed Diesel)

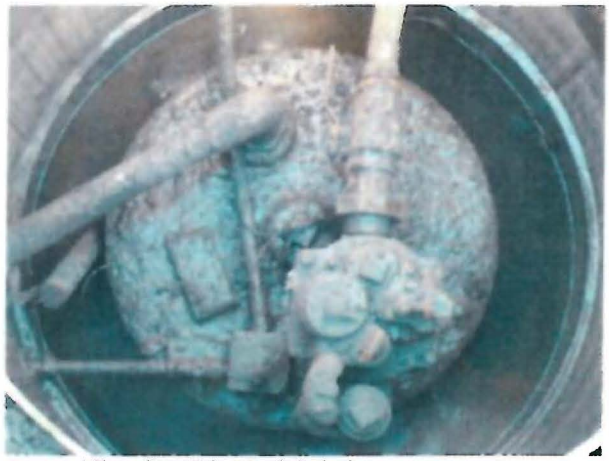


Spill bucket (dyed diesel) –Intact, product found in spill bucket



Fill port (dyed diesel) – records indicate ball floats for overfill protection

ATG Probe (dyed diesel) – wires are intact



Sump (diesel) – Dirt & debris in sump;

Sump sensor placed higher up in sum, water is visible in sump.

U.S. ENVIRONMENTAL PROTECTION AGENCY (REGION VIII)
1595 Wynkoop Street, Denver, CO 80202-1129

NOTICE OF INSPECTION

Resource Conservation and Recovery Act (RCRA) Public Law 94-580, as amended.
Subtitle I Underground Storage Tanks

Date	Inspector	Hour IN:	Facility name
4/10/13	GARY WANG	8:50	Battlefield C Store
		OUT 10:42	

EPA/STATE ID# 2020002

Street: I-90 & HWY 212

Facility Representative(s): BECKY WILSON

Phone # (406) / (638 - 4452)

City	State	Zip
CROW AGENCY	MT	59022

Reason For Inspection: Entry by Consent: (√) _____ Warrant: ( )

_____ To determine the extent of compliance with the above referenced law, which may require the collection of samples, documents, and/or photographs.

_____ Other (Specify)_____

Documents, and/or Photos collected (describe below)

1.

2.

3.

4.

5.

6.

The facts established by this inspection will be reviewed by personnel in the EPA Regional Office.
A final determination of your facility's compliance with the EPA regulations will be made as a result of this review.
The review may reveal additional violations.

Receipt of this Notice of Inspection is acknowledged.

_____
(Signature of facility representative)

Signature of Lead Inspector

_____

Assisting Inspectors (EPA/ Contr./State)

_____

_____

R8EPA Form 3540-2(7-07)

EPA ID# 2020002

VIOLATION AND COMPLIANCE IDENTIFICATION FORM

Date of Issuance: 4/10/13

Compliance Date (see below): 4/24/13

Facility Name: Battlefield Express C-Store

Facility Representative: Becky Wilson

Violations Found

1. 40 CFR 280.41(a) - Failure to Monitor tanks at least every 30 days.
2. 40 CFR 280.30(a) - Failure to take necessary precautions to prevent overfill/spill during transfer of product
3. 40 CFR 280.41(b)(1)(ii) - Failure to conduct annual tank tightness test or perform monthly monitoring on pressurized piping
4.
5.

Requirements for Compliance

1. CONTACT VENDOR TO VERIFY PROBLEM OF TANK LEAK DETECTION ON ATG & SEND RECEIPT OF VENDORS WORK & COPY OF PASSING/VALID TANK LEAK DETECTION ON ALL 5 TANKS
2. CLEAN OUT SPILLBUCKET OF DEBRIS & LIQUIDS & SEND PHOTOS TO EPA
3. CLEAN OUT SUMPS & LOWER SUMP SENSORS TO LESS THAN 1/2" FROM SUMP BOTTOM & SEND PHOTOS TO EPA
4.
5.

Inspector, please check one:

☑ You have **14 days** to submit proof of compliance. The EPA UST Enforcement Coordinator will review the inspection findings with the EPA inspector and determine if enforcement follow-up and/or a penalty is appropriate.

☐ Please read the instructions for the Expedited Enforcement Compliance Order and Settlement Agreement thoroughly. To settle the Expedited Compliance Order you must fulfill the specified requirements above, sign and return the settlement agreement, and pay the assessed fine within **30 days.**

Inspector's Name: GARY WANG

Inspector's Phone Number: 1.800.227.8917, extension 312-6469

Inspector's Fax Number: 303-312-6341 wong.gary@epa.gov

LEAK TEST HIST

5:DYED DIESEL

LAST GROSS TEST PASSED:
MAY 1, 2010 1:47 PM
STARTING VOLUME= 2304
PERCENT VOLUME = 60.4
TEST TYPE = STANDARD

LAST ANNUAL TEST PASSED:

NO TEST PASSED

FULLEST ANNUAL TEST PASS

NO TEST PASSED

LAST PERIODIC TEST PASS:
MAY 23, 2011 1:39 PM
TEST LENGTH 47 HOURS
STARTING VOLUME= 2447
PERCENT VOLUME = 64.1
TEST TYPE = CSLD

FULLEST PERIODIC TEST
PASSED EACH MONTH:

JAN 11, 2011 5:17 AM
TEST LENGTH 39 HOURS
STARTING VOLUME= 2742
PERCENT VOLUME = 71.8
TEST TYPE = CSLD

FEB 21, 2011 1:27 PM
TEST LENGTH 67 HOURS
STARTING VOLUME= 1937
PERCENT VOLUME = 50.7
TEST TYPE = CSLD

MAR 14, 2011 9:27 AM
TEST LENGTH 38 HOURS
STARTING VOLUME= 1691
PERCENT VOLUME = 44.3
TEST TYPE = CSLD

APR 17, 2011 6:54 AM
TEST LENGTH 53 HOURS
STARTING VOLUME= 2049
PERCENT VOLUME =
TEST TYPE = CSLD

22, 2011 9:13 PM
T LENGTH 42 HOURS
RTING VOLUME= 249
PERCENT VOLUME = 65.
TEST TYPE = CSLD

JUN 20, 2010 7:15 AM
TEST LENGTH 47 HOURS
STARTING VOLUME= 2174
PERCENT VOLUME = 56.9
TEST TYPE = CSLD

JUL 22, 2010 2:21 PM
TEST LENGTH 35 HOURS
STARTING VOLUME= 2109
PERCENT VOLUME = 55.2
TEST TYPE = CSLD

AUG 12, 2010 9:47 AM
TEST LENGTH 40 HOURS
STARTING VOLUME= 2572
PERCENT VOLUME = 67.4
TEST TYPE = CSLD

SEP 30, 2010 3:37 AM
TEST LENGTH 42 HOURS
STARTING VOLUME= 2661
PERCENT VOLUME = 69.7
TEST TYPE = CSLD

OCT 1, 2010 2:19 AM
TEST LENGTH 44 HOURS
STARTING VOLUME= 2594
PERCENT VOLUME = 67.9
TEST TYPE = CSLD

NOV 21, 2010 5:38 AM
TEST LENGTH 37 HOURS
STARTING VOLUME= 1820
PERCENT VOLUME = 47.7
TEST TYPE = CSLD

DEC 12, 2010 8:58 AM
TEST LENGTH 50 HOURS
STARTING VOLUME= 2425
PERCENT VOLUME = 63.5
TEST TYPE = CSLD

* * * * * END * * * * *

BATTLEFIELD
EXPRESS

APR 10, 2013 8:50 AM

SYSTEM STATUS REPORT

ALL FUNCTIONS NORMAL

INVENTORY REPORT

T 1:NOLEAD
VOLUME = 2454 GALS
ULLAGE = 7241 GALS
90% ULLAGE= 6271 GALS
TC VOLUME = 2469 GALS
HEIGHT = 27.81 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 51.3 DEG F

T 2:PLUS
VOLUME = 2400 GALS
ULLAGE = 3457 GALS
90% ULLAGE= 2871 GALS
TC VOLUME = 2424 GALS
HEIGHT = 39.71 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 45.6 DEG F

T 3:PREMIUM
VOLUME = 696 GALS
ULLAGE = 3123 GALS
90% ULLAGE= 2741 GALS
TC VOLUME = 703 GALS
HEIGHT = 22.18 INCHES
ER VOL = 0 GALS
R = 0.00 INCHE
= 44.8 DEG F

4:DIESEL
LUME = 1904
AGE = 3953
90% ULLAGE= 3367 GALS
TC VOLUME = 1912 GALS
HEIGHT = 33.66 INCHES
WATER VOL = 6 GALS
WATER = 0.89 INCHES
TEMP = 50.2 DEG F

T 5:DYED DIESEL
VOLUME = 1371 GALS
ULLAGE = 2448 GALS
90% ULLAGE= 2066 GALS
TC VOLUME = 1377 GALS
HEIGHT = 35.88 INCHES
WATER VOL = 8 GALS
WATER = 1.20 INCHES
TEMP = 49.1 DEG F

* * * * END * * * *

. LEAK TEST HISTO

. 3:PREMIUM

LAST GROSS TEST PASSED:
MAY 1, 2010 1:47 PM
STARTING VOLUME= 821
PERCENT VOLUME = 21.5
TEST TYPE = STANDARD

LAST ANNUAL TEST PASSED:

NO TEST PASSED

FULLEST ANNUAL TEST PASS

NO TEST PASSED

LAST PERIODIC TEST PASS:
MAY 23, 2011 2:22 PM
TEST LENGTH 38 HOURS
STARTING VOLUME= 1686
PERCENT VOLUME = 44.2
TEST TYPE = CSLD

FULLEST PERIODIC TEST
PASSED EACH MONTH:

JAN 21, 2011 3:42 PM
TEST LENGTH 35 HOURS
STARTING VOLUME= 2257
PERCENT VOLUME = 59.1
TEST TYPE = CSLD

FEB 12, 2011 2:48 AM
TEST LENGTH 34 HOURS
STARTING VOLUME= 2321
PERCENT VOLUME = 60.8
TEST TYPE = CSLD

MAR 5, 2011 9:21 AM
TEST LENGTH 44 HOURS
STARTING VOLUME= 1733
PERCENT VOLUME = 45.4
TEST TYPE = CSLD

APR 28, 2011 11:34 AM
TEST LENGTH 39 HOURS
STARTING VOLUME= [illegible]
[illegible] VOLUME = [illegible]
[illegible] TYPE = CSL

[illegible] 1, 2011 2:11 AM
[illegible] LENGTH 39 HOURS
STARTING VOLUME= 1689
PERCENT VOLUME = 48.7
TEST TYPE = CSLD

JUN 1, 2010 1:03 AM
TEST LENGTH 43 HOURS
STARTING VOLUME= 1953
PERCENT VOLUME = 51.2
TEST TYPE = CSLD

JUL 26, 2010 7:47 PM
TEST LENGTH 32 HOURS
STARTING VOLUME= 2327
PERCENT VOLUME = 61.0
TEST TYPE = CSLD

AUG 1, 2010 1:21 AM
TEST LENGTH 34 HOURS
STARTING VOLUME= 2104
PERCENT VOLUME = 55.1
TEST TYPE = CSLD

SEP 14, 2010 10:09 PM
TEST LENGTH 32 HOURS
STARTING VOLUME= 1466
PERCENT VOLUME = 38.4
TEST TYPE = CSLD

OCT 10, 2010 3:07 AM
TEST LENGTH 33 HOURS
STARTING VOLUME= 1601
PERCENT VOLUME = 41.9
TEST TYPE = CSLD

NOV 1, 2010 8:49 AM
TEST LENGTH 34 HOURS
STARTING VOLUME= 1515
PERCENT VOLUME = 39.7
TEST TYPE = CSLD

DEC 7, 2010 7:49 AM
TEST LENGTH 36 HOURS
STARTING VOLUME= 1578
PERCENT VOLUME = 41.3
TEST TYPE = CSLD

* * * * END * * * *

TANK LEAK TEST HISTO

T 4:DIESEL

LAST GROSS TEST PASSED:
MAY 1, 2010 1:47 PM
STARTING VOLUME= 2308
PERCENT VOLUME = 40.8
TEST TYPE = STANDARD

LAST ANNUAL TEST PASSED:

NO TEST PASSED

FULLEST ANNUAL TEST PASS

NO TEST PASSED

LAST PERIODIC TEST PASS:
APR 10, 2013 7:58 AM
TEST LENGTH 33 HOURS
STARTING VOLUME= 2178
PERCENT VOLUME = 37.2
TEST TYPE = CSLD

FULLEST PERIODIC TEST
PASSED EACH MONTH:

JAN 7, 2013 1:56 PM
TEST LENGTH 35 HOURS
STARTING VOLUME= 2449
PERCENT VOLUME = 41.8
TEST TYPE = CSLD

FEB 10, 2013 8:26 PM
TEST LENGTH 38 HOURS
STARTING VOLUME= 1046
PERCENT VOLUME = 17.9
TEST TYPE = CSLD

MAR 31, 2013 11:13 PM
TEST LENGTH 29 HOURS
STARTING VOLUME= 1289
PERCENT VOLUME = 22.0
TEST TYPE = CSLD

APR 6, 2013 11:04 PM
TEST LENGTH 31 HOURS
STARTING VOLUME= 2225
PERCENT VOLUME = 38.0
TEST TYPE = CSLD

[illegible] 21, 2012 6:56 AM
[illegible]T LENGTH 34 HOURS
STARTING VOLUME= 1268
PERCENT VOLUME = 21.7
TEST TYPE = CSLD

JUN 14, 2012 6:12 AM
TEST LENGTH 61 HOURS
STARTING VOLUME= 808
PERCENT VOLUME = 13.8
TEST TYPE = CSLD

JUL 20, 2012 8:10 PM
TEST LENGTH 32 HOURS
STARTING VOLUME= 1597
PERCENT VOLUME = 27.3
TEST TYPE = CSLD

AUG 26, 2012 3:57 AM
TEST LENGTH 30 HOURS
STARTING VOLUME= 1954
PERCENT VOLUME = 33.4
TEST TYPE = CSLD

SEP 23, 2012 1:38 PM
TEST LENGTH 29 HOURS
STARTING VOLUME= 2452
PERCENT VOLUME = 41.9
TEST TYPE = CSLD

OCT 1, 2012 12:28 AM
TEST LENGTH 31 HOURS
STARTING VOLUME= 1260
PERCENT VOLUME = 21.5
TEST TYPE = CSLD

NOV 16, 2012 7:44 AM
TEST LENGTH 36 HOURS
STARTING VOLUME= 2633
PERCENT VOLUME = 45.0
TEST TYPE = CSLD

DEC 11, 2012 5:58 PM
TEST LENGTH 32 HOURS
STARTING VOLUME= 2211
PERCENT VOLUME = 37.8
TEST TYPE = CSLD

* * * * END * * * *

BATTLEFIELD
EXPRESS

APR 10, 2013 10:13 AM

LIQUID STATUS

APR 10, 2013 10:13 AM

L 1:UNLEADED STP
SENSOR NORMAL

L 2:PLUS STP
SENSOR NORMAL

L 3:PREMIUM STP
SENSOR NORMAL

L 4:DISP 7-8
SENSOR NORMAL

L 5:DYED DIESEL STP
SENSOR NORMAL

L 6:DISP 3-4
SENSOR NORMAL

L 7:DISP 1-2
SENSOR NORMAL

L 8:DISP 9-10
SENSOR NORMAL

L 9:DISP 5-6
SENSOR NORMAL

L11:UNLEADED INTER
SENSOR NORMAL

L12:DIESEL STP
SENSOR NORMAL

L13:PLUS INTERSTITIAL
SENSOR NORMAL

* * * * * END * * * * *

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 1:UNLEADED STP
STP SUMP
FUEL ALARM
JAN 24, 2013 3:19 PM

FUEL ALARM
JAN 19, 2013 3:44 PM

FUEL ALARM
DEC 19, 2012 9:52 AM

* * *

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 2:PLUS STP
STP SUMP
FUEL ALARM
MAR 1, 2013 3:10 PM

FUEL ALARM
MAR 1, 2013 7:58 AM

FUEL ALARM
FEB 22, 2013 7:38 AM

*

ALARM HISTORY REPORT

---- SENSOR ALARM -----
3:PREMIUM STP
STP SUMP
UEL ALARM
EB 28, 2013 2:59 PM

FUEL ALARM
DEC 19, 2012 10:10 AM

FUEL ALARM
JUL 16, 2012 8:51 PM

* * * END * * *

HISTORY REPORT

---- SENSOR ALARM --
4:DISP 7-8
ISPENSER PAN
UEL ALARM
EC 19, 2012 9:42 AM

UEL ALARM
UL 16, 2012 9:25 PM

UEL ALARM
EB 22, 2012 3:30 PM

* * * * * END * * * * *

LARM HISTORY REPORT

---- SENSOR ALARM -----
5:DYED DIESEL STP
TP SUMP
UEL ALARM
EB 5, 2013 4:25 AM

UEL ALARM
EC 19, 2012 10:13 AM

UEL ALARM
AN 29, 2012 2:56 PM

* * * * * END * * * * *

TEST HISTORY

T 1:NOLEAD

LAST GROSS TEST PASSED:
MAY 1, 2010 1:47 PM
STARTING VOLUME= 6740
PERCENT VOLUME = 69.5
TEST TYPE = STANDARD

LAST ANNUAL TEST PASSED:

NO TEST PASSED

FULLEST ANNUAL TEST PASS

NO TEST PASSED

LAST PERIODIC TEST PASS:
APR 10, 2013 6:08 AM
TEST LENGTH 30 HOURS
STARTING VOLUME= 3985
PERCENT VOLUME = 41.1
TEST TYPE = CSLD

FULLEST PERIODIC TEST
PASSED EACH MONTH:

JAN 17, 2013 5:51 AM
TEST LENGTH 30 HOURS
STARTING VOLUME= 5379
PERCENT VOLUME = 55.5
TEST TYPE = CSLD

FEB 2, 2013 9:04 AM
TEST LENGTH 32 HOURS
STARTING VOLUME= 4185
PERCENT VOLUME = 43.2
TEST TYPE = CSLD

MAR 25, 2013 2:12 AM
TEST LENGTH 25 HOURS
STARTING VOLUME= 5397
PERCENT VOLUME = 55.7
TEST TYPE = CSLD

APR 5, 2013 3:42 AM
TEST LENGTH 27 HOURS
STARTING VOLUME= 4199
PERCENT VOLUME = 43
TEST TYPE = CSLD

MAY 5, 2012 8:02
TEST LENGTH 32 HOUR
STARTING VOLUME=
PERCENT VOLUME = 33.2
TEST TYPE = CSLD

JUN 11, 2012 6:01 AM
TEST LENGTH 30 HOURS
STARTING VOLUME= 3794
PERCENT VOLUME = 39.1
TEST TYPE = CSLD

JUL 1, 2012 6:00 AM
TEST LENGTH 31 HOURS
STARTING VOLUME= 2292
PERCENT VOLUME = 23.6
TEST TYPE = CSLD

AUG 31, 2012 10:26 PM
TEST LENGTH 33 HOURS
STARTING VOLUME= 4415
PERCENT VOLUME = 45.5
TEST TYPE = CSLD

SEP 1, 2012 1:27 AM
TEST LENGTH 33 HOURS
STARTING VOLUME= 4415
PERCENT VOLUME = 45.5
TEST TYPE = CSLD

OCT 6, 2012 4:46 AM
TEST LENGTH 31 HOURS
STARTING VOLUME= 3772
PERCENT VOLUME = 38.9
TEST TYPE = CSLD

NOV 28, 2012 5:55 AM
TEST LENGTH 30 HOURS
STARTING VOLUME= 4649
PERCENT VOLUME = 48.0
TEST TYPE = CSLD

DEC 5, 2012 2:03 AM
TEST LENGTH 30 HOURS
STARTING VOLUME= 5389
PERCENT VOLUME = 55.6
TEST TYPE = CSLD

* * * * * END * * * * *

TANK LEAK TEST HISTORY

T 2:PLUS

LAST GROSS TEST PASSED:
MAY 1, 2010 1:47 PM
STARTING VOLUME= 1736
PERCENT VOLUME = 29.7
TEST TYPE = STANDARD

LAST ANNUAL TEST PASSED:

NO TEST PASSED

FULLEST ANNUAL TEST PASS

NO TEST PASSED

LAST PERIODIC TEST PASS:
APR 10, 2013 5:56 AM
TEST LENGTH 49 HOURS
STARTING VOLUME= 1415
PERCENT VOLUME = 24.2
TEST TYPE = CSLD

FULLEST PERIODIC TEST
PASSED EACH MONTH:

JAN 12, 2013 6:03 AM
TEST LENGTH 31 HOURS
STARTING VOLUME= 2385
PERCENT VOLUME = 40.7
TEST TYPE = CSLD

FEB 24, 2013 8:55 AM
TEST LENGTH 35 HOURS
STARTING VOLUME= 2349
PERCENT VOLUME = 40.1
TEST TYPE = CSLD

MAR 1, 2013 2:35 AM
TEST LENGTH 38 HOURS
STARTING VOLUME= 2261
PERCENT VOLUME = 38.6
TEST TYPE = CSLD

APR 4, 2013 6:15 AM
TEST LENGTH 36 HOURS
STARTING VOLUME= 1811
PERCENT VOLUME = 30.
TEST TYPE = CSLD

AY 31, 2012 6:00
ST LENGTH 34 HOU
STARTING VOLUME=
PERCENT VOLUME = 32.0
TEST TYPE = CSLD

JUN 7, 2012 12:16 AM
TEST LENGTH 31 HOURS
STARTING VOLUME= 1910
PERCENT VOLUME = 32.6
TEST TYPE = CSLD

JUL 2, 2012 7:38 AM
TEST LENGTH 51 HOURS
STARTING VOLUME= 2037
PERCENT VOLUME = 34.8
TEST TYPE = CSLD

AUG 17, 2012 11:54 PM
TEST LENGTH 84 HOURS
STARTING VOLUME= 4168
PERCENT VOLUME = 71.2
TEST TYPE = CSLD

SEP 2, 2012 6:36 AM
TEST LENGTH 36 HOURS
STARTING VOLUME= 1789
PERCENT VOLUME = 30.6
TEST TYPE = CSLD

OCT 8, 2012 1:21 AM
TEST LENGTH 33 HOURS
STARTING VOLUME= 1995
PERCENT VOLUME = 34.1
TEST TYPE = CSLD

NOV 28, 2012 8:39 AM
TEST LENGTH 28 HOURS
STARTING VOLUME= 2015
PERCENT VOLUME = 34.4
TEST TYPE = CSLD

DEC 6, 2012 2:58 AM
TEST LENGTH 32 HOURS
STARTING VOLUME= 2004
PERCENT VOLUME =
TEST TYPE = CS

* * * * END * *

REGION 8
U.S. ENVIRONMENTAL PROTECTION AGENCY
1595 WYNKOOP STREET
DENVER CO 80202-1129

Battlefield Express (2022002)

ADDITIONAL ATC STRIPS

INSPECTION ON 4/10/13

[illegible]

[illegible]

APR 10, 2013 10:13 AM
[illegible]

ALARM HISTORY REPORT

----- SYSTEM ALARM -----
[illegible]
SANTEC SETUP 10:13 AM
BATTERY IS OFF
JAN 1, 1996 8:00 AM
CLOCK IS INCORRECT
APR 4, 2010 3:01 AM

* * * * * END * * * * *

ALARM HISTORY REPORT

----- SYSTEM ALARM -----
PAPER OUT
APR 10, 2013 10:13 AM
PRINTER ERROR
APR 10, 2013 10:13 AM
BATTERY IS OFF
JAN 1, 1996 8:00 AM
CLOCK IS INCORRECT
APR 4, 2010 3:01 AM

* * * * * END * * * * *

ALARM HISTORY REPORT
[illegible]
T 1:NOLEAD
[illegible]
HIGH PRODUCT ALARM
[illegible]
PROBE OUT
AUG 17, 2000 1:01 PM
MAY 3, 2000 8:40 AM

DELIVERY NEEDED
FEB 7, 2013 4:11 PM
JAN 18, 2013 11:12 PM
JAN 3, 2013 4:22 PM

MAX PRODUCT ALARM
[illegible]

* * * * * END * * * * *

ALARM HISTORY REPORT

----- IN-TANK ALARM -----

T 1:NOLEAD

OVERFILL ALARM
AUG 24, 2013 9:46 AM
AUG 17, 2012 9:21 AM
JUN 28, 2012 1:45 PM

HIGH PRODUCT ALARM
AUG 17, 2012 9:23 AM
JUN 28, 2012 1:46 PM
AUG 5, 2011 9:31 AM

PROBE OUT
AUG 17, 2000 1:01 PM
MAY 3, 2000 8:40 AM

DELIVERY NEEDED
FEB 7, 2013 4:11 PM
JAN 18, 2013 11:12 PM
JAN 3, 2013 4:22 PM

MAX PRODUCT ALARM
JUN 28, 2012 2:00 PM
[illegible]

* * * * * END * * * * *

ALARM HISTORY REPORT

----- IN-TANK ALARM -----

T 2:PLUS

OVERFILL ALARM
MAR 22, 2005 6:45 PM
JUN 26, 2004 2:31 PM
JUN 25, 2004 9:41 AM

LOW PRODUCT ALARM
APR 4, 2013 6:17 AM
APR 1, 2013 12:27 PM
MAR 22, 2013 12:20 PM

HIGH PRODUCT ALARM
JUN 26, 2004 2:32 PM
JUN 25, 2004 9:42 AM
JUN 23, 2004 12:13 PM

PROBE OUT
AUG 17, 2000 1:01 PM

DELIVERY NEEDED
[illegible]
MAX PRODUCT ALARM
[illegible]

ALARM HISTORY REPORT
[illegible]
T 1:NOLEAD
[illegible]
HIGH PRODUCT ALARM
[illegible]
PROBE OUT
AUG 17, 2000 1:01 PM
MAY 3, 2000 8:40 AM

DELIVERY NEEDED
FEB 7, 2013 4:11 PM
JAN 18, 2013 11:12 PM
JAN 3, 2013 4:22 PM

MAX PRODUCT ALARM
JUN 28, 2012 2:00 PM
[illegible]

---- IN-TANK ALARM -----

T 3:PREMIUM

HIGH WATER ALARM
MAY 23, 2007 4:41 AM
MAY 4, 2007 5:45 AM
APR 19, 2007 6:11 AM

OVERFILL ALARM
AUG 6, 2010 10:26 AM
AUG 5, 2010 10:51 AM
JUL 19, 2010 7:37 AM

LOW PRODUCT ALARM
SEP 19, 2010 5:40 PM
AUG 28, 2010 7:51 AM
AUG 2, 2010 9:30 PM

HIGH PRODUCT ALARM
AUG 6, 2010 10:27 AM
AUG 8, 2009 10:30 AM
AUG 4, 2006 8:28 AM

INVALID FUEL LEVEL
JAN 2, 2010 10:53 AM

PROBE OUT
MAY 1, 2009 10:26 AM
MAR 19, 2004 11:28 AM
AUG 17, 2000 1:13 PM

HIGH WATER WARNING
MAY 22, 2011 6:58 AM
AUG 9, 2009 4:05 PM
APR 29, 2009 6:49 PM

DELIVERY NEEDED
AUG 3, 2010 8:12 AM
JUL 12, 2010 9:30 PM
JUN 25, 2010 10:07 AM

MAX PRODUCT ALARM
AUG 6, 2010 10:28 AM
AUG 8, 2005 9:21 AM
MAR 30, 2005 7:57 AM

ALARM HISTORY REPORT

---- IN-TANK ALARM -----

T 4:DIESEL

HIGH WATER ALARM
JAN 30, 2009 1:45 PM
DEC 23, 2005 6:14 PM

OVERFILL ALARM
AUG 18, 2007 6:45 AM
JAN 2, 2007 6:04 AM
JUN 26, 2004 2:23 PM

LOW PRODUCT ALARM
MAR 19, 2013 1:38 PM
MAR 10, 2013 6:34 PM
MAR 5, 2013 3:16 PM

HIGH PRODUCT ALARM
JUN 26, 2004 2:25 PM
AUG 12, 2000 1:26 PM

INVALID FUEL LEVEL
MAY 20, 2002 4:47 PM

PROBE OUT
AUG 17, 2000 1:01 PM

HIGH WATER WARNING
JAN 30, 2009 1:36 PM
DEC 23, 2005 6:14 PM

DELIVERY NEEDED
MAR 19, 2013 11:07 AM
MAR 10, 2013 1:44 PM
MAR 5, 2013 12:39 PM

* * * * * END * * * * *

ALARM HISTORY REPORT

---- IN-TANK ALARM -----

T 5:DYED DIESEL

HIGH WATER ALARM
MAY 21, 2011 10:06 PM
JUN 14, 2006 11:10 PM
MAR 18, 2004 3:32 PM

OVERFILL ALARM
NOV 3, 2007 5:13 AM
JUL 16, 2006 6:35 AM
APR 17, 2006 7:16 AM

LOW PRODUCT ALARM
MAR 22, 2011 4:01 PM
JAN 31, 2011 9:14 AM
SEP 22, 2010 6:21 PM

HIGH PRODUCT ALARM
JUN 19, 2008 9:19 AM
MAY 20, 2008 4:08 PM

INVALID FUEL LEVEL
APR 23, 2010 9:55 AM

PROBE OUT
DEC 31, 2009 11:37 AM
DEC 31, 2009 11:33 AM
DEC 31, 2009 11:19 AM

HIGH WATER WARNING
MAY 21, 2011 1:33 AM
MAR 29, 2007 11:12 AM
JUN 14, 2006 11:10 PM

DELIVERY NEEDED
MAR 24, 2011 12:58 PM
APR 21, 2010 12:18 PM
APR 13, 2010 8:03 PM

* * * * * END * * * * *

L 1:UNLEADED STP
SENSOR NORMAL

L 2:PLUS STP
SENSOR NORMAL

L 3:PREMIUM STP
SENSOR NORMAL

L 4:DISP 7-8
SENSOR NORMAL

L 5:DYED DIESEL STP
SENSOR NORMAL

L 6:DISP 3-4
SENSOR NORMAL

L 7:DISP 1-2
SENSOR NORMAL

L 8:DISP 9-10
SENSOR NORMAL

L 9:DISP 5-6
SENSOR NORMAL

L11:UNLEADED INTER
SENSOR NORMAL

L12:DIESEL STP
SENSOR NORMAL

L13:PLUS INTERSTITIAL
SENSOR NORMAL

* * * * * END * * * * *

----- SYSTEM ALARM -----
PAPER OUT
APR 10, 2013 10:13 AM

ALARM HISTORY REPORT

----- SENSOR ALARM -----
[illegible]:PREMIUM STP
STP SUMP
FUEL ALARM
FEB 28, 2013 2:59 PM

FUEL ALARM
DEC 19, 2012 10:10 AM

FUEL ALARM
JUL 16, 2012 8:51 PM

* * * * * END * * * * *

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 1:UNLEADED STP
STP SUMP
FUEL ALARM
JAN 24, 2013 3:19 PM

FUEL ALARM
JAN 19, 2013 9:44 PM
[illegible]

* * * * * END * * * * *

THE US GRANT
A LUXURY COLLECTION HOTEL
San Diego

[illegible] [illegible]

FAC ADD [illegible] 717 + I-90
[illegible], MT 59022

FAC # 406-638-[illegible]

OWNER Stockton Oil Company
[illegible] 4th AVE N
Billings, MT [illegible]
406-[illegible]-[illegible]

REP. Becky Wilson

[illegible] [illegible] [illegible]
[illegible] [illegible] [illegible] [illegible] 6st

[illegible] [illegible]

TANKS 3 TANKS
* 10K - UNL (INST 6/99)
· 10K COMPARTMENT (INST 6/99)
[illegible] gal [illegible]
- [illegible] gal [illegible]
[illegible]
- 6000 [illegible]
40[illegible] [illegible] DIESEL ([illegible])
ALL FR. P. → DW.

. PREVENTION - N/A
DETECTION - [illegible] [illegible] LEAK DETECTION.
(USES [illegible] EMC)

T3 - P
T5 -

PIPES - [illegible] [illegible] ([illegible])
. [illegible]

USES SUMP SENSORS

PREVENTION - [illegible]
[illegible] NEED 1 YR LINE TIGHTNESS TEST
1 YR LINE LEAK DETECTOR TEST

(LAST [illegible])
· [illegible] 1/6/12 FROM [illegible] → EXP 1/6/12. 1/6/15
- ATG ALL PASS
· N/A } USES SUMP SENSORS.
. N/A

DISPENSERS - F.R.
- [illegible]
- [illegible] [illegible]
1 YR [illegible]

[illegible]
[illegible]
- [illegible]
- [illegible]

· [illegible] ([illegible]) → [illegible] [illegible]

[illegible] [illegible] [illegible] [illegible]
[illegible] - [illegible] [illegible] to have [illegible] [illegible] Perform Monthly [illegible]
[illegible] [illegible] (released [illegible] sump sensors)

[illegible] San Diego, CA 92101 tel 619 232 3121 fax 619 232 3626

SETH 406-444-1416

REDGE MICHAOUPH 406-444-1417

Sump sensors:

Reg - High - 3-4"

Diesel - High

Dyed - Partial Submerge?

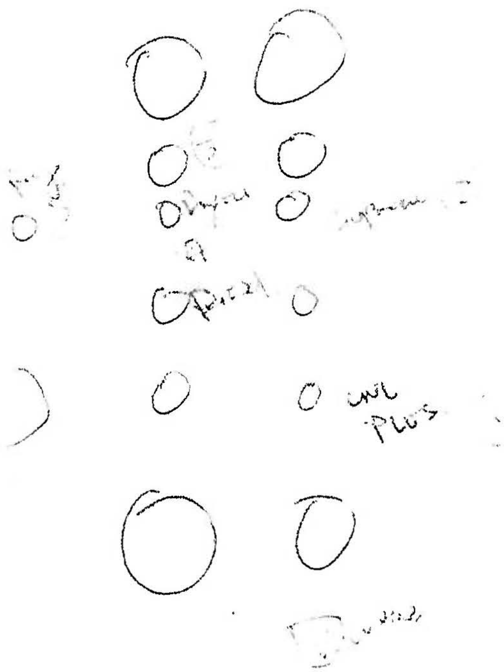
Super - High?

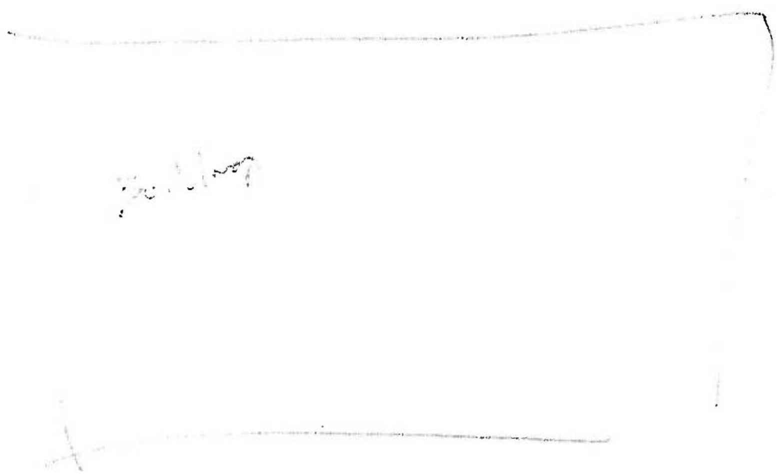
Premium

Diesel

Dyed diesel

] - Product in spill bucket





EPA Facility ID No.: 2020002

CONVERSATION RECORD	TIME: 12:30 PM	DATE: 03/28/2013

TYPE:

☐ VISIT ☐ CONFERENCE ☒ TELEPHONE CALL
☐ INCOMING
☒ OUTGOING

NAME OF PERSON CONTACTED OR IN CONTACT WITH YOU	ORGANIZATION (OFFICE, DEPT, BUREAU, FACILITY, ETC)	TELEPHONE NO.
Becky Wilson	Battlefield C Store	406-638-4452

SUBJECT:
Battlefield C Store UST Inspections

SUMMARY:

03/28/2013, 12:30 PM MDT (outgoing to 406-638-4452)
Talked to Becky Wilson, facility manager, and informed her that we are planning inspections at the facility on Wednesday, April 10, at approximately 9:30 in the morning. She says that she'll be available. I asked if she had any questions for me; she said that she is familiar with the inspections process. I left her my contact information in case she has any questions, otherwise I will just meet her during the inspection.

NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE
Gary Wang	GWang	4/5/13

EPA Facility ID No.: 2020002

CONVERSATION RECORD	TIME: 11:36 PM	DATE: 04/26/2013

TYPE:

☐ VISIT ☐ CONFERENCE ☒ TELEPHONE CALL ☐ INCOMING ☒ OUTGOING

NAME OF PERSON CONTACTED OR IN CONTACT WITH YOU	ORGANIZATION (OFFICE, DEPT, BUREAU, FACILITY, ETC)	TELEPHONE NO.
Becky Wilson	Battlefield C Store	406-638-4452

SUBJECT:
Battlefield C Store UST Inspections

SUMMARY:

04/26/2013, 11:36 PM MDT (outgoing to 406-638-4452)
Talked to Becky Wilson, facility manager, and asked whether they have taken any steps towards meeting compliance of the violations. She said that Marketing (Main Office) had come fix the ATG problem and that they have the receipts. She told the main office that they needed to provide the information to EPA by Wednesday. I told her that I haven't received anything. I asked whether she may be able to provide any documents herself for proof of compliance. She says that she can provide the passing ATG results, but does not have any documents in terms of the vendors coming to fix the system. In addition, she doesn't have email or a phone to take and send the photos of the spill buckets and sump sensors. I told her to send the ATG information. Ms. Wilson told me she can do that and she also gave me the phone number of the Main Office (406-245-6376). She says to contact Joe Stockton at that number. ,

04/26/2013, 16:09 MDT (outgoing to 406-245-6376)
Talked to Michael Stockton of Stockton Oil, owner of the Battlefield Express. I told him that I haven't received any information regarding actions on fixing the violations. He informed me that he had sent an email out to me on Tuesday (4/23/2013), the day before the due date. I told him that I hadn't received it and asked if he can send me the email again. I verified my email address for him to submit the information.

05/03/2013, 11:40 MDT (outgoing to 406-245-6376)
Briefly talked to Joe Stockton. He says he was on the other line and asked if he could call me back. I left him my number, 303-312-6469, and told him I'll wait to hear from him.

	SIGNATURE	DATE
	[signature]	5/3/13

UNDERGROUND STORAGE TANK INSPECTION REPORT
Battlefield Express C-Store

ADDENDUM
May 3, 2013

On April 10, 2013, the Environmental Protection Agency's (EPA) Underground Storage Tank Program conducted an inspection at the Battlefield Express C-Store in Crow Agency, Montana. The intent of this addendum is to clarify the identification associated with the ATG tests and reports. Updates of the progress of the facility's correction of their inspection violations are also documented in this addendum.

Identification of the Monitoring Probes and Sensors in ATG Reports: During the inspection, various ATG reports were printed to determine the facility's compliance. The ATG reports had individual labels to identify the tanks' ATG probes, the tanks' interstitial monitoring probes, and sensors in the STP sumps and dispenser sumps.

The labels identified in the ATG and their correlation to specific probes or sensors, as well as their test results are presented in Tables 1 and Table 2. Table 1 identifies the ATG probes for continuous statistical leak detection (CSLD) tank tests, as well as the tanks' interstitial monitoring probes, both used for tank leak detection.

The ATG probes connected to each tank are identified as "T" in the ATG reports. The tank's interstitial sensors, sump sensors for pipe leak detection and sump sensors for the facilities dispensers are identified as "L" in the ATG reports.

Table 1: CSLD Test (Monthly Monitoring) Identification and Liquid Status (Interstitial Monitoring) Identification Correlated to their respective Tank Leak Detection results

	Identification in CSLD Test Reports	CSLD Test Results	Identification in Liquid Status Report	Liquid Status Results
Tank 1 (Unleaded)	T1	Pass for previous 12 months	L11	Sensor Normal
Tank 2-1 (Plus)	T2	Pass for previous 12 months	L13	Sensor Normal
Tank 2-2 (Premium)	T3	No Record for Previous 12 months		
Tank 3-1 (Diesel)	T4	Pass for previous 12 months	**N/A***	**N/A**
Tank 3-2 (Dyed Diesel)	**T5**	**No Record for Previous 12 months**		

*Previous inspection reports indicated as "L10" in Liquid Status for Tanks 3-1 and 3-2. However, "L10" was not listed in the Liquid Status Report during the April 2013 inspection.

Results in Tables 1 were used to determine compliance associated with tank leak detection. As results indicate, the dyed diesel (Tank 3-2) compartment did not have any passing CSLD test results for the previous 12 months, nor did it show any interstitial monitoring available during the inspection. During the inspection, ATG records for the dyed diesel tank compartment showed that monthly CSLD tank leak detection tests have not passed for the previous 22 months, since May 2011.

Table 2: Liquid Status Identification Correlated to Pipe Leak Detection (STP Sump Sensor)

	Identification in Liquid Status Report	Liquid Status Results
STP Sump 1 (Unleaded)	L1	Sensor Normal
STP Sump 2 (Plus)	L2	Sensor Normal
STP Sump 3 (Premium)	L3	Sensor Normal
STP Sump 4 (Diesel)	L12	Sensor Normal
STP Sump 5 (Dyed Diesel)	L5	Sensor Normal

Table 2 identifies the sump sensors, for pipe leak detection. Results in Table 2 indicate that all sensors were normal.

Additional Communication with the Facility for Compliance: Three violations were determined during the site. Follow up with the facility were performed to determine the status of fixing their violations.

In reference to violation 40 CFR 280.41(a), Becky Wilson, facility manager submitted a fax on April 26, 2013 which showed passing tank leak detection test results for the month of April 2013 for the premium unleaded (tank 2-2) and the dyed diesel (tank 3-2) tanks. By providing ATG documentation of passing CSLD monthly monitoring tests for the premium and dyed diesel tanks, the facility has corrected its violation for 40 CFR 280.41(a).

In reference to violations 40 CFR 280.30(a) and 40 CFR 280.41(b)(1)(ii), Mykel Stockton and Joe Stockton, facility owners, were contacted on April 26, 2013 and May 3, 2013 in attempts to obtain records which show the violations were corrected. However, no records were ever submitted by the owner to indicate compliance for the two violations.

As reference and review, the following violations were determined during the site inspection on April 10, 2013:

- **40 CFR 280.41(a) – Failure to monitor tanks every 30 days.**
- **40 CFR 280.30(a) – Failure to take necessary precautions to prevent overfill/spillage during the transfer of products**
- **40 CFR 280.41(b)(1)(ii) – Failure to have annual line tightness or perform monthly monitoring on pressurized piping**

Inspector Signature: _____ **Date:** 5/3/13

Attachments:

(1) ATG CSLD Tank Leak Test Results, April 2013
(2) Conversation record 4/26/13 – 5/3/13: compliance assistance for violations

UNDERGROUND STORAGE TANK INSPECTION REPORT
Battlefield Express C-Store

ADDENDUM
September 25, 2013

On April 10, 2013, the Environmental Protection Agency's (EPA) Underground Storage Tank Program conducted an inspection at the Battlefield Express C-Store in Crow Agency, Montana. The intent of this addendum is to report the facility's progress of correcting their inspection violations found during the inspection.

As reference and review, the following violations were determined during the site inspection on April 10, 2013:

- **40 CFR 280.41(a) – Failure to monitor tanks every 30 days.**
- **40 CFR 280.30(a) – Failure to take necessary precautions to prevent overfill/spillage during the transfer of products**
- **40 CFR 280.41(b)(1)(ii) – Failure to have annual line tightness or perform monthly monitoring on pressurized piping**

In reference to violation 40 CFR 280.41(a), the facility corrected this violation on April 26, 2013 as described in the addendum reported on May 3, 2013.

In reference to violations 40 CFR 280.30(a), the diesel and dyed diesel spill buckets were filled with product during the inspections. On September 23, 2013, Fran Chambus, UST enforcement coordinator, received emails from Mykel Stockton, facility owner, which showed photo records of the cleaned diesel and dyed diesel spill buckets. The clean spill buckets showed that the facility has corrected their violation for 40 CFR 280.30(a).

In reference to violation 40 CFR 280.41(b)(1)(ii), the sump sensors were visible in all the STP sumps, but the sensors were positioned high and did not alarm with visible water and mud in the tank. On September 23, 2013, Fran Chambus also received emails from Mr. Stockton which also showed photo records of the STP sumps. Additional review of EPA guidance (EPA Guidance # EPA 510-R-05-001, May 2005) indicated that sump sensors need to be placement below piping entry and did not have any requirements in terms of distance to the STP sump's bottom. Since the placement of the sump sensors were placed below piping entry during the inspection, this violation was dismissed.

In addition to the submitted photographs, Mr. Stockton also submitted a screenshot of his computer email which indicated that he had tried to submit all the photographic records on April 29, 2013. Despite the screenshot showing the email submission, I never received any email or records from Mr. Stockton from April 29, 2013.

Inspector Signature: _____ **Date:** 9/25/13

Attachments:
(1) STP sump & Spill Bucket Photos, Received Sept. 23, 2013

U.S. Environmental Protection Agency
Region 8

UST PHOTOGRAPHIC LOG

Facility Location:	Photographer:	Camera:
Battlefield Express C-Store, Highway 212 & Interstate 90, Crow Agency, MT 59022; (EPA ID 2020002)	Mykel Stockton	N/A

Dates Photographs Were Taken:
Date approximate
April 29, 2013

Photo No.	Time:
1	--

Direction Photo Taken:
N/A

Photo Description:
Location of tanks showing access covers. Covers on left side of photo show access to the unleaded plus and premium gasoline compartments. Covers in far back (behind trailer), show access to the dyed diesel compartment.

U.S. Environmental Protection Agency
Region 8

UST PHOTOGRAPHIC LOG

Facility Location:	Photographer:	Camera:
Battlefield Express C-Store, Highway 212 & Interstate 90, Crow Agency, MT 59022; (EPA ID 2020002)	Mykel Stockton	N/A

Dates Photographs Were Taken:
Date approximate
April 29, 2013

Photo No.	Time:
2	--

Direction Photo Taken:
N/A

Photo Description:
Location of tanks showing access covers. Cover in center of photo show access to the dyed diesel compartment. Covers shown on the top of the photo show access to unleaded pluas and premium unleaded compartments.

U.S. Environmental Protection Agency
Region 8

UST PHOTOGRAPHIC LOG

Facility Location:	Photographer:	Camera:
Battlefield Express C-Store, Highway 212 & Interstate 90, Crow Agency, MT 59022; (EPA ID 2020002)	Mykel Stockton	N/A

Dates Photographs Were Taken:
Date approximate
April 29, 2013

Photo No.	Time:
3	--

Direction Photo Taken:
N/A

Photo Description:
STP Sump for unleaded gasoline tank. Sensors are placed below lowest pipe entry.

U.S. Environmental Protection Agency
Region 8

UST PHOTOGRAPHIC LOG

Facility Location:	Photographer:	Camera:
Battlefield Express C-Store, Highway 212 & Interstate 90, Crow Agency, MT 59022; (EPA ID 2020002)	Mykel Stockton	N/A

Dates Photographs Were Taken:
Date approximate
April 29, 2013

Photo No.	Time:
4	--

Direction Photo Taken:
N/A

Photo Description:
STP Sump for dyed diesel tank. Sensors are placed below lowest pipe entry.

U.S. Environmental Protection Agency Region 8	UST PHOTOGRAPHIC LOG	
Facility Location: Battlefield Express C-Store, Highway 212 & Interstate 90, Crow Agency, MT 59022; (EPA ID 2020002)	**Photographer:** Mykel Stockton	**Camera:** N/A

Dates Photographs Were Taken: Date approximate April 29, 2013	
Photo No.: 5 / **Time:** --	
Direction Photo Taken: N/A	
Photo Description: STP Sump for diesel tank. Sensors are placed below lowest pipe entry.	

U.S. Environmental Protection Agency Region 8	UST PHOTOGRAPHIC LOG	
Facility Location: Battlefield Express C-Store, Highway 212 & Interstate 90, Crow Agency, MT 59022; (EPA ID 2020002)	**Photographer:** Mykel Stockton	**Camera:** N/A

Dates Photographs Were Taken: Date approximate April 29, 2013	
Photo No.: 6 / **Time:** --	
Direction Photo Taken: N/A	
Photo Description: STP Sump for premium gasoline compartment. Sensors are placed below lowest pipe entry.	

U.S. Environmental Protection Agency
Region 8

UST PHOTOGRAPHIC LOG

Facility Location:	Photographer:	Camera:
Battlefield Express C-Store, Highway 212 & Interstate 90, Crow Agency, MT 59022; (EPA ID 2020002)	Mykel Stockton	N/A

Dates Photographs Were Taken:
Date approximate
April 29, 2013

Photo No.	Time:
7	--

Direction Photo Taken:
N/A

Photo Description:
STP Sump for unleaded plus gasoline compartment. Sensors are placed below lowest pipe entry.

U.S. Environmental Protection Agency
Region 8

UST PHOTOGRAPHIC LOG

Facility Location:	Photographer:	Camera:
Battlefield Express C-Store, Highway 212 & Interstate 90, Crow Agency, MT 59022; (EPA ID 2020002)	Mykel Stockton	N/A

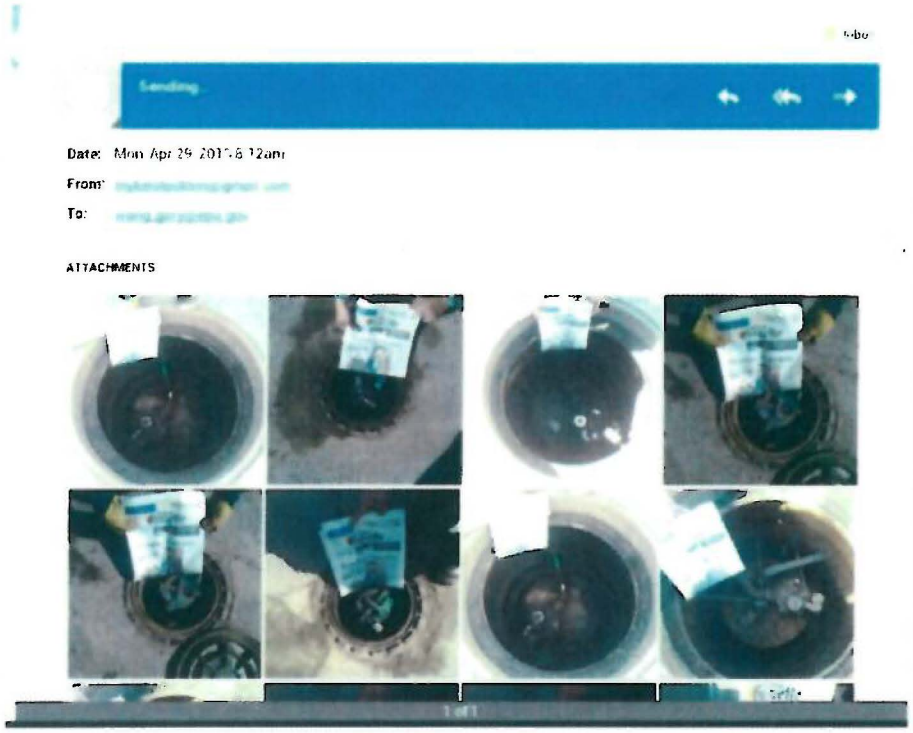
Dates Photographs Were Taken:
Date approximate
April 29, 2013

Photo No.	Time:
8	--

Direction Photo Taken:
N/A

Photo Description:
Diesel fill port & spill bucket. Spill bucket has been cleaned out and product has been removed.

U.S. Environmental Protection Agency Region 8	UST PHOTOGRAPHIC LOG	
Facility Location: Battlefield Express C-Store, Highway 212 & Interstate 90, Crow Agency, MT 59022; (EPA ID 2020002)	**Photographer:** Mykel Stockton	**Camera:** N/A

Dates Photographs Were Taken: Date approximate April 29, 2013	
Photo No. 9 / **Time:** --	
Direction Photo Taken: N/A	
Photo Description: Screenshot of Mykel Stockton's (facility owner) email indicating that he attempted to submit all the photographic records on April 29, 2013. The dyed diesel spill bucket is located on the second row, second from the left. The photos indicate that spill bucket has been cleaned out and product has been removed.	