UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

LR-8J

DATE: September 18, 2012

SUBJECT: Isle Bus Garage

FROM: Mark Restaino
Underground Storage Tanks Section

TO: UST Enforcement File

On September 18, 2012, Scott Hansen I discussed the inspections he conducted in August. It was determined that the Isle School Bus Garage was not adequately monitoring the USTs for a release. I put together a chart which shows the number of passing test the facility. The facility had only 25% of the test records for Tank 1 and 58% of the tests for Tank 2. It was decided that I would issue a field citation for failing to monitor the USTs.

UST Inspection Checklist

PART I. OWNER/OPERATOR INFORMATION

1. Facility Name: Isle Public School Bus Garage
2. Owner: Isle Public School Dist.
3. Operator: PO Box 25 Isle, MN
5. Contact Person: Mark Bruske
6. UST Site Phone #: 320-676-3335

6. Date of Visit: 8/14/12 7. Marketer: ~~X~~ Bus Non-Marketer: X
8. Site Arrival/Departure (Time): 2:05 / 3:15
9. Facility Address: 585 Isle St. W Isle, MN 56342
10: Team Members: Scott Hansen

PART II. UST SITE INFORMATION

	1	2	3	4	5	6	7
1. Tank #:	1	2					
2. Tank Type:	FRP →						
3. Piping Type:	SW FRP →						
4. Size of Tank:	10K	2K					
5. Tank Contents:	Diesel	GAS					
6. Install Date:	7/13/91 →						
7. TTT Date:							
8. LTT Date:	NA →						
9: LD (Tank):	ATG OPW Site Sentinel						
10: LD (Pipe):	S.S → Safe Suction						
11. Closure Date:							
	Perm__ Temp__	Perm__ Temp__	Perm__ Temp__	Perm__ Temp__	Perm__ Temp__	Perm__ Temp__	Perm__ Temp__
12. Spill: (clean)	Yes ✓ No __	Yes ✓ No __	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__
13. Overfill:	Yes ✓ No __	Yes ✓ No __	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__
Type:	Flapper →	(Verifyed)					
14. CP (Tank):	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__
Date:	NA →						
Type:							
15. CP (Piping):	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__	Yes__ No__
Date:							
Type:	NA →						

16. CP Monitoring: [For all cathodic protection systems (Galvanic Anodes and Impressed Current Systems)]

6 Mo./3 Yrs: Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__
Note: Monitoring conducted within six month of installation and three years after initial monitoring. [280.31(b)(1)]

Six Months: Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__
Note: Monitoring conducted within six month of any repairs to UST system. [280.33(e)]

Records: Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__
Note: Records on file of last two monitoring results. [280.31(d)(2)]

17. CP Monitoring: [For Impressed Current Systems Only]

60 Day Insp.: Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__
Note: System is inspected ever 60 days, involvers reading and recording systems voltage and amperage. [280.31(c)]

Records: Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__ Yes__ No__
Note: Records on file of last three voltage and amperage readings. [280.33(d)(1)]

UST Inspection Checklist

PART III. RECOMMENDATION(S) & NARRATIVE COMMENTS

1. Further action is recommend/necessary: Yes X No ___

Notes: Continue to work on making sure there is enough prod. for passing tank test!

2. Facility to provide info. on compliance: Yes ___ No ___

Notes: ___

3. Follow-up inspection recommended: Yes ___ No ___

Notes: ___
[If Yes, state reason(s) why.]

4. Information Request Letter (IRL): Yes ___ No ___ Date: ___

Notes: ___
[If Yes, A Full Narrative Report is required along with this checklist]

5. Notice of Violation (NOV): Yes ___ No ___ Date: ___

Notes: ___
[If Yes, A Full Narrative Report is required along with this checklist]

6. Field Citation (FC): Yes ___ No ___ Date: ___

Notes: ___
[If Yes, A Full Narrative Report is required along with this checklist]

7. Administrative Order (AO): Yes ___ No ___ Date: ___

Notes: ___
[If Yes, A Full Narrative Report is required along with this checklist]

8. Refer to State: Yes ___ No ___ Date: ___

Notes: ___
[If Yes, A Full Narrative Report may be required along with this checklist]

9. Financial Responsibility (FR): Yes ___ No ___ Expiration Date: ___

MPCA Handbook

10. Inspector's Remarks: Conducted visual inspection of dispensers and fill (flapper verified) both were clean and dry - reccommended pg 43 - to conduct walkthrough monthly.

11. Additional Remarks/Comments:

	Diesel Tank I	Gass Tank II
8-11	pass (9)	— low prod (8) (9)
10-11	— (10)	pass
11-11	pass	pass
12-11	pass	pass
1-12	— (1)	— no records - accident occurred at bus garage (car ran into building) no UST DAMAGE (1) (2)
3-12	low prod. (2) (3)	pass
4-12	low prod. (4)	pass
5-12	low prod. (5)	pass
6-12	— (6)	pass
7-12	pass	— (7)
8-12	pass	low prod. (8)

Missing 9th

Missing 2 Diesel

Missing 8/12

6/12 NOT Including Feb/Jan

Missing 6/12 4/12 NOT including Jan/Feb

Aug. 2, 2012 - A/B Operator Lic. MPCA passed

Scott Hansen
Inspector Signature

8/14/12
Date

Isle Bus Garage Insp. 8/14/12

Tank 1 Diesel

08/14/2012 04:16 PM

1 1 0

07/31/2012 07:52 PM

70.665

36.5523 [in]

[F]

[gal]

3650.8487

3623.4359

07/31/2012 11:52 PM

69.967

36.5469 [in]

[F]

[gal]

3650.1047

3624.4946

0.20 [gal/hr]

-0.698 [F]

37.2%

240 [min]

Tank 2 Gas 08/14/2012 04:19 PM

2 2 1

06/28/2012 11:41 AM

58.252

37.3395 [in]

[F]

[gal]

1169.8826

1171.3188

06/28/2012 03:41 PM

58.286

37.3406 [in]

[F]

[gal]

1169.9255

1171.3341

0.20 [gal/hr]

0.034 [F]

53.7%

240 [min]

Appendix A - LCD Screen Icons

Sensor, Probe and Controller Status Icons

Leak Test Result Icons

Scott Hansen to: Mark Restaino 08/27/2012 04:03 PM

3 attachments

winmail.dat Scott Hansen.vcf DOC046.pdf

Isle Bus Garage

Scott Hansen
Environmental Program Manager
Mille Lacs Band DNR/E
(320) 532-7445 business
(320) 532-7514 fax
(320 630 2439 cell

FC for
Failing To Monitor UST
every 30 days

Leak Detection Records - Isle Bus Garage

Month	Tank 1	Tank 2
Sep-11	-	Pass
Oct-11	-	Pass
Nov-11	Pass	Pass
Dec-11	-	-
Jan-12	-	-
Feb-12	-	-
Mar-12	low prod.	Pass
Apr-12	low prod.	Pass
May-12	low prod.	Pass
Jun-12	-	Pass
Jul-12	Pass	-
Aug-12	Pass	Low Prod
Passing	3/12	7/12
% Passing	25%	58%

Leak Detection Records - Isle Bus Garage*

Month	Tank 1	Tank 2
Sep-11	-	Pass
Oct-11	-	Pass
Nov-11	Pass	Pass
Dec-11	-	-
Jan-12		
Feb-12		
Mar-12	low prod.	Pass
Apr-12	low prod.	Pass
May-12	low prod.	Pass
Jun-12	-	Pass
Jul-12	Pass	-
Aug-12	Pass	Low Prod
Passing	3/10	7/10
% Passing	30%	70%

* Jan & Feb 2012 are left out because the system was damaged and being fixed.

Issue Date: January 26, 2009
Revision Date: August 8, 2012

OPW Fuel Management Systems

Site Sentinel Model iSite and Site Sentinel Integra (Model 924B with 2 inch dia or 4 inch dia Floats, Magnetostrictive Probes or Q0400-4xx Magnetostrictive Probe)

AUTOMATIC TANK GAUGING METHOD

Certification	Leak rate of 0.2 gph with PD = 98.18% and PFA = 1.82% using 924/B probe with 2" dia float. Leak rate of 0.2 gph with PD = 95.28% and PFA = 4.72% using 924/B probe with 4" dia float. Leak rate of 0.1 gph with PD = 95.9% and PFA = 4.1% using 924/B probe with 2" dia float. Leak rate of 0.1 gph with PD = 96.5% and PFA = 3.5% using 924/B probe with 4" dia float. Leak rate of 0.2 gph with PD = 98.1% and PFA = 1.9% using Q0400-4xx probe with 4" dia float.
Leak Threshold	0.1 gph for leak rate of 0.2 gph using 924/B or Q0400-4xx probe for 2" dia and 4" dia floats. 0.033 gph for leak rate of 0.1 gph using 924/B probe with 2" dia float. 0.05 gph for leak rate of 0.1 gph using 924/B probe with 4" dia float. A tank system should not be declared tight if the test result indicates a loss or gain that equals or exceeds this threshold.
Applicability	Gasoline, diesel, aviation fuel. Other liquids with known coefficients of expansion and density may be tested after consultation with the manufacturer.
Tank Capacity	Maximum of 20,000 gallons. Tank must be minimum 50% full for leak rate of 0.2 gph using 924/B or Q0400-4xx probe. Tank must be minimum 90% full for leak rate of 0.1 gph using 924/B probe.
Waiting Time	Minimum of 6 hours between delivery and testing using 924/B or Q0400-4xx probe. There must be no delivery during waiting time.
Test Period	Average data collection time of 30 minutes using 924/B probe for leak rate of 0.2 gph. Minimum of 6 hours using 924/B probe with 2" dia float for leak rate of 0.1 gph. Minimum of 1.5 hours using 924/B probe with 4" dia float for leak rate of 0.1 gph. Minimum of 4 hours for using Q0400-4xx probe with 4" dia float for leak rate of 0.2 gph. Test data are acquired and recorded by system's computer. There must be no dispensing or delivery during test.
Temperature	Average for product is determined by a probe containing 5 thermistors. 5 resistance temperature detectors (RTDs) for Q0400-4xx probes.
Water Sensor	Minimum detectable water level that can be detected by the 2" dia float is 0.75 inch. Minimum detectable water level that can be detected by the 4" dia float is 0.848 inch. Minimum detectable change in water level that can be detected by the 2" dia float is 0.080 inch. Minimum detectable change in water level that can be detected by the 4" dia float is 0.043 inch.
Calibration	Thermistors (or RTDs) and probe must be checked and, if necessary, calibrated in accordance with manufacturer's instructions.
Comments	Not evaluated using manifolded tank systems. Therefore, this certification is only applicable when there is a probe used in each tank and the siphon is broken during testing. Tests only portion of tank containing product. As product level is lowered, leak rate in a leaking tank decreases (due to lower head pressure). Consistent testing at low levels could allow a leak to remain undetected. EPA leak detection regulations require testing of the portion of the tank system which routinely contains product.

OPW Fuel Management Systems
6900 Santa Fe Dr.
Hodgkins, IL 60525-9909
Tel: (708) 485-4200
E-Mail: info@opwfms.com
URL: www.opwfms.com

Evaluator: Ken Wilcox Associates
Tel: (816) 443-2494
Date of Evaluation: 02/26/08, 12/29/08, 7/24/12

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Appearance on this list is not to be construed as an endorsement by any regulatory agency nor is it any guarantee of the performance of the method or equipment.
Equipment should be installed and operated in accordance with all applicable laws and regulations. For full details, please refer to our expanded "DISCLAIMER" page.