

Choctaw Nation of Oklahoma

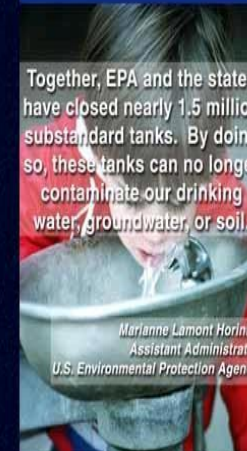
UST Facility
Regulatory
Management

 CHOCTAW

TRAVEL PLAZA



PROTECTING YOUR WATER



Together, EPA and the states have closed nearly 1.5 million substandard tanks. By doing so, these tanks can no longer contaminate our drinking water, groundwater, or soil.

Marianne Lamont Horinko
Assistant Administrator
U.S. Environmental Protection Agency



United States Environmental Protection Agency
Office of Underground Storage Tanks



- Setting tank standards
- Inspecting tanks
- Cleaning up leaks
- Promoting the cleanup and reuse of abandoned gas stations

www.epa.gov/oust

Working together to improve regulatory compliance and value to Choctaw Travel Plaza operation

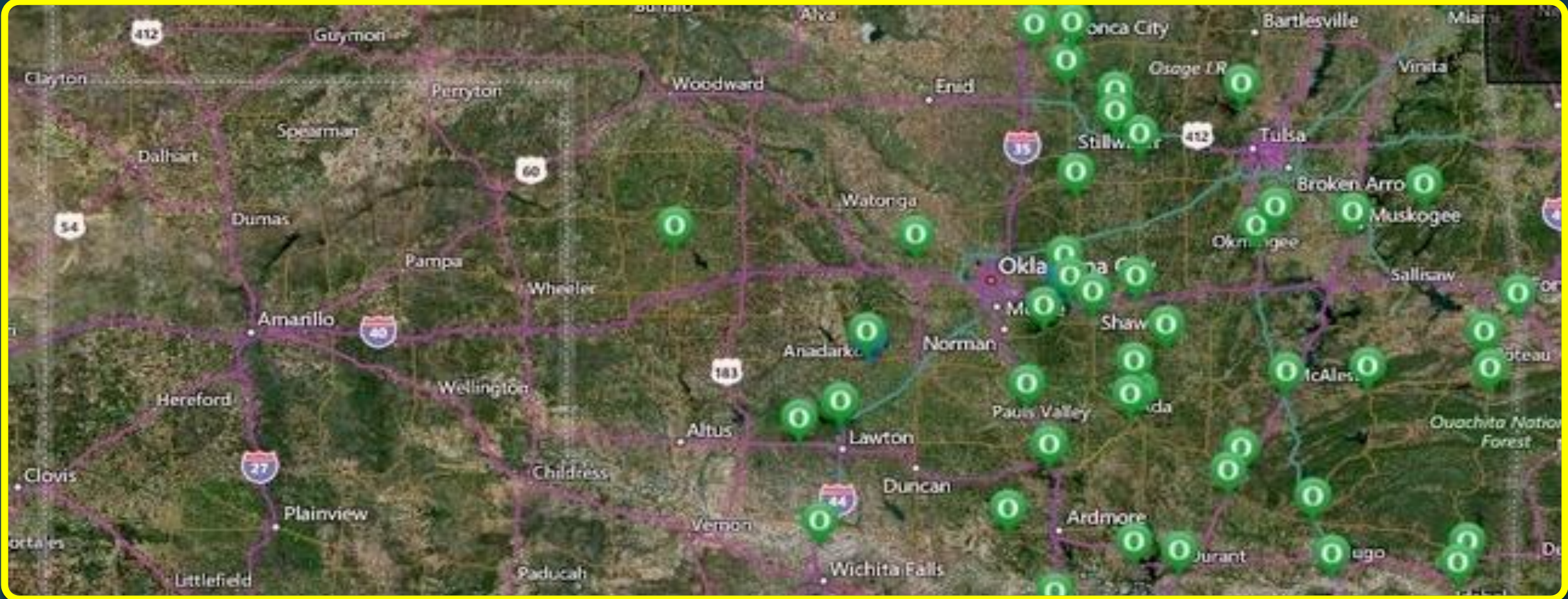


Region 6 Dallas, Texas



Cooperation- Communication- Compliance

- ▶ Over the years the development of solid, government to government communications, development of new tools for communication about compliance, and tools for compiling documentation of facility information, has led to a very significant rise in compliance rate for all Choctaw Nation UST facilities.



Location of EPA Tribally Regulated facilities throughout Oklahoma

Total of 52 facilities operated on tribal trust land.

Choctaw Nation of Oklahoma operates 13 facilities on trust land and 2 facilities on non-trust land within the State.

Choctaw Nation and EPA

Chuck Tillman Comments

- ▶ Choctaw UST Program started in 2004 with grant from Region 6 Tribal UST Program
- ▶ First EPA inspection went about as expected: Non Compliance at all facilities because no records available and no knowledge of UST systems within the Choctaw Nation.
- ▶ UST Program Monitor, *Chuck Tillman*, attended training through ITCA (Inter Tribal Council of Arizona)
- ▶ UST Program Monitor spent many hours in the field and educating the Travel Plaza Executive Director. Executive Director kept the Chief and Tribal Council informed of the regulatory requirements.

END OF THE GRANT Chuck Tillman

- ▶ At the end of the EPA UST grant. The Choctaw Nation was able to see the need to maintain the program. The Chief of the Choctaw Nation made arrangements with the Tribal Budget to maintain the program.
- ▶ Through the years, money has been appropriated to maintain the program and to further the education of the Tribal UST Inspector.

2004 Tribal UST Facility Compliance Monitors for Region 6 Tribal UST Program

Left to right

Robert Largent from ITEC, **Josh Presley**
from Chickasaw Nation of Oklahoma
and **Chuck Tillman**, Choctaw Nation of
Oklahoma.

Picture taken at Durant #1 site where site
assessment was taking place to identify
old release from piping change.

No significant contamination was found.

May, 2005



Choctaw Nation Travel Plazas



Choctaw Travel Plaza UST Systems

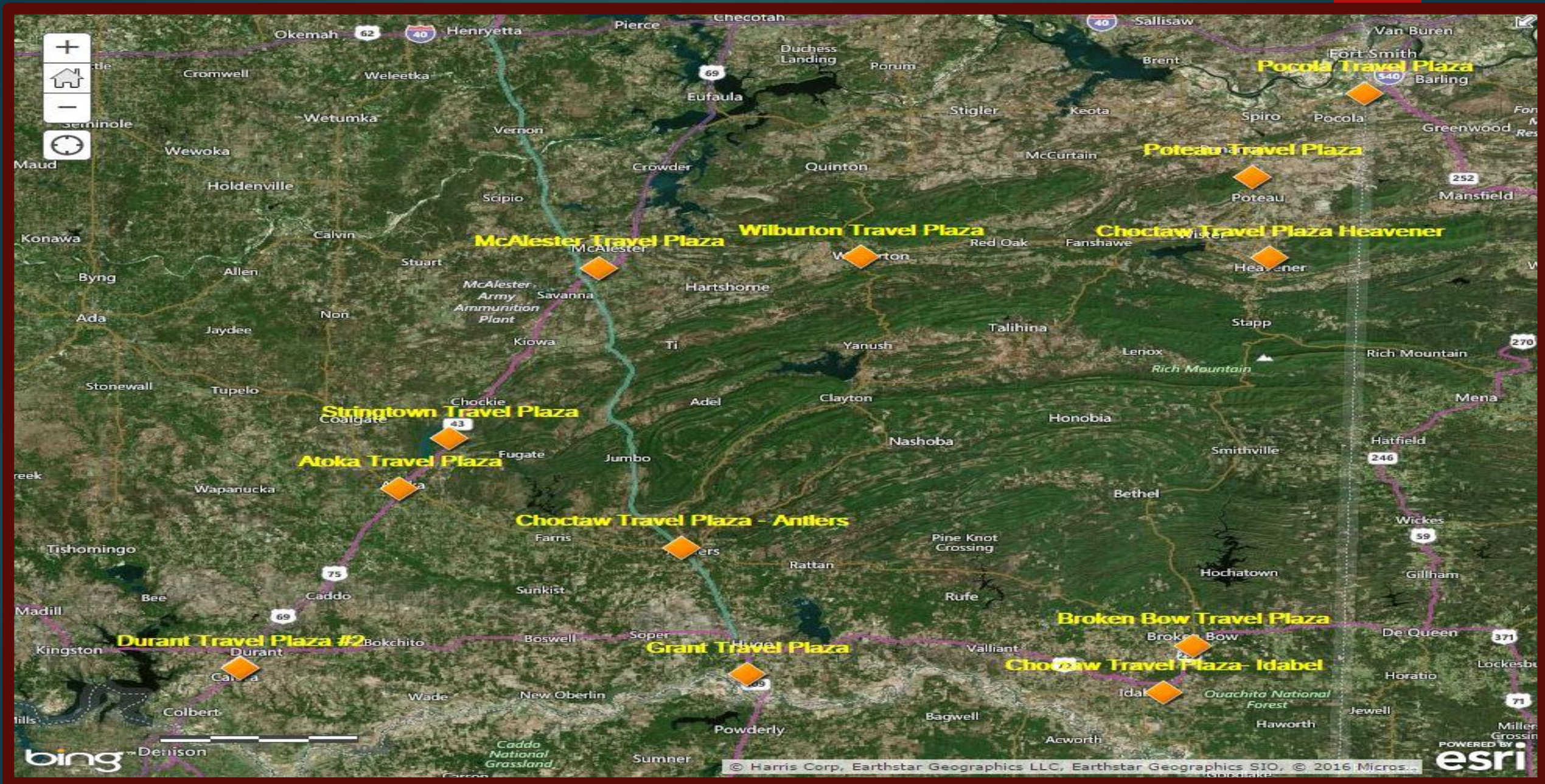
- ▶ System makeup varies for each facility.
- ▶ The Atoka Travel Plaza is a small facility with 2 tanks. One tank for regular gasoline and one compartmentalized tank for diesel and premium gas.
- ▶ Piping is fiberglass reinforced plastic.

Durant Travel Plaza #2



Durant Travel Plaza #2

- ▶ The system at this large truck stop type Travel Plaza consists of 5 tanks. Some tanks are single wall composite steel tanks while the newer diesel tanks are double wall composite steel tanks.
- ▶ All piping is fiberglass reinforced plastic.
- ▶ The Durant facility has a capacity for 50,000 gallons diesel and 22,000 gallons of gasoline.



Location of 13 Choctaw Travel Plazas in Southeastern Oklahoma

Return on the Investment

Chuck Tillman

- ▶ Business Matters – The cost of Compliance can be expensive but the benefits do outweigh the costs.
- ▶ The Choctaw Travel Plazas has see a growth of more than 25% in fuel sales since the inception of the EPA Grant in 2004. The total fuel sales for 2015 exceeded 25 Million gallons of fuel. That is a 6 ¼ Million gallon increase. (\$750,000 profit increase, at \$0.12 profit per gallon)
- ▶ Increase is a result of reputation of having the highest quality fuel for customers and maintaining compliance with the Oklahoma Corporation Commission (OCC) and EPA.

Compliance Rates

Choctaw Travel Plazas	FY 2016 85%
Facility Name	SOC (Y/N)
Broken Bow	Y
Grant	Y
Idabel	Y
Antlers	Y
Wilburton	Y
Pocola	Y
Poteau	Y
Heavener	Y
Atoka	Y
Durant #1	Y
Durant #2	Y
McAlester	N
Stringtown	N

SOC Compliance record Since 2004

Choctaw Travel Plazas	FY 2016 85%	FY 2013 90%	FY 2010 100%	FY 2007 100%	FY 2004 0%
Facility Name	SOC (Y/N)	SOC (Y/N)	SOC (Y/N)	SOC (Y/N)	SOC (Y/N)
Antlers	Y (CA ONLY)	NA	NA	NA	NA
Atoka	Y	Y	Y	Y	N
Broken Bow	Y	Y	Y	Y	N
Durant #1	Y	Y	Y	Y	N
Durant #2	Y	Y	Y	Y	N
Grant	Y	Y	Y	Y	N
Heavener	Y	NA	NA	NA	NA
Idabel	Y	Y	Y	Y	N
McAlester	N	N	Y	Y	N
Pocola	Y	Y	Y	Y	N
Poteau	Y	Y	Y	Y	N
Stringtown	N	Y	Y	Y	N
Wilburton	Y	Y	Y	Y	N

RELATIONSHIPS



Chuck Tillman

- ▶ The Choctaw Nation has since 2004 maintained a great working relationship with OCC and EPA.
- ▶ Constant contact with regulators is must.
- ▶ Nothing is hidden, if we experience any issues then we are on the phone and inviting the OCC and/or EPA to assist.
- ▶ OCC and EPA have also contacted the Choctaw Nation for assistance/knowledge about issues occurring in other areas of Oklahoma.

Trailer with equipment to provide compliance evaluation and maintenance at Choctaw UST facilities

Equipment in trailer also used to supply emergency response to spills at UST facilities. System developed by Chuck Tillman.



Lessons Learned

Chuck Tillman

- ▶ Chuck Tillman started with the program and stayed with it until FEB 2013. At this time Chuck took another position within the Choctaw Nation as Energy Manager for the Utility Authority.
- ▶ During this vacancy the Travel Plazas did not replace Chuck Tillman, UST Program Monitor, but decided to use the 3 maintenance men to maintain the systems.
- ▶ With no one person accountable for the USTs and compliance issues started to arise again. (Loss of paperwork/records and lack of required testing – LLD, Line Tightness, Tank Tightness, and CP testing)

The Journey Back to Compliance

Chuck Tillman

- ▶ In Jan 2015, Chuck returned to Travel Plazas to serve as Director of Operations. Unable to dedicate the time needed to oversee the facilities as needed search for a new UST Program Monitor was initiated.
- ▶ August of 2015 brought the start of a major restructure within the tribe. This derailed the efforts in placing a person dedicated to USTs.
- ▶ December 2015 finally brought the return of a UST Program Monitor back to the Choctaw Travel Plazas. Unfortunately the person needed training and spent the next several months trying to get paperwork back in order.
- ▶ However, just at the end of the EPA inspections this year, the UST Program Monitor took another position in the tribe. So the search continues for the right person.

Data available for facilities using EPA R6 geospatial reference system



The image shows an aerial satellite view of a facility, likely a travel plaza, with a large parking lot and several buildings. A popup window is overlaid on the image, providing detailed information about the facility. The popup window is titled "01530K: Broken Bow Travel Plaza" and includes the following information:

- View Google / Bing Imagery or Street View (if available)
- 1800 South Park Drive
Broken Bow, OK 74728
Latitude: 34.005256
Longitude: -94.739969
- Tribe: **Choctaw Nation of Oklahoma**
- Facility Status: **Operating**
- LUST Status:
- SWP: Yes
- Last Inspection Date: **3/3/2013**
- SOC Status: **In SOC**
- Site Vulnerability Score: TBD
- Owner Info
Choctaw Nation of Oklahoma
Zoom to Get Directions
Show Related Records

The popup window also features a date stamp "3/3/2013" and a small green icon with a white 'G' inside a circle. The background image shows a large parking lot with many cars, a large white building, and a red-roofed building. The "bing" logo is visible in the bottom left corner, and "ImagePatch.com, © 2016 Microsoft Corporation" is visible in the bottom right corner.

Surface water sources that may be influenced by a release from tanks



Identify drinking water sources within radius of influence from tanks



Choctaw Tribe has access to all data collected by EPA using SharePoint system.

Office 365 | **SharePoint**

BROWSE PAGE

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R6UST - TCAMS

Search this site

Choctaw Nation of OK

- Choctaw Nation of Oklahoma Information
- Choctaw Nation of Oklahoma Contacts
- Choctaw Nation of Oklahoma Inspection Schedule

Choctaw Nation of Oklahoma Contacts

Choctaw Nation of Oklahoma Facilities

- Atoka Travel Plaza - 0276OK
- Broken Bow Travel Plaza - 0153OK
- Choctaw Travel Mart Idabel - 0325OK
- Choctaw Travel Plaza

FY2016 Choctaw Travel Plaza due in 81 days

+ ADD TASK EDIT LIST

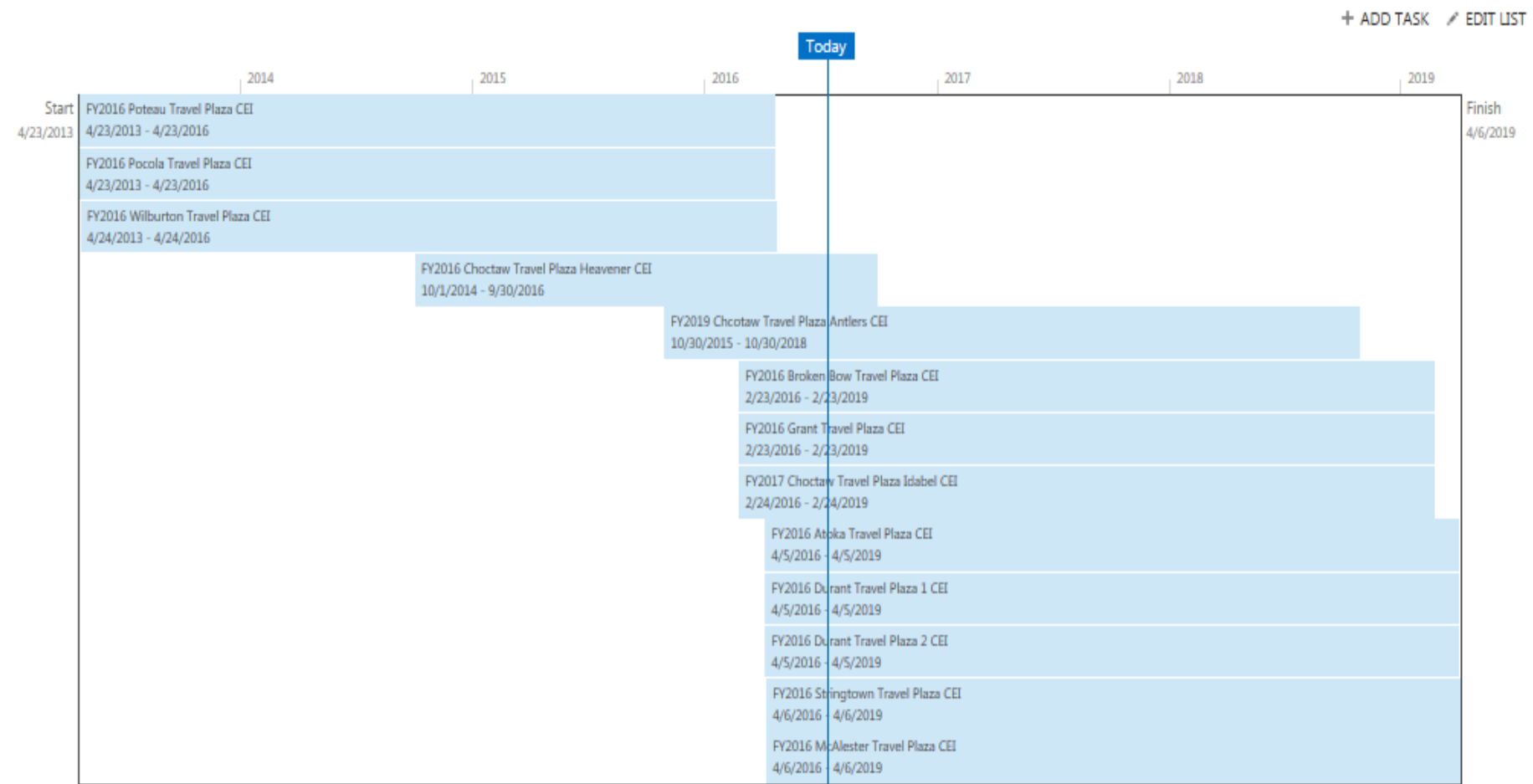
Task	Start	End
FY2016 Poteau Travel Plaza CEI	4/23/2013	4/23/2016
FY2016 Pocola Travel Plaza CEI	4/23/2013	4/23/2016
FY2016 Wilburton Travel Plaza CEI	4/24/2013	4/24/2016
FY2016 Choctaw Travel Plaza Heavener CEI	10/1/2014	9/30/2016

EPA Inspection Schedule Page

- Inspection Schedule
- Documents
- Choctaw Nation of Oklahoma Contacts
- Choctaw Nation of OK Facilities
- Atoka Travel Plaza - 0276OK
- Broken Bow Travel Plaza - 0153OK
- Choctaw Travel Mart Idabel - 0325OK
- Choctaw Travel Plaza Antlers - 0359OK
- Choctaw Travel Plaza Heavener - 0344OK
- Durant Travel Plaza 1 - 0065OK
- Durant Travel Plaza 2 - 0093OK
- Grant Travel Plaza - 0095OK
- McAlester Travel Plaza - 0098OK
- Pocola Travel Plaza - 0100OK
- Poteau Travel Plaza - 0183OK
- Stringtown Travel Plaza - 0184OK

Choctaw Nation of Oklahoma Inspection Schedule


FY2016
Choctaw
Travel Plaza
due in
81 days



Inspection Process and Status of Contact with Operator

Office 365 | SharePoint

BROWSE | **FILES** | LIBRARY

 R6UST - TCAMS
EPA Inspections ▶ **FY2016** ⓘ





Choctaw Nation of Oklahoma


Information
Inspection Schedule
Documents







Choctaw Nation of Oklahoma Contacts

Choctaw Nation of OK Facilities

- Atoka Travel Plaza - 0276OK
- Broken Bow Travel Plaza - 0153OK
- Choctaw Travel Mart Idabel - 0325OK

 New  Upload  Sync  Share More ▾

All Documents ... 

✓		Name		Modified	Modified By
		2016_03_Notice of Inspection Date	...	April 25	Thomas, Larry
		2016_03_Notice of Inspection Date Change	...	April 25	Thomas, Larry
		2016_04_Inspection Rpt-Durant 1	...	April 25	Thomas, Larry
		2016_05_Inspections Closed letter	...	June 6	Thomas, Larry
		2016_05_Status on Facilites inspected	...	June 6	Thomas, Larry

Drag files here to upload

Compliance Inspection Report page 1 of 26



COMPLIANCE INSPECTION REPORT FOR UNDERGROUND STORAGE TANKS EPA Region 6 Federal Form

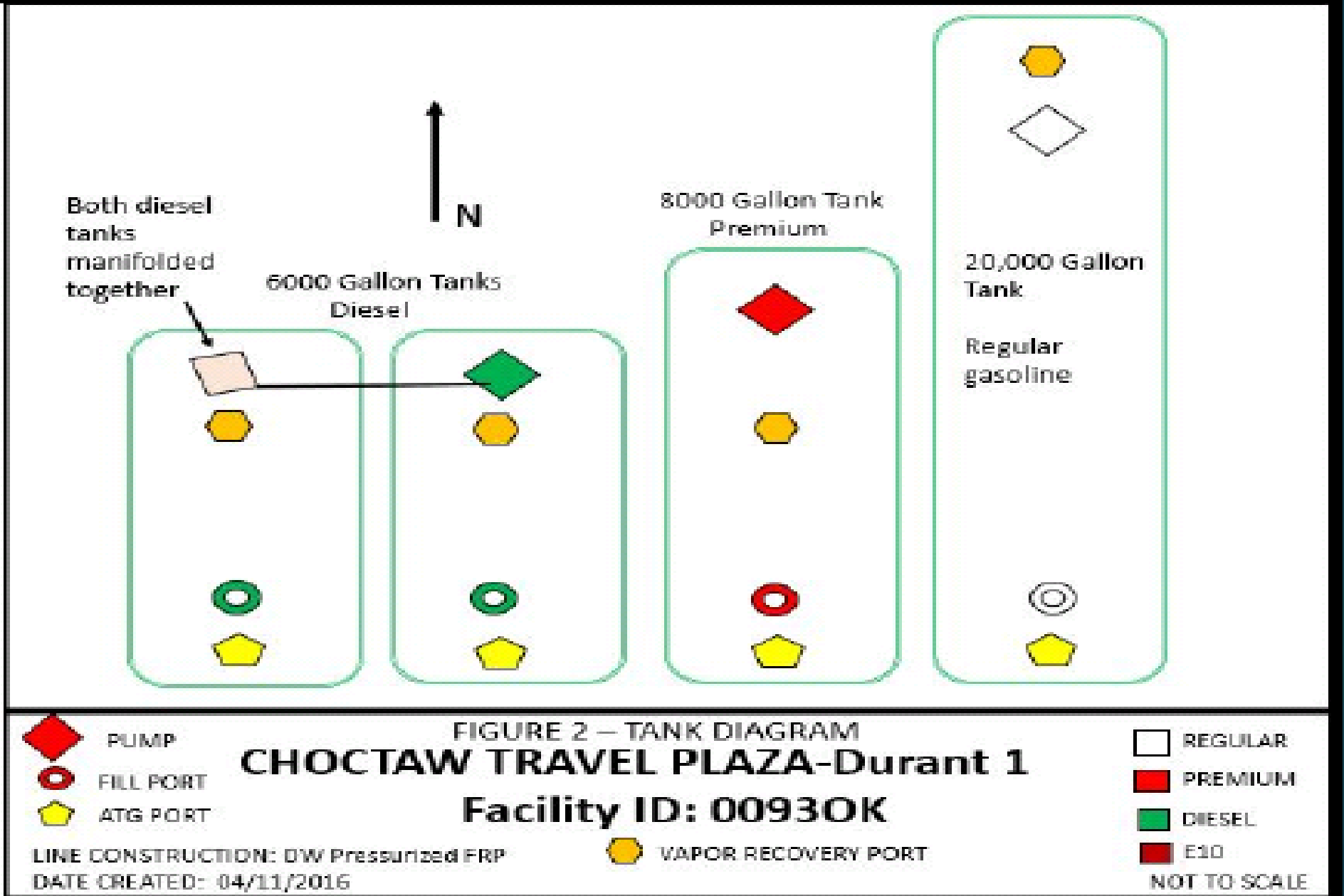
FID#	00650K	DID#	0060	Inspection Date	4/5/2016		
Facility Name	Choctaw Travel Plaza Durant 1						
<input checked="" type="checkbox"/> Facility Land Tribally Owned	<input type="checkbox"/> Facility Privately Owned or Leased on Tribal Land		Tribe	Choctaw Nation of Oklahoma			
Physical Address	4015 Choctaw Road		Phone:	580-920-2186		Fax:	
City:	Durant	State:	OK	Zip:	74701	County:	Bryan
Mailing Address	same as above		Address	City	State	Zip	
Facility Representative:	Michael Elrod		Title:	Merchandising Marketing Manager			
e-mail:	melrod@choctawnation.com		Phone:	580-775-8347			
Facility Coordinates							
Decimal Latitude:	0.000000		Decimal Longitude:	0.000000		Measured At:	UL Fill
Latitude	Degrees	Minutes	Seconds	Longitude	Degrees	Minutes	Seconds
	33	57	13.00		-96	24	56.80
UST Operator:	same as Owner		Phone:			Fax:	
Mailing Address			Address	City	State		
Contact Name			Title				
e-mail:			Phone:				
UST Owner	Choctaw Nation of Oklahoma		Phone:	800-522-6170		Fax:	
Mailing Address	16th and Locust St, (PO Box 1210)		Durant	OK	74702		
	Address		City	State	Zip		
Contact Name	Chuck Tillman		Title	Director of Operations			
e-mail	ctillman@choctawnation.com		Phone	580-326-8579 c			
Lead Inspector:	Larry Thomas		Type of Inspection:	CEI			
Additional Inspector(s) and Others_present	Michael Elrod						

Facility Layout as Presented in Report



FIGURE 1 – SITE FIGURE

CHOCTAW TRAVEL PLAZA DURANT #1 0065OK



Inspector Observation Report

FID#	0065OK	OID#	0080	Inspection Date	4/5/2016
Facility Name	Choctaw Travel Plaza Durant 1				

Inspection Summary	All equipment in good condition. Release detection by ATG CSLD and meets requirements for SOC compliance. Was missing 3 months of PASS during summer for regular due to lack of quiet time. Line tightness and leak detector test OK.
Inspection Comments	CP tests done for tanks and sumps.

Facility is in SOC:	Overall:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Prevention:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Detection:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Larry Thomas
Report Prepared By

Start	8:45	AM	End	11:30	AM
Time of Inspection					

Signature:	
Title:	UST Inspector

Report date:	4/6/2016
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<input checked="" type="checkbox"/> Document peer reviewed?	Reviewed by: Heather Mann
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Review date:	4/22/2016
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« UST TRIBAL FOLDERS ▶ TCAMS - Backup ▶ Oklahoma ▶ Choctaw Nation of OK ▶ Search Choctaw Nat...

File Edit View Tools Help

Organize Open Burn New folder

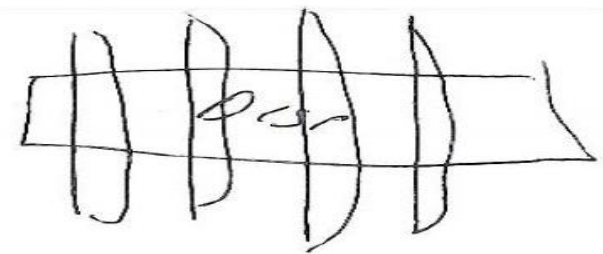
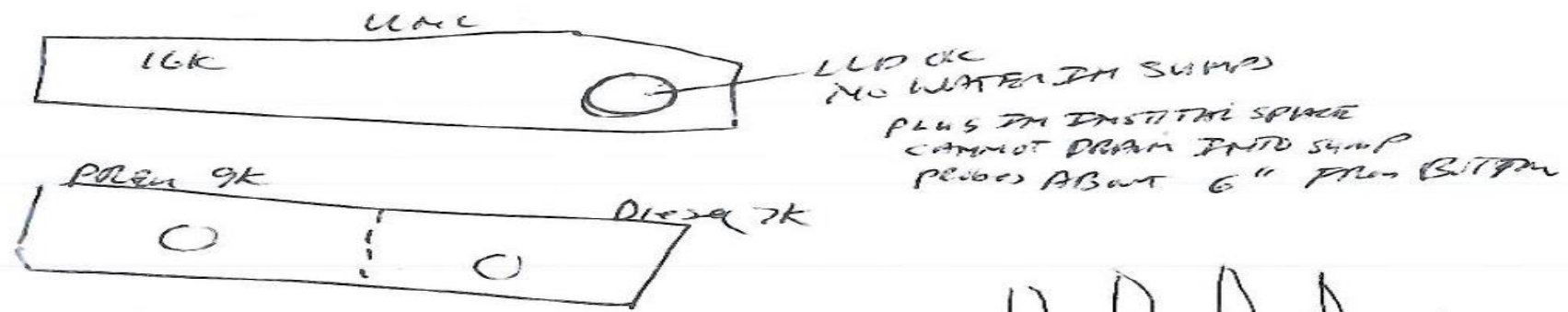
Name	Date modified	Type	Size
Atoka Travel Plaza	4/27/2016 11:14 A...	File folder	
Broken Bow Travel Plaza	4/24/2015 3:23 PM	File folder	
Choctaw Country Marketplace	12/23/2015 1:13 PM	File folder	
Choctaw Travel Plaza Antlers	12/16/2015 9:58 A...	File folder	
<u>Choctaw Travel Plaza Heavener</u>	<u>4/18/2016 4:12 PM</u>	<u>File folder</u>	
Choctaw Travel Plaza Idabel	12/7/2015 9:38 AM	File folder	
Durant Travel Plaza #1	4/27/2015 7:46 AM	File folder	
Durant Travel Plaza #2	4/28/2016 2:46 PM	File folder	
Grant Travel Plaza	4/27/2015 12:30 PM	File folder	
Idabel Travel Plaza	12/7/2015 9:42 AM	File folder	
McAlester Travel Plaza	5/2/2016 7:36 AM	File folder	
Pocola Travel Plaza	4/18/2016 4:13 PM	File folder	
Poteau Travel Plaza	4/18/2016 4:13 PM	File folder	
Stringtown Travel Plaza	4/27/2015 2:16 PM	File folder	
Wilburton Travel Plaza	4/6/2016 4:06 PM	File folder	

DATE: 7/9/04
TIME:
WEATHER: HOT 90°

SITE DRAWING

OTHER INSPECTOR(S)

Chuck Tillman



LLD'S IMPULSER (ELECTRONIC)
 ALL PUMP SUMPS WERE DRY
 THE INSTANT PIPING WAS BLOCKED
 IN ALL THREE SUMPS BY A BOLT
 IF THERE WAS A LEAK IN THE
 PLEX PIPING (DOUBLE WAVE) IT WOULD
 NOT DRAIN INTO PUMP SUMPS TO BE PICKED UP BY PROBES IN SUMPS
 HOWEVER USING PLEX. LLD'S ~~WAS~~ WHICH
 TEST PIPING



PROBES IN SUMPS SHOULD BE LOWERED CLOSER TO BOTTOM
 OF SUMPS.
~~SUMP SENSORS DO NOT APPEAR TO BE CONNECTED TO APL SYSTEM~~
 (OUL SUMP SENSORS NEARLY BE CHECKED TO SEE IF WORKING)
VIOLATION
 NOT KEEPING MONTHLY RECORDS ON TANKS LINES
 UNCLE TOMAS TANK & PIPING DID NOT ~~PROBE~~ TEST IN LAST 12 MONTHS.

Address
Tank
info.
and
Piping
2004

Index = 4 Letmore CO. 35° 05' 50.3" 94° 37' 5.9"

U.S. ENVIRONMENTAL PROTECTION AGENCY UST INSPECTION CHECKLIST - REGION 6

OWNER OF TANKS		LOCATION OF TANKS	
NAME: Choctaw Nation	NAME: Poteau Choctaw Travel Plaza	ADDRESS: 164 Lacust	ADDRESS: 4105 N. Broadway
CITY, STATE, ZIP: Durant, OK	CITY, STATE, ZIP: Poteau, OK 74953	TEL:	TEL: 918-647-3392
CONTACT PERSON: Chuck Tillman	FACILITY ID#: 183		

TANK INFO:	TANK#	1	2	3	4	5	6	7	8
MON/YR TANK INSTALLED		12/02							
CAPACITY (GAL)		12K	8K	20K					
MATERIAL OF CONSTRUCTION		Clad steel							
SUBSTANCE STORED		Res gas	Propane gas	diesel					
REL. DETECTION METHOD(S) (SIR, ATG, GW, VM, INV&TTT, INTER, OTHER)		ATG	AUTO	stick #					

PIPING INFO									
MATERIAL OF CONSTRUCTION		DW Flex							
PRESSURE/SUCTION (P OR S)		P	P	P					
AUTO. LINE LEAK DETECTORS?		Fire	camp miter		With	Sump	sensors	Water in	
AND ANNUAL LLD TEST DATE		no records						and	no records
DATE, LINE TIGHTNESS TEST OR, MONTHLY RD METHOD USED		NO records							
SUCTION ONLY- DATE OF TEST OR NOT REQUIRED									

SPILL, OVERFILL, CORROSION PROTECTION				DATE EXISTING TANK UPGRADED	
SPILL BUCKET ON ALL FILLS?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1	1
OVERFILL TYPE					

BALL FLOAT	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>						
FLAPPER VALVE (IN DROP TUBE)									
AUDIOVISUAL									

CORROSION PROTECTION FOR TANKS:

2004

Insp.
Check
list

CORROSION PROTECTION FOR TANKS:								
IMPRESSED CURRENT (NACE?)								
GALVANTIC (NACE?)								
DATE OF INTEGRITY TEST								
NONE REQUIRED								

CORROSION PROTECTION FOR PIPING AND PIPING COMPONENTS (FLEXJOINTS AND PUMP MANIFOLDS):																
BOOTED (D=Disp., M=MANIFOLD)	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M
ISOLATED FROM SOIL & WATER D - M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M
IMPRESSED CURRENT (NACE?) D-M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M
SPIKE/ SACK ANODES (NACE?) D-M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M	<input type="checkbox"/> D	<input type="checkbox"/> M
FINANCIAL RESPONSIBILITY (CIRCLE)	STATE TRUST FUND: SELF INSURED: PRIV. INS.: RISK RET. GROUP: GUARANTEE SURETY BOND: LOC. TRUST FUND: OTHER															

INSPECTOR NAME Greg Pashia [Signature] DATE OF INSPECTION 8/10/04 TIME 7:00A.M.
 PRINT SIGNATURE

ENFORCEMENT ACTION: OBSERVATION REPORT Y FIELD CITATION # UST6: _____ COMMENTS _____

*pictures 118-112
0012-0017*

Inspection in Oklahoma

“I wonder how I am going to get the bailer I dropped out of this ground water monitoring well?”



New state of the art double wall, steel tanks

These tanks were installed at the Idabel Oklahoma facility as part of upgrade of the Travel Plazas. The old facility, which was located across the street, was closed and the old tanks removed.



The Future

Chuck Tillman

- ▶ FY 2017 Choctaw Nation will be purchasing a \$30,000 calibration trailer, which will be used to perform calibration on dispensers every 6 months.
- ▶ In June 2016, the Durant East location was subject to an internal calibration check.
 - ▶ Monthly sales for Unleaded totaled 180,000 gallons
 - ▶ Calibration check showed that over 800 gallons of Unleaded were given away, because of poor dispenser calibration, resulting in a loss of revenue of over \$1,300 loss per month.
 - ▶ 6 of the 12 fueling locations exceeded the 6 cubic inches requirement

Cooperation- Communication- Compliance

- ▶ Choctaw Nation UST Travel Plaza Management, UST facility management, and EPA inspectors have made the effort to understand how regulations apply to each facility and then apply this understanding to gain compliance.

Working together for 13 years

