South Dakota Spill Report Form

PRCF #: **Case #:**

Reported (MM/DD/YY): 10/06/2025	Time: 15:19	Recorded By: Zach Burggraff

A. REPORTER

Reported By: Jeremy Huot			
Organization Name: American Engineering Testing, Inc.		○ Discharger ◉ Public ○ State ○ Local ○ Federal	
Phone: (605) 388-0029		Email: jhuot@teamAET.com	
Address: 1745 Samco Road			
City Rapid City	State: SD	Zip: 57702	

B. DISCHARGER (Responsible Party) ☐ As Above in A

Name: M.G. Oil Company (Dave Kulish)			
Address: 1180 Creek Drive			
City: Rapid City	State: SD	Zip: 57703	
Phone: (605) 342-0527	Email: dkulish@mgoil.com		

C. INCIDENT DATE & LOCATION ☐ As Above In B

Spill Date: (MM/DD/YY) Unknown	Spill Time: Unknown		
Street or Approx. Location: Flying J, 4200 North Interstate 90 Service Road (Exit 61)			
Survey Description: NW¼ SW¼ S27, T2NR8E (44.102905°, -103.149818°)			
City: Rapid City	County: Pennington	State: SD	Zip: 57701

D. MATERIAL

Material type (Code/Name): ☐ Hazardous Substance ☐ Material Unknown ☐ Oil ☐ Other	Quantity Spilled	Spilled in Water	Units (Check one)
Petroleum Hydrocarbon Products			○ lb. ○ bbl. ○ gal. ○ oth.
			○ lb. ○ bbl. ○ gal. ○ oth.
			○ lb. ○ bbl. ○ gal. ○ oth.

E. SOURCE

Source of Spill: ☐ AST ☑ UST ☐ Railway ☐ Transport ☐ Fixed Facility ☐ Pipeline ☐ Highway ☐ Other

Description: Underground storage tank (UST) system(s)

Regulated Tank Facility: ☑ Tank Facility ID #: 02-00136

F. MEDIUM

Medium Affected: ☐ Air ☑ Land ☐ Water ☐ Groundwater ☐ Within Facilities Only

Waterway Affected: N/A

G. CAUSE

Reported Cause: ○ Transportation Accident ○ Operational Error ○ Dumping ○ Equipment Failure ○ Natural Phenomenon ○ Unknown ◉ Other

Description: The operation of multiple UST systems from at least 1963 until 2025

H. DAMAGES

# of Injuries: N/A # of Fatalities: N/A

I. ACTIONS

Response Action Taken:
Phased removal of eight (1 x 4k gal, 3 x 12k gal, and 4 x 20k gal) USTs, product piping, and dispensers; Excavation and proper disposal 1,710 tons of contaminated soils (During May, June, and July 2025)

K. NOTIFIED

Responding Agency: ◉ DANR ○ Local ○ Discharger ○ Federal ○ EPA ○ Other

Agencies Notified: DANR

K. COMMENTS

Comments: During removal activities, 34 soil samples were collected, screened with a PID, and subsequently submitted for laboratory analyses. Laboratory analytical results indicated all but one sample contained measurable concentrations of petroleum hydrocarbons. Of these, 22 samples exceeded DANR Tier 1 Trigger and/or Action Levels for Soils, with several exceeding by a substantial margin. In addition, the subsurface water present in two tank basin excavations was overlain by thin layer of free phase product (< 1"). While recovery efforts utilizing absorbent pads proved sufficient to allow backfilling, free phase product may still remain outside the extents of the basin excavations. Considering 22 of the 34 soil samples submitted for laboratory analyses exceeded DANR Tier 1 Action/Trigger Levels, recoverable free phase product was encountered, and the possibility unobserved free phase product remains, further site assessment is warranted. [See Report of Underground Storage Tank System Removal by American Engineering Testing, Inc.]

Department of Agriculture and Natural Resources
Inspection, Compliance, and Remediation Program
523 East Capitol Avenue
Pierre, South Dakota 57501

Business Hours M – F 8:00-5:00 PM
Normal Business Hours- (605)773-3296
After Business Hours- (605) 773-3231

DEPARTMENT of AGRICULTURE and NATURAL RESOURCES
PO BOX 6221
221 MALL DRIVE, SUITE 201
RAPID CITY SD 57709-6221
danr.sd.gov

October 27, 2025

Dave Kulish
M.G. Oil Company
1180 Creek Drive
Rapid City, SD 57702

Re: Department of Agriculture and Natural Resources File Number – 2025.152
Petroleum contamination at Flying J (Facility ID #02-00136), 4200 North Interstate 90 Service Road, Rapid City, South Dakota.

Dear Mr. Kulish:

The Department of Agriculture and Natural Resources (DANR) is contacting you regarding a report of petroleum contamination at Flying J in Rapid City, SD. Information from the provided report has been recorded on an initial spill report form, a copy of which is enclosed for your review. To mitigate the potential of adverse impacts to the state's groundwater resources, DANR has developed procedures for the assessment of petroleum contamination at a site such as this. As a result, DANR is requiring the following:

- By November 24, 2025, complete and return the enclosed Written Contamination Incident Follow-Up Report form (This is a standard form to be completed as applicable);
- Direct your consultant to develop a Tier 2 receptor survey and site assessment work plan (SAWP) to determine the magnitude and extent of petroleum contamination and evaluate the potential risk to sensitive human health and environmental receptors; and
- Provide a copy of the Tier 2 Receptor Survey and SAWP to DANR for review once received.

Zach Burggraff has been assigned as the project manager for this case. Once Zach has reviewed all available information, he will contact you to discuss any further actions that may be needed. If you have any questions or concerns, please contact Zach at (605) 394-2229. Thank you for your cooperation in this matter.

Sincerely,

Trish Kindt
Inspection, Compliance, and Remediation Program

Enclosure

cc/e: Jeremy Huot, American Engineering and Testing, Inc., Rapid City, SD
Dustin Willet, Pennington County Emergency Management

DEPARTMENT of AGRICULTURE and NATURAL RESOURCES
JOE FOSS BUILDING
523 E CAPITOL AVE
PIERRE SD 57501-3182
danr.sd.gov

August 10, 2026

Dave Kulish
M.G. Oil Company
P.O. Box 1006
Rapid City, SD 57709

Re: No Further Action, pertaining to the removal of four underground storage tanks and product piping, Flying J Travel Plaza, 4200 N Interstate 90 Service Road, Rapid City
DANR #2025.152. Facility ID #02-00136.

Mr. Kulish:

Staff from the South Dakota Department of Agriculture and Natural Resources (DANR) have reviewed the available information for the above-referenced property and determined that further assessment will not be required. DANR has determined, based on the available site information, that there is no current risk to human health or further risk to the environment. Therefore, DANR will assign No Further Action status to DANR file number 2025.152.

It should be noted that soil contamination above DANR action levels exists on site. If construction activities result in contaminated soil being removed, it must be properly disposed of at a permitted facility.

In addition, if future exposure pathways are created or if problems arise from the remaining contamination associated with this release, M.G. Oil Company may be responsible for performing additional assessment or clean-up activities. M.G. Oil Company may also be responsible for further assessment and cleanup actions if the use of this property changes, which increases the risk to human health and the environment from contamination documented at this property. The No Further Action designation will be recorded in DANR's release database and can be found at https://apps.sd.gov/NR42InteractiveMap.

If you have questions or concerns about your site's No Further Action designation, please contact Marshall Brown of my staff at (605) 773-3296. Thank you for your cooperation in protecting South Dakota's water resources.

Sincerely,

Hunter Roberts, Department Secretary

Cc: Jeremy J. Huot, CPRR, American Engineering Testing
John McVey, PRCF

DEPARTMENT of AGRICULTURE and NATURAL RESOURCES
JOE FOSS BUILDING
523 E CAPITOL AVE
PIERRE SD 57501-3182
danr.sd.gov

MEMORANDUM

TO: Terry Florentz, P.E., CPRR, Administrator
Inspection, Compliance, and Remediation Program

From: Lance Clark, Engineer I
Inspection, Compliance, and Remediation Program

8/12/26

08/12/26

Subject: No Further Action recommendation for DANR Environmental Event No. 2025.152 – Flying J Travel Plaza, Rapid City, SD. Facility ID #02-00136.

Date: August 12, 2026

Introduction

This memo provides a summary of DANR Environmental Event No. 2025.152. This summary includes general spill information, investigation efforts, and remaining contamination. Finally, I recommend this file receive No Further Action status. Contamination is isolated to the Underground Storage Tank (UST) basin, distribution line trench, and islands. A Tier 2 Assessment determined that there is no viable pathway for contamination to reach potential receptors.

General Information

Site Name: Flying J Travel Plaza
Location: 4200 N Interstate-90 Service Road
Rapid City, Pennington County, SD, 57709
Discovery Date: 10/06/2025

Facility Background

Flying J Travel Station is a truck stop located in Rapid City owned by Pilot Travel Centers, that has been in operation since the 1970s. The facility is owned by MG Oil. The Station is located southeast of the intersection of East Mail Drive and North Elk Vale Road. The facility offers gasoline, diesel, and other amenities to customers. The site had numerous USTs, including one 4,000-gallon, three 12,000 to 20,000-gallon gasoline USTs, four 12,000 to 20,000-gallon diesel USTs, and one diesel exhaust fluid (DEF) UST. The site has experienced multiple releases in the past. A summary of the historical releases for this site is available in DANR File # 2015.191.

Previous Releases

1998 Release (See DANR #1998.322)

In 1998, a storage tank for E-85 was removed because it failed a tank tightness test. Upon removal, a rupture was observed on the seam of the UST. Also, olfactory and visual evidence of contamination was found in the backfill material. 13.3 cubic yards of soil were then removed from the site. Leggette, Brashers and Graham Inc. (now WSP) was contracted as consultants on this project. Analytical results from soil samples collected from the UST excavation site revealed concentrations of benzene higher than 0.2 ppm. In October 2000, groundwater monitoring well MW-5 was installed on the site because the site was close to two water supply wells. The following month, the well was sampled, and benzene was detected in concentrations above the South Dakota Ground Water Quality Standards (SDGWQS).

Two additional ground water monitoring wells (MW-6 and MW-7) were installed in 2003. MW-6 and MW-7 were sampled in May 2003. Again, the benzene concentration exceeded the SDGWQS from MW-6. In 2007, MG Oil requested that DENR place the site into No Further Action Status. The request was denied given the proximity of the water supply wells, and another groundwater sampling event was ordered. Only the concentration of benzene in MW-6 remained above the SDGWQS. It was determined that benzene in groundwater could not affect utilities as the groundwater table was below subsurface utilities. The case was then placed into No Further Action.

2015 Line Leak (See DANR #2015.191)

On September 25, 2015, Grimm's Pump and Industrial Supply was conducting routine compliance testing on one of their unleaded gasoline service lines. The gasoline line failed its liquid tightness test, and an unknown amount of gasoline was leaked into the subsurface. The line was repaired and returned to service on October 8, 2015. A Tier 2 Assessment was then ordered by DENR. WSP was hired as the consultant for the Assessment, and a plan was approved on November 3, 2016.

WSP mobilized to the site during October 2018. The consultant advanced four soil borings ranging from 25 to 40 feet below the ground. One of the borings was a 30-foot monitoring well. The recovered soil was screened with a photoionization detector (PID), and soil samples were taken from each boring. Petroleum contaminants were found in two soil and groundwater samples. However, concentrations were below the Tier 1 Action Levels and SDGWQS Standards. WSP performed a receptor survey as part of the assessment, and they could not find a pathway for contamination to enter nearby receptors. Therefore, the spill was placed into No Further Action Status on June 15, 2020.

2025 UST System Removal

On May 21, 2025, in preparation for the full removal, personnel from American Engineering Testing (AET) visited the site to collect soil samples. The samples were collected to provide the soil characterization required by Rapid City Landfill. It was noted that the spill buckets on site had been exposed. Soil samples were also collected on May 30, 2025, from the distribution pump islands.

On June 6, 2025, free product was observed during the removal of the DEF UST. Absorbent material was placed into the excavation and removed the following week. Two soil samples were collected from the sidewall of the DEF tank basin. The gasoline containing USTs were removed on July 2, 2025. Visual and olfactory evidence of contamination was observed during the removal. The gasoline USTs were removed that day and soil samples collected from under the tanks. Soil samples

were also collected from the open distribution line trenches. The remaining diesel tanks were removed on July 8, 2025. As before, soil samples were collected from the bottom of the basin. A thin layer of free product was observed floating on groundwater during the excavation. Like with the DEF basin, absorbents were used to remove the free product. The excavated area was backfilled with aggregate. The tanks appeared to be in good condition following removal; holes were most likely the result of punctures during removal. The distribution system appeared to be in fair condition, but it was difficult to visually ascertain based on the condition of collected piping.

Petroleum vapor concentrations were elevated in the DEF and petroleum UST basins, distribution line trenches, and from beneath most distribution islands. Concentrations of total petroleum hydrocarbons as diesel (TPH-D) above SD Trigger Levels were observed below most of the former pump islands, in the DEF basin, multiple locations in the distribution line trench, and in the floor of the petroleum UST basin. Total petroleum hydrocarbons as gasoline (TPH-G) concentrations above the Trigger Levels were observed in the DEF and petroleum UST basins. Concentrations of benzene exceeding SD Tier 1 Action Levels were observed below location L under canopy #2, at one spot in the distribution line trench and under the floor of the UST basin. Trigger concentrations of naphthalene were observed at two locations in the UST basin. Toluene, Ethyl Benzene, and Xylenes were also observed above the SD Action Levels at multiple points in the tank basin.

AET recommended a receptor evaluation and Tier 2 Assessment be conducted to determine the risks associated with the release. DANR concurred with the request in a letter dated October 27, 2025, due to the high petroleum hydrocarbon concentrations in soil. and observable free product at the site. A receptor evaluation was delivered on March 13, 2026. The receptor evaluation ruled out exposure pathways through surface water, soil, and groundwater as routes of potential human or environmental contact. Additionally, residential areas were ruled out as receptors. The following exposure pathways could not be ruled out: vapor intrusion to indoor air, vapors in underground utilities, soil in contact with a water line, and groundwater in contact with a water line. Thus, a Tier 2 Assessment was required.

AET submitted a Tier 2 Assessment on July 14, 2026. Two soil borings were done as part of the assessment. SB-1 was bored just south of the main building, and SB-2 was bored next to the utility junction box located next to the DEF UST basin. Groundwater was not encountered at any of the soil borings. Elevated organic vapors were not detected in either soil boring. Analytical results of soil samples did not detect concentrations of TPH-D, benzene, toluene, ethyl benzene, xylenes, methyl tert-butyl ether, and naphthalene above DANR Tier 1 Trigger/Action Levels. The low permeability of the subsurface far clay/shale inhibits the migration of petroleum contaminants.

Recommendations

Petroleum contamination remains on the project site. Existing contamination appears to be localized to the area of the USTs, gasoline and diesel dispenser islands, and distribution lines. Soil samples collected near utility lines show no evidence of petroleum migration under the surface. The fat clay/shale around the release site to heavily restricts the subsurface flow of petroleum contaminants. Therefore, I recommend that Environmental Event 2025.152 be placed into No Further Action Status.