

UST Inspection Report

Rock Energy McLaughlin

Date of Report: October 23, 2023

Inspection Date & Time: September 27, 2023, at 9:15 a.m. Mountain Daylight Time (MDT)

Weather: Sunny, ~ 65 degrees Fahrenheit

Facility Owner: Rock Energy – Standing Rock Sioux Tribe

Facility Owner Address: P.O. Box 567
Ft. Yates, North Dakota 58538

Facility Address: 101 Main Street
McLaughlin, South Dakota 57642

Facility Phone: [REDACTED]

Facility Representative: [REDACTED]

EPA Facility ID Number: 4040020

Reason for Inspection: Routine compliance inspection

Inspector(s): Marta Grabowski, EPA
Andy Woodward, EPA
[REDACTED], Standing Rock Sioux Tribe

UST System Description

The Rock Energy McLaughlin (Facility) is a Tribally-owned gas station and convenience store located on the Standing Rock Reservation in McLaughlin, South Dakota. The Standing Rock Sioux Tribe took ownership of the Facility, formerly owned by Farmers Union Oil of McLaughlin, in July 2023. The fuel at this Facility is sold to the public. The Environmental Protection Agency's Facility records indicate that the Facility has six single-walled, STI-P3 underground storage tanks (UST). Tank 1-Tank 4 were installed in 1990 and have pressurized, double-walled fiberglass reinforced plastic (FRP) piping. Tank 5 and Tank 6 were installed in 1998 and have pressurized, double-walled flex plastic piping. Tank capacities and products are listed in the table below:

Tank Number	Capacity (gallons)	Product
1	10,000	Unleaded gasoline with ethanol
2	10,000	Dyed diesel
3	6,000	Regular unleaded gasoline
4	2,000	Dyed diesel
5	4,000	Clear diesel
6	10,000	Clear diesel

Inspection Narrative

On September 27, 2023, the EPA UST program personnel conducted an inspection at Rock Energy McLaughlin in McLaughlin, South Dakota. The EPA last inspected the Facility on November 3, 2020, and they selected it for routine re-inspection. Ms. Grabowski spoke with a Facility representative on September 11, 2023, to schedule the inspection. She also sent a follow-up email (see Attachment A).

The EPA inspection team arrived at the Facility at 9:15 a.m. MDT. They were met by the Facility representatives. Ms. Grabowski introduced herself and presented her inspector credentials. Ms. Grabowski filled out a Notice of Inspection (NOI) (see Attachment B) and she requested a signature. Ms. Grabowski explained that the NOI serves as documentation of consent for the EPA to conduct an inspection. In addition, she said that she would provide the NOI to the Facility at the end of the inspection. EPA inspectors conducted a physical inspection of the UST system as well as a review of Facility records. Photographs of UST system components taken during the inspection are in Attachment C. Copies of operation and maintenance records are in Attachment D.

Tank Leak Detection

Tank leak detection is conducted by a Veeder Root TLS-350 automatic tank gauge (ATG), which performs continuous statistical leak detection (CSLD). No monthly release detection records from the past year were maintained onsite at the time of the inspection. During the inspection, the EPA inspector printed a tank history showing that all tanks passed a release detection test for each of the past 12 months. Documentation of annual operability testing of the ATG system was not available onsite; however, EPA records indicated the test was conducted and passed on December 28, 2022.

Piping Leak Detection

Piping leak detection for Tanks 1-4 is achieved by electronic automatic line leak detectors (ALLD), which are capable of conducting 0.2 gph tests. Pressure line leak results printed at the time of the inspection showed passing 0.2 gph tests for the following months: September 2023 (Line 1 and Line 3); August and September 2023 (Line 2); May 2023-September 2023 (Line 4). No 0.2 gph test data was available for Line 5 and Line 6 because they use mechanical line leak detection. Documentation of annual line leak detector operability testing (3.0 gph) was not available onsite; however, EPA records indicated the tests were conducted and passed on December 28, 2022, for six ALLDs. Annual line tightness testing records were not available.

Cathodic Protection

Cathodic protection (CP) test results were not available onsite; however, EPA records indicated the tests were conducted and passed on November 2, 2020, and May 30, 2017.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

The Facility representative was not able to provide records of spill bucket testing and overfill prevention device testing at the time of the inspection. According to EPA records, two of the spill buckets were hydrostatically tested and passed on June 8, 2023. The other four spill buckets were tested and passed on December 28, 2022. Overfill prevention devices (high-level alarms) were tested and passed on June 8, 2023, for each tank. Tanks 5 and 6 are also equipped with flapper valves; however, the high-level alarm is the primary method of overfill prevention.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Records of monthly and annual walkthrough inspections were not provided at the time of inspection.

Operator Training

The Class B operator training certificate was maintained at the Facility at the time of inspection. No Class A or Class C training records were provided.

Financial Responsibility

The Facility uses the South Dakota DANR Petroleum Release Compensation Fund as its financial responsibility mechanism.

Physical Observations

The inspection team viewed the spill buckets/fill pipes, one dispenser, submersible turbine pump (STP) sumps (except for Tank 4), Tank 3 ATG riser, ATG console and high level overfill alarms. Spill buckets for all tanks were clean and dry, and an overfill alarm was visible from each tank pad. The ATG probe access point for Tank 3 had a fuel odor, and the wiring was frayed and corroded. Tank 5 and Tank 6 were both equipped with mechanical LLDs, but also had disconnected ELLD units sitting on the pump head. The Tank 5 STP sump contained liquid. The ATG console showed several warnings including “high water” and tests needed.

Inspection Conclusions and Recommendations

At the end of the inspection, Ms. Grabowski filled out an Onsite Deficiency Identification Form (see Attachment E), which represents the EPA staff’s initial compliance recommendations at the time of the inspection. Listed deficiencies were discussed with the Facility representative, including two testing requirements that are due in November/December 2023. Prior to departing the Facility, Ms. Grabowski stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment F). Ms. Grabowski provided the Facility representative with the NOI form and the deficiency form and retained carbon copies of both forms for recordkeeping.

Inspection Report Attachments

- A. Record of communication for scheduling the inspection
- B. Notice of Inspection
- C. Photo log
- D. Facility O&M Documents
- E. Onsite Deficiency Identification Form
- F. Inspection checklist

Signature

Lead Inspector

MARTA GRABOWSKI Digitally signed by MARTA GRABOWSKI
Date: 2023.10.23 15:12:00 -06'00'

Marta Grabowski

Date of signature