

UST Inspection Report

Standing Rock Housing Authority

Date of Report: October 26, 2023

Inspection Date & Time: September 27, 2023, at 12:30 p.m. Central Daylight Time (CDT)

Weather: Partly sunny

Facility Owner: Standing Rock Housing Authority – Standing Rock Sioux Tribe

Facility Owner Address: 1333 92nd Street
Ft. Yates, North Dakota 58538

Facility Address: 2000 W. 5th Street
McLaughlin, South Dakota 57642

Facility Phone: [REDACTED]

Facility Representative: [REDACTED]

EPA Facility ID Number: 4040007

Reason for Inspection: Routine compliance inspection

Inspector(s): Marta Grabowski, EPA
Andy Woodward, EPA

UST System Description

The Standing Rock Housing Authority maintenance shop in McLaughlin (Facility) is a Tribally-owned Facility with one underground storage tank (UST) for fueling housing authority maintenance vehicles. It is located on the Standing Rock Reservation in McLaughlin, South Dakota. The fuel at this Facility is not sold to the public. The EPA's Facility records indicate that the Facility has one single-walled STI-P3 UST, which was installed in 1998. The tank is 560 gallons and contains unleaded gasoline. Facility piping is single-walled steel and operates with safe suction.

Inspection Narrative

On September 27, 2023, the EPA UST program personnel conducted an inspection at Standing Rock Housing Authority in McLaughlin, North 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 13, 2023, to schedule the inspection. She also sent a follow-up email (see Attachment A).

The EPA inspection team arrived at the Facility at 12:30 p.m. CDT. The Facility was closed, and no Facility representative came to meet the EPA inspectors. Ms. Grabowski filled out a Notice of Inspection (NOI) (see Attachment B) but was not able to get a signature from a Facility representative. One photograph was taken from the outside of the Facility (see Attachment C). Copies of operation and maintenance records obtained during the September 26, 2023, inspection at Ft. Yates Housing Authority are in Attachment D.

Tank Leak Detection

According to EPA knowledge of the Facility, tank leak detection is conducted by Franklin Fueling Systems EVO 200 automatic tank gauge (ATG), which was installed in approximately October 2022. Documentation of annual operability testing of the ATG system was not provided during the inspection.

Piping Leak Detection

EPA records indicate that the Facility piping operates with a safe suction system, therefore no release detection is required.

Cathodic Protection

Cathodic protection of the steel tank and piping is provided by a galvanic (sacrificial anode) system. Copies of the last two CP tests, dated July 7, 2022, and May 1, 2017, were obtained by the EPA during the September 26, 2023, inspection at the housing authority facility in Ft. Yates.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

A record of passing spill bucket test results dated December 4, 2020, was obtained during the Ft. Yates inspection. An overfill prevention device test record was not provided; however, a high-level alarm was installed in approximately October 2022, according to a service provider invoice that was maintained at the Ft. Yates facility.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Records of walkthrough inspections were not provided.

Operator Training

Proof of Class A operator training was provided during the Ft. Yates inspection; however, it is unclear whether the same individual operates both locations. No other operator certification was provided for the Facility.

Financial Responsibility

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

Physical Observations

The inspection team was not able to enter the Facility to observe the equipment.

Inspection Conclusions and Recommendations

An inspection checklist is included in Attachment E. Ms. Grabowski kept all copies of the NOI form 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. Inspection checklist

Signature

Lead Inspector

MARTA GRABOWSKI Digitally signed by MARTA GRABOWSKI
Date: 2023.10.26 10:44:05 -06'00'

Marta Grabowski

Date of signature