

## UST Inspection Report

Standing Rock Housing Authority

**Date of Report:** October 25, 2023

**Inspection Date & Time:** September 26, 2023, at 10:53 a.m. Central Daylight Time (CDT)

**Weather:** Cloudy, ~ 60 degrees Fahrenheit

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

**Facility Owner Address:** 1333 92<sup>nd</sup> Street  
Ft. Yates, North Dakota 58538

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Ft. Yates, North Dakota 58538

**Facility Phone:** [REDACTED]

**Facility Representative:** [REDACTED]

**EPA Facility ID Number:** 3040022

**Reason for Inspection:** Routine compliance inspection

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

### UST System Description

The Standing Rock Housing Authority in Fort Yates (Facility) is a Tribally-owned Facility with one underground storage tank (UST) for fueling housing authority vehicles. It is located on the Standing Rock Reservation in Fort Yates, North 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 December 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 26, 2023, the EPA UST program personnel conducted an inspection at Standing Rock Housing Authority in Fort Yates, North Dakota. The EPA last inspected the Facility on November 5, 2020, and they selected it for routine re-inspection. Ms. Grabowski spoke with a Facility representative on September 12, 2023, to schedule the inspection. She also sent a follow-up email (see Attachment A).

The EPA inspection team arrived at the Facility at 10:53 a.m. CDT. They were met by a Facility representative. 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 Franklin Fueling Systems EVO 200 automatic tank gauge (ATG), which performs continuous leak detection. At the time of the inspection, the Facility representative provided 12 months of passing test records, which were maintained onsite. Documentation of annual operability testing of the ATG system was not provided during the inspection; however, an invoice from the Facility's service provider, dated October 3, 2022, indicated that the ATG was installed around that time.

### **Piping Leak Detection**

No release detection is required as the Facility piping operates with a safe suction system.

### **Cathodic Protection**

Cathodic protection of the steel tank and piping is provided by a galvanic (sacrificial anode) system. The last two CP tests, dated July 6, 2022, and May 1, 2017, were maintained onsite at the time of inspection.

### **Periodic Testing/Inspection of Spill and Overfill Prevention Equipment**

The Facility representative provided a record of passing spill bucket test results dated October 8, 2020. An overfill prevention device test record was not provided; however, a high-level alarm was installed in approximately October 2022, according to an invoice from the service provider.

### **Periodic Operation & Maintenance (O&M) Walkthrough Inspections**

Records of monthly walkthrough inspections from October 2022 to September 2023 were maintained at the Facility. The monthly checklist includes opening dispenser sumps.

### **Operator Training**

Proof of Class A operator training was provided at the time of the inspection. No Class B operator certification was provided.

### **Financial Responsibility**

The Facility uses the North Dakota DEQ Petroleum Tank Release Compensation Fund (fund). The EPA observed a certificate of registration (Number 2518) for the fund onsite, which expires on July 31, 2024.

### **Physical Observations**

The inspection team viewed the spill bucket/fill pipe, ATG riser, ATG console and high-level alarm. The spill bucket was clean and dry. The fill pipe did not contain a flapper valve; however, an overfill alarm was present. The ATG console was showing an annual compliance alarm, which the EPA inspector pointed out to the Facility representative and advised that he discuss with a service provider during annual ATG operability testing.

### **Inspection Conclusions and Recommendations**

At the end of the inspection prior to departing the Facility, Ms. Grabowski stated that a full inspection report would be forthcoming, which includes the inspection checklist (see Attachment E. She reminded the Facility representative that annual ATG operability testing is due in October 2023 (within one year of ATG installation), and the spill bucket test is also due in October 2023 (every 3 years). Ms. Grabowski provided the Facility representative with the NOI form and retained a carbon copy 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: 2023.10.25 16:00:59 -06'00'

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Marta Grabowski

Date of signature