

UST Inspection Report

Prairie Knights Quik Mart

Date of Report: October 25, 2023

Inspection Date & Time: September 26, 2023, at 2:30 p.m. Central Daylight Time (CDT)

Weather: Cloudy, ~ 65 degrees Fahrenheit

Facility Owner: Prairie Knights Casino – Standing Rock Sioux Tribe

Facility Owner Address: 7392 ND-24
Ft. Yates, North Dakota 58538

Facility Address: 7392 ND-24
Ft. Yates, North Dakota 58538

Facility Phone: [REDACTED]

Facility Representative: [REDACTED]

EPA Facility ID Number: 3040011

Reason for Inspection: Routine compliance inspection

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

UST System Description

The Prairie Knights Quik Mart (Facility) is a Tribally-owned gas station and convenience store located on the Standing Rock Reservation in Fort Yates, North Dakota. The fuel at this Facility is sold to the public. The Environmental Protection Agency's Facility records indicate that the Facility has three, double-walled, jacketed steel underground storage tanks (UST) installed in May 2022. Tank 1 has a 15,000-gallon capacity and contains regular unleaded gasoline. Tank 2 has a 10,000-gallon capacity and contains premium unleaded gasoline. Tank 3 has an 8,000-gallon capacity and contains diesel fuel. Facility piping is pressurized, double-walled flex plastic.

Inspection Narrative

On September 26, 2023, the EPA UST program personnel conducted an inspection at Prairie Knights Quik Mart in Fort Yates, North Dakota. The EPA last inspected the Facility on November 4, 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 2:30 p.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 sensors connected to a Franklin Fueling Systems EVO 550 automatic tank gauge (ATG). The sensors are designed to detect liquid in the tanks' interstitial space. Monthly sensor status records from five of the past 12 months were maintained onsite at the time of the inspection, and a sensor status history printed during the inspection contained all 12 months of passing records. The ATG console and in-tank probes are also setup to perform continuous statistical leak detection for each tank. Documentation of annual operability testing of the ATG system and sensors was not provided.

Piping Leak Detection

Piping leak detection is achieved by electronic automatic line leak detectors (ALLD) and interstitial monitoring. There are sensors located in each submersible turbine pump (STP) sump and under dispenser containment (UDC) sump, which are designed to detect any liquid that accumulates in the containment sumps. Documentation of annual operability testing for ALLDs and sump sensors was not provided.

Cathodic Protection

Cathodic protection (CP) is not required at the Facility since the tanks and piping are constructed with noncorrosive material.

Periodic Testing/Inspection of Spill and Overfill Prevention Equipment

The tanks were installed in May 2022, including new, double-walled spill buckets, and new drop tubes with overfill prevention valves. Triennial spill and overfill prevention equipment testing records were not provided.

Periodic Operation & Maintenance (O&M) Walkthrough Inspections

Records of monthly walkthrough inspections were provided for the past 12 months. Annual walkthrough requirements were last checked and documented on June 1, 2023.

Operator Training

Class A/B operator training certification was maintained at the Facility at the time of inspection. No Class C training documentation was provided.

Financial Responsibility

The Facility uses a private commercial insurance policy as its financial responsibility mechanism. The current policy expires on August 25, 2024.

Physical Observations

The inspection team viewed the spill buckets/fill pipes, one dispenser, submersible turbine pump (STP) sumps and ATG console. The spill buckets for Tank 1 contained approximately three inches of liquid. All other components appeared to be in good condition.

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. 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: 2023.10.25 16:16:26 -06'00'

Marta Grabowski

Date of signature