

PST_11405_CP_20180222_Investigation
Texas Commission on Environmental Quality
Investigation Report

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Customer: American Air Lodge, L.P.
Customer Number: CN602939084

Regulated Entity Name: AMERICAN AIR LODGE
Regulated Entity Number: RN101654994

Investigation # 1472533 **Incident Numbers**
Investigator: LISA TORRES **Site Classification**
Conducted: 02/22/2018 -- 02/22/2018 **SIC Code:** 4581
Program(s): PETROLEUM STORAGE TANK REGISTRATION
Investigation Type: Compliance Investigation **Location:**
Additional ID(s): 11405

Address: 6915 BOEING DR,
EL PASO, TX , 79925

Local Unit: REGION 06 - EL PASO
Activity Type(s): PSTCEIMOD - Modified CEI

Principal(s):

Role	Name
RESPONDENT	AMERICAN AIR LODGE LP

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT	DIRECTOR OF MAINTENANCE	ALEJANDRO ZARATE	Work (915) 772-9733

Other Staff Member(s):

Role	Name
QA Reviewer	VERONICA GUERRERO
Investigator	GEORGE RAMOS
Supervisor	KENT WAGGONER
Investigator	VERONICA GUERRERO

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
PST EPA SOC	1
PST MODIFIED COMPLIANCE EVALUATION INVESTIGATION (revised 08/2012)	2

Investigation Comments:

X

INTRODUCTION

On February 22, 2018, Ms. Lisa M. Torres, Environmental Investigator for the Texas Commission on

AMERICAN AIR LODGE - EL PASO

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Environmental Quality (TCEQ) El Paso Region Office, conducted a full compliance evaluation investigation at American Air Lodge (AAL), Facility 11405, located at 6915 Boeing Drive, El Paso (El Paso County), Texas 79925, to evaluate compliance with applicable rules and regulations pertaining to petroleum storage tanks. Mr. Israel Zarate was notified of the investigation on February 7, 2018.

Ms. Torres was accompanied by Ms. Verónica Guerrero and Mr. George Ramos, both TCEQ Environmental Investigators (the investigators).

GENERAL FACILITY AND PROCESS INFORMATION

The site has one (1) regulated underground storage tank, installed on May 1, 1992, with a capacity of 12,000 gallons. The tank contains Jet fuel and is double walled fiberglass reinforced plastic (FRP). Product piping is an FRP suction system. The lines are aboveground with a dispenser reel and centrifugal pump.

Tank release detection is conducted by automatic tank gauge (Veeder-Root TLS-350) in conjunction with monthly reconciliation and inventory control. Documents were checked on-site.

BACKGROUND

PST investigations conducted at the site over the past five-years period included the following:

On March 18, 2013, a representative of the UTA PST Program (TCEQ Contractor) conducted an announced PST investigation (Investigation No. 1092359). Based on the investigation findings, no alleged violations were noted.

On December 11, 2015, a City of El Paso Code Compliance Officer conducted a PST Stage II CEI with Energy Act investigation (Investigation No. 1300972). Based on the investigation findings, two alleged violations: (1) failure to have a designated individual who is trained and certified as a Class A, B, or C Operator for a UST (Tracking No. 593405); and (2) failure to provide legible copies of required records pertaining to a UST system upon request (Tracking No. 593489), were noted. A Notice of Violation (NOV) letter was transmitted to the facility on January 22, 2016.

On March 9, 2016, a City of El Paso Code Compliance Officer conducted a PST record review investigation pertaining to the NOV dated January 22, 2016. Based on the investigation findings, the two noted alleged violations of Tracking Nos. 593405 and 593489, have been resolved. An NOV resolved letter was transmitted to the facility on April 1, 2016.

Facility compliance history is listed as "High". No current enforcement actions, Agreed Orders, Court Orders or other compliance agreements are pending for this facility.

DAILY NARRATIVE

Investigation

On February 22, 2018, the investigators arrived at the location and met with Mr. Alejandro Zarate, Director of Maintenance, AAL and Mr. Israel Zarate. The purpose of the investigation was explained at that time. The investigators proceeded to evaluate the facility in accordance with Title 30 Texas Administrative Code (TAC) §334 pertaining to underground storage tanks (UST). The equipment was checked, including spillways, sumps and fill pipes.

Exit Interview

Prior to departing the facility, Ms. Torres provided Mr. Zarate an exit interview form (attachment #1).

Post-Investigation

On February 23, 2018, Mr. Israel Zarate, provided Ms. Torres, via electronic mail, a copy of the financial assurance (electronically attached).

On March 3, 2018, Mr. Israel Zarate, provided Ms. Torres, via electronic mail, a copy of the Class A/B operator certificate (electronically attached). Mr. Israel Zarate is identified as the operator.

Although, jet fuel is considered a regulated substance delivery certificate is not required for USTs storing regulated substances that are not motor fuels (30 TAC §334.8).

CONCLUSION

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As a result of the investigation no alleged violations were cited. Facility is in full compliance with state rules and regulations pertaining to Underground Storage Tanks (30 TAC §334).

No Violations Associated to this Investigation

Signed



Environmental Investigator

Date

3/9/18

Signed



Supervisor

Date

3/12/18

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) : GC

___ Investigation Report

___ Sample Analysis Results

___ Manifests

___ Notice of Registration

___ Maps, Plans, Sketches

___ Photographs

___ Correspondence from the facility

☒ Other (specify) :

Ext Interview

SOS 226

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 14, 2018

Mr. Alejandro Zarate, Director of Maintenance
American Air Lodge
6915 Boeing Drive
El Paso, TX 79925


Re: Investigation Type - Compliance Evaluation Investigation at:
American Air Lodge, 6915 Boeing Drive, El Paso (El Paso County), Texas
TCEQ ID No.: 11405

Dear Mr. Zarate:

On February 22, 2018, Ms. Lisa M. Torres of the Texas Commission on Environmental Quality (TCEQ) El Paso Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for underground petroleum storage tanks. No violations are being alleged as a result of the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Torres in the El Paso Region Office at (915)834-4979.

Sincerely,


Mr. Kent Waggoner, P.G.
Section Manager
El Paso Region Office
KW/lt

TCEQ

Region 6 - El Paso



Paper Attachment No. 1

Investigation No. 1472533

RN101654994

Date of Investigation: February 22, 2018

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name	American Air Lodge	TCEQ Add. ID No. RN No. (optional)	11405
Investigation Type	PST Contact Made In-House (Y/N)	Purpose of Investigation	Compliance
Regulated Entity Contact	Alexandro Zorate	Telephone No.	(957) 777-9733 Date Contacted 2/22/18
Title	Director of Maint.	Fax No.	Date Faxed

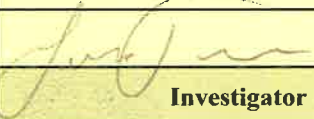
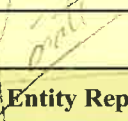
NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final TCEQ findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

Issue		For Records Request: identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues: include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type ¹	Rule Citation (if known)	Description of Issue
1	RR		Financial Assurance within 48 hours
2	RR		Delivery Certificate within 48 hours
3	RR		Annual Tank test within 2 week
4	RR		ATG monthly testing receipts past 3 months
			within 2 weeks

¹Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

 Investigator Name (Signed & Printed)	2/22/18 Date	 Regulated Entity Representative Name (Signed & Printed)	2-22-18 Date
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If you have questions about any information on this form, please contact your local TCEQ Regional Office.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512-239-3282.

Questions or Comments >>

Main Query Page

Program Area Search

Regulated Entity Detail					
Regulated Entity Name:	AMERICAN AIR LODGE			RN:	RN101654994
Status:	Active	Status Comment:		Stand Alone:	N
Physical Address:	6915 BOEING DR EL PASO, TX 79925-1107			County:	EL PASO
Physical Location:					
Nearest City:	EL PASO	State:	TX	Zip Code:	79925
Latitude:	31° 47 min 31 sec (31.791940)		Longitude:	106° 23 min 29 sec (-106.391400)	

1-4 of 4 Records

Affiliated Customers					List All
CN Number	Customer*	Role	Begin Date	End Date	RE Comp Hist
CN603559725	AERO SILZA-AEROTOMZA	OPERATOR	08/31/2004	12/31/3000	HIGH
CN602698037	AERO TOMZA	OPERATOR	12/8/2003	12/31/3000	UNCLASSIFIED
CN602939084	AMERICAN AIR LODGE LP	OWNER	08/31/2004	12/31/3000	HIGH
CN602635252	EL PASO INTERNATIONAL AIRPORT	OWNER	12/8/2003	12/31/3000	UNCLASSIFIED

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Program Interests									
Program	RE Type	ID Type	Addn ID	Addn ID Status	Alt RE Name	Role	Customer Name (CN)	Begin Date - End Date	View 'Issued To' History
PETROLEUM STORAGE TANK REGISTRATION	FACILITY	REGISTRATION	11405	ACTIVE	AMERICAN AIR LODGE	OWNER	RASHMARK JET CHARTER INC (CN604182311)	09/01/1989 - 09/30/1999	View
PETROLEUM STORAGE TANK REGISTRATION	FACILITY	REGISTRATION	11405	ACTIVE	AMERICAN AIR LODGE	OWNER OPERATOR	USA JET AIRLINES INC (CN600891964)	10/01/1999 - 08/30/2004	View
PETROLEUM STORAGE TANK REGISTRATION	FACILITY	REGISTRATION	11405	ACTIVE	AMERICAN AIR LODGE	OPERATOR	AERO SILZA-AEROTOMZA (CN603559725)	08/31/2004 - 12/31/3000	View
PETROLEUM STORAGE TANK REGISTRATION	FACILITY	REGISTRATION	11405	ACTIVE	AMERICAN AIR LODGE	OWNER	AMERICAN AIR LODGE LP (CN602939084)	08/31/2004 - 12/31/3000	View
PETROLEUM STORAGE TANK STAGE II	FACILITY								
STORMWATER	SITE	PERMIT	TXR05R278	DENIED	AERO TOMZA	OPERATOR	AERO TOMZA (CN602698037)	12/08/2003 - 12/31/3000	View
STORMWATER	SITE	PERMIT	TXR05R278	DENIED	AERO TOMZA	OWNER	EL PASO INTERNATIONAL AIRPORT (CN602635252)	12/08/2003 - 12/31/3000	View
STORMWATER	SITE								

*The Customer Name displayed may be different from the Customer Name associated with the Additional ID. This name may be different due to ownership changes, legal name changes, or other administrative changes.

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ROLANDO B. PABLOS[UCC](#) | [Business Organizations](#) | [Trademarks](#) | [Notary](#) | [Account](#) | [Help/Fees](#) | [Briefcase](#) | [Logout](#)**BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY**

Filing Number: 800256033 **Entity Type:** Domestic Limited Partnership (LP)
Original Date of Filing: October 8, 2003 **Entity Status:** In existence
Formation Date: N/A
Tax ID: 32035710923 **FEIN:**
Duration: Perpetual

Name: AMERICAN AIR LODGE, L.P.
Address: 6915 Boeing
El Paso, TX 79925 USA

REGISTERED AGENT	FILING HISTORY	NAMES	MANAGEMENT	ASSUMED NAMES	ASSOCIATED ENTITIES
Name		Address		Inactive Date	
Oscar Lowenberg		6915 Boeing El Paso, TX 79925 USA			

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