

NOTICE OF DOCUMENT QUALITY

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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PST STII/14917/S/08-13-2015/Investigation Report
City of Dallas, Air Pollution Control Program
Investigation Report

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Customer: Texas ARRM Investments Inc.
Customer Number: CN603459140

Regulated Entity Name: CONOCO FOOD STORE 1

Regulated Entity Number: RN101566545

Investigation # 1273877

Incident Numbers

Investigator: BRIAN CUNNINGHAM

Site Classification UNDERGROUND STORAGE
TANK - PST STAGE II

Conducted: 08/13/2015 -- 08/13/2015

No Industry Code Assigned

Program(s): PETROLEUM STORAGE TANK STAGE II

Investigation Type: Compliance Investigation

Location:

Additional ID(s): 14917

Address: 3308 FORT WORTH AVE,
DALLAS, TX , 75211

Local Unit: CITY OF DALLAS LOCAL PROGRAM

Activity Type(s): DECOMEACT - On-site Stage II
Decommissioning Evaluation
Investigation with EACT Investigation

Principal(s):

Role

Name

RESPONDENT

TEXAS ARRM INVESTMENTS INC

Contact(s):

Role

Title

Name

Phone

REGULATED
ENTITY MAIL
CONTACT

OWNER

RIAZ VALLIANI

Phone (214) 337-1414

Other Staff Member(s):

Role

Name

Supervisor
Supervisor

COLTON ROHLOFF
JONI KEACH

Associated Check List

Checklist Name

Unit Name

STAGE II DECOMMISSIONING/PST ENERGY
ACT FOCUSED INVESTIGATION
PST EPA SOC

14917

14917

Investigation Comments:

INTRODUCTION

On 08/13/15 a Stage II Decommissioning verification and Energy Act Investigation was performed at ARRM

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TCEQ
CENTRAL FILE ROOM

Conoco located at 3308 Ft. Worth Ave Dallas, Texas 75211 by Brian Cunningham, investigator for the Dallas Local Program. The owner Mr. Riaz Valliani was contacted on 08/13/15 to schedule the investigation and was informed of the investigation purpose. The purpose of this investigation was to determine the compliance status of this location under all applicable Federal and State rules regarding gasoline dispensing facilities. The regulated entity mail contact for the facility was Mr. Valliani.

GENERAL FACILITY AND PROCESS INFORMATION

AARM Conoco operates as a gasoline refueling station and convenience store.

The Stage II System previously in use at the facility was an ORVR compatible Gilbarco system with CARB order: G-70-150

Monthly Gasoline Throughput: 65,000 gallons

Number of USTs: 3

BACKGROUND

Conoco Food Store 1 RN101566545: High-o

Texas AARM Investments Inc. CN603459140: High-o

Current Enforcement Actions: None

Agreed Orders, Court orders and Other Compliance Agreements: None

Complaints: None

Prior Enforcement Issues: None

ADDITIONAL INFORMATION

On 12/10/14, Hawk Pump Supply conducted the Stage II decommissioning and J&S Testing Services performed decommissioning tests. The Pressure Decay and Dynamic Back-Pressure tests passed, and test results and Decommissioning Checklist were available for review. (Attachment 1)

On 08/13/15, an on-site Stage II decommissioning verification investigation was performed. The facility has 4 dispensers and 8 nozzles. All dispensers were opened and verified that the lower end of the vapor piping was disconnected and securely sealed within all dispenser cabinets. All below-grade dispenser vapor piping was disconnected and securely sealed at the base of each dispenser. All vacuum motors had been removed.

During the investigation all sets of stage II hanging hardware and nozzles were verified to have been removed. All Stage II Operating Instructions had been removed from each dispenser.

It appears that the decommissioning process was conducted appropriately.

The following requirements under the Energy Act were evaluated during the investigation:

Self Certification: The TCEQ Delivery Certificate expires on 03/31/16 and was posted.

Financial Assurance: Financial Assurance is maintained through a policy provided by Commerce & Industry Insurance Co. which expires on 03/04/16. It is in compliance with TCEQ financial requirements.

Corrosion Protection: There are three 12,000 gallon tanks at the facility. Records showed that the Underground Storage Tanks (UST) were double wall fiberglass tanks with fiberglass piping.

Tank Release Detection: The facility utilizes an automatic tank gauge to perform monthly 0.2 gallon/hr. release detection for the USTs. Six months of inventory control forms were also available for review.

Piping Release Detection: J&S performed successful annual line-tightness tests on 05/16/15. The site is equipped with mechanical leak detectors.

Spill Containment and Overfill Prevention: The tank fill risers were equipped with a five gallon spill buckets. Inspection of the spill buckets found the spill buckets to be in good working order. The regulated entity provided documentation of the 60-day spill bucket inspection logs. The facility has ball floats for overfill protection.

Release Reporting: No releases were detected for which reporting to the TCEQ was required as determined by 6 months of Inventory control forms.

CONOCO FOOD STORE 1 - DALLAS

8/13/2015 Inv. # - 1273877

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Operator Training: Mr. Valliani is listed as the certified A/B Operator for the facility.

Time Spent On Site: 1400-1500 hrs.

CONCLUSION

No violations were noted and a General Compliance Letter will be sent.

ATTACHEMNT

1. Decommissioning Check List and test results.

No Violations Associated to this Investigation

Signed


Environmental Investigator

Date

8/28/15

Signed


Supervisor

Date

8/28/15

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) : GCL

___ Investigation Report

___ Sample Analysis Results

___ Manifests

___ Notice of Registration

___ Maps, Plans, Sketches

___ Photographs

___ Correspondence from the facility

☒ Other (specify) :

1. Decommissioning Check

Attachment 1

6 Pages

PST14917 RN101566545 CN603459140

ARRM Investments Inc.

Conoco Food Store 1

08/13/15

TCEQ STAGE II DECOMMISSIONING CHECKLIST & SUBMITTAL FORM

PST ST21 14917 IS/05-19-2014/Decomm

FACILITY INFORMATION			
Facility Name	TX ARRM INC	TCEQ Facility ID	0014917
Facility Address	3308 Ft. Worth Ave	Facility City	Dallas
PST OWNER INFORMATION			
Owner Name	TX ARRM INC	Owner Phone	(214) 337-1414
Representative	Mailee Viram	Representative Phone	817-648-6671
PST OPERATOR INFORMATION			
Operator Name	TX ARRM INC	Operator Phone	(214) 337-1414
Representative	Mailee Viram	Representative Phone	817-648-6671
CONTRACTOR INFORMATION			
Company Name	MAK PUMP SUPPLY	Company Phone	972-484-7867
Company Address	11311 Harry Hines Blvd	Company City	Dallas, TX
Technician Name	Leo Alvarez	Technician Phone	972-484-7867
UST License (CRP / ILP)	CR 0000139 / 001762	STII Tester ID:	23/24

SYSTEM INFORMATION			
UST or AST	UST	CARB Executive Order	
No. of hanging hardware present	8	No. of hanging hardware replaced	8

DECOMMISSIONING CHECKLIST			
PEI Recommended Practices of Installation and Testing Vapor-Recovery Systems RP-300			
Item No.	Decommissioning Activity	RP300 Reference	Completed Yes/ No
1	Were safety procedures initiated?	14.6.1	Yes
2	Were all P/V vent valves removed to relieve pressure in tanks?	14.6.2	Yes
3	Were all liquid-collection points drained?	14.6.3	Yes
4	Were all dispensers reprogrammed to show Stage II is no longer active?	14.6.4	N/A
5	Were all electrical components of the Stage II system disconnected?	14.6.4	N/A
6	Were all vapor pumping and processing units drained and disconnected? <i>Includes all dispenser vacuum motors and central vacuum units</i>	14.6.4	N/A
7	If OPW Vapor Savor or Arid Permeator is present, has it been properly disconnected? (or NA)	14.6.4	N/A
8	If the Stage II system has a central vacuum motor, was it properly removed by TCEQ UST Licensed Contractor?	14.6.5	N/A


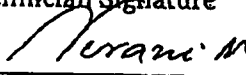
TCEQ-20695 (05-09-2014)

MAY 23 2014


DFW REGION-4


9	If a central vacuum motor was removed, was a product line tightness test conducted and passed before placing system back into operation? <i>Submit test results to TCEQ Regional Office and local government with jurisdiction.</i>	30 TAC 334.52(c)(3)	N/A
10	Was the lower end of the vapor piping securely sealed within all dispenser cabinets? <i>Only threaded plugs, threaded caps, or glued fittings allowed. No rubber caps with hose rings.</i>	14.6.8	Yes
11	Was all below-grade dispenser vapor piping securely sealed off below the base of the dispensers? <i>Only threaded plugs, threaded caps, or glued fittings allowed. No rubber caps with hose rings.</i>	14.6.6	Yes
12	Was all Stage II hanging hardware replaced with conventional hanging hardware?	14.6.9	Yes
13	Were all Stage II instructions removed from the outside of the dispenser cabinets?	14.6.11	Yes
14	If the tank top vapor piping is accessible without excavation, was all tank top vapor piping properly disconnected and securely. (NA for ASTs) <i>Only threaded plugs, threaded caps, or glued fittings allowed. No rubber caps with hose rings.</i>	14.6.7	N/A
15	Were the P/V Valves re-installed prior to Pressure Decay Testing?	14.6.10	Yes
16	Was a Pressure Decay (TX-102) test conducted and passed prior to restoring the facility to operating status? <i>Use TXP-102 form and submit to TCEQ Regional Office and local government with jurisdiction.</i>	14.6.12	Yes
17	Was a Dynamic Back-Pressure (TX-103) test conducted and passed on the vent lines prior to restoring the facility to operating status? <i>Use TXP-103 form and submit to TCEQ Regional Office and local government with jurisdiction.</i>	14.6.12	Yes
18	Were the visible components of the storage system are left in a condition that will reliably prevent the release of any vapors or liquids from any components of the storage system?	14.6.13	Yes
19	Was a site map with the tanks, dispensers and vapor piping (with disconnected and capped locations clearly marked) submitted with this checklist?	30 TAC 334.46(i)(B) (iii)	Yes

This form must be submitted to the TCEQ and local government with jurisdiction with a copy of all required test results and site map within **10 working days** [30 TAC 115.246(5)]. A copy must be kept on-site for five years after the decommissioning activity in accordance with [30 TAC 115.246(6)]

Leo Alvarez		5/20/2014
Technician Name Print	Technician Signature	Date
Mateet Virani		5/20/2014
Owner/Operator/ Representative Name Print	Owner/Operator/ Representative Signature	Date

TX ARM INC
3308 FT. WORTH AVE
DALLAS, TEXAS


Plug 


Plug 

Store

○
○
○

vents

Plug
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Plug
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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Vapor Recovery Test Result Cover Sheet

(Notice: Submit Test Results to the appropriate TCEQ regional office, and local program with jurisdiction, within 10 working days of test completion. See reverse side for addresses.)

Tests of the Vapor Recovery System were conducted at the following location:

Facility Name: Conoco Food Mart Facility ID Number: 0014917

Facility Address: 3308 Fort Worth Drive

Facility City: Dallas State: TX Zip: 75211

Facility Phone: ()

Owner Name: Same Phone Number: ()

Vapor Recovery System installed:

System	UST or AST	Type of System ¹	Executive Order or Certification Number	Test Purpose ²
Stage I	UST	Two Point	N/A	N/A
Stage II	UST	Balance	G-70-97-A	CM

¹ Coaxial or Two-Point for Stage I, Balance or Assist for Stage II.

² Test purposes are: CI=Initial Compliance, CA= Annual Compliance, CM= After Major Modification, or 3Y = Three Year.

The Following Tests were Conducted at this Facility:

Number	Test Procedure Name	Date Tested	Name of Person(s) Conducting Test	Pass or Fail
TXP-101	Vapor Space Manifold	----	----	----
TXP-102	Pressure Decay	5/19/2014	J & S Testing Services - Stahr	PASS
TXP-103	Dynamic Backpressure	5/19/2014	J & S Testing Services - Stahr	PASS
TXP-104	Flow Rate Determination	----		----
TXP-105	Liquid Removal Device	----		----
TXP-106	V/L Ratio	----		----
TP-201.5	CARB A/L Ratio	----		----
TXP-106-2	A/L Using Hasstech Equipment	----		----
TXP-107	Healy Booted Nozzle	----		----
Other:				

The tester arrived on-site at 16:30 ☐ AM ☒ PM and departed at 17:15 ☐ AM ☒ PM

There are a total of 2 pages containing test results attached to this cover sheet.

I certify that the above tests, the results of which are attached to this cover sheet, were conducted in accordance with the test procedures as outlined in the Vapor Recovery Test Procedures Handbook, and that the results submitted here are true and correct to the best of my knowledge.

Signature of Test Contractor Responsible Party: [Signature] Date: 05/19/2014

Test Company Name: J & S Testing Services - Stahr Phone Number: (817)237-1899

**Form 102-1:
Pressure Decay Test Data**

Test Date: 5/19/2014

Page 1 of 2

Facility Name: Conoco Food Mart

Facility ID Number: 0014917

Test Company Name: J & S Testing Services

Type of Stage II System Installed: Balance

Exec. Order: G-70-97-A

Describe Manifolding of system (if any): Underground

Date and Time of Last Bulk Delivery / Removal: 05/15/2014 @ 08:20

Time of Last Vehicle Refueling Prior to Test: 16:30 Time Test Begun: 17:00

	Parameter (Indicate Manifolding by Circling Tank Numbers) →	Tank Number				Total
		1	2	3	4	
1	Product Grade	RU	SU			---
2	Type of Storage Tank (AST or UST)	UST	UST			---
3	Actual Tank Capacity (gallons)	12000	10000			22000
4	Gasoline Volume (gallons)	2124	873			2997
5	Ullage (gallons) (Item 3-item 4)	9876	9127			19003
6	Number of Nozzles w/Vapor Return to Tank					0
7	P/V Manufacturers Rated Cracking Pressure					3.00
8	P/V Pressure When Cracking Began					3.16
9	Time Required to Pressurize System (seconds)					86.32
10	Nitrogen Flowrate Circle <u>SCFM</u> or SCFH	Flowrate:				5.0
11	Initial Pressure (Inches WC)					2.00
12	Pressure after 1 minute (Inches WC)					2.00
13	Pressure after 2 minutes (Inches WC)					1.99
14	Pressure after 3 minutes (Inches WC)					1.98
15	Pressure after 4 minutes (Inches WC)					1.97
16	Pressure after 5 minutes (Inches WC)					1.97
17	Allowable Final Pressure (from table or equation)*					1.92
18	Healy Nozzle to Multi / Mini-Jet: Pass or Fail	$\Delta V =$	Piping Length = ____ ft.	$\Delta \Delta V =$		
19	Test Result: Pass or Fail					PASS

Comments (Include any equipment replaced and/or repairs made prior to or during the test):

* Final regulatory compliance must be determined by using the appropriate equation in Section 9.2.

**Dynamic Back-Pressure Data: Vapor Piping Method
(for Procedures 1b & 2)**

Test Date: 5/19/2014

Page 2 of 2

Facility Name: Conoco Food Mart

Facility ID Number: 0014917

Vent Line to Tank Number	Gas Grade	System Manifold:				Pass or Fail ¹	
		Back-Pressure ("WC) at 60 SCFH	<input type="checkbox"/> Above-ground <input checked="" type="checkbox"/> Below-ground				
			Back-Pressure ("WC) through below-ground manifold for tank # (if appropriate)				
			1	2	3	4	
1	RU	0.05	X				
2	SU	0.03		X			
3					X		
4						X	

[illegible]

Compare flow rate readings with the appropriate values from § 12.2 above to determine pass/fail status.



City of Dallas

August 31, 2015

Mr. Riaz Valliani
ARRM Conoco
3308 Fort Worth Avenue
Dallas, Texas 75211

Re: PST Energy Act Focused (EAF) and Stage II Decommissioning Investigation at:
ARRM Conoco, 3308 Fort Worth Avenue, Dallas (Dallas County), Texas
TCEQ Account Numbers: RN 101566545, CN 603459140, PST14917

Dear Mr. Valliani:

On August 13, 2015, Mr. Brian Cunningham of the City of Dallas Air Quality Compliance Program conducted an investigation of the above-referenced facility to evaluate compliance with certain applicable requirements for the Stage II Vapor Recovery and PST programs. No violations are being alleged as a result of the investigation.

Please note that this investigation was limited in scope. Your facility is still required to comply with all requirements of 30 Texas Administrative Code (TAC), Chapter 334, and, under the Energy Policy Act of 2005, is subject to compliance investigations every three years.

If you feel that your facility may require assistance to achieve compliance with the requirements of the PST program, you have several options:

- Refer to the PST rules found in Title 30 TAC, Chapter 334, located at:
<http://www.tceq.state.tx.us/rules/indxpdf.html#334>
- Refer to the TCEQ's newest Underground Storage Tank Compliance Tool: The PST Super Guide: A Comprehensive Guide to Compliance in Texas (RG-475) located at:
http://www.tceq.state.tx.us/comm_exec/forms_pubs/pubs/rg/rg-475/
- Hire a contractor who is knowledgeable with PST issues to assist you with regulatory compliance;
- Refer to the Small Business and Local Government Assistance (SBLGA) website at:
<http://www.tceq.texas.gov/assistance/sblga.html> – click on the link for Petroleum Storage Tanks; or
- Call the SBLGA free, confidential compliance assistance hotline at 1-800-447-2827.

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 Mr. Cunningham at (214) 948-4203.

Sincerely,

A handwritten signature in cursive script, reading 'Joni M. Keach'.

Joni M. Keach, R.S. Manager
Air Quality Compliance
Public Works Department

JMK/jac