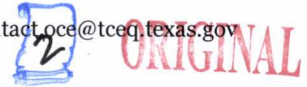


PST_56658_RP_20160411_INVESTIGATION REPORT
Texas Commission on Environmental Quality
Investigation Report

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oc@tceq.texas.gov



Customer: Big Diamond, Inc.
Customer Number: CN601363500

Regulated Entity Name: VALERO CORNER STORE 1021
Regulated Entity Number: RN102427366

Investigation # 1328647

Incident Numbers

Investigator: RAMON JUAREZ

Site Classification UNDERGROUND STORAGE TANK - REGISTRATION

Conducted: 04/11/2016 -- 04/11/2016

No Industry Code Assigned


Program(s): PETROLEUM STORAGE TANK REGISTRATION

Investigation Type: Compliance Investigation

Location:

Additional ID(s): 56658

WST PST/ Reports
 1st: 0056658 2nd: 4/11/2016
 CBC 100779563
 IBC: 100779564



Address: 4720 PECAN VALLEY DR,
 SAN ANTONIO, TX , 78223

Local Unit: REGION 13 - SAN ANTONIO

Activity Type(s): PSTEACT - PST Energy Act Focused Investigation

Principal(s):

Role	Name
RESPONDENT	BIG DIAMOND INC

Contact(s):

Role	Title	Name	Phone
PARTICIPATED IN	STORE MANAGER	MR JOHNNY SALINAS	Work (210) 359-6415
REGULATED ENTITY MAIL CONTACT	ENVIRONMENTAL AND COMPLIANCE	MR JOHN WILLRODT	Work (210) 692-2224
PARTICIPATED IN	SENIOR ENVIRONMENTAL TECHNICIAN	MR RAY TREVINO	Work (210) 692-2274 Cell (210) 273-5728
PARTICIPATED IN	OPERATIONS AND ENVIRONMENTAL COMPLIANCE COORDINATOR	MS JENNIFER RESNIK	Work (210) 345-4670 Work (210) 692-2135 Fax (210) 692-5407 Work (210) 692-2628 Cell (419) 350-1099

Other Staff Member(s):

Role	Name
QA Reviewer	MELISSA STORY
Supervisor	CAMERON LOPEZ
Supervisor	JORGE SALAZAR

RECEIVED
 MAY 02 2016
 TCEQ
 CENTRAL FILE ROOM

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
PST ENERGY ACT FOCUSED INVESTIGATION - revised 12/2014	VCS 1021
PST EPA SOC	VCS 1021

Investigation Comments:

INTRODUCTION

On April 11, 2016, Mr. Ramon G. Juarez, Environmental Investigator, with the Texas Commission on Environmental Quality (TCEQ) San Antonio Region 13 Office, conducted a Petroleum Storage Tank (PST) focused energy act (E-ACT) investigation at the Valero Corner Store (VCS), No. 1021, located at 4720 Pecan Valley Drive, San Antonio, in Bexar County.

The investigation was conducted to determine compliance with applicable TCEQ rules and regulations pertaining to underground storage tank (UST) systems. The VCS, No. 1021, TCEQ PST ID No. 56658, was evaluated for compliance with release detection, financial assurance, corrosion protection, spill containment and overfill prevention, and current delivery certificate.

On April 5, 2016, Ms. Jenifer Resnik, and Mr. Ray Trevino, CST Brand, Incorporated personnel were contacted via electronic mail to schedule the PST E-ACT investigation for April 11, 2016, and to request documentation necessary for the investigation. Mr. Trevino, participated in the onsite investigation.

GENERAL FACILITY AND PROCESS INFORMATION

The VCS No. 1021, PST Facility ID No. 56658 Regulated Entity No. RN102427366, is a retail fueling station and convenience store owned and operated by Big Diamond, LLC, Customer Number CN601363500, a subsidiary of CST Brands, Incorporated. The fuel throughput for this retail convenience store is approximately 93,909 gallons per month. The UST system consisted of three, 12,098 gallon volume, coated single wall steel tanks, holding regular unleaded, premium or super unleaded, and diesel. The piping is pressurized, and constructed of double wall Fiberglass-Reinforced Plastic (FRP) with metallic flex connectors.

BACKGROUND

A search of the TCEQ CCEDS data base indicated that a PST E-Act investigation (No. 1077118 was conducted on March 19, 2013, and approved April 30, 2013. The Regulated Entity (RE) has no active or unresolved alleged violations.

SUMMARY OF ON-SITE INVESTIGATION

On April 11, 2016, Mr. Juarez conducted an onsite investigation at the aforementioned PST facility accompanied by Mr. Trevino and Mr. Johnny Salinas, the Store Manager. The PST records made available for review were the release detection for the tanks and piping, corrosion protection, current financial assurance and delivery certificate. The spill containment, overfill prevention equipment and operator training record, were observed and reviewed during the onsite investigation.

The fueling system consists of three, single wall, coated underground steel storage tanks with double wall pressurized FRP piping, with metallic flex connectors affixed to the system.

The tanks used Monthly Statistical Inventory Reconciliation (SIR), and Inventory Control (IC) with automatic tank gauging (ATG), to detect a potential release. The investigator reviewed three months of records (January 2016 – March 2016). The records were determined to be compliant with the TCEQ rules and regulations.

The piping release detection methods were mechanical Auto Line Leak Detectors (ALLD) and annual line tightness tests successfully conducted on May 19, 2015, by Cleaneart Solutions.

On May 21, 2014, Innovative Corrosion Control, Incorporated, conducted a comprehensive investigation and verification of the corrosion prevention system. The report verifies the Underground storage tanks have sacrificial

anodes. The submersible pumps and the metallic flex connectors located below each dispenser are isolated from backfill material with the use of containment sumps and do not require cathodic protection.

The delivery certificate is current and expires on September 30, 2016. The financial assurance is also current, and expires on April 30 2016. The records were determined to be in compliance.

During the onsite investigation, the spill containment at the drop tubes for each tank were observed. The submersible turbine pumps were located in container sumps, isolated from backfill materials. The sumps and spill buckets were free of liquids/debris, and in satisfactory condition.

The store employee shut-off valve for the UST fuel system dispenser pumps were observed inside and outside the store.

The facility is maintaining the required training certification, and documentation for all 14-store employees and area manager. No discrepancies were found.

CONCLUSION

During the PST E-ACT Investigation, no alleged violations were observed. A Focused Energy Act Compliance Letter was sent to, Big Diamond, LLC, a subsidiary of CST Brands, Incorporated.

No Violations Associated to this Investigation

Signed Rami J. Gray
Environmental Investigator

Date 04/27/2016

Signed [Signature]
Supervisor

Date 4/27/2016

Attachments: (in order of final report submittal)

- Enforcement Action Request (EAR)
- Letter to Facility (specify type) : PST EACT GC Letter
- Investigation Report
- Sample Analysis Results
- Manifests
- Notice of Registration
- Maps, Plans, Sketches
- Photographs
- Correspondence from the facility
- Other (specify) :

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

April 28, 2016

Mr. John Willrodt, Director
Environmental and Compliance
CST Brands, Incorporated
PO Box 690350
San Antonio, TX 78269-0350

Re: Petroleum Storage Tank (PST) Focused Energy Act Investigation at: Valero Corner Store No. 1021, 4720 Pecan Valley Drive, San Antonio, Bexar County; TCEQ PST Registration Number 56658; Regulated Entity Number RN102427366; Investigation Number 1328647

Dear Mr. Willrodt:

On April 11, 2016, Ramon G. Juarez, of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office, conducted a Focused Energy Act investigation of the above-referenced facility to evaluate compliance with certain applicable requirements for the PST program. 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.

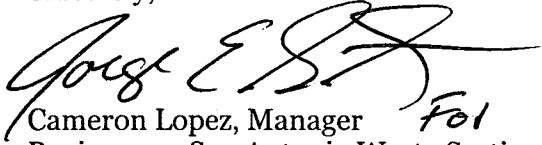
If you feel that your facility may require assistance to achieve compliance with the requirements of the PST program, you have several options:

- 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: www.sblga.info – click on the link for Petroleum Storage Tanks; or
- Call the SBLGA free, confidential compliance assistance hotline at 1-800-447-2827.

Mr. John Willrodt
Page 2
April 28, 2016

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. Ramon G. Juarez at (210) 490-3096.

Sincerely,

A handwritten signature in black ink, appearing to read "Cameron Lopez". The signature is stylized and cursive.

Cameron Lopez, Manager *F01*
Region 13 – San Antonio Waste Section
Texas Commission on Environmental Quality

CL/rgj/bju