PAPE-DAWSON ENGINEERS

January 20, 2021

Mr. Kyle Craig
Recharge Zone Protection
Edwards Aquifer Authority
900 E Quincy
San Antonio, Texas 78215

Re: 8,000-Gallon Diesel UST
North Central Baptist Hospital
520 Madison Oak Dr, San Antonio, TX

Dear Mr. Craig:

On behalf of North Central Baptist Hospital (NCB) and Tenet Healthcare System (Tenet), Pape-Dawson Engineers, Inc. (Pape-Dawson) is hereby submitting an official request to the Edwards Aquifer Authority (EAA) for a deadline extension regarding a tertiary containment requirement for an approximately 8,000-gallon diesel underground storage tank (UST) located at the North Central Baptist Hospital campus locally addressed at 520 Madison Oak Drive in San Antonio, Bexar County, Texas (hereinafter referred to as Site). The referenced 8,000-gallon UST is used to supply diesel fuel to two (2) 400-gallon aboveground storage tanks (ASTs), which are connected to two (2) emergency backup generators to power hospital operations during an electrical power outage. As indicated in *Chapter 713, Subchapter G (Aboveground and Underground Storage Tanks), rule 713.607(c)(1)* of EAA Rules, an approved method of tertiary containment must be incorporated into a UST located on the Edwards Aquifer Recharge Zone within 30 years of the date of UST installation. According to EAA and Texas Commission on Environmental Quality (TCEQ) records, the referenced 8,000-gallon UST was installed in March 1991, and as such, is required to have the necessary tertiary containment upgrades implemented by March 27, 2021.

The delay in addressing the above-referenced tertiary containment requirement is largely the result of a change in leadership within the facilities management department at North Central Baptist. Previous discussions to address this issue ended when the facility director resigned at the start of the Coronavirus Disease 2019 (COVID-19) pandemic in early 2020, and hospital leadership was not made aware of the impending deadline until additional notification was received from EAA later that year. Although the COVID-19 pandemic has impeded efforts, hospital administration is committed to resolving this issue.

At this time, Tenet has engaged the services of Pape-Dawson and CDS Muery to aid in regulatory coordination and permitting, and PST system design work, respectively. Plans to bring the existing petroleum storage tank (PST) system at the Site into compliance include the permanent removal of the 8,000-gallon UST from service and installation of a new approximately 12,000-gallon AST in accordance with *§713.605* of EAA Rules to meet with emergency backup generator and hospital needs. PST design plans are currently in progress pending regulatory direction. Although PST manufacturing delays associated with COVID-19 plant shutdowns have created a backlog of AST orders, CDS Muery, on behalf

of Tenet, has obtained proposals from at least two (2) vendors with available ASTs. At the time of this reporting, Tenet has approved the purchase of a 12,000-gallon AST by WATCO Tanks, Inc. Expedited fabrication of the referenced tank has also been approved. The timeframe for AST manufacturing is expected to run concurrent with design and regulatory approval of a TCEQ AST Facility Plan.

NCB hospital operations are a vital necessity to the health and wellbeing of the community, and any event impeding operations will have a catastrophic effect on not only the hospital's ability, but also the San Antonio and surrounding area's capacity to fight against the COVID-19 pandemic. Pape-Dawson respectfully requests that the existing UST system at the Site continue to operate until such time that the proposed AST system can be designed, approved, and installed. As a demonstration of North Central Baptist's good regulatory standing, the existing 8,000-gallon UST undergoes monthly vapor monitoring in addition to periodic compliance investigations by the TCEQ. The most recent TCEQ compliance investigation conducted on June 11, 2019 did not identify any violations and referenced no previous violations from past investigations in 2014 and 2016 (Appendix A). Additionally, recent vapor monitoring release detection results from January – December 2020 conducted by Chapman Engineering, Inc. do not indicate the presence of a fuel release from the UST (Appendix B). Recent precision tank tightness testing conducted by Tanknology on January 15, 2021 indicated that North Central Baptist's tank pass tightness criteria (Appendix C).

Introducing a temporary system (i.e., a small PST refilled as needed) at this time would place undue hardship on already exhausted hospital financial resources during this pandemic and uncertainty in PST refueling capabilities on an as-needed basis. Pending AST Facility Plan design and preparation and addressing regulatory comments, Pape-Dawson estimates that the new system will likely be operational as early as December 2021.

We appreciate your prompt attention to this matter. If you have questions or require additional information, please feel free to contact me.

Sincerely,
Pape-Dawson Engineers, Inc.

Heather D. Johnson

Heather D. Johnson
Environmental Manager

Attachments:
- Appendix A – 2019 TCEQ Compliance Investigation
- Appendix B – 2020 Vapor Monitoring Release Detection Results
- Appendix C – 2021 Tanknology Precision Tank Tightness Test

P:\57\86\13\Word\Letters\210108 NCB - EAA Letter revised 01-18-2021.docx

# APPENDIX A
# 2019 TCEQ Compliance Investigation

PST_58566_CP_2_90611_INVESTIGATION

# Texas Commission on Environmental Quality
# Investigation Report

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

## Customer: VHS San Antonio Partners, LLC
## Customer Number: CN601674633

P 06/11/2024

## Regulated Entity Name: NORTH CENTRAL BAPTIST HOSPITAL
## Regulated Entity Number: RN100629641

**Investigation** # 1577640
**Investigator:** CHRISTIAN WENSKE
**Conducted:** 06/11/2019 -- 06/11/2019

**Incident Numbers**
**Site Classification** UNDERGROUND STORAGE TANK - REGISTRATION
**NAIC Code:** 622110
**SIC Code:** 8062
**NAIC Code:** 62211
**NAIC Code:** 237310
**SIC Code:** 1611

RECEIVED
JAN 09 2020
TCEQ
CENTRAL FILE ROOM

**Program(s):** PETROLEUM STORAGE TANK REGISTRATION

**Investigation Type:** Compliance Investigation
**Additional ID(s):** 58566

**Location:** REMINGTON DR

**Address:** 520 MADISON OAK DR,
SAN ANTONIO, TX , 78258

**Local Unit:** EPA PST AUSTIN
**Activity Type(s):** PSTEACT - PST Energy Act Focused Investigation

**Principal(s):**

| Role | Name |
|---|---|
| RESPONDENT | VHS SAN ANTONIO PARTNERS LLC |

**Contact(s):**

| Role | Title | Name | Phone | |
|---|---|---|---|---|
| NOTIFIED | LIFE SAFETY OFFICER | MR MARK LUCAS | Work | (210) 887-5118 |
| PARTICIPATED IN | LIFE SAFETY OFFICER | MR MARK LUCAS | Work | (210) 887-5118 |
| REGULATED ENTITY CONTACT | PLANT OPERATIONS MANAGER | MR MICHAEL SMITH | Work | (210) 852-5341 |
| REGULATED ENTITY MAIL CONTACT | PLANT OPERATIONS MANAGER | MR MICHAEL SMITH | Work | (210) 852-5341 |
| REGULATED ENTITY CONTACT | LIFE SAFETY OFFICER | MR MARK LUCAS | Work | (210) 887-5118 |
| PARTICIPATED IN | PLANT OPERATIONS MANAGER | MR MICHAEL SMITH | Work | (210) 852-5341 |

**Other Staff Member(s):**

| Role | Name |
|---|---|
| Investigator | PATRICIA MELENDEZ |
| QA Reviewer | ELIZABETH VANDERWERKEN |
| QA Reviewer | ROBYN CLAFLIN |
| Supervisor | KENNETH AUSBIE |

## Associated Check List

| Checklist Name | Unit Name |
|---|---|
| PST ENERGY ACT FOCUSED INVESTIGATION - revised 12/2014 | FIN 58566 |
| PST EPA SOC | FIN 58566 |

**Investigation Comments:**

INTRODUCTION:

On June 11, 2019, Mr. Christian Wenske, Texas Commission on Environmental Quality (TCEQ) Contract Investigator with the University of Texas-Arlington (UTA) Petroleum Storage Tank (PST) Program, conducted a PST Focused Energy Act Investigation at North Central Baptist Hospital located at 520 Madison Oak Dr in San Antonio (Bexar County), Texas.
Facility ID: 58566

On June 4, 2019, the investigator communicated via phone with Mr. Mark Lucas, Life Safety Officer with North Central Baptist Hospital, and scheduled the investigation for June 11, 2019 at 12:00 noon. Mr. Lucas was provided with a list of the compliance documentation requested for the investigation.

During the inspection, Mr. Lucas and Mr. Michael Smith, Plant Operations Manager with North Central Baptist Hospital, were on site with the investigator.

GENERAL FACILITY AND PROCESS INFORMATION:

The facility operates as an emergency generator facility.

According to TCEQ's Permit and Registration Information System (PARIS), the regulated entity consists of one (1) Underground Storage Tank (UST) that was installed on March 1, 1991. The UST is registered as a double-walled, Fiberglass-Reinforced Plastic (FRP) tank.

Tank 1 has the capacity of 8,000 gallons and stores diesel fuel.

All product lines are registered as double-walled, steel, pressurized lines, but they are actually FRP lines.

REGISTRATION:

One UST is currently registered and self-certified with the TCEQ.

The piping is registered as steel, but is actually FRP.

The regulated entity has been requested to make the necessary amendments to the TCEQ Registration and Self Certification Form for this facility.

BACKGROUND:

On November 4, 2016, Ms. Deeandrea Burgos, TCEQ Contract Investigator, with the UTA PST Program conducted a PST Focused Energy Act Investigation at the above-referenced facility. No violations were documented as a result of this investigation. (CCEDS Investigation 1371712)

On June 18, 2014, Mr. Marc Geraci with the UTA PST Program (TCEQ Contractor) conducted a PST Focused

Energy Act investigation at the above-referenced facility. No violations were documented as a result of this investigation. (CCEDS Investigation 1186153)

ADDITIONAL INFORMATION:

During the on-site investigation and review of the facility's records, the following findings were determined:

MONTHLY THROUGHPUT:

According to the documentation provided by Mr. Smith during the on-site investigation, the average monthly throughput over a twelve month period was less than 1,000 gallons. This facility is considered a minor facility because the throughput is less than 50,000 gallons per month.

DELIVERY CERTIFICATE:

The TCEQ Delivery Certificate has an expiration date of January 31, 2020, and was posted at the facility. One UST was included on the Delivery Certificate.

FINANCIAL ASSURANCE:

Financial Assurance mechanism utilized by this UST system is insurance provided by Admiral Insurance Company. This insurance company has issued liability insurance for taking corrective action and compensating third parties for bodily injury and property damage caused by accidental releases. The limits of liability are $1,000,000 per occurrence and $3,000,000 annual aggregate arising from operating the underground storage tank included in the policy. The policy is effective as of June 1, 2019 and will expire on June 1, 2020. One UST is included in this insurance policy.

CORROSION PROTECTION:

During the on-site investigation, Mr. Smith submitted a Cathodic Protection Tank Verification Survey conducted on July 18, 2014 by Chapman Engineering. According to the report, the tank was indicated as being a Fiberglass tank and not in need of cathodic protection. The product piping was found to be Fiberglass-Reinforced Plastic (FRP) piping.

TANK MONTHLY RELEASE DETECTION:

Tank release detection is provided by Vapor Monitoring.

During the on-site investigation, Mr. Smith submitted Vapor Monitoring reports for the tank (and piping). The passing periods reviewed were from June 2018 to May 2019.

PIPING RELEASE DETECTION:

-Pressurized Piping:

The regulated entity has mechanical Line Leak Detectors (LLDs) installed on the UST.

During the on-site investigation, Mr. Smith provided an annual line tightness and LLD test conducted by Tanknology on October 29, 2018. The lines and LLDs had passing results.

The piping is also covered for release detection by the Vapor Monitoring mentioned above.

SPILL AND OVERFILL:

Each tank was equipped with a tight-fill fitting.

One spill bucket was installed. The investigator documented that the spill bucket was maintained in good operating condition; free of visible cracks or damage that would prevent them from being liquid tight.

The regulated entity provided overfill verification during a previous investigation. Investigation 1371712 indicates that the tank is equipped with a ball float as its overfill protection.

SUSPECTED OR CONFIRMED RELEASES:

The investigator found no evidence of a suspected or confirmed release as a result of this investigation.

OPERATOR TRAINING:

Mr. Michael Smith received the Class A/B Operator Training Certificate on February 16, 2017 from PASS. The training certification will expire on February 16, 2020. The investigator observed the Class C Operator training records for all of the employees on-site.

CONCLUSION:

No violations were documented during this investigation. A General Compliance (GC) letter has been issued as a result of this investigation and will be sent to Mr. Michael Smith.

Attachments:
1. Focused Checklist
2. Site Diagram
3. Old CP Test
4. Photographs

**No Violations Associated to this Investigation**

**Signed** Christian Wenske Digitally signed by Christian Wenske Date: 2019.07.18 12:54:37 -05'00' **Date** _____

**Environmental Investigator**

**Signed** _____ **Date** JUN 27 2019

**Supervisor**

## Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)

_X_ Letter to Facility (specify type) : **focused**

Investigation Report

___Sample Analysis Results

___Manifests

___Notice of Registration

___Maps, Plans, Sketches

___Photographs

___Correspondence from the facility

___Other (specify) :

_____

_____

THE UNIVERSITY
OF TEXAS
AT ARLINGTON

Center for
Environmental
Excellence

Division for
Enterprise Development

1851 Crosspoint,
Suite 1270
Houston, Texas 78759

T (512) 904-2281
F (512) 904-2288

June 27, 2019

Mr. Michael Smith, Plant Operations Manager
San Antonio Partners LLC
1150 Brussels St
San Antonio, Texas 78219

Re: Petroleum Storage Tank (PST) Focused Energy Act Investigation for Release Detection, Corrosion Protection, Financial Assurance, Spill Containment and Overfill Prevention, and Delivery Certificate at: North Central Baptist Hospital, 520 Madison Oak Dr, San Antonio (Bexar County), Texas 78258
TCEQ PST Registration No.: 58566 RN: 100629641

Dear Mr. Smith:

On June 11, 2019, Mr. Christian Wenske of University of Texas at Arlington (UTA) Austin office, PST Program Contractor for the Texas Commission on Environmental Quality (TCEQ), conducted an 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.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment.

Sincerely,

Kenneth Ausbie

Mr. Kenneth Ausbie, PST Team Manager
University of Texas / Arlington (TCEQ Contractor)

KA/CW/cw

| Initials: CW |
|---|
| ☒ Compliant<br>☐ Non-Compliant |
| ☐ GPS File: _____ |
| Region: 13 |

**UTA CENTER FOR ENVIRONMENTAL EXCELLENCE**
**PST FOCUSED ENERGY ACT INVESTIGATION CHECKLIST**
**FOR THE TCEQ**

| Notification Date: 06/04/19<br>☒ Phone ☐ fax ☐ e-mail<br>☐ Other: _____ |
|---|
| Start Time: 11:20<br>End Time: 12:15 |
| CCEDS: _____ By: _____ |

1577640

**Investigation Date:** 06/11/19 **Facility Thru-Put monthly avg.** <1000 **gal(s) for all tanks over** 12 **month(s)**

**Facility ID:** 58566 **Facility RN Name:** NORTH CENTRAL BAPTIST HOSPITAL **RN #** RN100629641

**Facility Address:** 520 MADISON OAK DR **City:** SAN ANTONIO **Zip Code:** 78258 **County:** BEXAR

**Owner:** VHS SAN ANTONIO PARTNERS LLC **Phone #** (210) 887-5118 **CN #** CN601674633

**Owner Address:** 1150 BRUSSELS ST **City:** SAN ANTONIO **Zip Code:** 78219

**Operator:** Same as Owner **Phone #** _____ **CN #** _____

**Operator Address:** Same as Owner **City:** _____ **Zip Code:** _____

**Facility Phone #** (210) 887-5118 **# of Tanks:** 1 **Tank Material:** FRP **Tanks:** DW

**Capacity of Tanks:** 1 8K _____ _____ _____ _____ **Piping Material:** Steel (actually FRP) **Piping:** DW
D _____ _____ _____ _____ _____

**Tanks Contain:** ☐ **gasoline** ☒ **diesel** ☐ **other:** 3/1/1991 **Facility Type:** ☐ **retail** ☐ **fleet refueling** ☒ **other:** Emergency Generator

| Investigator | Christian Wenske | | | | | *OS = *Present on-site (checkmark = yes)* |
|---|---|---|---|---|---|---|
| **Name** | ***OS** | ***Role** | **Title** | **Organization** | **Address** | **Phone** |
| Mark Lucas | ✔ | N, P, REC | Life Safety Officer | NORTH CENTRAL BAPTIST HOSPIT. | See Facility | (210) 887-5118 |
| Micheal Smith | ✔ | P, REC, REMC | Plant Operations Manage | NORTH CENTRAL BAPTIST HOSPIT. | See Owner and Facility | (210) 852-5341 |
| | | | | | | |
| | | | | | | |
| | | | | | | |

***Role: Notified (N), Participated in (P); Regulated Entity Contact (REC), Regulated Entity Mail Contact (REMC)** *(must have REC and REMC)*

| # | SELF CERTIFICATION Requirement | Investigator Notes | Compliant | Citation |
|---|---|---|---|---|
| 1 | Does the owner/operator have a current delivery certificate?<br>☐ Requested<br>☐ **Submitted:** _____ (MM/DD/YYYY) | ☒ A Central Registry Query indicates the facility is self-certified. The delivery certificate is current with an expiration date of 01/2020 (MM/YYYY).<br>☐ The delivery certificate has expired. The expiration date of _____ (MM//YYYY).<br>- # _____ fuel drops over _____ month(s)<br>Notes:<br>☐ Common Carrier violation cited effective April 19, 2012? (attach checklist) | Yes | **334.8(c)(5)(A)(i)** – failure to have a current, valid certificate (expired). |

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**PST FOCUSED ENERGY ACT INVESTIGATION CHECKLIST**
**FOR THE TCEQ**

| # | FINANCIAL ASSURANCE Requirement | Investigator Notes | Compliant | Citation |
|---|---|---|---|---|
| 2 | Can the facility demonstrate financial responsibility for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases?<br><br>☐Requested<br>☐**Submitted:** _____<br>(MM/DD/YYYY) | ☒ Financial assurance is provided by:<br>Name of company: Admiral Insurance Company<br>Date of policy: 6/1/2019 - 6/1/2020<br>Policy # $1M/$3M<br>☐ Financial assurance was provided by self insurance in the form of a: Select<br>☐Facility does not and could not provide financial assurance.<br>☐Records not available for review.<br>Notes: | Yes | **37.815(a)** and **37.815(b)** – failure to provide proof of financial assurance (insurance). |

| # | CORROSION PROTECTION Requirement | Investigator Notes | Compliant | Citation |
|---|---|---|---|---|
| 3 | Is the System equipped with a corrosion protection system and complying with the requirements to ensure that releases due to corrosion are prevented?<br><br>☐Requested<br>☐**Submitted:** _____<br>(MM/DD/YYYY) | Tanks:<br>☐**Impressed Current System (Steel Tanks)**<br>***- Rectifier appears to be on:*** Select ***Appears to be working :*** Select<br>****60 day checks conducted:*** Select<br>***- *Three year test conducted :*** Select **(see/fill below)**<br>☐**Sacrificial/Galvanic System (Steel w/FRP)**<br>***- Sacrificial (galvanic) anodes present?*** Select<br>***- Anodes appear to be functioning?*** Select<br>***- *Three year test conducted :*** Select **(see/fill below)**<br>☒**Electrically Isolated** *in the form of:* ☐**Composite Tank (Steel w/FRP)**<br>***- 100 mil FRP thickness?*** Select<br>☐**Jacketed Tanks**<br>☒**Fiberglass Tanks**<br>☐**Dual Protected (both ACT 100 and STI-P3)**<br>*- Tank Type:* _____<br>***- *CP test conducted?*** Select<br>*Date:* 7/18/14 (MM/DD/YYYY); (NACE#) 23357<br>*Co.* Chapman Engineering<br>Piping:<br>☒**Electrically isolated** *in the form of:*<br>☒**Fiberglass Piping**<br>☐**Flexible Piping**<br>☐**Impressed current system (Steel Piping see/fill above)**<br>☐**Sacrificial/Galvanic System (Steel Piping see/fill above)**<br>☐Facility did not have corrosion protection.<br>☐Records not available for review.<br>Notes: | Yes | **334.49(a)(1)** – failure to have corrosion protection for the UST system. |

**UTA CENTER FOR ENVIRONMENTAL EXCELLENCE**
**PST FOCUSED ENERGY ACT INVESTIGATION CHECKLIST**
**FOR THE TCEQ**

| # | RELEASE DETECTION Requirement | Investigator Notes | Compliant | Citation |
|---|---|---|---|---|
| 4 | Are the tanks monitored in a manner that will detect release at least monthly?<br><br>☐ Requested<br>☐ **Submitted:** _____ (MM/DD/YYYY) | ☐ **ATG and Inventory Control (IC)** ***(must have both)***<br>- IC reviewed months: _____ to _____.<br>- Monthly ATG tank tests (1 pass, per tank, per month) reviewed months: _____ to _____.<br>☐ **Statistical Inventory Reconciliation (SIR) and IC**<br>- SIR reviewed months: _____ to _____ by _____<br>(Name of SIR company).<br>☐ **Interstitial Monitoring**<br>- Reviewed months: _____ to _____.<br>☒ **Vapor Monitoring** *or* ☐ **Groundwater Monitoring**<br>- Reviewed months: 06/2018 to 05/2019 by Chapman Engineering<br>(Name of testing company). ***Site Assessment conducted?*** Select<br>☐ **Other:**<br>☐ Manual Monitoring (tanks < 1,000 gallons only)<br>☐ Monthly Monitoring (emergency generators only)<br>☐ Monitoring of Secondary Containment Barriers<br>- Reviewed months: _____ to _____.<br>☐ Facility did not have tank release detection.<br>☐ Records not available for review.<br>Notes: | Yes | ATG found? Yes<br><br>**334.50(b)(1)(A)** – failure to have release detection for UST systems. |
| 5 | Is the piping monitored in a manner to detect a release from any portion of the piping system?<br><br>☐ Requested<br>☐ **Submitted:** _____ (MM/DD/YYYY) | ☒ **Pressured** or ☐ **Suction** or ☐ **Gravity** lines<br>☒ **Line Leak Detector present?** Yes<br>☒ Mechanical LLD ☐ Electronic LLD<br>☒ **Line Tightness Test** or ☐ **N/A** (electronic LLD, Suction)<br>☒ Annual ☐ Triennial<br>- Test successfully conducted on 10/29/18 (MM/DD/YYYY) by Tanknology<br>(Name of testing company).<br>***LLD Tested?*** Yes (see/fill above)<br>☐ **Monthly Monitoring** (electronic LLD **only**)<br>- Reviewed months: _____ to _____.<br>☒ **Other Monitoring:** Vapor Monitoring (see/fill section #4)<br>☐ Facility did not have release detection for the piping.<br>☐ Records not available for review.<br>Notes: | Yes | **334.50(b) (2)** – failure to provide proper release detection for the piping associated UST systems. |

**UTA CENTER FOR ENVIRONMENTAL EXCELLENCE**
**PST FOCUSED ENERGY ACT INVESTIGATION CHECKLIST**
**FOR THE TCEQ**

| # | SPILL CONTAINMENT & OVERFILL PREVENTION Requirement | Investigator Notes | Compliant | Citation |
|---|---|---|---|---|
| 6 | Was the UST system equipped with spill and overfill prevention equipment that is functional?<br>☐ Requested<br>☐ **Submitted:** _____ (MM/DD/YYYY) | ☑ **Auto flow restrictor valve** (Ball-float)<br>☐ **Automatic shut-off valve** (flapper)<br>☐ Facility has no spill and no overfill prevention equipment.<br>☐ Records not available for review (ball-floats)<br>Notes:<br>See CCEDS Investigation 1371712 | Yes | **334.51(b) (2)** – failure to equip all USTs with spill and overfill prevention equipment. |
| # | **RELEASE REPORTING Requirement** | **Investigators Notes** | **Compliant** | **Citation** |
| 7 | If there was any suspected release, was it reported and investigated?<br>☐ Requested<br>☐ **Submitted:** _____ (MM/DD/YYYY) | N/A<br>Notes: | N/A | **334.74** – failure to conduct release investigation and confirmation steps within 30 days of discovery of suspected release. |
| # | **RECORD Requirement** | **Investigators Notes** | **Compliant** | **Citation** |
| 8 | Is the facility maintaining records to allow the investigator to perform regulatory oversight and/or determine compliance status? | Facility maintained records for compliance status.<br>Investigator not able to review records. Facility failed to keep required and legal copies of the following documents **(please specify)**:<br>☐ Release Detection Tanks: _____<br>☐ Release Detection Piping: _____<br>☐ Corrosion Protection: _____<br>☐ Overfill: **ball float verification for:** _____<br>☐ Financial Assurance: _____<br>☐ Other: _____<br>☐ Other: _____ | Yes | **334.10 (b)(1)(B)** – failure to maintain legible copies of all required records pertaining to an UST system in a secure location on the premises of the facility, immediately available for inspection by Commission personnel. |

## Communication History:

Date: 6/4/2019 Name: Mark Lucas Type: Phone/Notify
Date: _____ Name: _____ Type: _____
Date: _____ Name: _____ Type: _____
Date: _____ Name: _____ Type: _____

## Documentation/Photographs Attached:

1. Site Diagram
2. Old CP Test
3. Photographs
4. _____
5. _____

**Notes:** Operator Training Present? ✔ Name: Michael Smith From: PASS Date: 2/16/2017
Has Class C Operators

## Issues for Attention of Regional Office:

The piping is registered as steel but is actually FRP.

☑ Final review of checklist conducted before signing.
☑ File uploaded into DED.

Investigator Signature: Christian Wenske Digitally signed by Christian Wenske Date: 2019.06.26 08:05:12 -05'00'

UTA CENTER FOR ENVIRONMENTAL EXCELLENCE
PST FOCUSED ENERGY ACT INVESTIGATION CHECKLIST
FOR THE TCEQ

**Focused Investigation Additional Notes**

**Facility ID:** 58566

**1) Self-Certification Notes:**

**2) Financial Assurance Notes:**

**3) Corrosion Protection Notes:**

**4) Release Detection for Tanks Notes:**

**5) Release Detection for Piping Notes:**

**6) Spill and Overfill Notes:**

**7) Suspected Releases Notes:**

**8) Records Request Notes:**

**9) Other (Please specify):**

**10) Communication History cont:**

# SIGNIFICANT OPERATIONAL COMPLIANCE (SOC) CHECKLIST

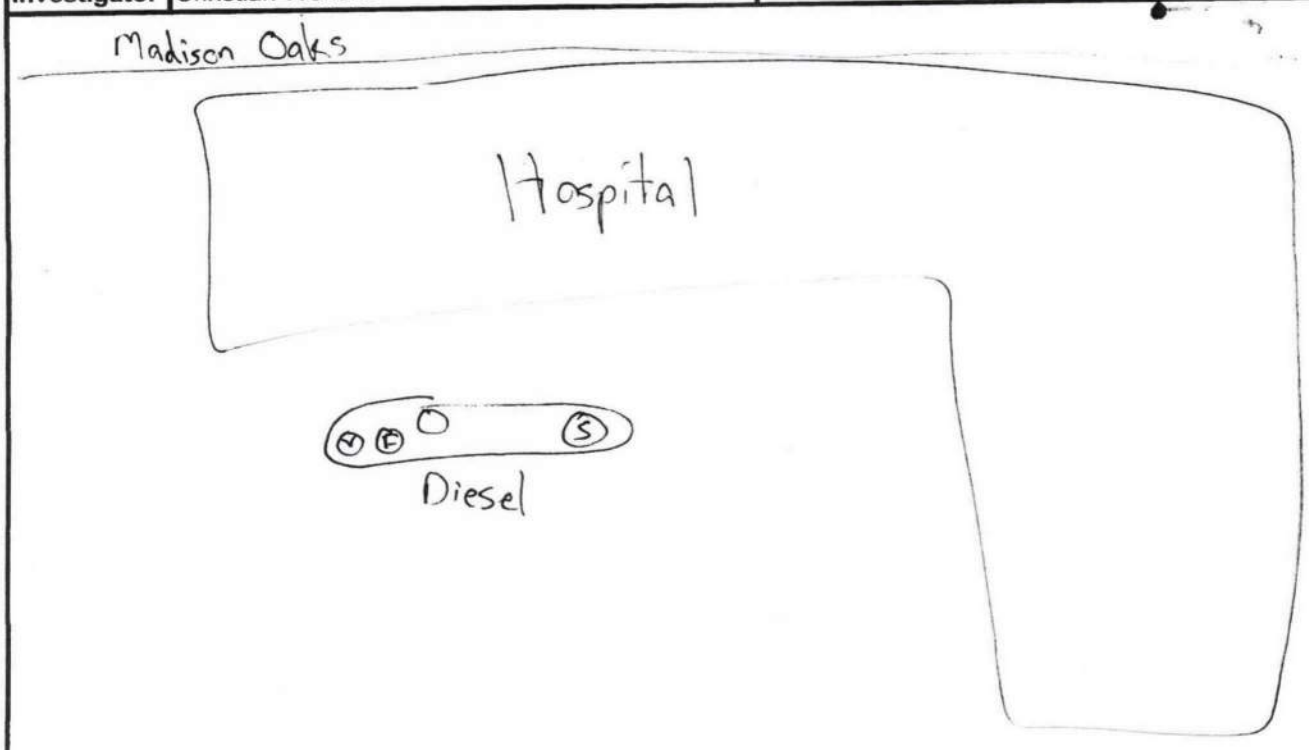
Regulated Entity Name: NORTH CENTRAL BAPTIST H  Date: 06/11/19

Additional ID 58566  Investigator Name Christian Wenske

| Item No. | | Description | Notes |
|---|---|---|---|
| A | | **RELEASE PREVENTION COMPLIANCE MEASURES MATRIX** | |
| | 1 | Spill Prevention device is present and functional? | Yes |
| | 2 | Overfill prevention device is present and operational? | Yes |
| | 3 | Repaired USTs and piping were tightness tested within 30 days of repair completion (not required with internal inspection or if monthly monitoring is used. | N/A |
| | 4 | Cathodic protection system was tested/inspected within 6 months of repair of any cathodically protected UST system. | N/A |
| | 5 | Corrosion protection system is properly operated and maintained to provide continuous protection. | Yes |
| | 6 | UST systems with impressed current cathodic protection are inspected every 60 days. | N/A |
| | 7 | Lined USTs are inspected periodically and lining is in compliance | N/A |
| | 8 | Buried metal UST and piping components are isolated from the soil or cathodically protected. | Yes |
| A9 | | Is the Facility SOC with release prevention (If ANY of the answers in this section are "NO", this answer must be "NO"). | Yes |
| | | | |
| B | | **RELEASE DETECTION COMPLIANCE MEASURES MATRIX** | |
| | 1 | Release detection method is present | Yes |
| | 2 | Release detection system is operating properly (able to detect a release from any portion of system that routinely contains product) | Yes |
| | 3 | Release detection meets performance standards in 40 CFR 280.43 or 40 CFR 280.44 (30 TAC 334.50) | Yes |
| | 4 | TCEQ has been notified of a suspected release as required (if applicable) | N/A |
| | 5 | USTs and piping are monitored monthly for releases and records are available | Yes |
| | 6 | Hazardous substance UST system leak detection meets requirements in 40 CFR 280.42(b) (from 40 CFR 280.12: Hazardous substance UST system means an underground storage tank system that contains a hazardous substance defined in section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (but not including any substance regulated as a hazardous waste under subtitle C) or any mixture of such substances and petroleum, and which is not a petroleum UST system) | N/A |
| | 7 | FOR TEMPORARY CLOSURE: Release detection requirements are being met for UST systems containing product (40 CFR 280.70(A)? | N/A |
| B8 | | Facility is SOC with release detection (if ANY of the above answers in this section are "NO", this answer MUST be "NO") | Yes |
| | | | |
| C | | **OVERALL SOC** | |
| C1 | | Facility is SOC (IF EITHER A9 or B8 answers are "NO", this answer MUST be "NO") | Yes |

# SITE DIAGRAM

| | |
|---|---|
| **Facility Name:** North Central Baptist Hospital | **Facility ID:** 58566 |
| **Date** 6/11/2019 | UNIVERSITY OF TEXAS ARLINGTON Division for Enterprise Development |
| **Investigator** Christian Wenske | |




| | |
|---|---|
| **The University of Texas at Arlington** | Not to Scale. This drawing is part of the inspection checklist. |
| **Center for Environmental Excellence** | |
| **Additional Notes:** | |
| | |
| | |

Chapman
ENGINEERING

CORPORATE OFFICE:
P. O. Box 1305
Boerne, TX 78006

July 18, 2014

Mr. Jim Rockey
North Central Baptist Hospital
520 Madison Oak Drive
San Antonio, Texas 78025

**Underground Storage Tank Piping Evaluation**
**520 Madison Oak Drive, San Antonio, Texas**
**TCEQ Facility ID #58566**

Dear Mr. Rockey:

Based on rule requirements through the Texas Commission on Environmental Quality (TCEQ), Chapman Engineering personnel evaluated the underground piping, which is part of the existing fuel system at North Central Baptist Hospital in San Antonio. This system consists of 1 - 8,000-gallon fiberglass-reinforced plastic (FRP) underground storage tank (UST). The tank supplies diesel fuel to the emergency generator system for the hospital.

Mr. Derek Moellendorf, NACE CP Tester for our company, has inspected the submersible pump location and has photographs of the fuel lines in that pump containment enclosure. The photos clearly show that fiberglass-reinforced plastic (FRP) piping exits the containment enclosure, and then carries fuel feeding to the generator location, along with fuel "return" and vent line from that location.

Piping is double-walled, as indicated by the "clam-shell" fittings used to join the fiberglass piping sets within the containment.

Because the piping is made of FRP, and no metal piping is in contact with soil or water within the containment or in the pipe runs through soil or backfill, there is no regulatory requirement for North Central Baptist Hospital to protect the product lines from external corrosion.

Thank you for this opportunity to provide this letter report. For questions or comments, please contact us at (830)-816-3311.

Sincerely,

Derek Moellendorf
NACE CP Tester #18337
CC/dm

Cal Chapman, P. E.
NACE CP Specialist

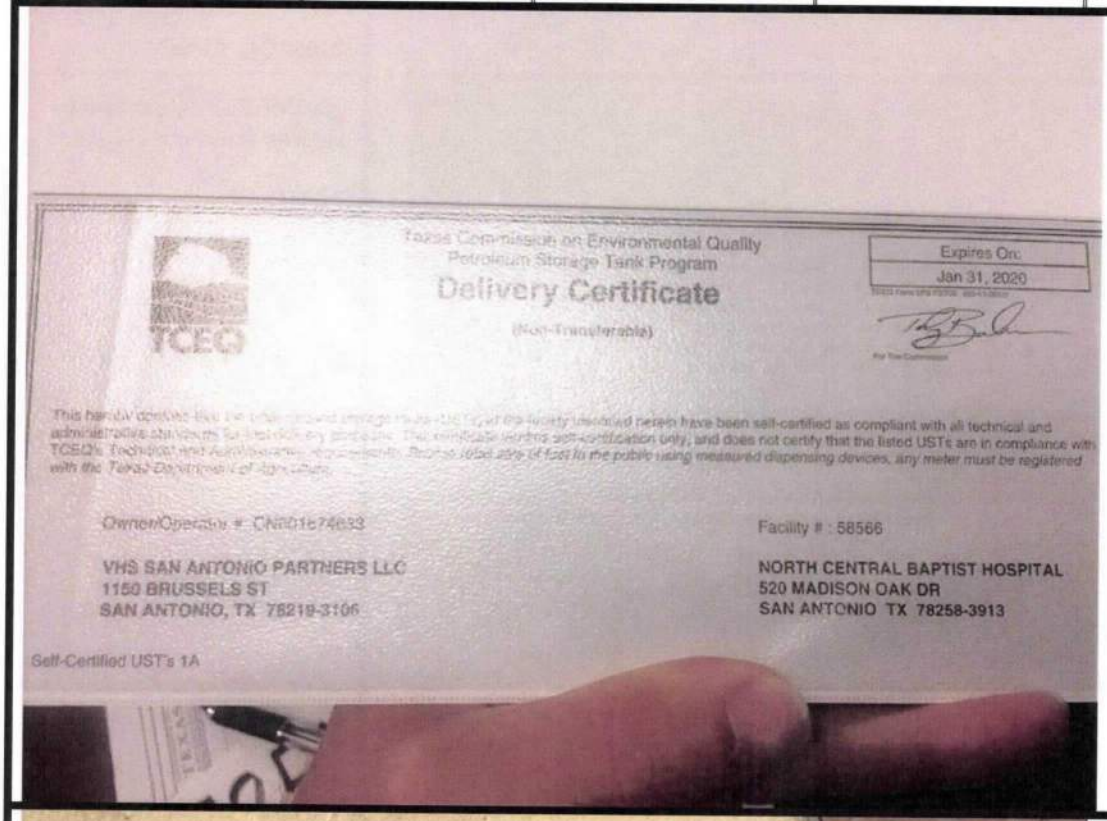
STATE OF TEXAS
C. C. CHAPMAN IV
81268
REGISTERED
PROFESSIONAL ENGINEER

CATHODIC PROTECTION
NACE
C.C. CHAPMAN IV
23357
SPECIALIST

(830) 816-3311 - (800) 375-7747 - Fax (830) 816-1753
info@chapmanengr.com - www.chapmanengr.com

# UTA PST PHOTOGRAPHIC DOCUMENTATION

| Facility ID No.: | 58566 | Regulated Entity: | North Central Baptist Hospital | | |
|---|---|---|---|---|---|
| Investigation Date: | 6/11/2019 | Photographer: | Christian Wenske | County: | Bexar |




SUBJECT: Delivery Certificate

COMMENTS: The Delivery Certificate expires at the end of January 2020.

PHOTO # 1


SUBJECT: Spill Bucket

COMMENTS: The spill bucket is clean.

PHOTO # 2

# UTA PST PHOTOGRAPHIC DOCUMENTATION

| Facility ID No.: | 58566 | Regulated Entity: | North Central Baptist Hospital | | |
|---|---|---|---|---|---|
| Investigation Date: | 6/11/2019 | Photographer: | Christian Wenske | County: | Bexar |


SUBJECT: Sump

COMMENTS: A mechanical line leak detector is present.

PHOTO # 3

# APPENDIX B
# 2020 Vapor Monitoring Release Detection Results

# CHAPMAN ENGINEERING, INC.

## Fuel Finder™ 30-Day Vapor Monitoring Release Detection Results

**Customer:**
North Central Baptist
520 Madison Oak
San Antonio, Texas 78258

**Location:**
North Central Baptist Hospital
520 Madison Oak
San Antonio, Texas 78258

| | |
|---|---|
| **Service Period:** | **December, 2020** |
| TCEQ Owner ID#: | 60661 |
| TCEQ Facility ID#: | 58566 |
| CE Route #: | 14 |

**YEAR:** **2020**

| MONTH | DIESEL |
|---|---|
| January | P |
| February | P |
| March | P |
| April | P |
| May | P |
| June | P |
| July | P |
| August | P |
| September | P |
| October | P |
| November | P |
| December | P |

Legend: P = Pass F = Fail I = Inconclusive

**30-Day Release Detection:** **PASS**

**REGULATORS and/or INSURANCE COPY:** Please retain this report in your files onsite. In the event of an inspection by TCEQ, you should have Release Detection Reports available for the previous 12 months.

Should you have any questions regarding this report, do not hesitate to contact our office at 800-375-7747.

**Thank you for your business.**

Cal Chapman P. E.
President

P. O. Box 1305
800-375-7747
830-816-3311
www.chapman.engineering
Boerne, Texas 78006
Fax: 830-816-1753

# APPENDIX C
# 2021 Tanknology Precision Tank Tightness Test

# Testing and Inspection Certificate

Tanknology Inc.
11000 North MoPac Expressway, Suite 500, Austin, TX 78759
800-800-4633 www.tanknology.com



| | | | |
|---|---|---|---|
| Test Date | 1/15/2021 | Tanknology WO# | GC1-5216702 |
| Test Purpose | COMPLIANCE | Customer PO# | |

**Customer**

TENET HEALTHCARE CORPORATION
1445 ROSS AVENUE
SUITE 1400
DALLAS, TX 75202
Attn: KERI KEGLEY
(469) 893-2815

**Location**

North Central Baptist Hospital
520 MADISON OAK
San Antonio, TX 78258
Attn: Mike Smith
(210) 852-5341

| Test / Inspection Description | Item Tested | Date Tested | Result |
|---|---|---|---|
| Precision Tank Tightness | Tank 1 Diesel | 1/15/2021 | Pass |

Tanknology Representative: Kevin Callaway
Telephone: (512) 380-7220

Technician: Christopher Brown
Technician Certification: (See forms)

Tanknology

# *VacuTect*
## Tank Tightness Test



Work Order: 5216702 Date: 1/15/2021

Site Name/ID: North Central Baptist Hospital

Address: 520 MADISON OAK

City: San Antonio State: TX Zip: 78258

| | | | | | | |
|---|---|---|---|---|---|---|
| Tank Information | 1 Diesel | | | | | |
| Customer Tank ID | 1 | | | | | |
| Regulatory Tank ID | 1 | | | | | |
| Product Category | Diesel | | | | | |
| Product Name | Diesel | | | | | |
| Gallons Capacity | 8000 | | | | | |
| Tank Type | Fiberglass | | | | | |
| Tank Walls | Doublewall (factory) | | | | | |
| Compartmentalized | No | | | | | |
| Siphon Tank | No | | | | | |
| Vents included with test | not tested | | | | | |
| Test Start Time | 09:59:00 | | | | | |
| Test End Time | 11:07:00 | | | | | |
| Water ingress (Y/N) | No | | | | | |
| Bubble ingress (Y/N) | No | | | | | |
| Ullage ingress (Y/N) | No | | | | | |
| **Test Result (P/F/I)** | **Pass** | | | | | |

☑ Yes ☐ No diagnostic only - Test was performed per 3rd party certifications as specified in 40 CFR parts 280 and 281.

**Technician Comments :**

Technician Name Christopher Brown Certification # 144548

Technician Signature

*Environmental Compliance for Petroleum Systems*

# Site Diagram

(This site diagram is for reference only and is not drawn to scale)

| | | | |
|---|---|---|---|
| Work Order: | 5216702 | | |
| Site ID / Name: | NORTH CENTRAL / North Central Baptist Hospital | | |
| Address: | 520 MADISON OAK | | |
| City: | San Antonio | State: TX | Zip: 78258 |