



Jayne Burritt, Administrator/CEO

Board of Directors

Heather Anderson, Chair

Ann Marie Tugwell, Vice Chair

Shane Jackson, Treasurer

Adam Cook, Secretary

Solicitation Number: 2024.026

Addendum Date: May 20, 2024

Closing Date: June 4, 2024 @ 11:00 A.M. Eastern Time

Total Page(s): 2 (plus 5 pages of the Inspection Report)

Questions/Answers:

Question #1: Asked during site visit: Have you passed all inspections?

Answer #1: Up until this last one. We will share the report from TDEC. (This will be included as separate pages after the addendum)

Jon Clark

Scott Davis

Brian Gard

Rob Glass

Chuck Severance

John Wright

Question #2: Asked during site visit: Is this a single-wall steel tank?

Answer #2: It was answered during the site visit as double-wall, upon further review, this tank is confirmed as a single-wall steel tank.

Question #3: Asked during site visit: Are there anodes?

Answer #3: Yes, the same as in your water heater.

Question #4: Asked during site visit: Do you have a rectifier?

Answer #4: No.

Question #5: Asked during site visit: How will the term work, pricing increases?

Answer #5: This location will be the first project, plus the inspections. If we have other locations come online, that will be assigned to the awarded firm to quote out. For each annual renewal period, PBA will reach out and at that point, pricing changes can be submitted.

Question #6: Asked during site visit: How old is the tank?

Answer #6: It was originally stated it was replaced in 1995, correction, it was replaced in 1998.

Question #7: Asked during site visit: Are there any signs of water entry?

Answer #7: No

Question #8: Asked during site visit: So it's annual renewals with a contingency of 5 years?

Answer #8: Annually we will work out renewals for a total of up to 5 years for the term contract.

Question #9: Asked during site visit: So you are looking for not only bringing this property up to code, but also monthly/annual inspections?

Answer #9: Yes, along with possibly adding other properties.

Question #10: Asked during site visit: For quoting purposes, do we assume there is a 2-4 inch opening?

Answer #10: You can quote that in your pricing, but you can also attach another pricing page to cover other options.

Question #11: Asked during site visit: What is the capacity of this tank?

Answer #11: 8500 gallons.

Question #12: Asked during site visit: When you stick the tank, do you use water finding paste?

Answer #12: Yes.

Question #13: Asked during site visit: Who manufactured this tank?

Answer #13: We do not have the documentation from the installation of 1998 to confirm this.

Question #14: Asked during site visit: Will this meter be put on the network? It currently isn't and is manual.

Answer #14: We could look into this being an option. We would need to know the benefits, the needed infrastructure, and cost associated with this.

Question #15: Asked during site visit: Do you have any pictures of when the tank was installed?

Answer #15: We check our archives and could not locate a picture of the installation in 1998.

End of Addendum #1.

Addendum must be acknowledged in Tab III of the submittal.



Brittany Daniels
Procurement Specialist
Public Building Authority



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF UNDERGROUND STORAGE TANKS
3711 MIDDLEBROOK PIKE
KNOXVILLE, TENNESSEE 37921
(865) 594-6035 FAX (865) 594-6105

April 4, 2024

Public Building Authority
610 Richards St.
Knoxville, TN 37921

Re: Results of Compliance Inspection – Action Required
City County Building
400 Main Street
Knoxville, TN 37902
Facility ID # 2470535, Knox County

Dear Sir or Madam:

On April 2, 2024, an inspection was performed at the referenced facility. The Division of Underground Storage Tanks (Division) appreciates your cooperation with the inspection process that we must complete together to ensure compliance with the Tennessee Petroleum Underground Storage Tank Act (UST Act) and implementing rules. These inspections are required at least once every three years to comply with the requirements of the U.S. Environmental Protection Agency (EPA) for Tennessee's EPA-authorized petroleum underground storage tank program (Section 1523 of the Federal Energy Policy Act of 2005).

During the inspection, violations were found that must be addressed:

Violation #1: Please select an approved method of release detection for the tank volume and submit the release detection test results for the following month to the Division for review. in accordance with Rule 0400-18-01-.04(3)(b)1.(iii). Specifically, at the time of the inspection the facility was registered as using Manual Tank Gauging for Tank release detection. Tank 2A (8,500 gallons ULS Diesel) has a capacity that is too large to use manual tank gauging as a form of tank release detection.

Response required: Select an approved method of release detection for the appropriate tank volume and begin conducting tank release detection. Submit

documentation of the implementation of the new release detection method and next month's release detection results.

Violation #2: Failure to install line leak detector for pressurized underground piping in accordance with Rule 0400-18-01-.04(2)(b)1.(i). Specifically, at the time of the inspection it was found that there was not a line leak detector installed at either STP motor.

Response required: Please install and test a line leak detector appropriate for the product stored and submit documentation to the Division for review.

Please be aware that local fire code for critical infrastructure may prevent the installation of Mechanical Line Leak Detectors that could disrupt the flow of fuel to the emergency generator during an emergency. In this case Electronic Line Leak Detectors (ELLD) and a monitoring console will need to be installed so that shutoff can be disabled, but the monitoring console will alarm if the ELLD detects a leak.

Violation #3: Failure to ensure that cathodic protection system is tested every 3 years in accordance with Rule 0400-18-01-.02(4)(c)2.(i). Specifically, at the time of the inspection there was not any corrosion protection test provided for steel piping installed at UST 2A (8,500 gallons ULS Diesel).

Response required: A new cathodic protection test must be conducted, and the results submitted to the Division for review.

Violation #4: Failure to conduct annual line tightness test on pressurized underground piping in accordance with Rule 0400-18-01-.04(2)(b)1.(ii). Specifically, at the time of the inspection there was not any piping release detection provide for piping associated with UST 2A (8,500 gallons ULS Diesel).

Response required: Please conduct a line tightness test and submit the results to the Division for review.

Violation #5: Failure to perform periodic and annual walkthrough inspections in accordance with Rule 0400-18-01-.02(8)(a)1. Specifically, at the time of the inspection the spill bucket logs and dispenser logs were being done, but the walkthrough form was not being completed. Additionally, the day tank walkthroughs were not being completed.

Response required: Please begin conducting periodic and annual walkthrough inspections and submit documentation on the Monthly/Annual Facility Walkthrough Inspection Form (CN-2544) to the Division for review.

Additionally, please complete day tank walkthroughs and submit documentation to the Division.

Violation #6: Failure to report a change of status for a UST system within 30 days in accordance with Rule 0400-18-01-.03(1)(g). Specifically, at the time of the inspection it was found that the release detection methods for both piping and tank were no longer valid forms of RD for this facility.

Response required: Please submit a notification form updating the release detection methods used for piping and tank.

Violation #7: Failure to monitor spill prevention equipment, for UST systems no less frequently than walkthrough inspections are conducted, or to test spill prevention equipment at least once every three (3) year in accordance with Rule 0400-18-01-.02(3)(c)1. Specifically, at the time of the inspection the spill bucket integrity test was not provided.

Response required: Conduct a spill bucket integrity test and submit documentation to the Division for review.

Violation #8: Failure to inspect overfill prevention equipment at least once every three (3) years. in accordance with Rule 0400-18-01-.02(3)(c)2. Specifically, at the time of the inspection the overfill test was not provided.

Response required: Conduct an overfill test and submit documentation to the Division for review.

Please submit documentation detailing the corrections to this office by **May 6, 2024**.

Due to the severity of the violations discovered at the time of the inspection, successful completion of operator retraining is required. Submit your certificate for A and B Operator training by **July 4, 2024**. There are two ways to obtain an A and B Operator certificate:

1. Complete online (Tennessee Tank Helper) training anytime at your convenience, using this link <https://tdec.tn.gov/tankhelper>. If you do not already have an account, you will need to create one and complete all relevant trainings for your site.
2. Complete virtual training (Tennessee Tank School) by registering for the upcoming class using this link <https://www.tn.gov/environment/program-areas/ust-underground-storage-tanks/operator-training/tank-school.html>. Tank school classes are held once a month on the second Wednesday of the month. You will need to register to attend the class at least 1 week prior to the class. A post-class test score of 70 or above is required.
3. Designate the person completing A and B operator training as an A and B operator if they are not already.

To avoid further enforcement, which may include civil penalties, you are urged to timely correct these violations and complete operator retraining by either attending and passing Tank School or completing operator retraining on the Tank Helper website. If you do not, the UST Act, as revised to comply with Section 1527 of the Federal Energy Policy Act of 2005 may require placing your facility on the "Delivery Prohibition" list and attaching red tags to the underground storage tanks. To avoid the possibility of any disruption of fuel delivery to your business, the Division requests that you immediately put back into proper operation the preventative measures that protect your USTs from leaking and that detect any leaks quickly.

Although we do have to make you aware of some violations in this letter, violations are correctable, and we are committed to working with you to help you return the facility to compliance and reach our common goal of safely storing petroleum in the State of Tennessee. We ask for your help to protect our natural resources because leaking tanks can contaminate Tennessee's drinking water or cause significant safety hazards and the cost to clean up even small leaks can be very high.

All Division forms and guidance can be found at <https://www.tn.gov/environment/program-areas/ust-underground-storage-tanks/forms-guidance.html>.

If you have any questions concerning this correspondence, please do not hesitate to contact me at (865) 333-6227 or at justin.evans@tn.gov.

Please take 5-10 minutes to complete our customer survey form at <https://www.tn.gov/environment/about-tdec/contact-tdec-customer-service-form.html>

Sincerely,

Public Building Authority

FID#2-470535

April 4, 2024

Page 5



Justin Evans

Division of Underground Storage Tanks

cc: Electronic File Uploaded (GasLog Database)

FO-036 OR 02282023 FINAL