



Jiffy Lube International, Inc. • P.O. Box 2967 • Houston, Texas 77252-2967 • (713) 546-3722 • Fax (713) 546-3656

August 23, 1996

Environmental, Safety & Health

Mr. Don Atkinson-Adams
Alameda County, Dept. of Environmental Health
1131 Harbor Bay Pkwy., Suite 250
Alameda, CA 94502-6577

Certified Mail P. 798 123 584
Return Receipt Requested

SUBJECT: Response to Facility Inspection - July 22, 1996
Jiffy Lube Store 606
2492 Castro Valley Blvd
Castro Valley, CA 94546

ENVIRONMENTAL
PROTECTION
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Dear Mr. Atkinson-Adams:

Please find enclosed the amended documents which you requested during your inspection of the above-referenced facility operated by Jiffy Lube International, Inc. on July 22, 1996. The documents enclosed include the following:

1. New Underground Storage Tank Registration Forms A and B.
2. New UST Monitoring Plan
3. Letter of Financial Test of Self-Insurance
4. Amended Hazardous Materials Business Plan, including amended pages of the Emergency Response Plan

If you have any questions concerning this matter, please call me at (713) 546-8637 or Ellen Thomson at (713) 546-8147.

Sincerely,

Frank Jeanson
JLI Environmental Coordinator

FGJ:et

Attachments

**Underground Storage Tank
Monitoring & Emergency Response Plan**

**Jiffy Lube International, Inc.
Store No. 606
2492 Castro Valley
Castro Valley, CA 94546-5120**

Date: August 1996

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I. GENERAL INFORMATION

STORE 606

Store Address: 2492 Castro Valley Blvd.
Castro Valley, CA 94546-5120

Mailing Address: Jiffy Lube International, Inc.
2930 Bowers Ave.
Santa Clara, CA 95051

Telephone Number: (Store) (510) 582-7677
(Regional Office) (408) 988-8999

Regional Manager: Brian Klarman
2930 Bowers Ave.
Santa Clara, CA 95051
(408) 988-8999 ext. 116 office
(800) 764-1487 pager

Store Manager: Efrin Thomas
(510) 582-7677 office

Type of Business: Automotive Oil Change/Lubrication - (Sic Code 7549)

Jiffy Lube International State Identification #: CAD 982038903

II. SITE DESCRIPTION

This plan specifically refers to one underground storage tank located at the site of Jiffy Lube Store #606, at 2492 Castro Valley Blvd., Castro Valley, CA.

There is one 2,000 gallon tank at this facility (see Section VII, Exhibit A) which contains used motor oil. It is a double-walled steel tank with steel piping.

III. MONITORING PROCEDURES

The tank is continuously monitoring using an ILS-350 Veeder Root monitor located in the annular space of the tank. The sensor detects the presence of fluid between the inner and outer walls of the tank with a detection limit of 1 inch of fluid. The sensor is hooked to an alarm box located in the store and which has both audible and visual alarms.

The company responsible for annual servicing and maintaining the tank monitoring system is:

Precision Environmental
1081 Alameda De Las Pulgas #85
Belmont, CA 94002
(408) 992-0603

IV. LEAK REPORTING PROCEDURES

When a leak is detected by the monitoring system, store personnel should report the incident within one hour to the following parties:

1. Regional Manager: Brian Klarman
(408) 988-8999 ext. 116 office
(800) 764-1487 pager
2. Regional Office: Jiffy Lube International
(408) 988-8999
3. Reg. Environmental
Coordinator: Dan Jensen
6739 SE Woodstock Blvd., #4
Portland, OR 97206
(503) 774-1352
4. Monitoring Co.: Precision Environmental
(408) 992-0603
5. Spill Clean-up Team: Evergreen Environmental
EPA ID #CAD980887418
(800) 972-5284
6. City Fire Department: (510) 670-5880
(911) in an emergency

V. SPILL RESPONSE PROCEDURES

In the event of a release of large amounts of used oil from the tank or overfill , the on-site coordinator will evacuate the immediate area. The on-site coordinator will make the determination as to what necessitates a complete evacuation of the property based upon the threat of human health and safety and notification of evacuation will be given by the on-site coordinator. The evacuation staging area for this store is located on the sidewalk at the south end of the property, adjacent to the entrance from Castro Valley Boulevard.

The on-site coordinator, with assistance from a trained employee, will implement the use of available absorbent to control the spill and to prevent off-site discharge. All existing floor drains, sumps and storm drains should be covered or diked to prevent the migration of the used oil to the sanitary sewer and/or surface water bodies. The designated Hazardous Material Spill contractor will be notified.

A release which impacts soil and/or groundwater will be cleaned up using one or more of a variety of methods, including, but not limited to, excavation of soil or extraction and treatment of groundwater.

In accordance with State regulations, all spent absorbents and petroleum-impacted soil will be collected in DOT approved containers and then, transported by a licensed hauler to a facility permitted to dispose of hazardous waste.

VI. MONITORING EQUIPMENT MAINTENANCE

The tank monitoring system is tested on a weekly basis by store personnel to assure the alarm is functioning properly.

The tank monitoring system is tested on an annual basis by Precision Environmental, 1081 Alameda De Las Pulgas, #85, Belmont, CA 94002, (408) 992-0603.

The piping is tested on a bi-annual basis by NDE Environmental Corporation, 8906 Wall Street, Suite 306, Austin, Texas 78754, (512) 719-4633.

LETTER FROM CHIEF FINANCIAL OFFICER

I am the Chief Financial Officer of Pennzoil Company, P. O. Box 2967, Houston, Texas 77252-2967, which is the parent company of Jiffy Lube International, Inc. This letter is in support of the use of the financial test of self-insurance to demonstrate financial responsibility for taking corrective action and/or compensating third parties for bodily injury and property damage caused by sudden accidental releases and/or nonsudden accidental releases in the amount of at least One Million Dollars (\$1,000,000.00) per occurrence and Two Million Dollars (\$2,000,000.00) annual aggregate arising from operating underground storage tanks (USTs).

Underground storage tanks at the following facilities are assured by this financial test or a financial test under an authorized State program by this owner or operator:

See revised Attachment 1, attached hereto and incorporated herein, for a list of all affected facilities as of March 13, 1996.

A financial test is also used by this owner or operator to demonstrate evidence of financial responsibility in the following amounts under other Environmental Protection Agency (EPA) regulations or state programs authorized by EPA under 40 CFR Parts 271 and 145:

<u>EPA Regulations</u>	<u>Amount</u>
Closure (§§ 264.143 & 265.143)	\$ 5,519,526
Post-Closure Care (§§ 264.145 & 265.145)	499,882
Liability Coverage (§§264.147 & 265.147)	0
Corrective Action (§§ 264.101(b))	0
Plugging and Abandonment (§ 144.63)	9,557,634
Closure	442,042
Post-Closure Care	0
Liability Coverage	5,000,000
Corrective Action	0
Plugging and Abandonment	0
Total	\$ 21,019,084

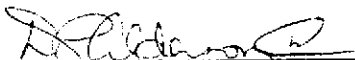
This owner or operator has not received an adverse opinion, a disclaimer of opinion, or a "going concern" qualification from an independent auditor on his financial statements for the latest completed fiscal year.

Alternative II

1. Amount of annual UST aggregate coverage, being assured by a test, and/or guarantee	\$ 2,000,000
2. Amount of corrective action, closure and post-closure care costs, liability coverage, and plugging and abandonment costs covered by a financial test, and/or guarantee	21,019,084
3. Sum of lines 1 and 2	23,019,084
4. Total tangible assets	4,160,866,000
* 5. Total liabilities [if any of the amount reported on line 3 is included in total liabilities, you may deduct that amount from this line and add that amount to line 6]	3,471,544,000
6. Tangible Net Worth [subtract line 5 from line 4]	689,322,000
* 7. Total assets in the U.S. [required only if less than 90 percent of the assets are located in the U.S.]	N/A

	<u>YES</u>	<u>NO</u>
8. Is line 6 at least \$10 million?	<u>X</u>	<u> </u>
9. Is line 6 at least 6 times line 3?	<u>X</u>	<u> </u>
*10. Are at least 90 percent of assets located in the U.S.? [If No, complete line 11.]	<u>X</u>	<u> </u>
11. Is line 7 at least 6 times line 3?	<u>N/A</u>	<u> </u>
Fill in either lines 12-15 or lines 16-18:		
12. Current Assets		
13. Current Liabilities		
14. Net working capital [subtract line 13 from line 12]		
15. Is line 14 at least 6 times line 3?	<u>YES</u>	<u>NO</u>
16. Current bond rating or most recent bond issue	Baa3/BBB	
17. Name of rating service	Moody's/ Standard & Poors	
18. Date of Maturity of bond	October 1, 2003	
19. Have financial statements for the latest fiscal year been filed with the SEC, the Energy Information Administration, or the Rural Electrification Administration?	<u>YES</u>	<u>NO</u>
	<u>X</u>	<u> </u>

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR Part 280.95(d) as such regulations were constituted on the date shown immediately below.



 David P. Alderson, II
 Group Vice President - Finance and
 Accounting and Treasurer
 April 23, 1996

EMERGENCY RESPONSE PLAN

Jiffy Lube International, Inc.

Store No. 606

ENVIRONMENTAL
PROTECTION

96 AUG 26 AM 9:18

Date: August 1996

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1. EMERGENCY RESPONSE NOTIFICATIONS

STORE 606

Store Address: 2492 Castro Valley Boulevard
Castro Valley, CA 94546-5120

Mailing Address: Jiffy Lube International, Inc.
2930 Bowers Ave.
Santa Clara, CA 95051

Telephone Number: (Store) (510) 582-7695/7677
(Regional Office) (408) 988-8999

Primary Contact: Brian Klarman - District /General Manager
Brian Klarman - Regional Manager

Type of Business: Automotive Oil Change/Lubrication - (Sic Code 7549)

Jiffy Lube International EPA Identification #: 982038903

Emergency Contact Information:

Emergency Coordinator: Brian Klarman (District/Regional Manager)
Pager Number: (800) 764-1487

On-Site Coordinator: Efrin Thomas (Store Manager)
Business Phone: (510) 582-7677

On-Site Alternate: Troy Cazames (Assistant Store Manager)

Pennzoil/Jiffy Lube Serious Incident Reporting Center: 1-800-848-7525

After initially responding to protect the safety and health of persons in danger, facilities should immediately report the occurrence of a serious incident to their management, the 24 hour Pennzoil/Jiffy Lube Serious Incident Reporting Center and Regulatory agencies. Examples of serious incident are: 1) Injuries that could result in death or permanent disability; 2) Substantial damage to property or natural resources; 3) Spills or releases of gases, oil or hazardous materials which could result in (1) or (2) above or the evacuation of the facility and/or public; 4) Fires and explosions which can result in (1) or (2) or (3); and 5) other situations which could attract adverse media, government or public attention.

STORE 606

Organization	Emergency Telephone Number	General Information Telephone Number
Fire Department	911	(510) 670-5880
San Leandro Sheriff's Dept.	911	(510) 667-7721
State Police	911	
Paramedics	911	
Medical Facility (Eden Hospital)		(510) 537-1234
Hazardous Material Spill Contractor (Garner Environmental)		1-800-442-7637
Poison Control Center	(800) 342-9293	
Pennzoil/JLI ESHA Department	(713) 546-8637 (Environmental) (713) 546-6489 (Safety and Health) (713) 546-8512 (Alternate Number)	

AGENCY NOTIFICATIONS

Organization	Telephone Number
State Office of Emergency Services	1-800-852-7550
State Department of Health Services, Toxic Substances Control Division (If the spill involves a waste material)	(916) 324-1826
Regional Water Quality Board	(510) 286-1255
Alameda County Dept. of Environmental Health	(510) 567-6700 or (510) 567-7721
EPA National Response Center	1-800-424-8802

Written follow-up spill notification to the State Office of Emergency Services and the Alameda County Department of Environmental Health must also be submitted.

In the event of a hazardous waste or material incident, the following information is required to be gathered immediately:

- Name of person and business
- Business street address
- Location of incident
- Type of incident (spill, gas release, etc.)
- Nature and volume of materials involved
- Extent of injuries
- Possible hazards to human health and/or environment