

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R067

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

September 1, 1993
STID # 367

Mr. Syed Rizvi
Environmental Compliance Officer, Unocal
Unocal Corporation
911 Wilshire Blvd., Floor 11
Los Angeles, California

Re: FIVE YEAR UNDERGROUND TANK PERMIT FOR UNOCAL # 3737 LOCATED
AT 1400 POWELL STREET, EMERYVILLE

Dear Mr. Rizvi;

Please find enclosed a five-year operating permit certificate, for four fiberglass underground storage tanks at the site noted above. This permit is being issued, contingent upon the facility's compliance with all applicable underground tank monitoring requirements. Acceptable monitoring procedures are described in the revised Title 23, California Code of Regulations (C.C.R.) which became effective August 9, 1991. In order to maintain a valid permit, any deficiencies noted on the final underground tank inspection report or subsequent inspections, must be corrected. Below is a summary of the monitoring requirements for your facility:

1. Sections 2645 and 2646 - Inventory Reconciliation

- a) Record the daily variation in inventory reconciliation. This is the difference between the measured inventory in the tank and the calculated inventory. The calculated inventory shall be determined by adding the fuel inputs from deliveries and subtracting the day's sales withdraws from the physically measured inventory of the day before.

Meters or gauges used to measure the in tank inventory must be approved by this office. Commercial gauges and measuring devices should meet the standards in Title 4, Chapter 9, of the California Code of Regulations (C.C.R.)

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and be inspected by the County Department of Weights and Measures.

Weekly tank gauging shall only be used as part of a monitoring program for existing tanks which have a total system capacity of 2,000 gallons or less and which can be taken out of service for at least 48 continuous hours each week. Tanks with a capacity of 550 gallons or less may be exempt from integrity testing each year.

You are advised that, using manual stick readings to measure the physical inventory, may require your inventory reconciliation data to be evaluated by a third party certified statistical analyst. This rule applies where the highest anticipated ground water may come to less than 20 feet below the bottom of the tank.

Daily variations shall be summed for a period of one month. If monthly variations exceed 1% per cent of the monthly tank delivery plus 130 gallons, this office must be notified. An investigation as to the cause of excess variations must be conducted and reported to this office.

- b) Submit an annual statement to this office which states that all inventory reconciliation data are within allowable limits or list the times and corresponding variations when allowable limits were exceeded. This statement shall be executed under penalty of perjury.

2. Section 2643 - Non-visual Monitoring

- a) Monitoring of piping shall be conducted at least hourly, which is capable of alerting the operator when 3 gallons have leaked or a leak rate of three gallons per hour at 10 p.s.i. exists; and

Annual piping system integrity testing shall be conducted which is capable of detecting a minimum release of 0.1 gallon per hour at 1.5 (one and a one/half times) normal operating pressure.

- b) Annual tank integrity testing shall be conducted which is capable of detecting a release of 0.1 gallon per hour at or above the maximum product level of the tank.

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3. Section 2663 - Overfill Prevention

- a) Onsite personnel or the operator's agent must ensure that the volume available in the tank is greater than the volume of product or waste oil to be transferred into the tank before the transfer is made. Also the transfer process must be watched to prevent overfilling and spilling.

4. Section 2643 et. seq., Non- Visual Monitoring

- a) Maintain the monitoring equipment in good repair and service in accordance with the manufacturer's instructions. In a written plan, describe the training needed for the operation of both the tank system and monitoring equipment or conducting monitoring procedures. Maintain the plan on site for review.

5. Section 2712 - Permit Conditions

- a) Retain all monitoring and maintenance records on-site or at a readily available location off-site, if approved by this agency, for a period of at least 3 years. These records must be made available, upon request within 36 hours, to the local agency or the Regional Water Quality Control Board.

The above listed requirements reflect the information currently on file and may not include deficiencies disclosed during routine inspections or changes that will result from tank and piping upgrading required by December 22, 1998. You may utilize other release detection methods for tanks and pipelines as outlined in the revised Title 23, C.C.R.. Please send a letter to this office notifying us of any changes in the monitoring methods.

Consult the revised Title 23, C.C.R. regarding any additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916)323-1262.

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Should you have any questions or concerns regarding the contents of this letter, please call me at (510)271-4320.

Sincerely,



Kevin Tinsley
Hazardous Materials Specialist

cc: Edgar Howell, Chief (kt-files), AlCo. E.H.D.
Brian Oliva, Haz. Mat. Specialist, AlCo. E.H.D.
Najmeddin Ravan, Unocal Dealer

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R067

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

August 16, 1991

Mr. Najmeddin Ravan
Unocal SS #3737
1400 Powell Street
Emeryville, CA 94608

Re: Letter dated August 12, 1991 for Unocal Facility #3737
addressed to Mr. Tracy Lum of Robert H. Lee Associates.

Dear Mr Ravan:

I have enclosed a copy of a letter to Mr. Lum regarding your
facility. If you have any questions, please contact me at (415)
271-4320.

Sincerely,

Young Fong, Environmental Health Specialist
Hazardous Materials Division

FYF:fyf

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Tony Yap, Unocal Oil Company
Files

enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0455 (#1871 at 96
MacArthur)

✓ R067 (#3737 at

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program 1400 Powell St.
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

August 16, 1991

Mr. Tracy Lum
Robert H. Lee Associates, Inc.
900 Larkspur Landing Circle #125
Larkspur, CA 94939

Re: Letters dated August 12, 1991 for Unocal Facilities #3737 and
#1871.

Dear Mr. Lum:

Per our phone conversation on August 14, 1991, this letter is to
clarify the misunderstanding that the letters regarding the above
mentioned facilities should have been directed to the operators
and not to you. These letters addressed several violations of
Title 23, California Code of Regulations and California Health
and Safety Code that need to be corrected by Unocal dealers at
1400 Powell Street, Emeryville and 96 MacArthur Blvd., Oakland.
The letters were to inform you of the violations, so possibly
Unocal can have your company address the issues.

Thank you for your attention to this matter. If you have any
questions, please contact me at (415) 271-4320.

Sincerely,

Young Fong
Young Fong, Environmental Health Specialist
Hazardous Materials Division

FYF:fyf

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Tony Yap, Unocal Oil Company
Files

Enclosures



DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

August 12, 1991

Mr. Tracy Lum
Robert E. Lee Associates, Inc.
900 Larkspur Landing Circle #125
Larkspur, CA 94939

NOTICE OF VIOLATION

SUBJ: Five-Year Permit to Operate Three Underground Storage Tank
at Unocal Oil Company Facility #3737, 1400 Powell Street
Emeryville, California 94608

Dear Mr. Lum:

On July 10, 1991, representatives from this office inspected the above premises, to evaluate whether the conditions for the 5-year underground storage permit were being met prior to its issuance.

As you are aware, four underground storage tanks exist at the subject facility. During this inspection, the following violations were noted:

- 1) A written routine monitoring procedure/plan must be submitted per Section 2632(d)(1) or 2634(d)(2), Title 23, CCR, which includes, where applicable: the frequency of performing the monitoring method, the methods and equipment to be used for monitoring, where monitoring will be performed, the location(s) from which the monitoring will be performed, the name(s) or title(s) of the person(s) responsible for performing the monitoring and/or maintaining the equipment, and the reporting format;

900 Larkspur Landing Circle, Larkspur
August 12, 1991
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- 2) A written spill/leak response plan must be submitted per Section 2632(d) (2), Title 23, CCR. This plan should demonstrate that in the event of an unauthorized release, product would be removed from the secondary container within the shortest possible time. It should include at least the following:
 - a) A description of the proposed methods and equipment to be used for removing the waste oil, including the location and availability of the required equipment, if not permanently on-site, and an equipment maintenance schedule for the equipment located on-site.
 - b) The name(s) or title(s) of the person(s) responsible for authorizing the work to be performed.
- 3) Precision tank test results for the three product tanks were not available on site. Submit tank test results for 1991 to this office.
- 4) Inventory records are currently maintained properly for the three product tanks. But, quarterly summary reports have not been submitted to this agency. Submit quarterly summary reports for the previous two quarters of daily reconciliation. Sample form was given to operator at time of inspection.

Submit all of the required materials to this office **within 10 days, i.e. no later than August 26, 1991**. A follow-up inspection will be conducted upon receipt and review of the required documents, and a five-year operating permit will be issued when the above requirements are met.

Failure to respond in a timely manner could result in civil liabilities under Division 20, Chapter 6.7, Section 25299 of the Health and Safety Code.

900 Larkspur Landing Circle, Larkspur
August 12, 1991
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Should you have any questions or concerns regarding the contents of this letter, please feel free to contact either Young Fong or myself, at (415) 271-4320.

Sincerely,

Susan L. Hugo

Susan Hugo, Hazmat Specialist
Hazardous Materials Division

FYF:fyf

cc: Winston Ow, David's Unocal
David Larson, Unocal Oil Company
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Files

enclosures