



DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

October 20, 1995

Luis Amado, Union Oil Company of California, Owner
P.O.Box 2390
Brea, CA 92622

Linda Mui, Operator
3020 Grove Way
Castro Valley, CA 94546

STID 4089

Subject: -List of Conditions for the Five Year Operating Permit for three
Underground Storage Tanks at Unocal Station #3770, 3020 Grove Way,
Castro Valley, CA 94546.

-List of upgrade requirements.

Dear Mr. Amado and Ms. Mui:

The tanks at this facility have a five year permit issued to Union Oil Company of California to operate three underground storage tank systems. The permit is valid until November 3, 1998. However since the piping and other portions of the tank systems were upgraded in December 1994 a new list of permit conditions is being issued. This letter contains the list of conditions which must be followed to maintain the five year permit to operate the underground storage tank systems (UST) at the subject site.

The UST systems are composed of double wall fiberglass, pressurized piping connected to three, 12000 gallon, single wall fiberglass tanks made by Xerxes. The tanks were installed in 1983 and the piping was upgraded to double wall in December of 1994. Tank monitoring is by automatic tank gauging (Veeder-Root TLS 350), manual sticking, and annual tightness testing. (Note: if the tank gauge meets the legal requirements then neither the manual sticking nor the tank tightness testing are required). The pressurized piping is monitored by Vaporless LD 2000 line leak detectors on the primary and the secondary is monitored by liquid sensors in the turbine sump. All liquid sensors are connected to the Veeder-Root TLS 350 monitor which is located inside the cashier's office. The power to the turbine pump is cut off if the monitor fails, is disconnected, or if a leak is detected. If there is a leak an audible alarm is activated which can be heard from any of the dispensers. Spill containment buckets around the fill risers and overflow prevention devices in the fill tubes were installed in 1994.

FIVE YEAR PERMIT CONDITIONS

Conformance with all applicable requirements of Chapter 6.7 and 6.75 of the California Health and Safety Code (H&SC) and with the California Code of Regulations (CCR) Title 23 is required of all tank owners and operators. Specific compliance with the following conditions is a requirement of the five year permit to operate the above facility:
[H&SC, sec. 25299] [CCR, sec. 2712(h)]

1- **Tank Monitoring-** [H&SC, sec. 25292 and CCR, Title 23, sec.2643]

A) Automatic tank gauge - "The automatic tank gauge shall test the tank at least once per month after product delivery or when the tank is filled to within 10 percent of the highest operating level during the previous month and shall be capable of detecting a release of 0.2 gallon per hour. The automatic tank gauge shall generate a hard copy of all data reported including time and date, tank identification, fuel depth, water depth, temperature, liquid volume, and the duration of the test."

[CCR, Title 23, sec. 2643(b)(1)]

-OR-

B) Automatic tank gauge plus manual inventory reconciliation- "The automatic tank gauge (ATG) shall test the tank at least once per month when the product level in the tank is at least three feet and shall be capable of detecting a release of 0.1 gallon per hour. The automatic tank gauge shall generate hard copies of data as specified above. In addition, manual inventory reconciliation (MIR) shall be conducted in accordance with section 2646 (except for subsection [b])."

[CCR, Title 23, sec. 2643(b)(2)]

C) Submit an annual written statement to this office of the results of the ATG tests of the tank. **Maintain the hard copy monitoring records for at least three years.** [CCR, Title 23, sec. 2712(b)]

(Note: if either A or B is used as a monitoring program then no routine tank tightness testing is required.)

2- **Pressure Piping Monitoring-**

A) The piping is monitored by Vaporless 2000 line leak detectors (one per tank system) which reduce the flow of fuel if a leak of 3 gallons per hour is detected. The piping has secondary containment which slopes to the pump sumps. Liquid sensors continuously monitor the sumps and are connected to a visible and audible alarm. The corresponding pump is shut

- off if a sensor detects a leak, or if the monitor fails, or is disconnected. [CCR, Title 23, sec. 2636(g)]
- B) No routine line tightness testing is required if the piping leak detection system is maintained as written in 2A above. [CCR, Title 23, sec. 2636(f)(4)]
- 3- All monitoring devices are to be serviced annually and whenever there is doubt of their proper functioning. [CCR, Title 23, sec. 2630(d) and 2641(j)]
 - 4- Maintain written records of all maintenance performed on the tank system. [CCR, Title 23, sec. 2712(b)]
 - 5- Notify this office two days in advance of any tightness testing and send a copy of the test results to this office within thirty days of the test. [CCR, Title 23, sec. 2643(g)]
 - 6- Report any unauthorized spills and releases to this office within 24 hours. Provide written reports of spills and releases within 5 working days. [CCR, Title 23, Article 5]
 - 7- Complete employee training at least annually and document such training.
 - 8- Report changes in facility staff and/or monitoring equipment on Forms A & B within 30 days. [CCR, Title 23, sec. 2711(b)]
 - 9- Fees related to the operation of the tanks are to be paid in a timely manner to this Department.
 - 10- Maintain a copy of the five year operating permit on site. The complete permit includes this list of permit conditions and all of the documents noted in this list.
 - 11- Maintain financial responsibility certification with this Department and have copies of the documentation on the site. [H&SC, sec. 25292.2] [CCR, Title 23, sec. 2711(a)(11)]
 - 12- Maintain a current copy of the Consolidated Tank Management Plan on site and give a copy of the plan to this office.[CCR, Title 23, sec. 2711(a)(9)]
 - 13- All records of monitoring and maintenance shall be made available, upon request within 36 hours, to this office or the State Water Board. [CCR, Title 23, sec. 2712(b)]

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- 14- Provide this office with a copy of the written agreement between the operator of the tank and the owner whenever there is a change. [H&SC, sec. 25293(b)] [CCR, Title 23, sec. 2620(b)]

Documents which are required attachments to the 5 year permit and must be on site at the facility and current:


Consolidated Tank Management Plan
Monitoring plan
Financial responsibility certification
Owner - Operator Agreement
State Form A - for the site
State Form B - for each tank
Records
Monitoring and maintenance
Training
Release reports

REQUIRED UPGRADES
TO BE COMPLETED NO LATER THAN DECEMBER 22, 1998
(CCR, Title 23, Article 6)

This facility has been fully upgraded to meet the requirements for underground tanks containing motor vehicle fuel.

If you have any questions please call me at 567-6734.

Sincerely,



Don Atkinson-Adams
Senior Registered Environmental
Health Specialist #5485

enclosure

cc: Bill Reynolds, East Area Manager
Robert Weston, Senior Hazardous Materials Specialist

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