CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

October 28, 2015

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 0640 0006 0950 4308

Mr. Charles Griffin
Building Engineer
United States Federal Courthouse
312 North Spring Street
Los Angeles, California 90012
Charles.Griffin@acepex.gov

SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS LOCATED AT THE UNITED STATES FEDERAL COURTHOUSE, 312 NORTH SPRING STREET, LOS ANGELES

Dear Mr. Griffin:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on October 7, 2015, pursuant to authority under Health and Safety Code, chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to Health and Safety Code (H&SC), chapter 6.7, and title 23 California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	**Failure to Maintain Operating Permit –** The facility permit to operate is expired.	Diesel	October 7, 2015	Ongoing	H&SC 25284(a)
2	**Failure to Submit or Update Facility and Tank Information (A & B Forms) –** Tank information form needs to be updated to include: installation date, secondary containment construction material for the tank and the piping, overfill prevention as a fill tube shut off device, and corrosion protection; form should not include information about a dispenser or UDC.	Diesel	October 7, 2015	Ongoing	23 CCR 2711(a)
3	**Failure to Submit or Update Monitoring Plan –** The monitoring plan in CERS is under review and was not onsite at the time of inspection. The plan contains errors and needs to be updated to include: all monitor and sensor information, pipe monitoring method, periodic system testing, recordkeeping for maintenance records, and annual employee training by designated operator.	Diesel	October 7, 2015	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1), 2634(b) and (d)

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	**Failure to Maintain Release Response Plan Onsite –** The response plan in CERS is under review and was not onsite at the time of inspection.	Diesel	October 7, 2015	Ongoing	23 CCR 2712(i)
5	**Failure to Submit or Update Plot Plan/Site Map –** Site map has insufficient detail about the UST system.	Diesel	October 7, 2015	Ongoing	H&SC 28286(a); 23 CCR 2711(a)(8)
6	**Failure to Monitor Product Piping –** The sensor in the fill sump is unable to detect a leak at the earliest opportunity because it is on the wrong side of the sump. It must be directly beneath the product piping at the low point.	Diesel	October 7, 2015	Ongoing	23 CCR 2630(d)
7	**Failure to Maintain Primary Containment –** Single-walled piping inside the basement is leaking at the piping union where product piping from two pumps join together and run to a filter.	Diesel	October 7, 2015	Ongoing	H&SC 25291(a)(1); 23 CCR 2631(a), 2712(j)
8	**Failure to Continuously Monitor Emergency Generator Single-Walled Piping –** The emergency backup generator's single-walled piping inside the basement did not have a visual inspection log onsite at the time of inspection.	Diesel	October 7, 2015	Ongoing	2643(d)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board
Ms. Rebecca Green
UST Enforcement Unit
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, California 95814
Rebecca.Green@waterboards.ca.gov

Local CUPA
Mr. Bernard Sanchez
Fire Inspector I
Los Angeles City Fire Department
200 Main Street, Suite 1700
Los Angeles, California 90012
bernard.sanchez@lacity.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of $500 to $5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,

Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Jeff Lim
Building Manager
U.S. General Services Administration
Jeff.Lim@gsa.gov

Ms. Lisa Sharp
Environmental Contact
U.S. General Services Administration
Lisa.Sharp@gsa.gov

Ms. Anna Olekszyk
Acting CUPA Manager
Los Angeles City Fire Department
Anna.Olekszyk@lacity.org

Captain Daniel Dragotto
Captain I
Los Angeles City Fire Department
Daniel.Dragotto@lacity.org

Mr. Bernard Sanchez
Fire Inspector I
Los Angeles City Fire Department
Bernard.Sanchez@lacity.org