September 11, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7018 0680 0000 1017 5321

Mr. Ivan Sequeira
Facilities Manager
San Francisco Police Department
850 Bryant Street, Room 458
San Francisco, California 94103
ivan.sequeira@sfgov.org

SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM(S) LOCATED AT SFPD PROPERTY CONTROL G-25, 850 BRYANT STREET, SAN FRANCISCO

Dear Mr. Sequeira:

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 UST(s) at your facility on August 29, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

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

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	**Failure to Maintain Plot Plan/Site Map –** The map onsite at the time of inspection does not indicate the location of the product piping.	All	August 29, 2018	Ongoing	23 CCR 2711(a)(8)
2	**Failure to Maintain Financial Responsibility –** The Chief Financial Officer letter onsite at the time of inspection did not include a copy of a bond rating published within the last 12 months. Additionally, the Certificate of Financial Responsibility must be updated.	All	August 29, 2018	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	**Failure to Maintain Monitoring or Testing Records Onsite –** The 2015, 2016, and 2017 annual monitoring system certification reports and the 2016 secondary containment testing report were not available at the time of inspection. Additionally, documents supporting corrections to failed/not tested components during the secondary containment testing, were not available at the time or inspection. Lastly, the November 2017 monthly designated operator report was not available at the time of inspection.	All	August 29, 2018	Ongoing	H&SC 25293; 23 CCR 2712(b), 2715(e)
4	**Failure to Maintain Monitoring Plan –** Under pipe monitoring, suction piping meets exemption criteria list "yes"; however, it should list "no." Additionally, under periodic system testing, spill bucket testing list "no"; however, is should list "yes."	All	August 29, 2018	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1)
5	**Failure to Maintain Tank Information Form –** Under fill pipe construction, fill components installed, both striker plate/bottom protector and containment sump lists "no"; however, both should list "yes."	All	August 29, 2018	Ongoing	23 CCR 2711(a)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and San Francisco City & County Public Health 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
Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA
Ms. Paula Stewart
Program Manager
San Francisco City & County Public Health Department
1390 Market Street, Room 210
San Francisco, California 94102
paula.stewart@sfdph.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. Ramon Padilla
Senior Engineer
CCSF Police Department
ramon.padilla@srgov.org

Ms. Paula Stewart
Program Manager
San Francisco City & County Public
Health Department
paula.stewart@sfdph.org