



Pacific Gas and
Electric Company

Environmental Management
Underground Storage Tank Program

Lori J. Luces-Nakagawa, REHS
4040 West Lane, 9W-103
Stockton, CA 95204

Tel: (209) 561-7163
Fax: (925) 415-6849
Email: LJLL@pge.com



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Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

Re: Comments for the proposed changes to Title 23, Division 3, and Chapter 16 for underground storage tanks (UST).

PG&E appreciates the opportunity to provide the following comments for the proposed changes to Title 23, Division 3, and Chapter 16 for underground storage tanks (UST).

1. Definitions: Recommend adding a definition for auto line leak detector under Section 2611. This term is being used for both sensors and independent devices. Traditionally, field inspectors and operators have thought of line leak detectors as independent devices connect to a turbine.

2. Facility Employee Training Certificates: Section 2715 (c)(4)

Currently Proposed Language:

“Notwithstanding paragraph (3) above, on and after the effective date of this paragraph, upon completion of the facility employee training, the designated UST operator(s) shall provide a signed “Facility Employee Training Certificate,” located in Appendix XII, to the owner or operator for facility employees that have received training. The certificates shall be maintained on-site or off-site at a readily accessible location, if approved by the local agency, and provided to the local agency upon request.

The process of generating individual certificates creates logistical issues related to their retention. Individual certificates could easily get lost which in turn could create a situation where a facility appears to not be in compliance. Section 2715 (c)(3) already requires that a list be maintained of the employees that have completed training. The list required by 2715 (c)(3) should satisfy the need for confirmation of training completed by the designated operator.

Recommended to strike Section 2715 (c)(4) entirely, but amend 2715 (c)(3):

“A list of facility employees who have been trained by the designated UST operator(s) shall be maintained on-site or off-site at a readily available location if approved by the local agency. The list shall be provided to the local agency upon request. The list shall include the dates of training for all facility employees, and the hiring dates for all facility employees hired on or after July 1, 2005. Upon completion of training, the designated operator shall sign and date the document, and provide a copy to the owner or operator.

3. Action for Owner or Operator to provide written response to Designated UST Operator: Section 2716 (e)

Currently Proposed Language:

"Within 48 hours of being provided a signed copy of the "Designated Underground Storage Tank Operator Visual Inspection Report" the owner or operator shall provide a description of the actions taken to correct all issues identified by the designated UST operator accompanied by a date and signature on the signed copy of the "Designated Underground Storage Tank Operator Visual Inspection Report."

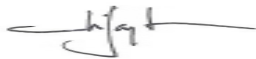
The concept of starting a 48 hour clock for owners and operators to respond in writing to the designated operator is problematic. Just because a Designated Operator emailed, faxed or provided a copy of the signed monthly visual inspection form, it does not mean that the owner or operator has reviewed the document. Additionally, dependent on the issue cited, it may require additional time for the owner/operator to correct any issues (even possibly requiring a service technician to be scheduled to resolve the issue). The language as written will lead to additional erroneous violations cited.

Recommended Language:

"Within 7 business days of reviewing a signed copy of the "Designated Underground Storage Tank Operator Visual Inspection Report" the owner or operator shall provide a description of the actions taken to correct all issues identified by the designated UST operator accompanied by a date and signature on the signed copy of the "Designated Underground Storage Tank Operator Visual Inspection Report."

We are more than willing to meet and discuss our recommended language reasoning in more detail. Please feel free to reach out to us in writing or over the phone.

Sincerely,



Lori J. Lucas-Nakagawa, REHS
Senior Environmental Scientist
Tank Program Coordinator