The City of Santa Monica Should Exit the Aviation Fuel Business

1. **Underground Storage Tanks (USTs) at SMO are past their life expectancy and have begun to fail**
   a. USTs are owned by City, licensed to Aeroplex, and leased to Atlantic Aviation as fuel service providers.
   b. USTs were **installed in 1986 over 36 years ago** and are clearly and imminent hazardous risk
   c. USTs life expectancies are 30 years, with average lifespans of only 20 years, per the U.S. EPA.
   d. Testing failures and leaks were detected and reported from 2014 to 2018 (Sunwest Engineering Constructors) when the SMO 1984 Agreement expired in July 2015 and leases were being discussed.
   e. USTs were never replaced.

2. **The City is NOT required to be in any part of the aviation fuel business**
   a. No law, agreement, or Grant Assurance requires the City to own, lease, operate, or maintain a fuel tank, or to engage in any part of the fuel service business.
   b. The Consent Decree only requires that leases are offered to "prospective tenants providing aeronautical services" including 3rd party fuel service providers and the City cannot restrict them from selling leaded aviation fuel.

3. **SMO will close in 6 years on December 31, 2018**
   a. Consent Decree (Feb 2017)
   b. City Council SMO Closure Resolution No. 11026 (CCS) (Feb 2017 - http://bit.ly/SMO-Closure-Resolution)

   "The City Council directs the City Manager, City Attorney and their staffs to take all actions necessary and proper to ensure that SMO will cease to operate as an airport and shall be closed to all aeronautical use forever effective as of midnight on December 31, 2028."

4. **The City should now exit the aviation fuel business completely**
   a. Do NOT lease aging and obsolete fuel tanks to FBOs. They can source their own tanks.
   b. Do NOT start a new Aviation Fuel Demonstration Project using these aging and failing fuel tanks.
   c. The City should instead focus on efficiently and effectively winding down the airport in favor of the future.

Underground Storage Tanks at SMO were installed in 1986, 36 years ago

California Cathodic Protection Test Information Page

UST Owner		UST Facility	
NAME: Atlantic Aviation		NAME: Atlantic Aviation	ID#:
ADDRESS: 2828 Donald Douglas Loop North		ADDRESS: 2828 Donald Douglas Loop North	
CITY: Santa Monica	STATE: CA	CITY: Santa Monica	STATE: CA

Cathodic Protection Tester

TESTER'S NAME: Todd Hansen	CP TESTER'S LICENSE #: ICC 8045710
COMPANY NAME: SunWest Engineering Constructors Inc.	EXPIRATION DATE: 3/29/2014
ADDRESS: 2766 Pomona Blvd.	PHONE NUMBER: (909)247-6538
CITY: Pomona STATE: CA	NACE CERTIFICATION #: 26518

Cathodic protection system is: ☑ Galvanic ☐ Impressed current Date Last Tested:

Weather Conditions at Time of Testing/Inspection: Sunny and Warm

Temperature: 85 F Soil/Backfill Conditions (check √) ☐ moist ☑ dry ☑ sand ☑ gravel ☐ soil Describe soil:

Cathodic Protection System Certification

Identify which of the following testing situations is being recorded:

☐ Test required within 6 months of installation of CP system (installation date was _____)
☑ Test required at least every 3 years after installation/test noted above
☐ Test required within 6 months of any repair activity

The cathodic protection system is effective, testing was performed according to NACE Standard RP-0285, and is providing cathodic protection to all tanks and product lines ☐ Yes ☑ No

Signature of Tester Date 08/28/12

UST SYSTEM INFORMATION

TANK #	YR TANK INSTALLED	CAPACITY	TANK MATERIAL	LINED? Y/N Date	YR CP INSTALLED	PIPING MATERIAL	YR CP INSTALLED
Jet A #1	1986	12,000	Steel	Unknown	1986	Steel	1986
Jet A #2	1986	12,000	Steel	Unknown	1986	Steel	1986
AvGas	1986	12,000	Steel	Unknown	1986	Steel	1986

UST SITE PLAN – On the back draw a diagram showing the important parts of the facility (tanks, lines, manway locations, turbines, vents, rectifier, pump islands, buildings). Indicate reference cell locations where structure-to-soil potential or continuity measurements have been made and label(R-1, R-2, R-3); location of all anodes and wires; location of CP test stations.

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[aiREFORM note]: Cathodic protection system failed, 8/28/2012 date on document. What records are there of repair or test since?

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SUNWEST

SunWest Engineering Constructors, Inc.
4780 Cheyenne Way, Chino, CA 91710
p. 888-588-8737 f. 909-594-6169

PROPOSED STATEMENT OF WORK

TO REPAIR SUSPECTED ULLAGE LEAKS

Jet A (Tanks #1 and #2) and Aviation Gas (Tank #3)

And

ADDRESS ADDITIONAL COMPLIANCE ISSUES

Atlantic Aviation – SMO

2828 Donald Douglas Loop North

Santa Monica, CA 90405

Proposed Work Start Date:

TBD

Prepared:

March 7, 2018

History:

On January 26, 2018 integrity testing was performed on piping associated with three tanks at the facility. This test yielded passing results on piping associated with Tanks # 1 and #2 (Jet A) and a failure on piping associated with Tank #3 (Avgas)(reference Tanknology report attached).

On January 18, 2017 annual tank/line testing was performed on Jet A Tanks #1 & 2 (reference Tanknology report attached). According to Tanknology, the failing result noted for Jet A Tank #2 may be misleading. Tanks #1 and #2 were tested together as a manifold system using Tanknology's Vacutect test method which allows testing of two tanks simultaneously. This test approach resulted in a failing result for Tank #2. Previous test results from 2014, 2015, and 2016 indicate that Jet A Tank #2 has always passed testing (see attached reports).

The Tank #3 (Avgas) was not tested in 2017 at the direction of the Santa Monica Fire Department representative on site due to no known repairs being made since failing the 2016 test.

Previous efforts in 2014 to determine the precise cause of the test failures in the ullage spaces of Tank #1 and #3 had resulted in three suspected areas of the failures. These suspected areas are identified as buried vent line fittings, inaccessible tank top connections or tank-side valves on the aboveground piping (note: blind flanges were installed on the piping side of these valves during line testing).

On January 22, 2015 vent line fittings were exposed at the base of the vent support stand and tested for leaks. All vent line fittings at this position passed testing.

As an interim solution to the ullage leaks, high level alarm settings were programmed on the Veeder Root monitoring panel for Tanks # 1 (Jet A) and #3 (Avgas) to allow a maximum 85% of volume to be stored within the UST. This measure insures that fuel levels will not reach the ullage area of the suspected leaks within each tank. This interim solution is not in compliance with regulatory requirements under Title 23 and correction will be addressed in this work plan.

Summary:

Test results have determined that failures exist in the ullage space of one (or both) Tank#1 and #2 (Jet A). It is presumed that a previously identified leak in the ullage space of the Avgas tank also remains. The leak identified in the Avgas piping on January 26, 2018 was indicated at the pump housing and did not indicate irreparable conditions.