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16 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

17 IN AND FOR THE COUNTY OF SAN JOAQUIN

19 PEOPLE OF THE STATE OF CALIFORNIA,

20 Plaintiff,

21 v.

22 FLYING J, INC., a Utah Corporation, and
DOES 1 through 100,

23 Defendants,

No. CV-029146

**FIRST AMENDED COMPLAINT
FOR CIVIL PENALTIES AND
INJUNCTIVE RELIEF**

(Health & Saf. Code, Div. 20, Chapters
6.5, 6.7 and 6.95; Bus. & Prof. Code,
§17200 et seq.)

FILED
SUPERIOR COURT-STOCKTON
07 MAY 23 AM 10:40
J. LISA JUNQUEIRO, CLERK
SONYA FARNSWORTH
BY _____
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1 compliance against any person who has engaged in, is engaged in, or is about to engage in any
2 acts or practices which violate Chapter 6.7.

3 6. Pursuant to the California Health and Safety Code section 25514, the Local Prosecutors
4 may bring an action for civil penalties for violations of California Health and Safety Code
5 sections 25503.5 to 25505, inclusive, or sections 25508 to 25520, inclusive. Pursuant to
6 California Health and Safety Code section 25516, the Local Prosecutors, when requested by an
7 administering agency, may bring an action to enjoin a violation of Chapter 6.95 of Division 20
8 of the California Health and Safety Code (hereinafter "Chapter 6.95").

9 7. Pursuant to California Business and Professions Code sections 17203, 17204, and
10 17206, the Attorney General and the Local Prosecutors may bring actions in the name of the
11 People of the State of California in a superior court for an injunction against any person who
12 engages, had engaged, or proposes to engage in unfair competition and for civil penalties for
13 each act of unfair competition.

14 8. Plaintiff brings this action without prejudice to any other action or claims which it may
15 have based on separate, independent and unrelated violations of Chapters 6.5, 6.7, or 6.95 of
16 Division 20 of the California Health and Safety Code by Flying J and/or on facts which are not
17 alleged in this Complaint.

18 DEFENDANTS

19 9. Defendant Flying J, Inc. ("Flying J") is a Utah corporation which does business in the
20 State of California at the facilities identified in Exhibit "A" which are incorporated herein by
21 reference (hereinafter collectively referred to as "Covered Facilities"). Flying J owns and/or
22 operates underground tank systems at the Covered Facilities that are used to store motor vehicle
23 fuel, including gasoline and diesel, for retail sale. Additionally, it uses hazardous materials and
24 manages waste products, including but not limited to waste motor oil and waste oil filters, that
25 are generated by its operation of these underground tank systems and from vehicle maintenance
26 services that it provides at the Covered Facilities. Flying J's principal business address is 1104
27 Country Hills Drive, Ogden, Utah.

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1 10. Flying J is, or at all times relevant to the claims in this complaint was, legally
2 responsible for compliance with the provisions of the California Health and Safety Code
3 including Chapters 6.5, 6.7, and 6.95 of Division 20 at its Covered Facilities.

4 11. In this complaint, when reference is made to any act of Defendant Flying J, such
5 allegations shall mean that the owners, officers, directors, agents, employees, contractors, or
6 representatives of Defendant Flying J did, or Flying J authorized, such acts, or negligently failed
7 and omitted to adequately or properly supervise, control or direct its employees and agents
8 while engaged in the management, direction, operation or control of the affairs of the business
9 organization and did so while acting within the course and scope of employment or agency of
10 Flying J.

11 12. Plaintiff is ignorant of the names of those defendants identified as Does 1 through 100,
12 who are therefore sued under fictitious names. When the true names of these defendants have
13 been ascertained, Plaintiff will amend the complaint to substitute the true names of each Doe
14 defendant in place of the fictitious names.

15 VENUE

16 13. Venue is proper in this county pursuant to California Health and Safety Code section
17 25299.03 in that violations of Chapter 6.7 alleged in the Complaint occurred in the County of
18 San Joaquin and that the other violations alleged in the complaint which occur at locations
19 outside this county are related to such violations. Venue would also be proper in this county
20 pursuant to California Health and Safety Code section 25183 in that violations of Chapter 6.5
21 alleged in the Complaint occurred in the County of San Joaquin and that the other violations
22 alleged in the Complaint which occur at locations outside this county are related to such
23 violations.

24 GENERAL ALLEGATIONS

25 14. Plaintiff is informed and believes and thereupon alleges that Flying J has violated the
26 California Health and Safety Code, including Chapters 6.5, 6.7, and 6.95 of Division 20, and the
27 Unfair Competition Law at one or more of the Covered Facilities. Flying J's violations include,
28 but are not limited to, the following representative actions:

- 1 a. Performed work on underground storage tank (UST) systems without permits or
2 authorization from the appropriate permitting agencies.
- 3 b. Changed monitoring procedures, such as replacing the leak sensor detection
4 equipment and/or monitoring system without notification of the appropriate
5 authority so as to ensure that only leak detection equipment approved by the
6 California State Water Resources Control Board was installed.
- 7 c. Improperly raised, altered the position of, tampered with, disabled or otherwise
8 rendered nonfunctional, sensors in spill boxes, under dispenser containment, and
9 sumps which prevented the sensors from providing continuous monitoring for
10 leak detection in violation of California Code of Regulations, title 23, section
11 2636(f)(1).
- 12 d. Improperly raised, altered the position of, tampered with, disabled or otherwise
13 rendered nonfunctional, the sensors in spill boxes, under dispenser containment
14 and sumps so that the sensors were unable to detect a leak at the earliest possible
15 opportunity in violation of California Code of Regulations, title 23, section
16 2630(d).
- 17 e. Failed to submit a Monitoring Response Plan pursuant to California Code of
18 Regulations, title 23, section 2632.
- 19 f. Failed to test secondary containment systems installed prior to January 1, 2001,
20 by January 1, 2003, in accordance with California Code Regulations, title 23,
21 section 2637(a).
- 22 g. Failed to test every thirty-six months secondary containment systems installed
23 prior to January 1, 2001, in accordance with California Code of Regulations, title
24 23, section 2637(a).
- 25 h. Failed to test secondary containment systems installed on or after January 1,
26 2001, in accordance with the schedule required by California Code of
27 Regulations, title 23, section 2637(a).
- 28

- 1 i. Failed to repair UST systems within a reasonable time after the systems were
2 found to have failed a secondary containment test performed pursuant to
3 California Code of Regulations, title 23, section 2637 thus disabling the integrity
4 of the tank systems ability to comply with Health and Safety Code section
5 25291(b) by being an UST system that is no longer designed and constructed
6 with a monitoring system capable of detecting the entry of the hazardous
7 substance stored in the primary containment into the secondary containment.
- 8 j. Failed to have documentation regarding monitoring system alarms and corrective
9 action taken in response to alarms, if any, available for review in violation of
10 California Code of Regulations, title 23, section 2712.
- 11 k. Failed to have secondary containment systems for product lines constructed so
12 that any releases to the secondary containment system will flow to a collection
13 sump in violation of California Code of Regulations, title 23, section 2636(c)(1).
- 14 l. Failed to annually perform on-line leak detection tests in violation of California
15 Code of Regulation, title 23, section 2636(f)(2).
- 16 m. Failed to annually perform pipeline integrity tests in violation of California Code
17 of Regulation, title 23, section 2636(f)(4).
- 18 n. Failed to annually perform tightness test on pressurized piping and be equipped
19 with an automatic line leak detector in violation of Health and Safety Code
20 section 25291(f).
- 21 o. Failed to annually test and certify UST monitoring systems in accordance with
22 California Code of Regulations, title 23, section 2638.
- 23 p. Failed to notify appropriate local agencies of upgrades of UST systems,
24 including but not limited to replacement of spill containers, which prevented the
25 local agency from determining whether the requirements of California Code of
26 Regulations, title 23, section 2660(k) were satisfied and thereby violated
27 California Code of Regulations, title 23, section 2662.

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- 1 q. Improperly allowed liquid and debris to accumulate in containment sumps in
2 violation of California Code of Regulations, title 23, sections 2630, 2631, 2632,
3 and 2635.
- 4 r. Failed to maintain monitoring and maintenance records pursuant to California
5 Code of Regulations, title 23, section 2712(b).
- 6 s. Failed to provide adequate training of all employees to respond to a hazardous
7 material spill or release from a UST system, including the failure to familiarize
8 employees with the UST monitoring plan and release report procedures in the
9 business response plan pursuant to California Health and Safety Code section
10 25504.
- 11 t. Failed to provide adequate training to employees pursuant to California Code of
12 Regulations, title 22, section 66265.16.
- 13 u. Failed to maintain documentation of training of employees pursuant to California
14 Code of Regulations, title 22, section 66265.16.
- 15 v. Failed to have a means of monitoring for water intrusion by precipitation or
16 infiltration into secondary containment in violation of California Code of
17 Regulations, title 23, section 2630(d) and California Health and Safety Code
18 section 25291(e).
- 19 w. Failed to label or properly label containers of hazardous waste in violation of
20 California Code of Regulations, title 22, section 66262.34
- 21 x. Failed to keep containers of hazardous waste closed except when removing or
22 adding hazardous waste in violation of California Code of Regulations, title 22,
23 section 66265.173.
- 24 y. Failed to maintain adequate aisle space in hazardous waste accumulation areas in
25 violation of California Code of Regulations, title 22, section 66265.35.
- 26 z. Failed to notify the local permitting authority of changes in the usage of the UST,
27 including a change in the storage of new hazardous substances, in violation of
28 California Health and Safety Code section 25286.

- 1 aa. Failed to maintain UST components and systems in proper working order and
2 conditions at all times in violation of California Health and Safety Code section
3 25292.1(a).
- 4 bb. Failed to timely notify local authorities of unauthorized releases from a diesel
5 vent line and to provide a report describing the release and the corrective actions
6 in violation of California Health and Safety Code section 25295 and California
7 Code of Regulations, title 23, sections 2650 and 2652.
- 8 cc. Failed to comply with the applicable requirements of Health and Safety Code
9 section 25294 or 25295 upon notification of an unauthorized release in violation
10 of Health and Safety Code section 25295.5.
- 11 dd. Failed to have an overfill prevention system for its UST systems which did not
12 allow for manual override in violation of California Code of Regulations, title 23,
13 section 2635(b)(2).
- 14 ee. Failed to submit accurate as-built drawings for variations to the approved plans
15 including but not limited to remote monitoring sumps, remote fill lines for waste
16 oil tanks, remote alarm panels, and monitoring sensors in violation of California
17 Code of Regulations, title 23, section 2711(a)(8).
- 18 ff. Failed to submit documentation to show compliance with state and federal
19 financial responsibility requirements applicable to underground storage tanks
20 containing petroleum in violation of California Code of Regulations, title 23,
21 section 2711(a)(11).
- 22 gg. Failed to designate a designated underground storage tank operator by January 1,
23 2005 in violation of California Code of Regulations, title 23, section 2715(a).
- 24 hh. Failed to inform local authorities of changes to designated underground storage
25 tank operator in violation of California Code of Regulations, title 23, section
26 2715 (a) - (f).
- 27 ii. Failed to provide facility employee training in violation of California Code of
28 Regulations, title 23, section 2715(f).

- 1 jj. Failed to maintain a list of facility employees who have been trained by the
2 designated underground storage tank operator and failed to provide a list of
3 facility employees who have been trained to the local agency upon request in
4 violation of California Code of Regulations, title 23, section 2715(f)(3).
- 5 kk. Failed to provide to the local authorities the bi-annual line integrity test results
6 for the J Care waste oil and the Oil Water Separator remote fill lines in violation
7 of California Code of Regulations, title 23, section 2643(e).
- 8 ll. Failed to submit UST permit application-Form A and UST application-Form B to
9 the local agency in violation of California Code of Regulations, title 23, sections
10 2711(e) and 2711(c).
- 11 mm. Failed to submit documentation showing compliance with financial responsibility
12 in violation of California Code of Regulations, title 23, section 2711(e).
- 13 nn. Failed to correct previous violations within 30 days after receiving an inspection
14 report in violation of California Code of Regulations, title 23, section 2712(f).
- 15 oo. Failed to establish/implement a business emergency plan in violation of Health
16 and Safety Code section 25503.5.
- 17 pp. Failed to submit/update a business emergency plan in violation of Health and
18 Safety Code section 25505.
- 19 qq. Failed to have an operational audible/visual alarm system connected for
20 continuous monitoring in violation of California Code of Regulations, title 23,
21 sections 2632 (c)(2)(B) and 2636(f)(1).
- 22 rr. Failed to have an overfill device installed and operational in violation of
23 California Code of Regulations, title 23, section 2635(b)(2).
- 24 ss. Failed to monitor the UST system as specified on the permit in violation of
25 Health and Safety Code section 25293.
- 26 tt. Failed to determine if a waste is a hazardous waste in violation of California
27 Code of Regulations, title 23, section 66262.11.
- 28

- 1 uu. Failed to have an emergency coordinator in violation of California Code of
2 Regulations, title 23, section 66265.55.
- 3 vv. Managed hazardous waste without an Environmental Protection Agency
4 Identification number in violation of California Code of Regulations, title 23,
5 section 66262.12(a).
- 6 ww. Failed to keep required copies of a consolidated manifest for three (3) years in
7 violation of California Health and Safety Code section 25160.2(b)(3).
- 8 xx. Stored hazardous waste on-site longer than ninety (90) days without a permit in
9 violation of California Health and Safety Code section 25201(a).

10 Flying J's noncompliance threatened and continues to threaten public health and safety,
11 and the environment. In addition, Flying J's noncompliance constituted unfair competition.
12 The People are informed and believe that while engaging in unfair competition, Flying J
13 acquired money and/or property which should be restored.

14 **FIRST CAUSE OF ACTION**

- 15 15. Plaintiff realleges Paragraphs 1 through 14, inclusive.
- 16 16. Flying J is liable for civil penalties as set forth in California Health and Safety Code
17 section 25189(b) for each intentional or negligent violation of rules, regulations, standards, or
18 requirements regarding hazardous waste set forth above which occurred within five years after
19 the discovery of the facts constituting the grounds for commencing the action on these claims.
- 20 17. Flying J must immediately and permanently be enjoined from further violations of
21 Chapter 6.5.

22 **SECOND CAUSE OF ACTION**

- 23 18. Plaintiff realleges Paragraphs 1 through 14, inclusive.
- 24 19. Flying J is liable for civil penalties as set forth in California Health and Safety Code
25 section 25189.2 (b) for each violation of the rules, regulations, standards or requirements
26 regarding hazardous waste set forth above which occurred within five years after the discovery
27 of the facts constituting the grounds for commencing the action on these claims.
- 28

1 20. Flying J is liable for civil penalties as set forth in California Health and Safety Code
2 section 25189.2 (b) for each violation of the rules, regulations, standards or requirements set
3 forth above.

4 21. Flying J must immediately and permanently be enjoined from further violations of
5 Chapter 6.5.

6 **THIRD CAUSE OF ACTION**

7 22. Plaintiff realleges Paragraphs 1 through 14, inclusive.

8 23. To the extent that Flying J is the operator of the underground tank systems at the
9 Covered Facilities, Flying J is liable for civil penalties as set forth in California Health and
10 Safety Code section 25299(a) for each violation of the rules, regulations, standards or
11 requirements applicable to each underground storage tank as set forth above which occurred
12 within five years after the discovery of the facts constituting the grounds for commencing the
13 action on these claims.

14 24. Flying J, as the operator of the underground tank systems, must immediately and
15 permanently be enjoined from further violations of Chapter 6.7.

16 **FOURTH CAUSE OF ACTION**

17 25. Plaintiff realleges Paragraphs 1 through 14, inclusive.

18 26. To the extent that Flying J is the owner of the underground tank systems at the Covered
19 Facilities, Flying J is liable for civil penalties as set forth in California Health and Safety Code
20 section 25299(b) for each violation of the rules, regulations, standards or requirements
21 applicable to each underground storage tank as set forth above which occurred within five years
22 after the discovery of the facts constituting the grounds for commencing the action on these
23 claims.

24 27. Flying J, as the owner of underground tank systems, must immediately and permanently
25 be enjoined from further violations of Chapter 6.7.

26 **FIFTH CAUSE OF ACTION**

27 28. Plaintiff realleges Paragraphs 1 through 14, inclusive.
28

1 29. Pursuant to Health and Safety Code section 25516, the district attorney, at the request of
2 an administering agency, or on the district attorney's own motion, may apply to the superior
3 court for an order directing compliance with Chapter 6.95.

4 30. The district attorneys and the Attorney General are authorized to bring this cause of
5 action pursuant to California Health and Safety Code section 25516.1.

6 31. Flying J is liable for civil penalties as set forth in California Health and Safety Code
7 section 25514 for each violation of the California Health and Safety Code sections 25503.5 to
8 25505, inclusive, or sections 25508 to 25510, inclusive, as set forth above.

9 32. Flying J must immediately and permanently be enjoined from further violations of
10 Chapter 6.95.

11 SIXTH CAUSE OF ACTION

12 33. Plaintiff realleges Paragraphs 1 through 32, inclusive.

13 34. By the acts described herein, Flying J engaged in daily acts of unlawful and/or unfair
14 competition prohibited by California Business and Professions Code sections 17200-17208.
15 Each act constitutes an unlawful and/or unfair business practice.

16 35. Pursuant to California Business and Professions Code section 17206, Flying J is liable
17 for civil penalties for each violation which accrued within four years of the filing of this
18 complaint.

19 36. Flying J must immediately and permanently be enjoined from engaging in activity that
20 violates Chapters 6.5, 6.7 and 6.95 of Division 20 of the California Health and Safety Code
21 which thereby constitutes unfair competition within the meaning of California Business and
22 Professions Code section 17200, and made subject to such orders or judgments as may be
23 necessary to prevent the use or employment of any practice which constitutes unfair
24 competition, or as may be necessary to restore to any person in interest any money or property,
25 real or personal, which may have been acquired by means of such unfair competition.

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1 WHEREFORE, PLAINTIFF PRAYS FOR THE FOLLOWING RELIEF:

2 1. Civil penalties according to proof against Flying J pursuant to California Health and
3 Safety Code section 25189 at the statutory maximum of twenty-five thousand dollars (\$25,000)
4 for each violation or, for continuing violations, for each day that the violation continues.

5 2. Civil penalties according to proof against Flying J pursuant to California Health and
6 Safety Code section 25299 at the statutory maximum of five thousand dollars (\$5,000) for each
7 underground storage tank system violation for each day of violation.

8 3. Civil penalties according to proof against Flying J pursuant to California Health and
9 Safety Code section 25514 at the statutory maximum of two thousand dollars (\$2,000) and/or
10 five thousand dollars (\$5,000) for each day in which a violation occurred;

11 4. Civil penalties according to proof against Flying J pursuant to California Business and
12 Professions Code section 17206 at the statutory maximum of two thousand five hundred dollars
13 (\$2,500) for each violation of the Unfair Competition Law;

14 5. A preliminary and permanent injunction requiring Flying J to comply with the specific
15 requirements of California Health and Safety Code, Division 20, Chapter 6.5 alleged in the
16 Complaint;

17 6. A preliminary and permanent injunction requiring Flying J to comply with the specific
18 requirements of California Health and Safety Code, Division 20, Chapter 6.7 alleged in the
19 Complaint;

20 7. A preliminary and permanent injunction requiring Flying J to comply with the specific
21 requirements of California Health and Safety Code, Division 20, Chapter 6.95 alleged in the
22 Complaint;

23 8. A preliminary and permanent injunction prohibiting Flying J from engaging in activity
24 that violates Chapters 6.5, 6.7 and 6.95 of Division 20 of the California Health and Safety Code
25 and the Uniform Fire Code which thereby constitutes unfair competition within the meaning of
26 the Unfair Competition Law, and any such orders or judgments as may be necessary to prevent
27 the use or employment of any practice which constitutes unfair competition, or as may be
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1 necessary to restore to any person in interest any money or property, real or personal, which
2 may have been acquired by means of such unfair competition;

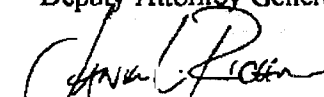
3 9. Plaintiffs' costs of inspection, investigation, attorneys fees, enforcement, prosecution,
4 and suit, herein pursuant to Code of Civil Procedure section 1021.8, and all other authority; and

5 10. Such other and further relief as the Court deems just and proper.

6
7 RESPECTFULLY REQUESTED:

8 Dated: May 18, 2007


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17 Dated: May 23, 2007

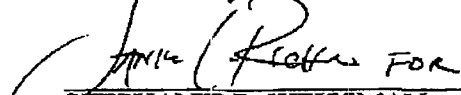
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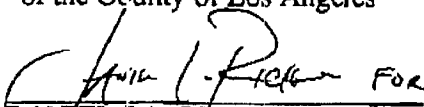


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Dated: May 18, 2007

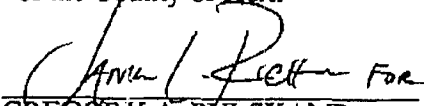
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R. GLENN YABUNO

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EXHIBIT A

COVERED FACILITIES

Flying J Travel Plazas

Flying J Travel Plaza	17047 Zachary Rd.	Bakersfield	Kern County	CA
Flying J Travel Plaza	42810 Frazier Mountain Rd.	Frazier Park	Los Angeles County	CA
Flying J Travel Plaza	72235 Varner Rd.	Thousand Palms	Riverside County	CA
Flying J Travel Plaza	2611 Fisher Blvd.	Barstow	San Bernardino County	CA
Flying J Travel Plaza	15237 Thornton Road	Lodi	San Joaquin County	CA
Flying J Travel Plaza	1501 N. Jack Tone Rd.	Ripon	San Joaquin County	CA