

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION

STAFF REPORT FOR REGULAR MEETING JULY 6, 2007

ITEM NUMBER: 6

SUBJECT: Low Threat and General Discharge Cases

DISCUSSION

General WDR – Oilfield Beneficial Reuse and Waste Pile Facilities

E&B Natural Resources Management Company, South Cuyama Oilfield, Santa Barbara County
[Rich Chandler 805/542-4627]

On April 13, 2007, Water Board staff enrolled E&B Natural Resources Management Company (E&B) under the General Conditional Waiver of Waste Discharge Requirements for the Reuse of Non-hazardous Crude Oil Impacted Soil and Non-hazardous Spent Sandblasting Aggregate on Active Leases (general WDRs for reuse, Resolution No. R3-2005-005). E&B plans to place eligible reuse material on various roads for dust control and erosion prevention within the following E&B lease areas:

Sections 19, 20, 30, and 31, Township 10 North, Range 26 West;

and, Sections 11 through 14, 23 through 26, 35, and 36, Township 10 North, Range 27 West, San Bernardino Baseline and Meridian.

E&B's application for enrollment under the general WDR included compliance plans, management practice plans, and property owner notification documentation. As a condition of enrollment under the general WDRs for beneficial reuse, E&B is required to submit information on the originating source of petroleum-impacted soil, chemical characterization of petroleum impacted material, and annual monitoring reports by October 1 of each calendar year summarizing its preparedness measures to prevent discharges during the rainy season.

Prior to approving E&B's enrollment, Water Board staff sent E&B's application to Division of Oil, Gas, and Geothermal Resources (DOGGR) and the Santa Barbara County Fire Department for a 30-day review and comment period. Neither agency had any comments on E&B's application.

Aera Energy LLC, San Ardo Oilfield, Monterey County [Rich Chandler 805/542-4627]

On April 13, 2007, Water Board staff enrolled Aera Energy LLC (Aera) under the General Conditional Waiver of Waste Discharge Requirements for the Reuse of Non-hazardous Crude Oil Impacted Soil and Non-hazardous Spent Sandblasting Aggregate on Active Leases (general WDRs for reuse, Resolution No. R3-2005-005). Aera plans to place eligible reuse material on various roads for dust control and erosion prevention within the following Aera lease areas:

Sections 35 and 36, Township 22 South, Range 10 East;

Section 31, Township 22 South, Range 11 East;

Sections 1, 2, 11, 12, 13 and 14, Township 23 South, Range 10 East;

and, Sections 6, 7, and 18, Township 23 South, Range 11 East, Mount Diablo Baseline and Meridian.

Aera's application for enrollment under the general WDR included compliance plans, management practices plans, and property owner notification documentation. As a condition of enrollment under the general WDRs for beneficial reuse, Aera is required to submit information on the originating source of petroleum-impacted soil, chemical characterization of petroleum impacted material, and annual monitoring reports by October 1 of each calendar year summarizing its preparedness measures to prevent discharges during the rainy season.

Prior to approving Aera's enrollment, Water Board staff sent Aera's application to DOGGR and the Monterey County Environmental Health Department for a 30-day review and comment period. Neither agency had any comments on Aera's application

Greka Oil & Gas, Inc., Cat Canyon and Zaca Oilfields, Santa Barbara County [Rich Chandler 805/542-4627]

On April 13, 2007, Water Board staff enrolled Greka Oil & Gas, Inc. (Greka) under the General Conditional Waiver of Waste Discharge Requirements for the Management of Petroleum-Impacted Soils at Authorized Waste Pile Management Facilities on Active Oil Leases and Fee Properties in the Central Coast (general WDRs for waste pile facilities, Resolution No. R3-2005-006). Greka plans to temporarily store crude oil impacted soil before beneficial reuse or off-site disposal of this material. Waste pile management facilities will be operated at the following locations:

Within the Bell Lease of the Cat Canyon Oilfield, Section 26, Township 9 North, Range 33 West;

Within the Security Fee of the Cat Canyon Oilfield, Section 15, Township 9 North, Range 33 West;

And, within the Davis Lease of the Zaca Oilfield, Section 33, Township 8 North, Range 31 West, San Bernardino Baseline and Meridian.

Greka's application for enrollment under the general WDR included compliance plans, management practices plans, and property owner notification documentation. As a condition of enrollment under the general WDRs for beneficial reuse, Greka is required to submit information on the originating source of petroleum-impacted soil, chemical characterization of petroleum impacted material, and annual monitoring reports by October 1 of each calendar year summarizing its preparedness measures to prevent discharges during the rainy season.

Prior to approving Greka's enrollment, Water Board staff sent Greka's application to DOGGR and the Santa Barbara County Fire Department for a 30-day review and comment period. Neither agency had any comments on Greka's application.

BreitBurn Energy Company LP, Orcutt Hill Oilfield, Santa Barbara County [Rich Chandler.805/542-4627]

On May 14, 2007, Water Board staff enrolled BreitBurn Energy Company LP (BreitBurn) under the General Conditional Waiver of Waste Discharge Requirements for the Reuse of Non-hazardous

Crude Oil Impacted Soil and Non-hazardous Spent Sandblasting Aggregate on Active Leases (general WDRs for reuse, Resolution No. R3-2005-005). BreitBurn plans to place eligible reuse material on various roads for dust control and erosion prevention within BreitBurn leases in Sections 22, 23, 26, and 27, Township 7 North, Range 34 West, San Bernardino Baseline and Meridian.

BreitBurn's application for enrollment under the general WDR included compliance plans, management practices plans, and property owner notification documentation. As a condition of enrollment under the general WDRs for beneficial reuse, BreitBurn is required to submit information on the originating source of petroleum-impacted soil, chemical characterization of petroleum impacted material, and annual monitoring reports by October 1 of each calendar year summarizing its preparedness measures to prevent discharges during the rainy season.

Prior to approving BreitBurn's enrollment, Water Board staff sent Breitburn's application to DOGGR and the Santa Barbara County Fire Department for a 30-day review and comment period. Neither agency had any comments on BreitBurn's application.

General WDRs for Food and Vegetable Processing

[Natural Selection Foods, Inc., DBA Earthbound Farm, San Benito County, Cecile DeMartini, 805/542-4782]

Natural Selection Foods, Inc. – DBA Earthbound Farm (hereafter “Discharger”) owns and operates the Natural Selection Foods mixed leafy greens processing facility at 1721 San Juan Highway, San Juan Bautista, California.

The Discharger's facility is currently regulated by Waste Discharge Requirements Order No. 99-99. On July 10, 2006, the Discharger submitted a Notice of Intent (NOI) requesting enrollment into the Central Coast Region General Waste Discharge Requirements for Discharges of Fruit and Vegetable Processing Waste (Order No. R3-2004-0066). Process wastewater treatment consists of screening and settling at a lined pond. Currently, final disposal of process wastewater is by spray disposal onto approximately 67 acres of grass (non-fodder, non-food). Prior to November 2006, the Discharger sprayed process wastewater onto 78 acres of grass fields. In the past 10 months, the Discharger has investigated alternative disposal options due to planned increased production operations in the next five years and has discussed these options with Water Board staff. Based on these planned changes, the Discharger submitted an updated NOI to the Water Board on April 23, 2007. The Discharger's current permit, WDR Order No. 99-99, does not regulate process wastewater discharges from the facility aside from limiting the disposal spray field location and prohibiting the maximum amount of discharge the Discharger uses for spray irrigation. According to recent process wastewater effluent data and groundwater monitoring data, downgradient groundwater characteristics for total dissolved solids, chloride, sodium, and sulfate at monitoring well Nos. MW-1 and MW-2 have been influenced by upgradient groundwater or upgradient surface discharges.

Due to past alleged violations and the current need to enroll the Discharger into a WDR that more comprehensively monitors the process wastewater, Water Board staff recommends that the Board rescind Order 99-99 and concur with the Executive Officer's determination to regulate the process wastewater using the Central Coast Region General Waste Discharge Requirements for Discharges of Fruit and Vegetable Processing Waste (Order No. R3-2004-0066).

General WDRs for Discharges of Winery Waste

Foxen Winery, Santa Maria, Santa Barbara County [David LaCaro 805/549-3892]

Central Coast Water Board staff terminated Foxen Winery's waiver and enrolled the facility under General Waste Discharge Requirements for Discharges of Winery Waste (General WDRs) on June 4, 2007. Foxen Winery is located at 7600 Foxen Canyon Road, Santa Maria, Santa Barbara County.

Foxen Winery expects to increase annual wine production from 10,000 cases to 20,000 cases. The process wastewater treatment and disposal system design is based on an estimated peak flow of 1,200 gallons per day (gpd) during the crush season. Winery process water will be discharged to a 2,500-gallon septic tank then to a 360 linear foot leachfield. Pomace will be placed in a material handler and spread on surrounding pastureland. The domestic wastewater discharges are separate from the winery wastewater discharges. Depth to groundwater, measured northwest of the proposed barrel room, is at least 50 feet below ground surface.

Enrollment under the General WDRs requires Foxen Winery to follow Monitoring and Reporting Program (MRP) No. R3-2002-0084. Central Coast Water Board staff will begin regular compliance inspections of Foxen Winery this fall.

General Waiver of Waste Discharge Requirements

California American Water Company, Seaside, Monterey County [Matthew Keeling 805/549-3685]

Staff waived report of waste discharge and waste discharge requirements for California American Water under Resolution No. R3-2002-0115, General Waiver for Specific Types of Discharges, on June 1, 2007. Specifically, staff waived the requirements for onsite discharges of well development water from proposed monitoring and aquifer storage and recovery (ASR) supply wells and the injection of potable water into the ASR wells as part of the California American Water Company Aquifer Storage Recovery Coastal Water Project. This waiver is conditional on the proposed discharges being conducted in accordance with paragraph C.4 of the General Waiver. Site conditions and estimated pump test flow rates preclude the discharge and containment of produced water onsite. Therefore, it is anticipated that pump test (produced) water will be discharged to an adjacent storm drain system as allowable per paragraph B.3 of Water Quality Order 2003-0005 DWQ (MS4 General Permit).

Cases Recommended for Closure

Unocal 76 Station #5679, 6105 San Anselmo Road, Atascadero, San Luis Obispo County [Corey Walsh 805-542-4781]

Staff recommends closure of this underground storage tank (UST) case where groundwater sample results indicate pollution remains at concentrations greater than Central Coast Water Board (Water Board) cleanup goals for methyl tertiary-butyl ether (MTBE) and benzene. The cleanup goal for MTBE is exceeded in three monitoring wells MW-1, MW-5, and MW-13, and for benzene in two monitoring wells MW-3 and MW-6; MTBE was detected at 29 micrograms per liter ($\mu\text{g/L}$), 7.3 $\mu\text{g/L}$, and 14 $\mu\text{g/L}$, and benzene at 4.1 $\mu\text{g/L}$, and 2.6 $\mu\text{g/L}$, respectively. Attachment 1, *Dissolved-Phase MTBE Concentration Map*, presents concentrations for samples collected on January 2, 2007. Other typical petroleum hydrocarbon constituents of concern (e.g., toluene, ethylbenzene, xylenes, and other fuel oxygenates) are below cleanup goals or were not detected in groundwater samples.

The site is an active fuel service station that operates three 12,000-gallon gasoline underground storage tanks (UST) and one waste oil UST. Shallow groundwater beneath the site has generally fluctuated between 21 feet and 32 feet below ground surface, and generally flows to the east/northeast at approximately 0.01 feet per foot.

The site lies within the Atascadero Hydrologic Subarea (3-9.81) of the Salinas Hydrologic Unit. The "Water Quality Control Plan, Central Coast Region" (Basin Plan) designates groundwater beneficial uses to be domestic and municipal supply, agricultural supply, and industrial supply. Therefore, the groundwater cleanup goals for common gasoline constituents are as follows: 1,000 µg/L total petroleum hydrocarbons, 1 µg/L benzene, and 5 µg/L MTBE. The benzene goal is based on the California Primary Maximum Contaminant Level, which is based on health effects data, but also contains other information relating to technical and economic feasibility of attainment in a water distribution system. The MTBE cleanup goal has been established based on taste and odor thresholds, not health risks. Although, the Primary Maximum Contaminant Level for MTBE is 13 µg/L.

The nearest water supply well is a domestic/ irrigation well located approximately 1,300 feet north of the site. The residual petroleum hydrocarbons remaining are unlikely to impact this well considering the groundwater flow direction, area geology, well distances, and low remaining contaminant concentrations.

The groundwater plume extent has been adequately characterized and is generally contracting or declining in size and concentration, and historical monitoring data indicate the petroleum hydrocarbon concentrations are expected to continue to decrease with time. Therefore, based on the information provided, we have no further requirements for groundwater monitoring, investigation or cleanup of the site.

Our recommendation for closure is based on the following:

- (1) Remaining groundwater pollution above cleanup goals is limited in extent and decreasing in concentration,
- (2) Remaining hydrocarbon constituents are unlikely to reach a drinking water supply well, and
- (3) Closure is consistent with Section III.G. of State Board Resolution No. 92-49, allowing the consideration of cost effective abatement measures for a site where attainment of reasonable objectives less stringent than background water quality does not unreasonably affect present or anticipated beneficial uses of groundwater, and will not result in water quality less than that prescribed by the Basin Plan.

In addition, Water Board staff has evaluated remaining soil and groundwater concentrations with respect to direct human exposure, indoor air impacts, gross contamination, and leaching potential in soil. Comparison of these residual soil and groundwater concentrations with corresponding environmental screening levels for a residential land use scenario indicate no significant threat to human health or the environment. The property owner and adjacent property owners/tenants have also been notified of the proposed case closure.

Unless the Water Board objects and pending monitoring well destruction, the Executive Officer will issue a case closure letter pursuant to California Underground Storage Tank Regulations.

Attachments

1. *Dissolved-Phase MTBE Concentration Map*