

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION

STAFF REPORT FOR REGULAR MEETING OF OCTOBER 23, 2009
Prepared on September 28, 2009

ITEM NUMBER: 8

SUBJECT: Low Threat and General Discharge Cases

DISCUSSION: The following items serve as notification that the subject sites have been enrolled under the noted General WDR or General Waiver of WDRs

General Waiver for Specific Types of Discharges (Resolution No. R3-2008-0010)

Ideal Cleaners, 1154 South Main Street, Salinas, Monterey County [Donette Dunaway, 805/549-3698]

Ideal Cleaners' representatives (AllWest) submitted a Remedial Action Plan to use in-situ chemical oxidation to remove dry cleaning solvents, predominantly tetrachloroethene (PCE), from soil and groundwater beneath their property. AllWest have agreed to comply with the requirements of the General Waiver of Waste Discharge Requirements for specific Types of Discharges (General Waiver). General Waiver requirements include monitoring and mitigation for potential indoor vapor intrusion during and after the chemical oxidation injection. The project consultant sent a letter to the neighbors within 500 feet of the site describing the proposed cleanup plan, and requested public comments within 30 days. Central Coast Water Board staff did not receive any public comments. On August 11, 2009 Water Board staff enrolled Ideal Cleaners under the General Waiver.

AllWest proposes injecting RegenOx™ to directly oxidize PCE. Full oxidation should yield water, carbon dioxide, and sodium chloride. If partial oxidation or rebounding of contaminant concentrations in groundwater occurs, AllWest will apply a follow-up injection of enhanced biodegradation compound to continue the PCE breakdown process. AllWest proposes to inject RegenOx™ into 18 injection points, at depths of five to 30 feet below grade.

AllWest conducted an onsite pre-injection, baseline soil vapor investigation on July 2, 2009. AllWest will collect soil vapor samples from the three sub-slab vapor probes, and groundwater samples from the three onsite monitoring wells, at least 30 days after completion of the proposed remediation activities and at quarterly intervals thereafter for a period of one year. Additional soil vapor data generated over the next 12 months will provide a basis for evaluating the remedial action's effectiveness. Soil vapor data will also be used to monitor human health risk from potential vapor intrusion of toxic breakdown products that could result if there is incomplete chemical oxidation of PCE. In the event of post-remediation detection in soil vapor samples of volatile organics at concentrations exceeding the site-specific target level, or significantly exceeding San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels, AllWest will initiate indoor vapor intrusion mitigation measures as summarized in their Soil Vapor Intrusion and Groundwater Mitigation Contingency Plan.

Chevron Estero Marine Terminal, 4000 Highway One, Morro Bay, San Luis Obispo County
[Rich Chandler, 805/542-4627]

Chevron Environmental Management Company's (Chevron) representatives (Entrix, Inc.) submitted a Work Plan to use in-situ chemical oxidation to remove petroleum hydrocarbons from soil and groundwater beneath their property at the former marine terminal. Entrix has agreed to comply with the requirements of the General Waiver, including groundwater monitoring. On September 28, 2009 Water Board staff enrolled Chevron under the General Waiver.

Entrix proposes to apply Adventus EHC-O™ to the base of a proposed excavation known as the Cutter Stock excavation to oxidize petroleum hydrocarbons. Excavation will remove significant quantities of petroleum hydrocarbons in soil and the oxidizing agent will enhance aerobic degradation of petroleum hydrocarbons in groundwater. Entrix proposes to apply Adventus EHC-O™ to the upper two feet of the excavation, two to three feet below the top of the groundwater table, and eight to twelve feet below the ground surface. Following the application of the oxidizing agent the excavation will be backfilled.

Three groundwater monitoring wells will be installed following the soil excavation and application of the oxidizing agent. Groundwater samples will be collected and analyzed for petroleum hydrocarbon constituents in accordance with the current monitoring program; additionally, these samples will also be analyzed for oxidation-reduction potential and dissolved oxygen.

ConocoPhillips Company, Santa Margarita Ranch, Santa Margarita, San Luis Obispo County
[Rich Chandler, 805/542-4627]

ConocoPhillips Company's representatives (Terra Pacific Group) have submitted a Technical Memorandum to conduct an aquifer test at the Santa Margarita Ranch. Terra Pacific Group has agreed to comply with the requirements of the General Waiver. General Waiver requirements include implementing appropriate management practices to prevent discharged water from causing erosion or entering surface drainages. On September 28, 2009 Water Board staff enrolled ConocoPhillips under the General Waiver.

The purpose of the aquifer test will be to determine what effect, if any, pumping of groundwater for irrigation or drinking water supply at Santa Margarita Ranch may have on a nearby plume of crude oil-impacted groundwater. It is not anticipated that the aquifer test will result in the pumping of any contaminated water, however, extracted groundwater will be contained and tested for total petroleum hydrocarbons as oil prior to discharge. Following analytical testing and confirmation that the extracted water does not contain hydrocarbons, the water will be used for irrigation.

General Waiver of WDR at Active Oilfields for Beneficial Reuse (Resolution No. R3-2005-005) and Waste Pile Management Facilities (Resolution No. R3-2005-006)

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

On April 29, 2009, Water Board staff enrolled E&B Natural Resources Management Company (E&B) 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 (Resolution No. R3-2005-006). E&B plans to operate a waste pile management facility in the Russell Ranch Unit of the Cuyama Oilfield, within Section 6, Township 10 North, Range 27 West, San Bernardino Baseline and Meridian. The

facility will be slightly over one acre in size. E&B plans to temporarily store crude oil-impacted soil removed from spills and tank bottoms before beneficially reusing this material.

On April 29, 2009, Water Board staff also enrolled 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 (Resolution No. R3-2005-005). E&B plans to place eligible reuse material on various roads and well pads throughout the Russell Ranch Unit for dust control and erosion prevention. E&B's applications for enrollment under both general WDRs at oil fields included compliance plans, management practices plans, and property owner notification documentation.

Prior to approving E&B's enrollment, Water Board staff sent E&B's application to the Santa Barbara County Fire Department, the Santa Barbara County Office of Planning and Development, and the California Division of Oil and Gas and Geothermal Resources (DOGGR) for a 30-day review and comment period. None of these agencies had any comments on E&B's application.

As a condition of enrollment under the general WDRs for waste pile facilities, 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 E&B's preparedness measures to prevent discharges from the waste pile management facility during the rainy season. Water Board staff notified both Santa Barbara County agencies and DOGGR of E&B's enrollment under the general oilfield WDRs.

General Permit for Low Threat Discharges to Surface Waters (General Permit Order No. R3-2006-0063)

Shell Gaviota Terminal Storage Tank Discharge, Santa Barbara County [Ryan Lodge (805) 549-3506]

Water Board staff enrolled Shell Oil Products US (Shell) under the National Pollutant Discharge Elimination System General Permit for Low Threat Discharges to Surface Water, Order No. R3-2006-0063. Shell's Notice of Intent, dated July 14, 2009, requested enrollment for discharges associated with dewatering of a water storage tank containing desalinated ocean water. The water will be treated through a filter system to reduce zinc concentrations to below the water quality objective. The tank water will be treated and discharged to a temporary holding tank while awaiting analytical results to verify that the effluent meets water quality objectives. The General Permit requires monitoring and reporting to ensure the discharges do not degrade water quality.

Water Board staff's review of the application indicates the proposed discharge is appropriate for enrollment under the General Order and Shell was authorized to discharge in a July 22, 2009 Water Board letter. The Discharger is required to submit annual reports on January 31st of each year.