

**Regional Water Quality Control Board
Central Valley Region**

Board Meeting – 30/31 May 2013

**Response to Written Comments on
Tentative Order R5-2013-XXXX
Waste Discharge Requirements**

**for
Chevron USA, Inc.
for**

**Post-Closure Maintenance and Corrective Action
Section 29 Surface Impoundments
Lost Hills Oil Field, Kern County**

23 April 2013

At a public hearing scheduled for 30/31 May 2013, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of a Tentative Order for Waste Discharge Requirements issued to Chevron USA, Inc. for Post-Closure Maintenance and Corrective Action of the Section 29 Surface Impoundments in Lost Hills Oil Field, Kern County.

This document contains responses to written comments received from interested parties in response to the Tentative Order. Written comments were required to be received by the Central Valley Water Board by 5 p.m. on 9 April 2013 in order to receive full consideration.

Written comments received on 2 April 2013 from Chevron USA, Inc. (Chevron) are summarized below, followed by the Central Valley Water Board staff response. No other comments were received.

Chevron USA, Inc. Comments

COMMENT #1

Finding #3 states that filter backwash water from the water treatment plant was discharged to the facility. Chevron states that filter backwash water was not disposed of in the water treatment plant. During a telephone conversation on 22 April 2013 with Central Valley Water Board staff, Chevron (Jim Waldron) stated that “filter backwash water from the water treatment plant was sent to injection disposal wells...”

RESPONSE #1

Finding #2 in Waste Discharge Requirements Order R5-2005-0134 (WDRs) states “Non-hazardous production water from the Discharger’s oil wells and filter backwash water from the Discharger’s water treatment plant (hereafter wastewater) are discharged to the impoundments.”

The Tentative WDRs has been revised to state the following in Finding #4 (previously Finding #3): *“According to WDRs Order R5-2005-0134, filter backwash water from the Discharger’s water treatment plant was discharged to the facility. Since then, Chevron stated that filter backwash water from the water treatment plant was sent to injection disposal wells.”*

COMMENT #2

Finding #47 states that based on site conditions, the threat and complexity of the discharge, the facility is determined to be classified 3B. Chevron requests that the Central Valley Water Board staff reconsider the discharge designation of 3B to 3C.

RESPONSE #2

Category 3B remains the appropriate designation for the threat and complexity because the facility is a Class II waste management unit that has not been clean closed. Residual waste (salt) remains beneath the engineered cover and in the underlying unsaturated interval. The engineered cover requires inspection and maintenance. Groundwater degraded by saline wastewater previously discharged at the facility continues to be monitored.

COMMENT #3

Monitoring and Reporting Program (MRP) Item B states “The Discharger shall submit the following reports annually...” Chevron requests that the five annual reports be submitted as one combined report due on October 31 of each year.

RESPONSE #3

Chevron can submit the annual reports listed in Item B of the MRP as a single combined report with each individual report clearly identified as a separate section in the combined report. The Reporting Requirements section of Item B states that the due date for the annual reports is 31 October of each year. Therefore, a combined annual report may be submitted each year by 31 October.

COMMENT #4

Monitoring and Reporting Program (MRP) Item C.6 states “The compliance period shall be the number of years equal to the active life of the facility.” Chevron requests the compliance period be 30 years from the date of impoundment closure.

RESPONSE #4

Provision E.3 of the Tentative Order has been modified to address the 30-year compliance period in section 21180 of Title 27, California Code of Regulations. Provision E.3 of the Tentative Order now includes the following: “*The Plan shall be implemented for a minimum period of 30 years or until it can be determined that the waste no longer poses a threat to the environment, whichever is greater.*” The minimum compliance period of 30 years applies to the Cover Integrity Monitoring and Maintenance Program and Cover Moisture Monitoring Program.

The Tentative Order includes a new Provision E.6, which states the following: “***Within one year following completion of the additional groundwater characterization as proposed in the approved WQMP, the Discharger shall propose a concentration limit for each of the COCs. The concentration limits shall be proposed in accordance with section 20400 of Title 27.***” As described in section 20400 of Title 27, Chevron can propose concentration limits for the COCs at background values or concentration limits greater than background.
