

## INFORMATION SHEET

WASTE DISCHARGE REQUIREMENTS ORDER R5-2014-XXXX  
FOR AERA ENERGY LLC  
FOR POST-CLOSURE MAINTENANCE  
NORTH BELTRIDGE SOLID WASTE DISPOSAL SITE  
KERN COUNTY

AERA Energy LLC (hereinafter Discharger) owns and maintains the North Belridge Solid Waste Disposal Site (facility) about ten miles southwest of Lost Hills, in Section 2, T28S, R20E, MDB&M. The 31.7-acre facility contains one closed unlined 28-acre waste management unit.

The California Regional Water Quality Control Board (Central Valley Water Board) adopted Waste Discharge Requirements (WDRs) Order 98-227 on 11 December 1998, which classified the waste management unit (Unit) as a Class III unit for the discharge of nonhazardous industrial solid waste as defined in California Code of Regulations, title 27, section 20005 et seq. (hereafter Title 27). The proposed Order revises the existing WDRs to regulate post-closure maintenance.

The waste management facility is located on the southern edge of the North Belridge Oilfield in the southwestern portion of the San Joaquin Valley. The geology of the southern San Joaquin Valley is characterized by structural deformation associated with the tectonics of the continental margin, including movement along the San Andreas Fault. The facility is located on the North Belridge Anticline and is underlain by Pleistocene age unconsolidated non-marine sediments of the Upper Tulare Formation.

The first fluid encountered beneath the facility is oil and tar at approximately 250 feet below ground surface.

Analysis of groundwater samples from the nearest wells (over one mile to the east) show total dissolved solids (TDS) concentrations of about 3,300 milligrams per liter (mg/l), electrical conductivity (EC) of about 4,000 micromhos per centimeter, Chloride concentrations of about 750 mg/l, sulfate concentrations of about 1,000 mg/l and boron concentrations over 1 mg/l. According to the California Division of Oil, Gas, and Geothermal Resources, groundwater that occurs in the Tulare Formation in the North Belridge area has concentrations of TDS over 20,000 mg/l.

Title 27 ordinarily requires Dischargers to institute a detection monitoring program for each waste management unit. However, the Central Valley Water Board finds that it is reasonable to waive compliance with Title 27 detection monitoring requirements at the Unit because the first fluid encountered beneath the Unit consists of oil and tar, there is no groundwater in the first 250 feet of sediments beneath the Unit, and groundwater in the vicinity of the facility has

high EC, high concentrations of TDS, and high concentrations of naturally occurring inorganic constituents.

The Discharger adequately demonstrated that construction of a Title 27 prescriptive standard cover would be unreasonable and unnecessarily burdensome when compared to the proposed engineered alternative design. There is no clay source on-site or nearby and the cost of importing clay from off-site or mixing on-site soils with bentonite would cost substantially more than the alternative design. The Discharger demonstrated that an evapotranspirative cover utilizing soil from a nearby borrow source would be an appropriate engineered alternative to the prescriptive design. During 2010, the Discharger constructed the final cover in accordance with the Final Closure Plan and the WDRs.

The action to revise waste discharge requirements for this existing facility is exempt from the provisions of the California Environmental Quality Act (CEQA), Public Resource Code section 21000, et seq., and the CEQA guidelines, in accordance with California Code of Regulations, title 14, section 15301.

This order requires full containment of wastes and does not permit degradation of surface water or groundwater. Further antidegradation analysis is therefore not needed. The discharge is consistent with the antidegradation provisions of State Water Resource Control Board Resolution No. 68-16.

REH: