

**ADDENDUM TO INITIAL STUDY AND
NEGATIVE DECLARATION (SCH NO. 2005051071)**

FOR

**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 OIL LEASES AND FEE PROPERTIES IN THE
CENTRAL COAST REGION**

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1.0 Introduction

This environmental document is an Addendum to the Initial Study (IS) and Negative Declaration (ND) for 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 Oil Leases and Fee Properties in the Central Coast Region, State Clearinghouse No. 2005051071, adopted on September 9, 2005 by the Central Coast Regional Water Quality Control Board (Central Coast Water Board). This Addendum evaluates the potential environmental impact(s) resulting from the Central Coast Water Board's proposed revisions to the regulatory program overseeing the temporary storage and beneficial reuse of non-hazardous crude oil impacted soil and non-hazardous spent sandblasting aggregate. These proposed revisions include replacing the conditional waiver of waste discharge requirements with general waste discharge requirements and more stringent containment and monitoring requirements. As demonstrated in this Addendum, the IS and ND continue to serve as the appropriate documents addressing the potential environmental impacts resulting from the implementation of the program.

1.1 Background

The IS and ND were prepared to evaluate the development of a regulatory program that establishes the conditions under which certain oil field materials may be reused and regulates the reuse of crude-oil impacted soils in such a way that protects waters of the State. The IS and ND assessed the potential environmental effects on aesthetics, hazards and hazardous materials, public services, agricultural resources, hydrology/water quality, recreation, air quality, land use planning, biological resources mineral resources, utilities/service systems, cultural resources, noise, mandatory findings of significance, geology/soils, and transportation/traffic. The IS and ND found that the project will have no impact on the subject resources and services.

The Central Coast Regional Water Quality Control Board is the lead agency under the California Environmental Quality Act (CEQA).

1.2 Purpose of Addendum to the IS and ND

When a proposed project is changed, there are changes in the environmental setting, or additional analysis is required, a determination must be made by the lead agency as to what, if any, type of supplemental environmental documentation is appropriate. CEQA Guidelines Sections 15162 and 15164 define the criteria (listed below) a lead agency must assess when determining whether an addendum or subsequent ND needs to be prepared. If the criteria below are true, then an addendum is an appropriate document:

- No new significant impacts will result from the project or from new mitigation measures.

- No substantial increase in the severity of environmental impacts will occur.
- No new feasible alternatives or mitigation measures that would reduce impacts previously found not to be feasible have, in fact, been found to be feasible.

Based on the information provided in Section 3.0 of this document, the changes to the approved project will not result in new significant impacts or substantially increase the severity of impacts previously identified in the IS and ND, and there are no previously infeasible alternatives that are now feasible. None of the other factors set forth in Section 15162(a)(3) are present. Therefore, an Addendum is appropriate, and this Addendum has been prepared to address the environmental efforts of the refinements to the project.

This Addendum will be appended to the previously adopted ND (SCH# 2005051071). The original initial study and all current and previous documentation, including this Addendum, are available upon request to the Central Coast Water Board. A Notice of Determination will be filed at the State Clearinghouse within five days of issuance of the general waste discharge requirements. This Addendum, along with the previously adopted Final ND (SCH#2005051071), now constitute the Final ND for the Project.

1.3 Summary

This Addendum provides additional environmental analysis for the changes to the regulatory program overseeing the temporary storage and beneficial reuse of non-hazardous crude oil impacted soil and non-hazardous spent sandblasting aggregate. The conclusions of the analysis in this Addendum remain consistent with those made in the IS and ND. **No new significant impacts will result, and no substantial increase in severity of impacts will result from those previously identified in the IS and ND.**

2.0 Project Description

2.1 Project Location

The possible project sites consist of all active oil fields and fee properties within the jurisdiction of the Central Coast Water Board. This project updates the existing regulatory program overseeing the temporary storage and beneficial reuse of petroleum-impacted soils on active oil fields. Operators at any active oil field within the Central Coast Region¹ may apply for coverage under the proposed general waste discharge requirements.

¹ The Central Coast Region extends from Santa Clara County south to northern Ventura County. The region has 378 miles of coastline and 3559 square miles of groundwater basins, including Santa Cruz and the Monterey Peninsula, the agricultural Salinas and Santa Maria Valleys, and the Santa Barbara coastal plain.

2.2 Proposed Project

While the proposed project has not changed, and the potential environmental impacts are the same as described in the IS and ND, the proposed revisions to the regulatory program will require more stringent containment and/or monitoring requirements to demonstrate consistency with the State Water Resources Control Board Anti-Degradation Policy Order No. 68-16. This project consists of two primary components: 1) regulating authorized waste management facilities that screen, sort, and temporarily store petroleum contaminated soils derived from hydrocarbon contaminated tank bottom sediment, cleanup activities related to spills and leaks at tank settings or pipelines at active oil fields, drilling muds from the development or redevelopment of oil production or injection wells, and the refurbishment of tanks, heater-treaters, H₂S scrubbers and various other oil production equipment and 2) the beneficial reuse of these petroleum contaminated soils for the construction of oil field access roads, berms, and curbing to manage storm water runoff and/or secondary containment features.

3.0 Environmental Analysis

As explained in Section 1.0, this addendum has been undertaken pursuant to the provisions of CEQA Section 15162 and 15164 to provide the Central Coast Water Board with the basis for determining whether any changes in the project, in the circumstances, or any new information since the IS and ND were certified require additional environmental review or preparation of subsequent CEQA documentation.

The environmental analysis provided in the IS and ND remains current and applicable to the proposed project in all areas listed below:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic

- Utilities and Services Systems
- Mandatory Findings of Significance

Because there are no changes to the proposed project, the Hydrology and Water Quality analysis in the IS and ND remains valid. However, revisions to the regulatory program are necessary to maintain consistency with the Anti-Degradation Policy. Specifically, these changes include requiring operators to apply best practicable treatment or control (BPTC), demonstrate that complete containment of waste at the waste pile management facility is or collect groundwater quality data to demonstrate compliance with the containment requirements, and replaces the conditional waiver of waste discharge requirements with general waste discharge requirements.

3.1 Hydrology and Water Quality

The proposed project changes would require operators to either use impermeable concrete working surfaces at authorized waste pile management facilities, conduct an engineering evaluation of the existing working surface to demonstrate that it meets or exceeds the protection provided through use of impermeable concrete working surfaces, and/or collect groundwater quality data to demonstrate that the operation of the waste pile management facility is not causing or contributing to a condition of pollution or nuisance. These practices are more stringent than those required under the previous general conditional waivers and will contribute to a beneficial impact on water quality by requiring complete containment of petroleum impacted soils.

4.0 Conclusion

Based on the information provided above, the revisions to the regulatory program would not result in a measurable increase in new environmental impacts. No new significant impacts have been identified, nor is the severity of newly identified impacts substantially greater than the conclusions of the IS and ND.

Based on the evidence included in the above analysis, the proposed project as described in Section 2.0 would not result in a substantial change in the conclusions and analysis included in the IS and ND.