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**Central Valley Regional Water Quality Control Board**

9 October 2013

**NOTICE OF VIOLATION**

Larry Bright  
Valley Water Management Company  
7500 Meany Avenue  
Bakersfield, CA 93308

**CERTIFIED MAIL**  
**7012 2920 0000 1430 3329**

**INSPECTION REPORT – VALLEY WATER MANAGEMENT COMPANY, C-PLANT FACILITY,  
EDISON OIL FIELD, KERN COUNTY**

Central Valley Regional Water Quality Control Board staff (Staff) inspected the wastewater disposal facility at the C-Plant Facility on 18 September 2013. Disposal operations at the facility are regulated by Waste Discharge Requirements Order 92-11037 (WDRs). Staff's comments and observations are presented in the enclosed inspection report.

Staff observed that oil field produced wastewater was being discharged into seven surface impoundments (sumps) at the facility. Two sumps (referred to as wastewater sumps; see Figure 1) appeared to have insufficient freeboard (approximately 1 foot of freeboard) and are in violation of the WDRs. Waste Discharge Specification B.6 of the WDRs states that a minimum of two feet of freeboard needs to be maintained in the sumps. The final sump in the series has recently been covered with netting to preclude wildlife.

Waste Discharge Specification B.1 of the WDRs states that wastewater discharged to sumps cannot exceed the following limits: electrical conductivity (EC), 1,000 micromhos per centimeter ( $\mu\text{mhos/cm}$ ); chloride, 200 milligrams per liter (mg/L); and boron, 1.0 mg/L. Analytical results provided in Valley Water Management Company's 2013 annual monitoring report indicate that the wastewater contains an EC of 5,700  $\mu\text{mhos/cm}$ , a chloride concentration of 1,800 mg/L, and a boron concentration of 14 mg/L, which exceed the salinity limits prescribed in the WDRs. Discharge of high salinity wastewater to sumps at the facility is a violation of the WDRs and poses a threat to groundwater.

Failure to comply with Waste Discharge Requirements Order 92-11037 can subject you to administrative civil liability (monetary penalties) at a rate of up to \$10 for each gallon discharged to the surface impoundments which exceeds the waste constituent limitations contained in Discharge Specification 1. of Order 92-11037. It is important that you promptly comply with the discharge limitations stipulated in Order 92-11037 to minimize your potential liability pursuant to California Water Code section 13350(e).

If you have any questions, please contact Ryan West at (559) 445-6188 or by email at [Ryan.West@waterboards.ca.gov](mailto:Ryan.West@waterboards.ca.gov)



DANE S. JOHNSON  
Senior Engineering Geologist  
PG No. 4239

Enclosure: Inspection Report

cc: Vincent Agusiegbe, CDOG&GR, Bakersfield

VALLEY WATER MANAGEMENT COMPANY	EDISON, C-PLANT FACILITY
DISCHARGER NAME	FACILITY NAME
7500 MEANY AVENUE	SW ¼ OF SECTION 34, T29S, R29E, MDB&M
STREET ADDRESS	STREET ADDRESS
BAKERSFIELD, CA 93308	KERN COUNTY
CITY, STATE, ZIP CODE	CITY, STATE, ZIP CODE
LARRY BRIGHT	RUSSELL EMERSON
DISCHARGER CONTACT PERSON	FACILITY CONTACT PERSON
(661) 410-7500	(661) 978-0982
TELEPHONE NO.	TELEPHONE NO.
lbright@vwwater.com	remerson@vwwater.com
E-MAIL ADDRESS	E-MAIL ADDRESS

### GENERAL INSPECTION INFORMATION

Inspection Type: <u>B Type Compliance Inspection</u>	Lead Inspector: <u>R. West</u>		
9/18/2013 to 09/18/2013	9:30 am Clear, Sunny		
INSPECTION DATE(S)	INSPECTION TIME		
GENERAL WEATHER CONDITIONS			
INSPECTION ATTENDEE(S)			
Scott Moore	Central Valley Water Board	(559) 445-5170	smoore@waterboards.ca.gov
NAME	COMPANY/AGENCY	TELEPHONE NO.	E-MAIL ADDRESS
Russell Emerson	Valley Water Management Co.	(661) 978-0982	remerson@vwwater.com
NAME	COMPANY/AGENCY	TELEPHONE NO.	E-MAIL ADDRESS
Mike Toland	CDOGGR	(661) 334-3662	michael.toland@conservation.ca.gov
NAME	COMPANY/AGENCY	TELEPHONE NO.	E-MAIL ADDRESS

### INSPECTION SUMMARY (for CIWQS entry – 500 character maximum)

The C-Plant Facility was inspected to determine compliance with Waste Discharge Requirements Order 92-11037 (WDRs). Oil field produced wastewater is discharged into seven surface impoundments (sumps) at the facility. The quality of wastewater discharged to sumps exceeds salinity limits prescribed in Discharge Specification B. 1 of the WDRs. Discharge of high salinity wastewater to sumps at the facility is a violation of the WDRs and poses a threat to groundwater.

### INSPECTION VIOLATIONS SUMMARY (if applicable)

Identify VIOLATIONS noted during inspection in table below. For each violation documented entered into CIWQS, identify Violation ID and Violation Type, describe violation, and identify section of the WDRs or Water Code violated.

Label	Violation ID	Violation Type	Violation Description	Section of the WDRs Violated
V1	955513	Effluent Violation	Disposal of high salinity wastewater to sumps.	Discharge Specification B.1
V2	955555	Order Conditions	Insufficient freeboard	Discharge Specification B.6
V3	393320	NOV	Notice of Violation letter describing facility violations	
V4				
V5				
V6				

### OTHER VIOLATIONS (if applicable)

SMR violations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Evaluated	Notes:
File Review violations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Evaluated	Notes:

Lead Inspector ID: <u>139472</u>	Signature: <u>Ryan K. West</u>	Date: <u>10/8/13</u>
Inspection Tracking Information	Reviewed by: (1) <u>[Signature]</u> (2) _____ (3) <u>(RKW) 139472</u>	CIWQS Coordinator
Filename: <u>VWMC, C-Plant Facility, Edison Oil Field, Kern County, Order No. 92-11037</u>	CIWQS Entry Date: <u>09/26/2013</u>	CIWQS Inspection ID: <u>13869583</u>

**FACILITY INFORMATION**

Oil field production wastewater disposal facility.

Active

FACILITY DESCRIPTION (e.g., total area in acres, number of waste management units, etc.)

STATUS (active, inactive, closed)

Oil field production wastewater.

Sub-15 Surface Impoundments

WASTE TYPES

FACILITY CLASSIFICATION

Twenty-seven unlined surface impoundments and sprinkler irrigation system.

DISPOSAL DESCRIPTION (e.g., composting, landfill, surface impoundment, etc.)

**BACKGROUND**

The C-Plant Facility (Figure 1) contains seven sumps that are used for oil separation and storage of oil field production wastewater. The C-Plant Facility accepts approximately 4.5 million barrels (189 million gallons) of oil field production wastewater per year from several small oil producers in the Edison Oil Field whose wastewater does not meet Basin Plan salinity limits for discharges to unlined sumps. The wastewater contains an electrical conductivity (EC) of 5,700 micromhos per centimeter ( $\mu\text{mhos/cm}$ ), a chloride concentration of 1,800 milligrams per liter (mg/L), and a boron concentration of 14 mg/L. Wastewater from the C-plant Facility is piped to Valley Water Management Company's Race Track Hill Facility for disposal to unlined sumps.

**INSPECTION GIS DATA**

GIS Equipment used:

	MANUFACTURER	MODEL	SERIAL NO.	DATUM
Description of Measured Point	Latitude	Longitude	Datum	Comments
Centroid of Facility	35.355071	-118.859904	NAD 83	

**INSPECTION OBSERVATIONS AND FINDINGS**

Describe observations and findings and identify those that document and reference each violation listed in the Inspection Violations Summary table by identifying the cited violation number within parentheses following the observation/finding (e.g., Exposed waste on top deck (V1)).

The facility was inspected to observe current wastewater disposal operations and evaluate compliance with the WDRs. Photographs were taken to document conditions observed (see page 4).

Staff observed that oil field produced wastewater was being discharged into seven sumps at the facility. Land in the immediate vicinity of the facility is used for farming. It appeared that grapes are being farmed immediately south of the facility (see Figure 1).

Wastewater enters the facility by means of inlet pipes (Photograph 1). The inlet pipes discharge wastewater into two oil separation sumps that are covered with netting (Photograph 2). The oil separation sumps are gunite-lined and contained wastewater coated with crude oil. From the oil separation sumps, the wastewater enters two gunite-lined sumps (hereafter referred to as "wastewater sumps") that are each approximately 125 feet in length and 45 feet wide (Photographs 3 and 4). The two wastewater sumps are equipped with built-in skimmers, that when lowered by an operator, skim crude oil off the wastewater. I did not observe any crude oil in the wastewater sumps (Photograph 4). Both of the wastewater sumps appeared to have insufficient freeboard (approximately 1 foot of freeboard). There are two unlined sumps (hereafter referred to as "oil sumps") that are used for storage of crude oil that is skimmed from wastewater. The two oil sumps were at maximum capacity and contained wastewater coated with a thin veneer of crude oil (Photograph 5). The last sump in the series is gunite-lined and is referred to as the shipping sump. Netting was recently constructed over the shipping sump to prevent wildlife from contacting crude oil (Photograph 6). The shipping sump contained wastewater coated with some crude oil near the northeast corner of the sump.

The storm water basin located at the southern portion of the facility was dry.

**SAMPLING INFORMATION AND OBSERVATIONS**

Were samples collected during the inspection?  Yes  No  
 Did discharger collect split samples?  Yes  No

Are sample results included in report?  Yes  No

**SAMPLE COLLECTION INFORMATION AND OBSERVATIONS**

SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.
SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.
SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.
SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.

**DISCUSSION OF SAMPLING RESULTS**

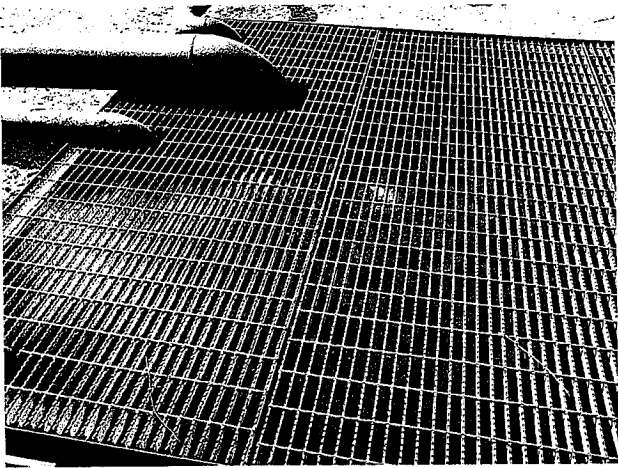
Discuss sampling results (e.g., discuss whether sampling results show compliance with WDRs).

**CONCLUSIONS**

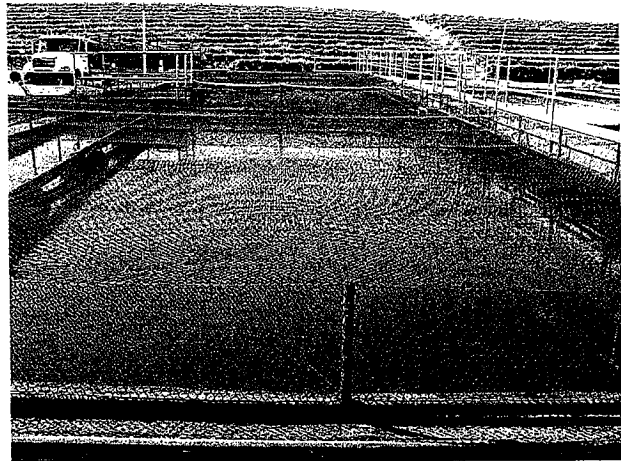
Summarize the conclusions of the inspection(s) below.

1. The shipping sump has recently been covered with netting to preclude wildlife. This resolves the Notice of Violation dated 28 June 2012 issued to Valley Water Management Company.
  2. The two wastewater sumps appeared to have insufficient freeboard (approximately 1 foot) and are in violation of the WDRs. Waste Discharge Specification B.6 of the WDRs states that a minimum of two feet of freeboard needs to be maintained in the sumps.
  3. Waste Discharge Specification B.1 of the WDRs states that wastewater discharged to sumps cannot exceed the following limits: EC, 1,000  $\mu$ mhos/cm; chloride, 200 mg/L; and boron, 1.0 mg/L. Analytical results provided in Valley Water Management Company's 2013 annual monitoring report indicate that the wastewater contains an EC of 5,700  $\mu$ mhos/cm, a chloride concentration of 1,800 mg/L, and a boron concentration of 14 mg/L, which exceed the salinity limits prescribed in the WDRs.
  4. Discharge of high salinity wastewater to sumps at the facility is a violation of the WDRs and poses a threat to groundwater. The disposal of wastewater to sumps at the facility needs to cease.
  5. The WDRs are outdated and need to be updated for conformance with current Central Valley Water Board policies, and State regulations and policies.

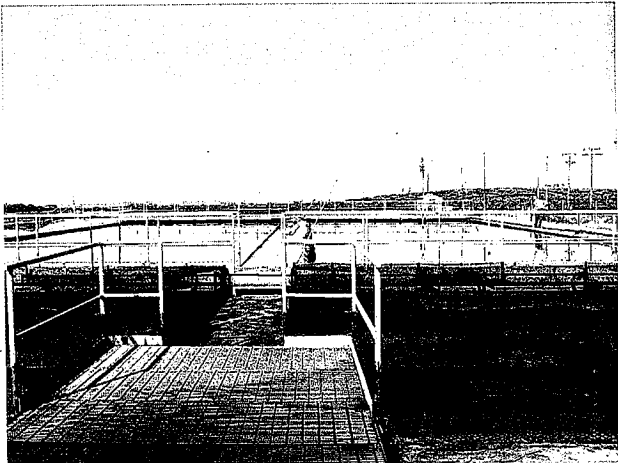
PHOTOGRAPHS



Photograph 1. – View of incoming wastewater pipes that discharge into the separation sumps.



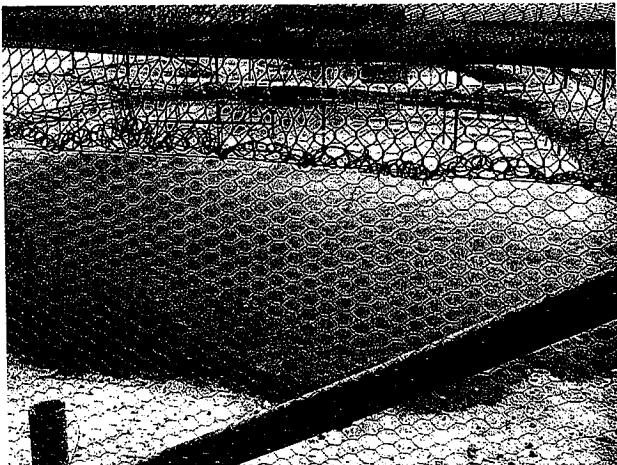
Photograph 2. – View of oil separation sumps.



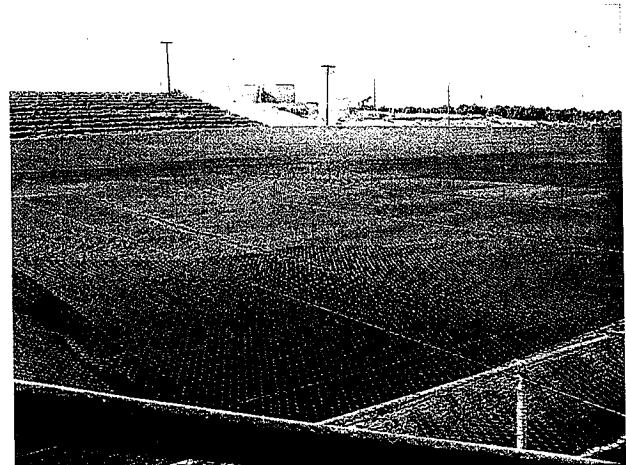
Photograph 3. – View of a separation sump and wastewater sumps looking west.



Photograph 4. – View of the wastewater sumps looking southeast.



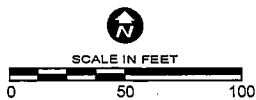
Photograph 5. – View of the two unlined oil sumps.



Photograph 6. – View of the shipping sump.



Map Source:  
ESRI's ArcGIS Online Premium Services  
Section 34, T29S, R29E, MDB&M



### SITE MAP

ORDER NO. 92-11037

VALLEY WATER MANAGEMENT COMPANY

EDISON FEE 34 (RACETRACK HILL, C-PLANT) FACILITY

KERN COUNTY

FIGURE 1