California Regional Water Quality Control Board

Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

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Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

July 27, 2001

Mr. Paul Roden
Vintage Petroleum, Inc.
3055 W. Pacific Coast Highway
Ventura, CA 93001

Dear Mr. Roden:

REQUIREMENT FOR MONITORING OF PRIORITY POLLUTANTS REGULATED IN THE CALIFORNIA TOXIC RULE – GRUBB-RINCON, VENTURA (ORDER NO. 95-094, NPDES NO. CA0000761, CI-5358)

On March 2, 2000, the State Water Resources Control Board (SWRCB) adopted the *Policy for Implementation of Toxic Standards (SIP) for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (Policy). The Policy implements the provisions promulgated by the U.S. Environmental Protection Agency in National Toxics Rule [40 CFR 136.36] and the California Toxics Rule (CTR) [40 CFR 131.38]. Criteria for 126 priority pollutants are established by the CTR. The SIP requires the Regional Water Quality Control Board (Regional Board) to conduct reasonable potential analysis (RPA) to determine whether a discharge may: (1) cause, (2) have a reasonable potential to cause, or (3) contribute to an excursion above any applicable priority pollutant objective. If the RPA determines that a limitation for a priority pollutant is required, the Regional Board will establish an appropriate limitation for that pollutant.

In accordance with Section 13267 of the California Water Code, dischargers must submit data to the Regional Board to: (1) determine if water quality-based effluent limitations for priority pollutants are required; and (2) to calculate effluent limitations, if required. The policy further provides that the time schedule for providing the data shall be as short as practicable but not to exceed three years from the effective date of the SIP, which was May 22, 2000.

A. Reasonable Potential Analyses (RPA) Data Requirement

The following data must be compiled to perform an RPA, and, if necessary, to develop effluent limits:

- The concentration of each priority pollutant in the effluent at the point of discharge;
- The concentration of each pollutant in the receiving water upstream of the point of discharge;
- The flow rate of the receiving water at the time of sampling (if discharge is to a river or creek);
- The pH of the receiving water;
- The hardness of the receiving water; and,
- The salinity of the receiving water.

The RPA and effluent limit calculations are statistically based. Thus, the more data sets used in the calculations, the better would be the results of the analyses. Normally ten data sets are necessary to perform an RPA. However, to minimize monitoring and analytical costs dischargers will be allowed to submit seven quarters of monitoring and analysis data for this purpose.

B. Reasonable Potential Monitoring Program

Pursuant to CWC Section 13267, Vintage Petroleum, Inc. is hereby directed to conduct seven quarters (**from July 2001 to March 2003**) of effluent and receiving water sampling/monitoring for all the constituents listed in Attachment A.

- The effluent sample shall be collected at the end of discharge pipe from your facility.
- You must monitor your effluent and receiving water for the presence of the 17 congeners of 2,3,7,8-TCDD listed in Attachment A, once during the dry weather and once during the wet weather (a total of two samples) during this period. You must report for each congener the analytical results of the effluent monitoring, including the quantifiable limit and the Method Detection Limit (MDL), and the measured or estimated concentration. You must multiply each measured or estimated congener concentration by its respective Toxicity Equivalent Factors (TEFs) and report the sum of these values.
- The receiving water samples shall be collected upstream of the effluent discharge point in the receiving water outside the influence of the discharge. Where feasible receiving water sample should be collected 50 feet upstream of the effluent discharge point.

You may conduct the quarterly/semi-annually sampling during the periods prescribed in the monitoring and reporting section of your current permit, but the data must be submitted according to the Monitoring and Reporting Schedule in Section C of this correspondence. However, if quarterly/semi-annually sampling is not required in your current permit, you must sample your effluent and the receiving water, and submit a report according to the Monitoring and Reporting Schedule in Section C, below. Please note that the report for this required monitoring must be submitted separately from the regular discharger self-monitoring reports.

C. Reasonable Potential Reporting Program

The RPA monitoring reports must be submitted every quarter according to the schedule below:

Monitoring and Reporting Schedule	
Monitoring Period	**Report Due Date**
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15
Semi-annual sampling (to be conducted during October to March, and during April to September)	April 15 & October 15, respectively

D. Reasonable Potential Monitoring Provisions

- SWRCB-approved laboratory methods and the corresponding minimum levels (MLs) for the examination of each priority pollutant are listed in Attachment B of this letter. Reporting requirements for the data to be submitted are listed in Attachment C of this letter. We recommend that you select analytical method from Attachment A capable of achieving the lowest ML for each pollutant as listed on Attachment B. ML is necessary for determining compliance for a priority pollutant when an effluent limit is below the MDL.

- The laboratory analytical data shall include applicable MLs, MDL, quality assurance/quality control data, and shall comply with the reporting requirements contained in the Attachments B & C.

- The first and last monitoring data under this program are due **October 15, 2001 and April 15, 2003**, respectively to this Regional Board. The last monitoring data shall include all the analytical data from the previous sampling events under this program. You must provide these analytical results in both **electronic format** (available as a **Microsoft Excel Spreadsheet** on our Web site http://www.swrcb.ca.gov/~rwqcb4/html/programs/watershed_reg.html) and **in paper format**.

- Please forward all monitoring data/report to The Regional Board, Attn: Industrial Permitting Unit, and please include a reference to "Compliance File No. CI-5358 and NPDES No. CA0000761".

Pursuant to Section 13268 of the CWC, failure to conduct the required monitoring and/or to provide the required information in a timely manner may result in civil liability imposed by the Regional Board in an amount not to exceed one thousand dollars ($1000) for each day the information is not received.

Attached for your information is a copy of answers to some of the most frequently asked questions. If you have any other questions, please contact Cassandra Owens at (213) 576-6750 or fax your questions to (213) 576-6660.

Sincerely,

Dennis A. Dickerson
Executive Officer

Enclosures: Attachment "A" – Priority Pollutants Analytical Methods Table
Attachment "B" – SWRCB Minimum Levels
Attachment "C" – Example Data Format
Frequently Asked Questions

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5358

State of California
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

ORDER NO. 95-094
NPDES NO. CA0000761

WASTE DISCHARGE REQUIREMENTS
FOR
VINTAGE PETROLEUM, INC.
(Vintage Grubb Lease Ocean Water Plant)

The California Regional Water Quality Control Board, Los Angeles Region, finds:

1. Vintage Petroleum, Inc., discharges wastewater under waste discharge requirements contained in Order No. 84-61, issued to Conoco, Inc., and adopted by this Regional Board on June 25, 1984.

2. Vintage Petroleum, Inc., has acquired this facility and has filed a report of waste discharge and applied for renewal of these waste discharge requirements and National Pollutant Discharge Elimination System (NPDES) permit for discharge of wastes to surface waters.

3. Vintage Petroleum, Inc., operates a crude oil production facility located at 3055 West Pacific Coast Highway, Ventura, California, just north of the community of Dulah, Ventura County. The facility uses treated seawater for waterflooding operations in San Miguelito Oil Field. Treatment consists of chlorination, alum settling, and filtration. The permit is needed so that, in the event of malfunctioning of the injection equipment, the seawater being processed in the treatment system can be discharged back to the ocean. There has been no discharge since the adoption of Order No. 84-61.

4. The volume of wastes discharged back to the ocean could be up to 245,000 gallons per day (gpd) of partially treated seawater from occasional draining of the flocculation tank and/or other basins as necessary to facilitate repair of malfunctioning underwater equipment or structures. The wastes would contain chlorine, aluminum hydroxide floc, and insoluble material removed from the seawater influent stream. The discharge would be to an unnamed watercourse at a point about 625 feet from the shoreline of the Pacific Ocean (Discharge Serial No. 001, at Latitude 34°19'2.8"; Longitude 119°21'54.8").

5. The discharge point is in Section 26, T3N, R24W, S.B.B.&M., within the boundaries of the Rincon Creek Hydrologic subarea.

There are no known beneficial uses of the ground water in the area of the discharge. May 23, 1995

6. The Board adopted a revised Water Quality Control Plan (Basin Plan) on June 13, 1994. The plan identifies the beneficial uses of the nearshore zone of the Pacific Ocean, and enumerates the water quality objectives necessary to protect those uses.

7. The beneficial uses of the receiving waters are: industrial service supply, water contact and non-contact recreation, ocean commercial and sport fishing, preservation of rare and endangered species, marine habitat, saline water habitat, and shellfish harvesting.

8. The issuance of waste discharge requirements for this discharge is exempt from the provisions of Chapter 3 (commencing with Section 21000) of Division 13 of the Public Resources Code in accordance with Water Code Section 13389.

9. Effluent limitation standards established pursuant to Section 301 of the Federal Clean Water Act and amendments thereto are applicable to the discharge.

The Board has notified the discharger and interested agencies and persons of its intent to renew waste discharge requirements for this discharge and has provided them with an opportunity to submit their written views and recommendations.

The Board, in a public hearing, heard and considered all comments pertaining to the discharge and to the tentative requirements.

This Order shall serve as a National Pollutant Discharge Elimination System (NPDES) permit pursuant to Section 402 of the Federal Clean Water Act (FCWA), or amendments thereto, and shall take effect at the end of ten days from the date of its adoption, provided the Regional Administrator of the United States Environmental Protection Agency (EPA) has no objections.

IT IS HEREBY ORDERED that Vintage Petroleum, Inc., in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, and the provisions of the Federal Clean Water Act and regulations and guidelines adopted thereunder, shall comply with the following:

A. Effluent Limitations

1. Wastewater discharged shall be limited to seawater from a flocculation treatment system only, as proposed.

2. The pH of wastes discharged shall at all times be within the range of 6.0 to 9.0.

3. The temperature of wastes discharged shall not exceed 100°F.

4. The discharge of wastes in excess of the following limits is prohibited:

Constituent	Units	Discharge Limitations Daily Maximum
Suspended solids	mg/l	75
	lbs/day(1)	153
Settleable solids	mg/l	0.2
Oil and grease	mg/l	15
	lbs/day(1)	30.7
BOD_5(20°C)	mg/l	30
	lbs/day(1)	61.3
Residual chlorine	mg/l	0.10

1) Based on a maximum waste flow of 245,000 gpd

B. Narrative Water Quality Limitations

1. Surface water communities and populations, including vertebrate, invertebrate, and plant species, shall not be degraded as a result of this waste discharge.

2. The natural taste and odor of fish, shellfish, or other surface water resources used for human consumption, shall not be impaired as a result of this waste discharge.

3. Toxic pollutants shall not be discharged at levels that will bioaccumulate in aquatic resources to levels which are harmful to human health.

4. The waste discharge shall not cause concentrations of toxic pollutants in the water column, sediments, or biota that would adversely affect any beneficial uses.

C. Requirements and Provisions

This Order includes the attached "Standard Provisions and General Monitoring and Reporting Requirements" ("Standard Provisions"). If there is any conflict between requirements stated herein, including limitations and objectives, and the "Standard Provisions", the requirements shall prevail.

D. Expiration Date

This Order expires on July 10, 2000. The discharger must file a Report of Waste Discharge in accordance with Title 23, California Code of Regulations, not later than 180 days in advance of that date as application for issuance of new waste discharge requirements and NPDES permit.

E. Rescission

Order No. 84-61, adopted by this Board on June 25, 1984, is hereby rescinded.

I, Robert P. Ghirelli, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on July 17, 1995.

Robert P. Ghirelli

ROBERT P. GHIRELLI, D.Env.
Executive Officer

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. CI-5358
FOR
VINTAGE PETROLEUM, INC.
(Vintage Grubb Lease Ocean Water Plant)
(CA0000761)

The discharger shall implement this monitoring program on the effective date of this Order. The first monitoring report under this program is due by October 15, 1995.

Monitoring reports shall be submitted by the dates in the following schedule:

Reporting Period	Report Due
January - March	April 15
April - June	July 15
July - September	October 15
October - December	January 15

Effluent Monitoring

A sampling station shall be established for each point of discharge and shall be located where representative samples of the effluent can be obtained. The following shall constitute the effluent monitoring program:

Constituent	Units	Type of Sample	Minimum Frequency of Analysis
Total waste flow	gal/day	----	once per discharge event
Temperature	°F	grab*	once per discharge event
pH	pH units	grab*	once per discharge event
Suspended solids	mg/l	grab*	once per discharge event
Settleable solids	mg/l	grab*	once per discharge event
BOD_5 20°C	mg/l	grab*	once per discharge event
Oil and grease	mg/l	grab*	once per discharge event
Residual chlorine	mg/g	grab*	once per discharge event

* Sample shall be taken within the first 30 minutes of discharge

Ordered by:

Robert P. Ghirelli

ROBERT P. GHIRELLI, D.Env.
Executive Officer

Date: July 17, 1995

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
101 CENTRE PLAZA DRIVE
MONTEREY PARK, CA 91754-2156
(21[illegible]66-7500
FA[illegible].13) 266-7600

July 31, 1995

Vintage Petroleum, Inc.
4200 One Williams Center
Tulsa, Oklahoma 74172

Vintage Petroleum, Inc.
3055 West Pacific Coast Highway
Ventura, CA 93001
ATTN.: Paul Roden - Production Foreman

Waste Discharge Requirements (NPDES Permit No. CA0000761)

Reference is made to our letter dated May 23, 1995, which transmitted a draft of tentative requirements for your disposal of wastes to the Pacific Ocean nearshore zone.

Pursuant to Division 7 of the California Water Code, this California Regional Water Quality Control Board, at a public hearing held on July 17, 1995, reviewed these tentative requirements, considered all factors in the case, and adopted Order No. 95-094 (copy attached) relative to this waste discharge. This Order serves as a permit under the National Pollutant Discharge Elimination System, and expires July 10, 2000. Please note that you must file an application for a new permit at least 180 days in advance of that date.

You are required to implement the new monitoring program as stated in the Monitoring and Reporting Program on the effective date of this Order. Please note that any monitoring report due under your previous Monitoring and Reporting Program is still required and must be submitted by the due date. Please reference all technical and monitoring reports to Compliance File No. 5358. We would appreciate it if you would not combine other reports, such as progress or technical reports, with your monitoring reports, but would submit each type of report as a separate document.

Inasmuch as the Board adopted the tentative requirements without changes, we are sending the final copy only to the permittee. For those on the mailing list, please add "Order No. 95-094" to the tentative order previously sent to you. A copy of the final Order as adopted will be furnished to anyone who requests it.

for Joshua M. Workman
Lawrence A. Meyerson
Supervising Water Resource
Control Engineer

cc: See attached mailing list
Enclosures

Vintage Petroleum, Inc. CA0000761

Mailing List

cc: Environmental Protection Agency, Region 9, Administrative Service Division (W-5-1)
U.S. Army Corps of Engineers
NOAA, National Marine Fisheries Service
Department of Interior, U.S. Fish and Wildlife Service
Mr. John Youngerman, State Water Resources Control Board, Division of Water Quality
Department of Fish and Game, Marine Resources Region
Department of Fish and Game, Region 5
State of California Department of Parks and Recreation
Department of Health Services, Sanitary Engineering Section Santa Barbara
Ventura County Department of Environmental Health
Ventura County Planning Commission
Ventura Regional County Sanitation Districts
Division of Oil and Gas, Santa Paula
South Coast Air Quality Management District
California Coastal Commission, South Central Coast Regional Commission