

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

ENTRE PLAZA DRIVE
MONTEREY PARK, CA 91754-2156
(213) 266-7500
FAX: (213) 266-7600



7440

September 27, 1994

Mr. John Duhon, Manager of Operations
The Estate of Albert Levinson, dba
Brea Cañon Oil Co.
2300 East Imperial Highway
El Segundo, CA 90245

**THE ESTATE OF ALBERT LEVINSON, DBA BREA CAÑON OIL COMPANY - WASTE
DISCHARGE REQUIREMENTS (FILE No. 92-32)**

Our letter of September 14, 1994, transmitted revised tentative waste discharge requirements for land treatment of non-hazardous petroleum-hydrocarbon-contaminated soil and production solids originating at the Dominguez Hills and Wilmington Oil Fields.

Pursuant to Section 13263 of the California Code of Regulations, this Regional Board at a public meeting held on September 26, 1994, reviewed the tentative Order, considered all factors in the case, and adopted Order No. 94-104 and Monitoring and Reporting Program No. CI 7440 (copy attached) relative to the discharge.

The "Monitoring and Reporting Program" requires you to implement the monitoring program and submit your first monitoring report under this program by **January 15, 1995**. Please reference all technical and monitoring reports to our Compliance File number CI 7440. We would appreciate it if you would not combine other reports, such as progress or technical, with your monitoring reports but would submit each type of report as a separate document. All monitoring reports should be sent to the Regional Board, ATTN: Technical Support Unit.

Please call Keith Elliott at (213) 266-7533 if you have any questions or comments.

J.E. ROSS, Unit Chief
Site Cleanup Unit

cc: See mailing list

Enclosures

Mr. John Duhon, Manager of Operations
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Brea Cañon Oil Co.
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MAILING LIST

CC: Mr. Archie Matthews, State Water Resources Control Board,
Division of Water Quality
State Department of Toxic Substances Control, Region 4
U. S. Army Corps of Engineers
NOAA, National Marine Fisheries Service
Department of Interior, U. S. Fish and Wildlife Service
Department of Fish and Game, Region 5
Los Angeles County Fire Department, Hazmat Unit
South Coast Air Quality Management District
City of Carson
City of Los Angeles (Harbor City)
Ms. Elizabeth Robbins, Environmental Science & Engineering,
Inc.
Ms. Gwen Telegan, Brea Cañon Oil Co.

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

ORDER NO. 94-104
WASTE DISCHARGE REQUIREMENTS
FOR
LAND TREATMENT OF PETROLEUM-HYDROCARBON-CONTAMINATED SOILS
AT
THE ESTATE OF ALBERT LEVINSON
DBA BREA CAÑON OIL COMPANY
(Dominguez Hills and Wilmington Oil Fields,
Los Angeles County, California)

(FILE NO. 92-32)

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

1. The Estate of Albert Levinson, doing business as Brea Cañon Oil Company, hereinafter called the discharger, operates the Callender Lease (about 633 acres) and the Hellman Lease (about 810 acres) in the Dominguez Oil Field which is an active oil and gas producing field. Also, the discharger operates the Joughin Lease (about 814 acres) and South Torrance Lease (about 176 acres) in the Wilmington Oil Field. These oil fields are active oil and gas producing fields, in operation since the 1920's. The Callender Lease is located at 17810 Central Avenue, and the Hellman Lease is located at 1441 East Victoria Street, in the City of Carson. The Joughin Lease is located at 23903 South Normandie and the Torrance Lease is located at 630 West Lomita Boulevard in the City of Los Angeles (portions of these leases are outside the City in the unincorporated portions of Los Angeles County).
2. The discharger has filed a report of waste discharge for land treatment of petroleum-hydrocarbon-contaminated soil and production solids. The production solids are non-hazardous solids collected in the bottom of oil/water separation vessels located at the Callender, Joughin, and South Torrance leases. The discharger proposes to land treat approximately 100,000 cubic yards of petroleum-hydrocarbon-contaminated soil and 1,200 cubic yards of petroleum-hydrocarbon oil/water separator solids on site. The primary purpose for this activity is to clean up contaminated soil resulting from previous oil production operations and develop the site for residential housing.
3. In 1993 the former Hellman Lease holder implemented land treatment of petroleum-hydrocarbon-contaminated soils from the diesel fuel washdown area. This remediation was conducted

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under General Waste Discharge Requirements of Order No. 90-148, adopted on October 20, 1990. In addition, the underground tank area of the Hellman Lease was remediated in 1993 under the oversight of the Los Angeles Department of Public Works.

4. Ground water was encountered at about 135 feet below ground surface (bgs) at the Callender Lease, 196 feet bgs at the Hellman Lease, and about 77 feet bgs at the Joughin and Torrance Leases. Ground water flow direction is generally to the west beneath the Callender, Hellman, and Torrance leases and to the southwest beneath the Joughin lease.
5. The subject leases are believed to be underlain by the Gage, Lynwood, and Silverado aquifers. The Bellflower Aquiclude is also found beneath the subject leases overlying the Gage Aquifer. This aquiclude is found approximately 35 to 115 feet below grade. The Gage aquifer is found at about 145 feet bgs and extends to about 225 feet bgs.
6. The Regional Board adopted a revised Water Quality Control Plan for the Los Angeles River Basin (4B) on June 3, 1991. The Plan contains water quality objectives for ground waters in the Coastal Plain of Los Angeles County where the subject leases are located. The requirements contained in this Order, as they are met, will be in conformance with the goals of the Water Quality Control Plan.
7. Ground water in the Coastal Plain is beneficially used for municipal and domestic supply, agricultural supply, and industrial service and process supply. Ground water in the lower aquifers is usually of the best quality and quantity.
8. Section 2532(b)(5) of Chapter 15, Division 3, Title 23 of the California Code of Regulations, requires Regional Boards to specify, in Waste Discharge Requirements, the elements of land treatment programs by dischargers who treat or dispose of wastes in land treatment waste management units. The requirements contained in this Order, as they are met, will be in conformance with the goals of Chapter 15 regulations for land treatment units.
9. This project involves an action taken for the protection of the environment and as such is exempt from the provisions of the California Environmental Quality Act (Public Resources

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Code, commencing with Section 21100) in accordance with Section 15321, Chapter 3, Title 14, of the California Code of Regulations.

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

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

IT IS HEREBY ORDERED that the Estate of Albert Levinson DBA Brea Cañon Oil Company, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, shall comply with the following:

A. Waste discharge requirements:

1. Wastes discharged at the Callender and Hellman leases for biodegradation by a land treatment process shall be limited to petroleum-hydrocarbon-contaminated soil and non-hazardous oil/water separator solids from the Callender, Hellman, Joughin, and Torrance leases, as proposed. The land treatment process, which includes nutrients and/or bacterial addition to soil, and soil aeration, shall be conducted in such a way that no contaminants are added to surface water or ground waters.
2. Neither the disposal nor any handling of waste shall cause pollution, or nuisance odor at the individual lease boundaries.
3. No off-site soils shall be imported for treatment at this site unless specifically approved by the Executive Officer. Treated soils may be reused at the Callender and Hellman leases, after achieving specified cleanup values, or at other specific locations following prior written approval by the Executive Officer.
4. The following cleanup limits shall apply for backfill:

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<u>Parameter</u>	<u>Limit</u> (mg/kg)
Total Petroleum Hydrocarbons	
(EPA Method 8015 - Diesel and C ₄ -C ₂₈ HC Scan)	1,000
(EPA Method 8015 - Gasoline)	100
(EPA Method 8015 - Condensate)	100
Aromatic Volatile Organic Compounds (VOCs)	
Benzene	0.30
Toluene	1.22 ¹
Ethylbenzene	0.84 ¹
Xylene	0.49 ¹
Semi-Volatile Organic Compounds	Non-detect ²

5. The following additional cleanup limits shall apply for backfill of treated oil/water separator solids:

<u>Parameter</u>	<u>Limit</u> (mg/kg)
CAM Metals	
Arsenic	50
Chromium	560
Chromium VI	5
Lead	50
Mercury	20
Nickel	134
Selenium	100
Zinc	250

6. Adequate facilities shall be provided to divert away from the treatment area all storm water runoff.
7. The treatment area shall be bermed in such a way that storm water falling directly on the treatment area will be contained. Standing water within the contained treatment area shall be pumped down and removed to

¹ Limits based on the August 1994 draft attenuation factor method using an attenuation factor of 29. The site has generally 110 feet of sand, and 20 feet of silt above ground water at 135 feet below ground surface.

² Non-detect at the practical quantification limits of detection for each compound.

treatment facilities on site or disposed of at a legal disposal site. For the purpose of this requirement, a legal point of disposal is defined as one for which waste discharge requirements have been established by a California Regional Water Quality Control Board and which is in full compliance therewith.

B. Provisions:

1. This Order includes "Standard Provisions Applicable to Waste Discharge Requirements". If there is any conflict between provisions stated herein and the "Standard Provisions Applicable to Waste Discharge Requirements", these provisions stated herein will prevail.
2. A copy of these requirements shall be maintained at the discharger's on-site office and be available at all times to operating personnel.
3. In the event of any change in name, ownership, or control of these facilities, the discharger shall notify this Board in writing and shall notify the succeeding owner or operator of the existence of this order by letter, a copy of which shall be forwarded to the Board.
4. The discharger must notify this Board by telephone within 24 hours, followed by written notification within one week, in the event they are unable to comply with any of the conditions of this Order due to:
 - a. Breakdown of waste treatment equipment,
 - b. Accidents caused by human error or negligence,
 - c. Other causes such as acts of nature, or
 - d. Oil Lease operations.
5. At least 180 days prior to closure of the waste management units the discharger shall submit operation plans for precipitation and drainage controls, any required cover, a closure and post-closure maintenance plan acceptable to the Executive Officer as set forth in Article 5 and Sections 2581, 2594 through 2597 of Chapter 15, Title 23, California Code of Regulations.

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6. In accordance with Section 13260 of the California Water Code, the discharger shall file a report with this Regional Board of any material change or proposed change in the character, location or volume of the discharge.
7. In accordance with Section 13267 of the California Water Code, the discharger shall furnish, under penalty of perjury, technical monitoring program reports; such reports shall be submitted in accordance with specifications prepared by the Executive Officer. The specifications are subject to periodic revisions as may be warranted.
8. The Regional Board and other authorized representative shall be allowed:
 - a. Entry upon premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order;
 - b. Access to copy any records that are kept under the conditions of this order;
 - c. To inspect any facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this order; and
 - d. To photograph, sample, and monitor for the purpose of assuring compliance with this Order, or as otherwise authorized by the California Water Code.
9. In accordance with Section 13263 of the Water Code, these waste discharge requirements are subject to periodic review and revision by this Regional Board.
10. These requirements do not exempt the discharger from compliance with any other laws, regulations, or ordinances which may be applicable. They do not legalize these waste treatment and disposal facilities and they leave unaffected any further restraints on those

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facilities that may be contained in other statutes or
required by other agencies.

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 September 26, 1994.



ROBERT P. GHIRELLI, D.Env.
Executive Officer

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. CI 7440

FOR

THE ESTATE OF ALBERT LEVINSON
DBA BREA CAÑON OIL COMPANY
(Dominguez Hills and Wilmington Oil Fields,
Los Angeles County, California)

(FILE NO. 92-32)

The Estate of Albert Levinson DBA Brea Cañon Oil Company shall implement this Monitoring and Reporting Program on the date of issuance of the Waste Discharge Requirements.

The first monitoring report under this program is due on January 15, 1995, for the fourth quarter 1994. Subsequent quarterly progress and monitoring reports shall be submitted by the date in the following schedule:

<u>Reporting Period</u>	<u>Report Due</u>
January - March	April 15
April - June	July 15
July - September	October 15
October - December	January 15

I. GROUND WATER MONITORING

The land treatment activity specified in these waste discharge requirements are not expected to impact the quality of ground water identified at least 135 feet below ground surface. Therefore, ground water monitoring is not a part of these waste discharge requirements.

II. LAND TREATMENT FACILITY SOIL MONITORING

A soil sampling grid shall be established for the land treatment units (LTUs) and the sampling locations shall be located where representative soil samples can be obtained. Soil samples shall be collected and analyzed for the following Parameters:

<u>Parameter</u>	<u>Unit</u>	<u>Frequency</u> ¹
Bacteria Plate Count	Colonies/gm	Quarterly
Soil Moisture content	%	Quarterly
Total Petroleum Hydrocarbons (EPA Method 8015-Gasoline, EPA Method 8015-Diesel, EPA Method 8015-Condensate, and EPA Method 8015-C ₄ to C ₂₈ Hydrocarbon Scan)	mg/kg	Quarterly

Priority Pollutants

Volatile Organic Compounds (EPA Method 8240 or EPA Methods 8010/8020)	µg/kg	As described ²
Semivolatile Organic compounds (EPA Method 8270)	mg/kg	As described ²
CAM Metals	mg/kg	As described ²

III. GENERAL PROVISIONS FOR SAMPLING AND ANALYSIS

- A. All chemical, bacteriological, and bioassay analyses shall be conducted at a laboratory certified for such analyses by the State Department of Health Services, or approved by the Executive Officer. No changes shall be made in sampling points without prior approval of the Executive Officer.
- C. All verification sampling require 72 hours written and verbal notice to the Board in order for staff to participate in the sampling.

¹ Final verification samples shall be collected from each 550 cubic yards of treated soil at the end of treatment and just prior to removal and reuse. In the event the land treatment of a lift is completed prior to the due date of the first monitoring report, then final verification samples for the lift shall be collected and analyzed in lieu of the sampling frequency of this Order.

² Final verification samples shall be collected from each 1,000 cubic yards of treated material at the end of treatment and just prior to removal and reuse.

IV. SPECIFIC REPORTING REQUIREMENTS

- A. The following technical reports shall be filed with the Regional Board:
1. A work plan and time schedule to characterize all contaminated areas on the Leases must be submitted within 60 days of the adoption of these Waste Discharge Requirements.
 2. The fourth quarter report of each year, beginning in 1994, shall also serve as an annual report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the year. In addition, The discharger shall discuss the compliance record and the corrective actions taken or planned which may be needed to bring the discharge into full compliance with the waste discharge requirements.
 3. A "Final Closure Report" shall be submitted within 30 days of completing all treatment in the land treatment units. This report shall include analyses of soil samples underlying the treatment cells documenting that any contaminants that may have been released during its life have been remediated.
- B. All technical reports submitted shall contain the following minimum information:
1. Quantity of waste material treated during the reporting period.
 2. Analytical results, from:
 - a. Land treatment zone soil sampling,
 - b. Soil monitoring in the excavated areas, and
 - c. If a lift was removed, all data collected during the reporting period verifying that cleanup levels set by the Executive Officer have been met.
 3. Estimated time until completion of the next lift in each LTU and final disposition of any soils removed from the treatment cells during the reporting period.

4. A statement certifying that storm water runoff was prevented from entering the land treatment area, other than rainfall directly on the LTUs, and that no wastes material was carried away from the land treatment area by rainfall runoff.
- C. All technical reports prepared for submittal to the Regional Board shall be signed by either a California registered Civil Engineer, a registered geologist, or certified engineering geologist.
 - D. In reporting the monitoring data, the discharger shall arrange the data in tabular form so that the data, the constituents, and the concentrations are readily discernible. The data shall be summarized to determine compliance with waste discharge requirements and, where applicable, shall include receiving ground water observations. In addition, quarterly monitoring reports shall describe the facility name, location, and location at the facility where any contaminated soil originated (including a site map), verify that all contaminated soil has been removed for land treatment or document the contaminants remaining, and including all soil verification data supporting the nature and extent of removed soil and nature and extent of contaminated soils to remain in place. In addition, the report shall state the volume of contaminated soils placed into each treatment cell.
 - E. For every item where the requirements are not met the discharger shall submit a statement of the actions undertaken or proposed, together with a timetable, to bring the discharge back into full compliance with the requirements at the earliest time.
 - F. Monitoring reports submitted to the Regional Board shall be signed by:
 1. In the case of a corporation, the principal executive officer, at least of the level of Vice President or his duly authorized representative, if such representative is responsible for the overall operation of the facility from which the discharge originates;
 2. In case of a partnership, a general partner;
 3. In case of a sole proprietorship, the proprietor;

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CI NO. 7440

4. In the case of a municipal, state or public facility, either a principal executive officer, ranking elected official, or other duly authorized employee.

Each report shall contain the following completed declaration:

" I declare under penalty of perjury that the foregoing is true and correct.

Executed on the day of _____ at _____

_____ (Signature)

_____ (Title)"

Ordered by

Robert P. Ghirelli
ROBERT P. GHIRELLI, D.Env.
Executive Officer

Date: September 26, 1994