



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

August 4, 2010

Ms. Candice Salway
Plains Exploration & Production Company
5640 South Fairfax Avenue
Los Angeles, CA 90056

REVISED MONITORING AND REPORTING PROGRAM, LAND TREATMENT UNITS, INGLEWOOD OIL FIELD (FILE NO. 00-117, ORDER NO. 01-054, CI-8266)

Dear Ms. Salway:

The Inglewood (Baldwin) Oil Field, covering approximately 1,000 acres in the Baldwin Hills area of the City of Los Angeles, has been operated by Plains Exploration & Production Company (Discharger) since 2002. On August 26, 2008, staff of the Los Angeles Regional Quality Control Board (Regional Board) conducted an inspection of the Inglewood Oil Field in order to evaluate compliance with Regional Board waste discharge requirements (WDRs), as contained in Order No. 01-054 adopted by the Regional Board on April 26, 2001, for three on-site land treatment units (LTUs). Based on inspection results, Regional Board staff concluded that revision of Regional Board Order No. 01-054 was necessary, principally because the groundwater monitoring program associated with the LTUs was deemed ineffective in assessing groundwater contamination, given that the groundwater monitoring network consisted of only one well for the entire facility.

On September 15, 2008, the Discharger was directed by Regional Board staff, pursuant to California Water Code (CWC) section 13260, to submit a report of waste discharge incorporating a revised groundwater monitoring program for WDR Order No. 01-054. This directive expanded on comments provided by Regional Board staff to the Los Angeles County Department of Regional Planning on August 19, 2008, regarding the Draft Program Environmental Impact Report for a proposed Community Standards District for the Inglewood Oil Field. On August 14, 2009, the Discharger submitted a report, titled *Groundwater Monitoring Program, Expanded Monitoring Well Network Workplan* (Workplan), to the Regional Board and proposed to expand the facility monitoring network to target shallow alluvial groundwater in native canyon areas. Regional Board staff approved the proposed groundwater monitoring network on September 14, 2009.

Reference is made to your report titled "*Groundwater Monitoring Program, Operation of Land Treatment Units, Monitoring Well Installation and First Quarter 2010 Groundwater Monitoring Results*" (Report), dated June 7, 2010, for the referenced facility. Regional Board staff has reviewed the Report and determined that it is consistent with provisions of the Workplan. The Report is hereby approved. Attached is a revised monitoring and reporting program for the facility that incorporates requirements for the expanded monitoring network.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Ms. Candice Salway
Plains Exploration & Production Company

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August 4, 2010

Should you have any questions, please contact Dr. Enrique Casas at (213) 620-2299.

Sincerely,

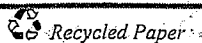


Samuel Unger, P.E.
Interim Executive Officer

Attachment: Revised Monitoring and Reporting Program CI-8266

cc: Justin Campbell, ENTRIX

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

MONITORING AND REPORTING PROGRAM (CI-8266)
FOR
(INGLEWOOD OIL FIELD LAND TREATMENT UNITS)

File No. 00-117

Plains Exploration & Production Company (hereafter "Discharger") shall implement this monitoring and reporting program (Program) immediately.

I. Reporting

A. All reports submitted must be addressed to the Regional Water Quality Control Board, Los Angeles Region, Attention: Information Technology Unit. All monitoring and technical reports shall be referenced to Compliance File No. CI-8266 to facilitate routing to the appropriate staff and file. The name of the Discharger and the reporting period covered by the monitoring report shall be clearly displayed on the cover page.

B. A Petroleum Hydrocarbon Contamination Completion and Land Treatment Completion Report shall be submitted to the Regional Board by the dates in the following schedule:

<u>Reporting Period</u>	<u>Report Due</u>
January - March	April 15
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C. Quarterly reports shall contain a tabular list of the quantities and types of materials deposited at each land treatment unit (LTU), in cubic yards or barrels, for each month of the quarter. Application rates of deposited materials, in barrels/acre or cubic yards/acre shall be calculated for each month and reported. The reports shall also include the results of all the required sampling and analytical data obtained during the quarter.

D. The annual report shall summarize the data obtained during the previous year. In addition, the Discharger shall discuss the compliance record and the corrective actions taken or planned, which may be needed to bring the land treatment unit (LTU) operations into full compliance with the waste discharge requirements.

E. The State Water Resources Control Board (SWRCB) has implemented regulations that require the electronic submittal of information (ESI) for Groundwater Cleanup programs

(Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, California Code of Regulation). Starting on January 1, 2005, electronic submittal of these items and a portable data format (PDF) copy of full reports was extended to include all SWRCB groundwater cleanup programs, including the Land Disposal Program. Because the subject site is regulated under the Land Disposal Program of this Regional Board, the Discharger shall submit all reports required under this Program, including groundwater monitoring data, to the GeoTracker database starting on or before October 15, 2010. Once the Discharger demonstrates mastery of electronic submittal of reports to GeoTracker for the subject site, the Regional Board may waive the requirement for hard copies of submitted reports.

- F. If the Discharger performs analyses for any parameter more frequently than required by this Program, using approved analytical methods, the results shall be included in the monitoring report.
- G. The Discharger may submit additional data to the Regional Board not required by this Program in order to simplify reporting to other agencies.
- H. Within 90 days following completion of the LTU activities at this site, the Discharger shall submit a Final Project Completion Report. This Report shall describe final closure activities at the LTUs in compliance with the applicable regulations contained in Title 27, California Code of Regulations.

II. Land Treatment Unit Monitoring

- A. For each batch of material to be treated, the Discharger shall take a representative initial waste sample and analyze for the following constituents:

<u>Constituent</u>	<u>Units</u>	<u>Minimum Frequency of Analysis</u>
Total petroleum hydrocarbons (EPA Method 8015M)	mg/kg	Every 1,000 cubic yards
Bacteria Plate Count	(colonies/g)	Every 1,000 cubic yards

- B. At the end of each treatment cycle, the Discharger shall take a representative sample of treated material and sample and analyze for the following constituents:

<u>Constituent</u>	<u>Units</u>	<u>Minimum Frequency of Analysis</u>
Total petroleum hydrocarbons (EPA Method 8015M)	mg/kg	Every 1,000 cubic yards
Nitrate	mg/kg	Every 1,000 cubic yards

Nitrite	mg/kg	Every 1,000 cubic yards
Ammonia	mg/kg	Every 1,000 cubic yards
Ortho-Phosphate	mg/kg	Every 1,000 cubic yards
Lead (STLC)	mg/l	Every 1,000 cubic yards
VOCs & Semi-VOCs (EPA Method 8020/8270)	µg/kg	Every 1,000 cubic yards

III. Groundwater Monitoring

- A. Quarterly monitoring of groundwater shall be performed at the site and results shall be reported pursuant to the schedule in provision I.B.
- B. Routine groundwater monitoring at monitoring wells MW-3, MW-4A, MW-4B, MW-4C, MW-5, MW-6, and MW-7 shall consist of the following analytes:

<u>Constituent</u>	<u>Units</u>	<u>Minimum Frequency of Analysis</u>
Groundwater elevation	-	Quarterly
pH Units	pH Units	Quarterly
Total dissolved solids	mg/l	Quarterly
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Barium	mg/L	Quarterly
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Cobalt	mg/L	Quarterly
Copper	mg/L	Quarterly
Lead	mg/L	Quarterly
Zinc	mg/L	Quarterly
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Ethylbenzene	µg/L	Quarterly
Toluene	µg/L	Quarterly
Xylenes	µg/L	Quarterly
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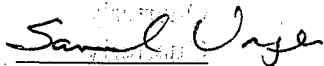
- C. All analyses shall be conducted at a laboratory certified for such analyses by the State Department of Public Health Environmental Laboratory Accreditation Program, or approved by the Executive Officer. Laboratory analyses must follow methods approved by

the United States Environmental Protection Agency (EPA), and the laboratory must meet EPA Quality Assurance/Quality Control criteria.

- D. For any analyses performed for which no procedure is specified in the EPA guidelines, or in this Order, the constituent or parameter analyzed, and the method or procedure used, must be specified in the report.
- E. Analytical data reported as "less than" shall be reported as less than a numeric value, or below the limit of detection, for that particular analytical method.
- F. The monitoring report must also include the following:
1. Sampling protocol and analytical methods used;
 2. If any required samples were omitted during the reporting period, a statement to that effect shall be made and reasons given for any omission;
 3. An evaluation of the results of the testing signed by a California registered geologist or professional engineer.
 4. Monitoring reports shall be signed by a principal executive officer at the level of vice-president or above, or by his/her duly authorized representative, if such representative is responsible for the overall operation of the facility from which the discharge originates. Any person signing a document under this section shall make the following certification:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment".

Ordered by:


Samuel Unger, P.E.
Interim Executive Officer

Date:

August 4, 2010

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

**MONITORING AND REPORTING PROGRAM (CI-8266)
FOR**

(INGLEWOOD OIL FIELD LAND TREATMENT UNITS)

File No. 00-117

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Lead	mg/L	Quarterly
Zinc	mg/L	Quarterly
Benzene	µg/L	Quarterly
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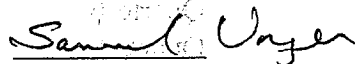
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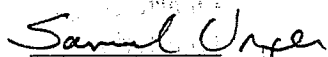
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