
From: Chen, Jau Ren@Waterboards
Sent: Wednesday, September 14, 2016 2:14 PM
To: Steven Johnson
Cc: Rita Kampalath; James Alamillo; Hung, David@Waterboards; Owens, Cassandra@Waterboards
Subject: RE: Comments: Tentative TSO Amending NPDES Permit, Inglewood Oil Field

Hi Steven:

Thank you for your comments. To address your concerns, we requested calcifications from the Discharger. The following are information provided by the Discharger.

We would like to discuss these issues over the phone around 3:00 pm this afternoon. If you are not available at that time, please let us know when is the good time to call you. We need to issue this TSO amendment by tomorrow (the expiration date of the current TSO). We appreciate your prompt response to this email. Thanks.

1.0 Treatment System Design and Testing

In developing designs for treatment systems that would be field-tested, FM O&G commissioned extensive testing and modeling to establish design parameters, expected field conditions, and expected performance of alternative systems. The work was initiated in 2014 and is ongoing. Although a significant amount of work has been conducted at the desktop level, including modeling efforts, the heterogeneous characteristics of the stormwater runoff, suspended sediments, and treatment system designs require field testing and validation during actual storm conditions, as described in our request for an amended TSO. The studies that have been conducted include the following:

Design parameters

1. Extensive field testing to identify sources of metals on the field that may contribute to stormwater runoff. Conclusion was that there are no particular sources from field operations, and that background concentrations in soils, including atmospheric deposition of vehicle brake dust and other regional contributions, are likely contributors but out of the field's control. Based on last year's performance we find that modeling would not add any value and real time actual condition weather is needed as we have commented to the Board in the past.
2. Grain size analysis of sediments to be treated, testing of what size fractions may preferentially retain metals, and correlation of deposited sediments in the basins with discharge concentrations measured in the compliance sampling. Conclusion was that the sediments are exceptionally fine grained, and that there is no preferential size that retains metals.
3. Hydrologic and hydraulic characterization of field topography, and numerical modeling of runoff volumes expected to each basin, based on a range of design storm events. Modeling of retention times of each basin under these scenarios, and basin volumes.

Treatment System Modeling and Bench Scale Testing

1. Use by treatment system vendors of turbid water samples from the field to conduct bench scale tests of treatment system alternatives, use of proprietary system models to predict performance, consideration of methods to enhance particle agglomeration and settling, and types of filters.

2. Sending design parameters to three vendors to obtain further recommendations for potential treatment system alternatives that may be suitable for use at the field.

Field Testing of Treatment System Performance

1. Evaluation of using field measurements of turbidity as a surrogate for the laboratory metals analysis in evaluating system performance real-time
2. Installation of alternative designs at the field, and testing system operation during storm events. Field conditions are heterogeneous and not fully amenable to bench testing and modeling alone.
3. Modification of field installations based on the results of field testing. This activity is ongoing and requires storm events for testing purposes. Note that the discharge is treated during these storms; FM O&G is validating, optimizing, and modifying designs based on the treatment and testing.

2.0 Field Landscaping

Landscaping improvements at the oil field began in 2007 at the intersection of Stocker Street and Fairfax Avenue. Subsequently with the adoption of the Baldwin Hills Community Standards District (CSD) in 2008, a Seven Phase Landscaping Plan was set forth. The overall Landscaping Plan was developed to be consistent with the conceptual plan prepared by Mia Lehrer & Associated (per the CSD requirement), and with input from the surrounding homeowners groups and the Community Advisory Panel (CAP).

The seven phase plan includes by way of implementation, the west side of La Brea Avenue (between Stocker Street & Slauson Avenue, Phase 2), Ladera Crest (north of the Lewis Homes, Phase 1), the east and west sides of Las Cienega Blvd., (north of Stocker Street and south of our overpass, Phases 4 and 5), Fairfax Avenue (between Stocker Street and the soccer fields, Phase 6), Stocker Street (between La Brea Avenue and Las Cienega Blvd., Phase 7), and the east side of Las Cienega Blvd. (south of Stocker Street, Phase 3). Presently four of the seven phases have been completed (Phases 1, 2, 4, and 5), and Phase 6 will be completed in 2016.

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From: Steven Johnson [mailto:sjohnson@healthebay.org]
Sent: Monday, September 12, 2016 10:57 AM
To: Chen, Jau Ren@Waterboards; WB-RB4-losangeles
Cc: Rita Kampalath; James Alamillo
Subject: Comments: Tentative TSO Amending NPDES Permit, Inglewood Oil Field

Mr. Chen,

Please find Heal the Bay's comments regarding Inglewood Oil Field's Tentative TSO amending their NPDES Permit attached. Please write back if you have any questions.

Thank you,

Steven



STEVEN JOHNSON | WATER RESOURCES POLICY ANALYST

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