

1/11/2016

Los Angeles Regional Water Quality Control Board
Attn: Adam Taing
320 West Fourth Street
Suite 200
Los Angeles, CA 90013

Via email: adam.taing@waterboards.ca.gov

Re: AMENDED REPORT AND SUBMITTAL

Investigative Order No. R4-2015-0304

Report on Disposal of Fluids from Oil and Gas Operations for The Termo Company Operations in Los Angeles and Ventura County

Dear Mr. Taing –

The purpose of this letter is to follow-up on our field meeting of March 14th, 2016 at Termo's San Gabriel Lease in the Seal Beach Oil Field located at 6301 East Pacific Coast Highway in Long Beach. This letter provides additional information as requested by you during that meeting and amends my original submittal to the RWQCB of January 11th, 2016.

The letter is being amended with the following information:

1. Termo has an active poured concrete sump for the temporary holding of water. The details are as follows:
 - a. Concrete sump is located within our oil and gas production facility and is connected with our tanks and separation system.
 - b. Concrete sump is poured in place concrete 25' L x 7' W x 9' D x 8" thick and the interior is coated with an epoxy sealant.
 - c. During the oil and water separation process, water is drained from the bottom of a nearby tank into the concrete sump. Water is then pumped out of the sump and back into the tanks in the facility.
 - d. See Attachment A – AQMD Permit to Operate No. G21239 item #6 and Attachment B – Pictures of the exterior and interior of the concrete sump.
2. Termo is working with RWQCB – Site Cleanup Unit 1 (David Young) to achieve a sign-off and No Further Action (NFA) letter for a legacy drilling fluid sump located near our facilities. The details are as follows:
 - a. SCP No. 0576, Site ID No. 1844800
 - b. Sump disposal was utilized by Chevron or another operator (prior to Termo ownership) for their well drilling or operations in the field.
 - c. Surface and mineral owner proposed developing the property in the early 1990's and jointly with Termo approached the Water Board to provide some regulatory clarity and oversight.

- d. Termo and the property owner entered into a joint agreement with the RWQCB and began *in situ* remediation of soil along with soil vapor analysis and ground water monitoring.
- e. Site was determined to be clean and contaminants below regulatory thresholds by about 2001.
- f. Termo tried multiple times to communicate with RWQCB and get NFA without response by the RWQCB.
- g. Since mid-2015 Termo has been communicating with Site Cleanup Unit personnel David Young and is developing a work plan at RWQCB request to reassess the situation at the legacy site. The work plan is currently in development and will be submitted for Mr. Young's approval by May 16th, 2016

Please let me know at your earliest convenience if this letter and attachments provides the information you are seeking. We remain committed to working with the RWQCB to satisfy the information request. Please feel free to contact me at any time at via email ralphc@termoco.com or phone (562) 279-1955.

Sincerely -



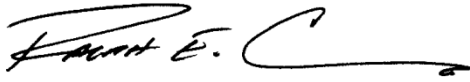
Ralph Combs
Manager, Corporate Development
The Termo Company

Encl.

Statement of Certification

Pursuant to California Water Code section 13267, subdivision (b)(1)

I, Ralph E. Combs, 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 the 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.



Ralph E. Combs
Manager, Corporate Development
The Termo Company

March 24, 2016

Date

Attachment A – AQMD Permit for Sump



PERMIT TO CONSTRUCT/OPERATE

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301.f) is not received by the expiration date, contact the District.

Legal Owner
or Operator:

THE TERMO CO
P O BOX 2767
LONG BEACH, CA 90801-2767

ID 76065

Equipment Location: 6301 PACIFIC COAST HWY, LONG BEACH, CA 90803

Equipment Description :

CRUDE OIL/GAS/WATER SEPARATION AND WASTE WATER TREATMENT SYSTEMS CONSISTING OF:

1. FREE WATER KNOCKOUT, 6' DIA. X 32' - 7" L., PRESSURE VESSEL, VENTED TO VAPOR RECOVERY COMPRESSOR.
2. WASH TANK, #25673, 15'-4-5/8" X. 16'-0" H., CAPACITY 500 BBL, FIXED ROOF, VENTED TO VAPOR RECOVERY COMPRESSOR.
3. STOCK TANK, 22' DIA. X 8' H., CAPACITY 500 BBL, FIXED ROOF, VENTED TO VAPOR RECOVERY COMPRESSOR.
4. STOCK TANK, 15' DIA. X 8' H., CAPACITY 250 BBL, FIXED ROOF, VENTED TO VAPOR RECOVERY COMPRESSOR.
5. SPHERICAL BALL TRAP (TEST TRAP), 41" DIA.
6. WASTE WATER SUMP PIT, CONCRETE LINED, 25' L. X 7' W. X 9' D., CLOSED TOP, CONNECTED TO VAPOR RECOVERY COMPRESSOR.
7. TWO (2) WASTE WATER TANKS, EACH 12' DIA. X 15' H., CAPACITY 300 BBL, FIBERGLASS, VENTED TO VAPOR RECOVERY COMPRESSOR.
8. THREE (3) CHEMICAL TANKS.
9. SHIPPING/REJECT PUMP, CENTRIFUGAL WITH A 5 H.P. ELECTRIC MOTOR.
10. WASTEWATER PUMP, CENTRIFUGAL, WITH A 3 H.P. ELECTRIC MOTOR AND A SPARE PUMP, WITH A 5 H.P. ELECTRIC MOTOR.
11. SAMPLE PUMP, CENTRIFUGAL, WITH A 1 H.P. ELECTRIC MOTOR.
12. TWO (2) CHEMICAL INJECTION PUMPS, CENTRIFUGAL, WITH 1/2 H.P. ELECTRIC MOTORS.
13. SUMP PUMP, CENTRIFUGAL, WITH A 3 H.P. ELECTRIC MOTOR.

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PERMIT TO CONSTRUCT/OPERATE

14. CHARGE PUMP, CENTRIFUGAL, WITH A 15 H.P. ELECTRIC MOTOR.

Conditions :

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. TANKS' GAUGING AND SAMPLING HATCHES SHALL BE CLOSED AT ALL TIMES EXCEPT DURING GAUGING AND SAMPLING OPERATION.
4. THE WASH TANKS, STOCK TANKS, SUMP PIT AND WASTE WATER TANKS SHALL NOT BE OPERATED UNLESS THEY ARE CONNECTED TO THE VAPOR COLLECTION SYSTEM WHICH IS IN OPERATION AND WHICH HAS BEEN PERMITTED BY THE EXECUTIVE OFFICER.
5. THE OPERATOR SHALL NOT LOAD MORE THAN 20,000 GALLONS OF CRUDE OIL IN ANY ONE DAY INTO ANY TANK TRUCK, TRAILER, OR RAILROAD TANK CAR.
6. THIS EQUIPMENT SHALL COMPLY WITH THE APPLICABLE REQUIREMENTS OF RULES 462, 463, 1113, 1148.1, 1173 AND 1176.
7. RECORDS TO DEMONSTRATE COMPLIANCE WITH ABOVE CONDITIONS AND THOSE RECORDS REQUIRED BY RULES 462, 463, 1113, 1148.1, 1173 AND 1176 SHALL BE MAINTAINED IN A FORMAT APPROVED BY THE EXECUTIVE OFFICER AND KEPT ON FILE FOR A MINIMUM OF TWO YEARS AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

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PERMIT TO CONSTRUCT/OPERATE

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR COPY SHALL BE POSTED ON OR WITHIN 8 METERS OF THE EQUIPMENT.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT CANNOT BE CONSIDERED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF OTHER GOVERNMENT AGENCIES.

EXECUTIVE OFFICER

By Dorris M. Bailey/RC04

10/30/2012

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Attachment B – Pictures of Concrete Sump



WASH T

DANGER
CRUDE OIL

