

1 AMY E. GAYLORD (SBN 217553)
PILLSBURY WINTHROP SHAW PITTMAN LLP
2 50 Fremont Street
San Francisco, CA 94105
3 Telephone: (415) 983-1000
Facsimile: (415) 983-1200
4 E-mail: amy.gaylord@pillsburylaw.com

5 Attorneys for Petitioner,
CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY

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STATE WATER RESOURCES CONTROL BOARD

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11 In the Matter of the California Regional
Water Quality Control Board – Los Angeles)
12 Region Requirement to Provide a Technical)
Report on Soil and Groundwater)
13 Investigation (California Water Code Section)
13267 Order) Directed to “ConocoPhillips)
14 Company”; 76 Service Station, 1025 E.)
Carson Street, Carson, California (UST Case)
15 No. I-02903)

**CHEVRON ENVIRONMENTAL
MANAGEMENT COMPANY’S
PETITION FOR REVIEW,
REQUEST FOR HEARING, AND
REQUEST FOR STAY**

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1 **I. PETITION FOR REVIEW.**

2 Pursuant to Section 13267 of the California Water Code and Section 2050 of
3 Title 23 of the California Code of Regulations (“CCR”), Chevron Environmental
4 Management Company (“EMC”) (“Petitioner”)¹ petitions the State Water Resources
5 Control Board (“State Board”) to review the April 26, 2011 action of the California
6 Regional Water Quality Control Board, Los Angeles Region (“Regional Board”) in issuing
7 the order entitled “*Requirement to Provide Technical Report on Soil and Groundwater*
8 *Investigation (California Water Code Section 13267) Directed To ‘ConocoPhillips*
9 *Company’ 76 Service Station 1025 E. Carson Street, Carson, California (UST Case No. I-*
10 *02903).*” Hereafter, this April 26, 2011 directive is referred to as the “Order.” A true and
11 correct copy of the Order is attached as Exhibit 1 to the declaration of Amy E. Gaylord,
12 concurrently submitted in support of this Petition (hereafter “Gaylord Decl.”).

13 Additionally, Pursuant to Section 13320 of the California Water Code and Section
14 2053 of Title 23 of the California Code of Regulations, Petitioner requests that an order be
15 issued staying the effect of the Order, and requests a hearing on this Petition.

16 **A. NAME, ADDRESS, TELEPHONE NUMBER AND EMAIL ADDRESS**
17 **OF PETITIONER.**

18 Petitioner is Chevron Environmental Management Company
19 Attn: Mr. A. Todd Littleworth
20 Chevron Corporation - Law Department
21 6001 Bollinger Canyon Road
22 San Ramon, CA 94583
23 Telephone: (925) 842-9159
24 Email: TLittleworth@chevron.com
25

26 ¹ This site is subject to a contractual agreement between Chevron EMC and
27 ConocoPhillips, whereby going forward, Chevron EMC will be responsible for
28 remediation of the historical releases at the site, including the existing LUST case and any
actions required by this Order. See Declaration of Amy E. Gaylord, ¶ 3.

1 Petitioner requests that copies of all communications and documents relating to this
2 Petition also be sent to:

3 Amy E. Gaylord, Esq.
4 Pillsbury Winthrop Shaw Pittman LLP
5 50 Fremont Street
6 San Francisco, CA 94105-2228
7 Telephone: (415) 987-7262
8 Email: amy.gaylord@pillsburylaw.com

9 B. **THE SPECIFIC ACTION OF THE REGIONAL BOARD THAT THE**
10 **STATE BOARD IS REQUESTED TO REVIEW.**

11 Petitioner seeks rescission of the directives contained in the Regional Board's April
12 26, 2011 Order which are vague, ambiguous, overly broad and duplicative of other
13 Regional Board orders. Specifically, Petitioner seeks rescission of the Order insofar as it
14 attempts to require it to: (1) investigate a service station that has already been extensively
15 investigated pursuant to an open Regional Board Leaking Underground Storage Tank
16 ("LUST") case and is not reasonably considered a potential source of the petroleum release
17 in the Dominguez Channel; and (2) investigate the undefined "Site," which presumably is
18 intended to encompass the Dominguez Channel and properties in the vicinity, none of
19 which Petitioner owns or operates, and over which it has no control or right of access.

20 The Order exceeds the scope of the Regional Board's investigatory authority under
21 Water Code section 13267 because the burden of the directive does not bear a reasonable
22 relationship to the need for the work directed or the benefits to be gained by it, and because
23 the Order is not supported by adequate evidence. *See* Cal. Wat. Code § 13267 (b)(1).

24 C. **THE DATE ON WHICH THE REGIONAL BOARD ACTED OR**
25 **FAILED TO ACT.**

26 The Regional Board acted on April 26, 2011 when it issued the Order.

27 D. **STATEMENT OF REASONS THE ACTION OR INACTION WAS**
28 **INAPPROPRIATE AND IMPROPER.**

1. **History of the Order.**

1 In January 2011, a petroleum release from the bottom of the Dominguez Channel
2 was discovered. On April 26, 2011, the Regional Board issued Orders² to “Chevron
3 Pipeline”, Chevron Environmental Management Company, ConocoPhillips Company,
4 Crimson Pipeline, Shell Oil Products US, Tesoro Corporation, Prowell Family Trust, and
5 BP Pipelines, naming them as potentially responsible parties for approximately 13 different
6 “petroleum facilities” in the vicinity of the Dominguez Channel. *See* Gaylord Decl., Ex. 1.
7 The facilities for which these entities are responsible include current and former service
8 stations, various pipelines, a former air harbor facility and an active petroleum terminal,
9 among others. *Id.* Several of these facilities are already under unrelated Regional Board
10 orders. *Id.*

11 The Order requires the recipients to submit:

12 1. By June 8, 2011, a work plan to delineate the vertical and lateral
13 extent of petroleum impact in the vicinity of the release. The work plan
14 shall be prepared with the intent of determining (1) the extent of petroleum
15 impact from the Site and (2) if your facility has contributed to the Release in
16 the Dominguez Channel. The work plan shall place an emphasis on
17 expedient groundwater delineation but shall also include plans to delineate
18 soil and soil gas impacts. The work plan shall propose initial sampling
19 locations, describe proposed sampling and analysis techniques, provide a
20 proposed timeline for activities, and include provisions for follow-up work
21 in the event the proposed work does not sufficiently define the extent of
22 impact.

23 2. After Approval by the Regional Board Executive Officer, implement
24 the work plan and report results in accordance with the approved work plan
25 schedule.

26 *Id.* The Order does not define the term “Site.”

27 The Order states that the work it directs is necessary “to determine (1) the extent of
28 petroleum impact beneath and near the ongoing release in the Dominguez Channel,
approximately 400 feet south of Carson Street in Carson, California and (2) whether your
facility has contributed to the petroleum release.” *Id.* The Order represents that the
evidence justifying the burden imposed by it is the “operation of a petroleum facility near

29 ² Petitioner has not seen the text of the orders to all of the other recipients, but presumes
30 they are the same.

1 the release site.” *Id.* In addition, a table attached to the Order, entitled “Recipients of CWC
2 Section 12367 Orders Associated with a Petroleum Release Near Carson Street in the
3 Dominguez Channel,” purports to explain the “Basis for Order” as it pertains to each of the
4 recipients. *Id.* However, the information contained in the table with regard to the 76
5 Station includes references to data, with no citation as to the source of the data referenced.
6 *Id.* Presumably the data referenced was intended to be the maximum on-site concentrations
7 of petroleum constituents detected, however Petitioner cannot reasonably determine where
8 the data contained in the table originated. Declaration of Ian Robb (“Robb Decl.”) at ¶ 2.

9 On May 13, 2011, the Regional Board held a meeting in Los Angeles with the Order
10 recipients. According to information presented by the Regional Board project manager for
11 the Order, Greg Bishop, petroleum was discovered “daylighting” from the bottom of the
12 Dominguez Channel in January 2011. See Gaylord Decl., Ex. 3 at 3. Since then, Los
13 Angeles Department of Water and Power (“LADPW”), the owner and operator of the
14 Channel, has been undertaking capture activities in the Channel. *Id.* at 5. Apparently, only
15 very limited sampling of the petroleum product found in the Channel has been conducted.
16 According to the Regional Board, data indicate that the product found in the seep is refined
17 petroleum, likely a gasoline and/or jet fuel range hydrocarbon. *Id.* at 22-24. An additional
18 source of petroleum to the Channel from what appears to be a distinct petroleum product
19 has been detected in subdrain piping running in the levees along the sides of the Channel.
20 *Id.*

21 On May 17, 2011, the Regional Board issued a Cleanup and Abatement Order
22 (“CAO”) to the Los Angeles Department of Public Works (“DPW”), directing it to “assess,
23 monitor, cleanup the waste, and abate the effects of the ongoing discharge of LNAPL and
24 other wastes within the Dominguez Channel, approximately 400 feet south of Carson Street
25 in Carson, California.” Gaylord Decl. Ex. 4.

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1 2. The 76 Station.

2 The Order was issued as the result of the discovery of LNAPL in the Dominguez
3 Channel. The subject site is located approximately 450 feet from the Channel. Robb Decl.

4 ¶ 3. Groundwater monitoring has been performed at the site since 1992. In order for
5 LNAPL to travel to the Channel, one would expect to see an onsite accumulation
6 (thickness) greater than has historically been observed in the monitoring wells at this
7 station. *Id.* Moreover, although LNAPL is currently present onsite it was only measured
8 in well MW9 at 0.01 ft during the 2nd half 2010 monitoring event and has not been
9 measured at a thickness greater than 0.03 ft since 1996. LNAPL has only been sporadically
10 measured in well MW1, located between MW2 and MW9, during 18 years of monitoring.
11 Robb Decl. ¶ 4. In sum, the existing data does not support the conclusion that the 76
12 Station is a source of the petroleum found in the Channel. *See*
13 <http://geotracker.swrcb.ca.gov/profile_report.asp?global_id=T0603702871>.

14 3. The "Site".

15 In addition to investigating its facility and any offsite impacts from it, the order
16 directs Petitioner to investigate some undefined "Site." As explained during the meeting
17 with the Regional Board, the assessment goals of this Order are:

- 18 1. Physical subsurface sampling to fully delineate soil, *groundwater* and
19 soil gas impact around petroleum infrastructure and the Dominguez
20 Channel (including the connection to subdrain systems and the bottom of
21 the channel).
22 • LNAPL
23 • Other petroleum (dissolved phase, soil gas, etc.)
24 • Other contaminants (?)
25 • Full lateral and vertical extents
26 • Connection to bottom of channel
27 • Connection to subdrains
28 • Transport along subdrains
29 2. Gain an understanding of the subsurface conditions delivering LNAPL to
30 the channel bottom and the levee subdrains.
31 3. Determine whether individual petroleum infrastructures are contributing
32 to the Dominguez Channel release.
33 4. Complete sufficient assessment to design a remediation approach.

- 1 5. Collaborate to improve efficiency to achieve Goals 1 to 4.
2 • Faster results
3 • Better results
4 • Lower Costs

5 Gaylord Decl., Ex. 3 at 27-39 (emphasis in original). Petitioner understands the Regional
6 Board's goals, in combination with the vague language of the Order, to require the Order
7 recipients to investigate and delineate the scope of impacts in some undefined area *in and*
8 *near the Channel itself*, despite having ordered LADPW to clean up and abate any ongoing
9 releases at the Channel, and despite the fact that LADPW is the owner and operator of the
10 Channel and the only entity involved with control or access to the Channel.

11 4. **The Burden of the Order is Not Justified In Light of the**
12 **Limited/Non-Existent Benefits to Be Gained by It.**

13 Due to the vague nature of the Order, it is not clear what Petitioner is expected to do
14 to comply with it. It appears that the Regional Board expects Petitioner to prepare a new
15 work plan and conduct further investigation of the 76 Station site, as well as some
16 unidentified area in the vicinity of, and including, the Dominguez Channel. The cost and
17 burden of preparing such a work plan is disproportionate to the need and benefits to be
18 gained by the report. California Water Code Section 13267(b)(1) states, in part: "The
19 burden, including costs, of these [technical] reports shall bear a reasonable relationship to
20 the need for the report and the benefits to be obtained from the reports." Moreover,
21 evidence from old investigations that does not support continuing investigation
22 requirements, is not a valid basis for an investigatory Order pursuant to Water Code section
23 13267. *See In the Matter of the Petition of Chevron Products Company*, 2004 WL
24 1371359, at 4 (Cal. St. Wat. Res. Bd., Order WQO 2004-2005)(May 20, 2004).

25 The burden imposed by the Order has not been properly justified, in light of the
26 following:
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- 1 • The 76 Station is currently under oversight of the Regional Board’s UST
2 program and any work done pursuant to this Order may conflict, duplicate or
3 repeat work already completed;
- 4 • Data from the 76 Station indicate that it is unlikely to be a source of the
5 release in the Dominguez Channel;
- 6 • If Petitioner were to attempt to comply with the Order, it would be under
7 two distinct regulatory orders from the same agency. Petitioner is faced with
8 potentially conflicting, or at a minimum, duplicative orders for the service
9 station site;
- 10 • The Order demands Petitioner submit a work plan to investigate the release
11 in the Dominguez Channel, which is vague and infeasible. It also is
12 duplicative in light of the fact that it already issued a cleanup and abatement
13 order to the rightful party – the owner and operator of the Channel – to do
14 the more than just investigate, but to also cleanup and abate the release; and
- 15 • Petitioner does not own, operate or have access – other than to the service
16 station site – to the area of the Dominguez Channel, including the Channel
17 itself.

18 The Order does not meet the requirement of Water Code section 13267 that the need for the
19 work required bear a “reasonable relationship” to the burden of completing it and exceeds
20 the Regional Board’s authority under Water Code section 13267.

21 E. **THE MANNER IN WHICH THE PETITIONER IS AGGRIEVED.**

22 The requirement to prepare a work plan to investigate a service station already
23 under Regional Board jurisdiction aggrieves Petitioner because it is vague, overly broad,
24 fails to consider work already done by Petitioner under an existing LUST case under the
25 Regional Board’s oversight, is not justified in light of current data which the Order fails to
26 consider, requires investigation of properties outside the scope of Petitioner’s control, and
27 duplicates/conflicts with directives to Petitioner and other parties. The Order demands

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1 preparation of a work plan and investigation, which is an unreasonable expense in light of
2 these facts.

3 F. **THE SPECIFIC ACTION BY THE STATE OR THE REGIONAL**
4 **BOARD THAT PETITIONER REQUESTS.**

5 Petitioner requests that the State Board rescind the Order. Petitioner will comply
6 with reasonable requirements to investigate the 76 Station pursuant to the open LUST case
7 for that site, consistent with the existing data. Petitioner also requests a Stay of the June 8,
8 2011 due date presented in the Order.

9 G. **A STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF**
10 **LEGAL ISSUES RAISED IN THE PETITION.**

11 Petitioner's initial statement of points and authorities is set forth herein above.
12 Petitioner reserves the right to supplement this statement and file additional points and
13 authorities at a future date upon receipt and review of the administrative record and as
14 additional information and evidence is developed.

15 H. **STATEMENT THAT THE PETITION HAS BEEN SENT TO THE**
16 **REGIONAL BOARD AND TO THE DISCHARGER, IF NOT THE**
17 **PETITIONER.**

18 A copy of this Petition has been sent to the Regional Board, and will be transmitted
19 to the other named parties in the Order.

20 I. **STATEMENT THAT THE SUBSTANTIVE ISSUES OR**
21 **OBJECTIONS RAISED IN THE PETITION WERE RAISED**
22 **BEFORE THE REGIONAL BOARD.**

23 This site is subject to a contractual agreement between Chevron EMC and
24 ConocoPhillips, whereby going forward, Chevron EMC will be responsible for remediation
25 of the historical releases at the site, including the existing LUST case and any actions
26 required by this Order. Gaylord Decl. ¶ 3. This transition of site responsibility was
27 occurring at such a time that earlier communication with the Regional Board after receipt of
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1 this Order did not occur. *Id.* Although Petitioner did not substantively communicate with
2 the Regional Board about this site specifically, many of the issues raised herein were raised
3 by other Order recipients and rejected by the Regional Board. *Id.*

4 J. **THE PETITIONER REQUESTS A HEARING ON THE ORDER.**

5 Petitioner requests a hearing on the Order. In support of this request, it makes the
6 following points:

7 (1) A summary of the arguments that Petitioner wishes to make at the
8 hearing is provided in the Petition above.

9 (2) A summary of the testimony or evidence the petitioner wishes to
10 introduce is provided in the Petition above, including all documents referenced in this
11 Petition, although Petitioner may supplement the testimony or evidence at the hearing.

12 II. **REQUEST FOR STAY ORDER.**

13 Petitioner requests a stay of the Order pending resolution of the issues raised in this
14 Petition. This stay request is based on the accompanying declarations of Amy E. Gaylord
15 and Ian Robb that demonstrate (1) substantial harm to the Petitioner if a stay is not granted;
16 (2) a lack of substantial harm to other interested persons and to the public interest if a stay
17 is granted; and (3) substantial questions of fact or law regarding the disputed action.

18 A. **LEGAL GROUNDS FOR A STAY.**

19 Pursuant to section 2053 of the State Board's regulations (23 CCR § 2053), a stay of
20 the effect of an order shall be granted if the petitioner shows:

21 (1) Substantial harm to petitioner or to the public interest if a stay is not
22 granted;

23 (2) A lack of substantial harm to other interested parties and to the public
24 if a stay is granted; and

25 (3) Substantial questions of fact or law regarding the disputed action
26 exist.

27 These requirements are met in this case.

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1 1. **Petitioner Will Suffer Substantial Harm if a Stay Is Not Granted.**

2 Petitioner challenges the Order on the grounds that the Regional Board does not
3 meet the burden required under California Water Code Section 13267 to show that the need
4 and benefits of a work plan outweigh the significant costs to be incurred in its preparation.

5 The Order requires the submittal of a work plan to evaluate a service station
6 property that already has been investigated under an unrelated Regional Board case, as well
7 as some undefined "Site." The cost of submitting and implementing a work plan to
8 investigate the overly broad and undefined area in the vicinity of, and including, the
9 Dominguez Channel is presently incalculable, but given the apparent breadth of the Order
10 could potentially total several millions of dollars or more. These costs are unjustified given
11 the existence of the existing order for the site, and the data collected there to date. As a
12 result, these costs should be deemed unnecessary when the State Board acts on the Petition,
13 rendering the expenditure of money, time and resources to comply in the meantime a costly
14 exercise in futility. However, if Petitioner declines to expend money, time and resources in
15 an effort to produce a work plan for a site it already is investigating, it becomes exposed to
16 significant daily penalties for non-compliance with the Order. If a stay is not granted,
17 Petitioner therefore would be faced with a no-win scenario: expend substantial and
18 unnecessary sums to prepare and implement an unnecessary work plan, or face substantial
19 monetary penalties for failure to produce the work plan. Robb Decl. ¶ 5. A stay until a
20 determination is made as to the cleanup goals would solve this problem and save Petitioner
21 from significant and substantial monetary harm. *Id.*

22 2. **The Public Will Not Be Substantially Harmed If a Stay Is**
23 **Granted.**

24 As noted, above, Petitioner has conducted significant investigation of the service
25 station site under an open UST case. Current data from the Site does not support the
26 conclusion that the service station is a source of petroleum to the Channel. Moreover,
27 because a Cleanup and Abatement Order was issued to the owner/operator of the
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1 Dominguez Channel, where the release is occurring, to cleanup and abate it, the public will
2 not be harmed by issuance of a stay with regard to the Order to investigate the already
3 investigated service station. Gaylord Decl. Ex. 4.

4 Accordingly, the grant of a stay would not substantially harm the public.

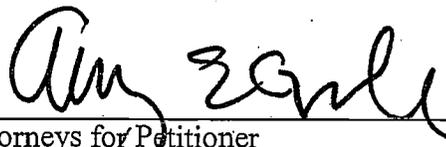
5 3. The Petition Raises Substantial Questions of Law and Fact.

6 As discussed, above, there are significant questions being posed in this case as to
7 whether the Order requiring completion of a work plan meets the burdens established under
8 California Water Code Section 13267. Petitioner disputes the benefit to be derived from
9 and need for any work plan the Regional Board requires in its Order. There are significant
10 issues of fact and law that are sufficient to warrant the granting of a stay.

11 Dated: May 26, 2011.

Respectfully submitted,

12 PILLSBURY WINTHROP SHAW PITTMAN LLP
13 AMY E. GAYLORD
14 50 Fremont Street
San Francisco, CA 94105-2228

15 By: 
16 Attorneys for Petitioner
17 CHEVRON ENVIRONMENTAL MANAGEMENT
18 COMPANY
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PILLSBURY WINTHROP SHAW PITTMAN LLP
2 50 Fremont Street
San Francisco, CA 94105
3 Telephone: (415) 983-1000
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5 Attorneys for Petitioner,
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8 STATE WATER RESOURCES CONTROL BOARD
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11 In the Matter of the California Regional }
Water Quality Control Board – Los Angeles }
12 Region Requirement to Provide a Technical }
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13 Investigation (California Water Code Section }
13267 Order) Directed to “ConocoPhillips }
14 Company”; 76 Service Station, 1025 E. }
Carson Street, Carson, California (UST Case }
15 No. I-02903) }
16 _____

**DECLARATION OF IAN ROBB IN
SUPPORT OF CHEVRON
ENVIRONMENTAL
MANAGEMENT COMPANY’S
PETITION FOR REVIEW,
REQUEST FOR HEARING, AND
REQUEST FOR STAY**

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1 I, Ian Robb, declare and state as follows:

2 1. I am a project manager for Chevron Environmental Management Company
3 (“Petitioner”) with oversight responsibilities for the property involved in the instant action.
4 This declaration is submitted in support of the Petition to the State Board challenging the
5 April 26, 2011 action of the California Regional Water Quality Control Board, Los Angeles
6 Region (“Regional Board”) in issuing the order entitled “*Requirement to Provide Technical*
7 *Report on Soil and Groundwater Investigation (California Water Code Section 13267)*
8 *Directed To ‘ConocoPhillips Company’ 76 Service Station 1025 E. Carson Street, Carson,*
9 *California (UST Case No. I-02903)*” (the “Order”). I am aware of the site conditions at this
10 property and have reviewed the existing site data available for this site. Unless otherwise
11 stated, I have personal knowledge of the matters stated here in and could and would testify
12 competently thereto.

13 2. A table attached to the Order, entitled “Recipients of CWC Section 12367
14 Orders Associated with a Petroleum Release Near Carson Street in the Dominguez
15 Channel,” purports to explain the “Basis for Order” as it pertains to each of the Order
16 recipients. However, the information contained in the table with regard to the 76 Station
17 includes references to data, with no citation as to the source of the data referenced.
18 Presumably the data referenced were intended to be the maximum on site concentrations of
19 petroleum constituents detected; however, I have been unable to determine where the data
20 contained in the table originated.

21 3. The subject site is located approximately 450 feet from the Channel.
22 Groundwater monitoring has been performed at the site since 1992. In order for LNAPL to
23 travel to the Channel, one would expect to see an onsite accumulation (thickness) greater
24 than has historically been observed in the monitoring wells at this station.

25 4. Although LNAPL is currently present onsite it was only measured in well
26 MW9 at 0.01 ft during the 2nd half 2010 monitoring event and has not been measured at a
27 thickness greater than 0.03 ft since 1996. LNAPL has only been sporadically measured in
28 well MW1, located between MW2 and MW9, during 18 years of monitoring.

1 5. The cost of submitting and implementing a work plan to investigate the
2 overly broad and undefined area in the vicinity of, and including, the Dominguez Channel
3 is presently incalculable, but given the apparent breadth of the Order could potentially total
4 several millions of dollars or more. These costs are unjustified given the existing order for
5 the site, and the data collected there to date. As a result, these costs should be deemed
6 unnecessary when the State Board acts on the Petition, rendering the expenditure of money,
7 time and resources to comply in the meantime a costly exercise in futility. However, if
8 Petitioner declines to expend money, time and resources in an effort to produce a work plan
9 for a site it already is investigating, it becomes exposed to significant daily penalties for
10 non-compliance with the Order. If a stay is not granted, Petitioner therefore would be faced
11 with a no-win scenario: expend substantial and unnecessary sums to prepare and implement
12 an unnecessary work plan, or face substantial monetary penalties for failure to produce the
13 work plan. A stay until a determination is made as to the cleanup goals would solve this
14 problem and save Petitioner from significant and substantial monetary harm.

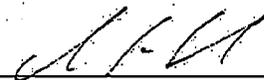
15

16 I certify under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Dated this 26th day of May, 2011, in San Ramon, California.

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By 

Ian Robb

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1 AMY E. GAYLORD (SBN 217553)
PILLSBURY WINTHROP SHAW PITTMAN LLP
2 50 Fremont Street
San Francisco, CA 94105
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5 Attorneys for Petitioner,
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**DECLARATION OF AMY E.
GAYLORD IN SUPPORT OF
CHEVRON ENVIRONMENTAL
MANAGEMENT COMPANY’S
PETITION FOR REVIEW,
REQUEST FOR HEARING, AND
REQUEST FOR STAY**

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1 I, Amy E. Gaylord, declare and state as follows:

2 1. I am a licensed attorney with the law firm Pillsbury Winthrop Shaw Pittman
3 LLP. I am representing Chevron Environmental Management Company (“Petitioner”) in
4 the instant action. This declaration is submitted in support of the Petition to the State Board
5 challenging the April 26, 2011 action of the California Regional Water Quality Control
6 Board, Los Angeles Region (“Regional Board”) in issuing the order entitled “*Requirement*
7 *to Provide Technical Report on Soil and Groundwater Investigation (California Water*
8 *Code Section 13267) Directed To ‘ConocoPhillips Company’ 76 Service Station 1025 E.*
9 *Carson Street, Carson, California (UST Case No. I-02903)*” (the “Order”). Unless
10 otherwise stated, I have personal knowledge of the matters stated here in and could and
11 would testify competently thereto.

12 2. A true and correct copy of the Order is attached hereto as Exhibit 1.

13 3. I am informed and believe that by virtue of a contractual agreement between
14 Chevron and ConocoPhillips, Chevron Environmental Management Company has accepted
15 responsibility for the environmental remediation of the 76 Service Station site located at
16 1025 E. Carson Street, Carson, California (UST Case No. I-02903). It is my understanding
17 that ConocoPhillips has informed, or will shortly inform, the Regional Board of the
18 transition of site responsibility, consistent with the letter attached hereto as Exhibit 2. This
19 site is subject to a contractual agreement between Chevron EMC and ConocoPhillips,
20 whereby going forward, Chevron EMC will be responsible for remediation of the historical
21 releases at the site, including the existing LUST case and any actions required by this
22 Order. This transition of site responsibility was occurring at such a time that earlier
23 communication with the Regional Board after receipt of this Order did not occur
24 specifically with regard to this site; however, many of the issues raised herein were raised
25 by other Order recipients and rejected by the Regional Board.

26 4. On May 13, 2011, the Regional Board held a meeting in Los Angeles with
27 the Order recipients. I attended on Petitioner’s behalf. At the time, a slide presentation was
28

1 given, and the slides were later uploaded to the Geotracker website. A true and correct
2 copy of the slide presentation is attached hereto as Exhibit 3.

3 5. On May 17, 2011, the Regional Board issued a Cleanup and Abatement
4 Order ("CAO") to the Los Angeles Department of Public Works, directing it to "assess,
5 monitor, cleanup the waste, and abate the effects of the ongoing discharge of LNAPL and
6 other wastes within the Dominguez Channel, approximately 400 feet south of Carson Street
7 in Carson, California." A true and correct copy of that order was obtained from the
8 Geotracker website and is attached hereto as Exhibit 4.

9 I certify under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct.

11 Dated this 26th day of May, 2011, in San Francisco, California.

12
13 By 
14 AMY E. GAYLORD
15 Attorney for Petitioner
16 CHEVRON ENVIRONMENTAL
17 MANAGEMENT COMPANY
18
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27
28

EXHIBIT 1



California Regional Water Quality Control Board
Los Angeles Region



320 West Fourth Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • FAX (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

Linda S. Adams
Acting Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

April 26, 2011

Ms. Holly Quasem
ConocoPhillips Company
3900 Kilroy Airport Way, Suite 210
Long Beach, CA 90806

**SUBJECT: REQUIREMENT FOR TECHNICAL REPORT – PURSUANT TO CALIFORNIA
WATER CODE SECTION 13267 ORDER**

**SITE/CASE: DOMINGUEZ CHANNEL, SOUTH OF CARSON STREET
CARSON, CALIFORNIA**

Dear Ms. Quasem:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of groundwater and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura counties, including the referenced Site. To accomplish this, the Regional Board oversees the investigation and cleanup of unregulated discharges adversely affecting the State's water, authorized by the Porter-Cologne Water Quality Control Act (California Water Code [CWC], Division 7).

Since January 2011, light non-aqueous phase liquids (LNAPL) have been appearing within the Dominguez Channel in Carson, California, approximately 400 feet south of Carson Street. The petroleum product has been observed (1) entering into channel waters from sediments within the bottom of the channel and (2) within horizontal, perforated sub-drain pipe systems installed within both the west and east channel levees.

This Regional Board has been working in collaboration with other agencies, under United States Environmental Protection Agency (USEPA) lead, to facilitate the assessment and remedy of the release. As the channel owner and operator, the Los Angeles County Department of Public Works (LADPW) has been performing containment operations using booms and absorbent pads in the channel. In addition to the recovery of released product to channel waters, this Regional Board has requested that LADPW extract LNAPL from the sub-drain piping systems on both sides of the channel.

Samples of product entering channel waters from sediments in the bottom of the channel have been determined to contain primarily gasoline-range hydrocarbons, with smaller fractions of heavier-end (diesel- and oil-range) hydrocarbons. Product examined from the western sub-drain system was observed to be approximately 0.25 inch thick on one occasion with a clear and colorless appearance. Product examined from the eastern sub-drain system was observed to be dark brown to black and translucent. Based upon the variation in the visual appearance of the product, this Regional Board suspects that multiple releases of petroleum may be involved. The sources of the release have not been identified.

California Environmental Protection Agency

Ms. Holly Quasem
ConocoPhillips Company

- 2 -

April 26, 2011

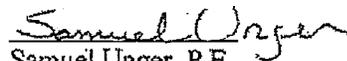
We have determined that, to protect the beneficial uses of the waters beneath the Site, an assessment of the full extent of impacts to the subsurface from the identified contaminants of concern is required.

Enclosed is a Regional Board Order requiring, pursuant to section 13267 of the CWC, that you complete assessments of the contaminants of concern impacting soil, soil vapor, and groundwater at the Dominguez Channel and determine the extent to which your facility may have contributed to the release.

Similar Orders are being sent to multiple suspected Responsible Parties in the vicinity of the release, including you. The attached Order includes a table that lists these parties. At your discretion, you may collaborate with some or all of the other parties to satisfy the requirements of the Order.

If you have any questions, please contact Mr. Greg Bishop at (213) 576-6727 or gbishop@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosure



Linda S. Adams
Acting Secretary for
Environmental Protection

California Regional Water Quality Control Board Los Angeles Region

320 West Fourth Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • FAX (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>



Edmund G. Brown Jr.
Governor

REQUIREMENT TO PROVIDE A TECHNICAL REPORT ON SOIL AND GROUNDWATER INVESTIGATION (CALIFORNIA WATER CODE SECTION 13267¹)

DIRECTED TO "CONOCOPHILLIPS COMPANY"

76 SERVICE STATION,
1025 E. CARSON STREET
CARSON, CALIFORNIA
(UST CASE NO. I-02903)

You are legally obligated to respond to this Order. Please read this carefully.

Since January 2011, light non-aqueous phase liquids (LNAPL) have been appearing within the Dominguez Channel in Carson, California, approximately 400 feet south of Carson Street. The petroleum product has been observed (1) entering into channel waters from sediments within the bottom of the channel and (2) within horizontal, perforated sub-drain pipe systems installed within both the west and east channel levees.

Pursuant to section 13267(b) of the California Water Code (CWC), you are hereby directed to submit the following:

1. By **June 8, 2011**, a work plan to delineate the vertical and lateral extent of petroleum impact in the vicinity of the release. The work plan shall be prepared with the intent of determining (1) the extent of petroleum impact from the Site and (2) if your facility has contributed to the release in the Dominguez Channel. The work plan shall place an emphasis on expedient groundwater delineation but shall also include plans to delineate soil and soil gas impacts. The work plan shall propose initial sampling locations, describe proposed sampling and analytical techniques, provide a proposed timeline for activities, and include provisions for follow-up work in the event the proposed work does not sufficiently define the extent of impact.
2. After approval by the Regional Board Executive Officer, implement the work plan and report results in accordance with the approved work plan schedule.

¹ California Water Code section 13267 states, in part: (b)(1) In conducting an investigation. . . , the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region . . . shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.

Ms. Holly Quasem
ConocoPhillips Company

- 2 -

April 26, 2011

The work plan shall be submitted via e-mail (in portable document format [pdf]) with one paper hard-copy to:

Mr. Greg Bishop, P.G.
Engineering Geologist
Regional Water Quality Control Board – Los Angeles Region
320 W. 4th Street, Los Angeles, CA 90013
(213) 576-6727
gbishop@waterboards.ca.gov

Pursuant to section 13268(b)(1) of the CWC, failure to submit the required technical or monitoring report described in paragraph 1 above may result in the imposition of civil liability penalties by the Regional Board, without further warning, of up to \$1,000 per day for each day the report is not received after the due dates.

The Regional Board needs the required information to determine (1) the extent of petroleum impact beneath and near the ongoing release within the Dominguez Channel, approximately 400 feet south of Carson Street in Carson, California and (2) whether your facility has contributed to the petroleum release.

The evidence supporting this requirement is your operation of a petroleum facility near the release site (see the attached table).

We believe that the burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. If you disagree and have information about the burdens, including costs, of complying with these requirements, provide such information to Mr. Greg Bishop within ten days of the date of this letter so that we may reconsider the requirements.

Please note that effective immediately, the Regional Board, under the authority given by California Water Code (CWC) section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by a senior authorized Chevron Company representative (not by a consultant). The perjury statement shall be in the following format:

“I, [NAME], do hereby declare, under penalty of perjury under laws of State of California, that I am [JOB TITLE] for Chevron Company, that I am authorized to attest, that veracity of the information contained in [NAME AND DATE OF THE REPORT] is true and correct, and that this declaration was executed at [PLACE], [STATE], on [DATE].”

The State Water Resources Control Board (State Water Board) adopted regulations requiring the electronic submittals of information over the Internet using the State Water Board GeoTracker data management system. You are required not only to submit hard copy reports required in this Order, but also to comply by uploading all reports and correspondence prepared to date on to the GeoTracker data management system. The text of the regulations can be found at the URL:

http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal.

California Environmental Protection Agency

 Recycled Paper

Ms. Holly Quasem
ConocoPhillips Company

- 3 -

April 26, 2011

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

or will be provided upon request.

SO ORDERED.


Samuel Unger, P.E.
Executive Officer

Enclosure: Recipients of CWC Section 13267 Orders Associated with a Petroleum Release near Carson Street in Dominguez Channel, Carson, California, April 26, 2011

**Recipients of CWC Section 13267 Orders
Associated with a Petroleum Release near Carson Street in the Dominguez Channel, Carson, California**
April 26, 2011

Recipient	Division	First Name	Last Name	Company	Address	City	State	Zip	Phone	E-Mail	Notes	Regional Order Case Number
1	Mr.	John	Clippen	Chevron Pipeline	1601 Trojan Way	La Mirada	CA	90538	714-936-4678	clippe@chevron.com	Former Union Oil pipeline within Perry Street, beneath Active RV, and adjacent to the Dominguez Channel	
2	Ms.	Holly	Quasem	ComcoPhillips Company	3900 Kilroy Alhambra Way, Suite 210	Long Beach	CA	90806	562-290-1727	holly.quasem@contractor.com	7% Service Station (1025 E. Carson Street) with underground storage tanks operated at the site. Historically, fire product (up to 1.28 feet) was identified beneath the site since July 1992. Groundwater samples collected detected TPHg up to 640,000 µg/L, benzene up to 37,000 µg/L, and TBA up to 76,000 µg/L.	UST: 102909
3	Mr.	Mike	Romley	Clifton Pipeline	2459 Redondo Avenue	Long Beach	CA	90755	562-595-9463	mromley@cliftonpl.com	Former Union Oil pipeline within Perry Street, beneath Active RV, and adjacent to the Dominguez Channel	SCP: 0490C
4	Mr.	Eugene	Freed	Shell Oil Products US	20945 S. Wilmington Avenue	Carson	CA	90810-1039	818-991-5356	eugene.freed@shell.com	Pipeline 0367 (water, active; former petroleum, inactive)	SCP: 0490A/0490B
5	Mr.	Daniel	Gabel	Tosoro Corporation	1830 E. Pacific Coast Highway	Wilmington	CA	90744-2911	310-522-8602		Pipeline corridor approximately 400 feet west of 1402 and E. Carson Street	SCP: 0729B
6	Mr.	Courtland	Prowell	Prowell Family Trust	3997 Mistral Road	Huntington Beach	CA	92649	714-799-1621	c/o Mr. Ron Prowell rprowell@gmail.com	Pipeline 0366 (jet, fuel, active)	SCP: 1110A SCP: 1110B
7	Mr.	Rob	Sperer	Chevron Environmental Management Company	4800 Fairance Pl. #526A	Bellair	TX	77401	713-432-2142		Former Active RV (1305 E. Carson Street) Former Humble Oil Gas Station (1236 E. Carson Street) Former Texaco Gasoline Station (1209 E. Carson Street) Chevron facility 21-1316 (with underground storage tanks operated at the site. Historically, a petroleum sheen has been detected at the site since March 2004. LMAT, (0.03 foot) was identified in June 2010. Groundwater samples collected beneath the site detected TPHg up to 370,000 µg/L, TPHd up to 120,000 µg/L, benzene up to 14,000 µg/L, MTBE up to 43 µg/L, and TBA up to 54 µg/L.	UST: R-05994
8	Ms.	Donna	Diarcho	BP Pipelines	1300 Pier B Street	Long Beach	CA	90813	562-499-2202	donna.diarcho@bp.com	Pipelines north of Carson Street, adjacent to Dominguez Channel (oil and refined product) Pipelines beneath the Dominguez Channel north of Carson Street Pipelines within Recreation Road	

Legend
 UST: Underground Storage Tank Program
 SCP: Site Cleaning Program
 TPHg: Total Petroleum Hydrocarbons (Gasoline Range)
 TPHd: Total Petroleum Hydrocarbons (Diesel Range)
 MTBE: Methyl tert-butyl ether
 TBA: Tertiary Butyl Alcohol
 UMAPL: Light Non-Aqueous Phase Liquids

EXHIBIT 2



Dan Fischman, CPG, CHG
Site Manager
Risk Management & Remediation
3900 Kilroy Airport Way, Ste. 210
Long Beach, CA 90806
Phone 562.290-1553
Fax 918.662-8443
dan.fischman@conocophillips.com

May 26, 2011

Greg Bishop
California Regional Water Quality Control Board, Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

**Re: Notice to Agency of Change in Contact Information for Former Unocal 6082
(Chevron Facility No. 351816) – Site Address: 1025 East Carson, Carson, CA (Dominguez Channel)
– Case No. I-02903**

Dear Mr. Bishop:

As of May 26, 2011 ("Effective Date"), ConocoPhillips Company transferred the management of the environmental remediation activities at the above-referenced site to Union Oil Company of California ("Union Oil"). From the Effective Date forward, Union Oil (or its designees or representatives, including Chevron Environmental Management Company) will manage the day-to-day corrective action/remediation obligations related to the referenced case and will be responsible for responding to the Los Angeles Regional Water Quality Control Board's order entitled "*Requirement to Provide Technical Report on Soil and Groundwater Investigation (California Water Code Section 13267) directed to ConocoPhillips Company,*" which was sent on your behalf on April 26, 2011.

As of the Effective Date, please direct all correspondence related to this project to:

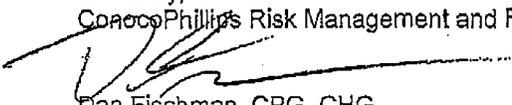
Ian Robb
Chevron Environmental Management Company
6101 Bollinger Canyon Road, Fifth Floor
San Ramon, CA 94583-5186
Office Phone: 925-790-6237
E-mail: ianrobb@Chevron.com

The environmental consultant for this site is now: Mark Fahan of Holguin, Fahan & Associates, Inc. All applicable contact information is provided below:

Mark Fahan
Holguin, Fahan & Associates, Inc.
50 West Main St
Ventura, CA 93001
Office Phone: 805-641-4087
E-mail: Mark_Fahan@hfa.com

If you have any questions, please feel free to contact me.

Sincerely,
ConocoPhillips Risk Management and Remediation



Dan Fischman, CPG, CHG
Area Manager

cc: Kambiz Katirai, 1025 E. Carson, Carson, CA 90745

EXHIBIT 3



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Acting Secretary for
Environmental Protection

320 West Fourth Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • FAX (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown Jr.
Governor

MEETING ATTENDANCE SHEET

Date: May 13, 2011

SCP Case No.: Dominguez Channel @ Carson St.

SUBJECT: Release Briefing / Investigation Kick-Off Meeting

Page 1

Name	Organization	Telephone	E-Mail
Greg Bishop	LARWQCB	(213) 576-6727	gbishop@waterboards.ca.gov
Ed T	LACDPW	562 811-0314	eteran@cdpw.lacounty.gov
Mike Romley	CRIMSON Pipeline	562-595-9465	mromley@crimsonpl.com
Paula Rasmussen	LA RWQCB	213-576-6791	prasmussen@waterboards.ca.gov
Art Heath	LARWQCB	213-576-6725	aheath@waterboards.ca.gov
Matt Himmelstein	URS	714-648-2888	matt_himmelstein@urscorp.com
Rebecca Friend	URS	(919) 294-7099	rebecca_friend@urscorp.com
Marc Greenberg	Tesoro Counsel	562 456-2066	marc_greenberg@KYZ.com
Jo Anne Alvarez	Tesoro	(310) 522-6195	Jo-Anne.J.Alvarez@tsacorp.com
Dan Gabel	Tesoro	(310) 522-8602	david.g.gabel@tsacorp.com
Kim Fowler	Tesoro	310 522 8663	Kim.W.Fowler@Tsacorp.com
Amy Gaylord	Pillsbury for Chevron	415-983-7262	amy.gaylord@pillsburyllc.com
Pete Bergeron	Chevron EMC	925-796-6519	pete.bergeron@chevron.com
Jennifer Nobvi	URS	213-996-2451	jennifer_nobvi@urscorp.com
Holly Quasen	COP	949-637-1543	Holly Quasen @ contractor, contact@phillips.com
Louis Mosconi	COP	562 790-1721	MOSCONS@CONROPHILLIPS.COM
MARK REESE	CRIMSON PIPELINE	714 624-5301	MREESE@BEACONESI.COM
LARRY ALEXANDER	CRIMSON P/L	562 595 9216	LWALEXANDER@CRIMSONPL.COM
Sam Unger	RWQCB	213 576-6605	sunger@waterboards.ca.gov

California Environmental Protection Agency

Dominguez Channel Release

Overview of Conditions and
Subsurface Investigation Requirements

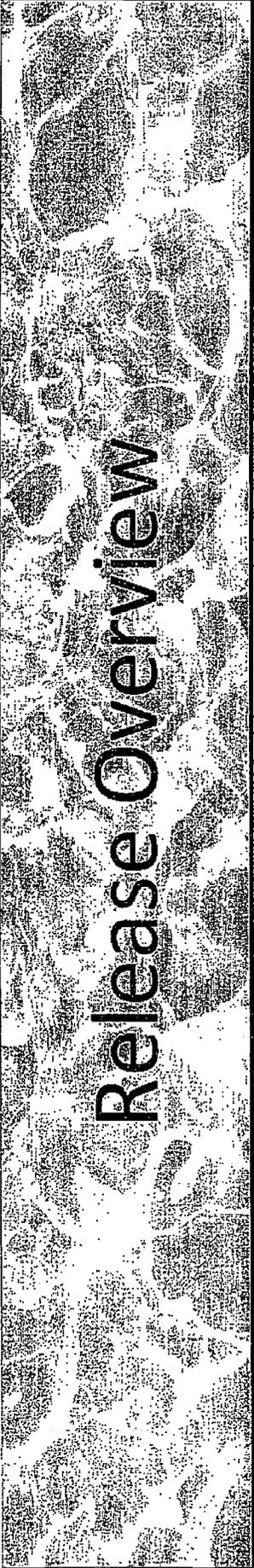
May 13, 2011



Dominguez Channel Release Location Carson, California

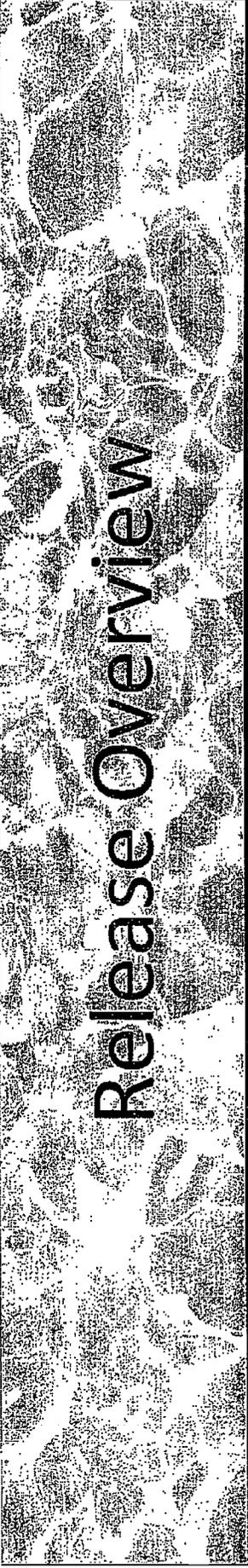


**DOMINGUEZ CHANNEL
SURFACE RELEASE
LOCATION**



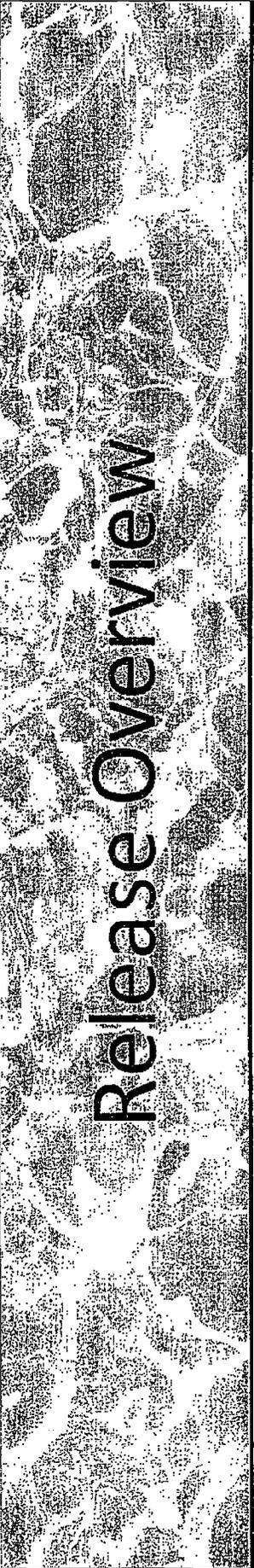
Release Overview

- **Petroleum Daylighting**
 - Petroleum sheen on water surface
 - Primarily lighter-end hydrocarbons (not exclusively)
 - Discovered in January 2011
 - Release still occurring
 - Occurs at low tides



Release Overview

- Agencies
 - U.S. Environmental Protection Agency
 - California Department of Fish and Game
 - Regional Water Quality Control Board
 - California Department of Forestry and Fire Protection (CalFire)
 - South Coast Air Quality Management District
 - Los Angeles County Fire Department
 - City of Carson



Release Overview

- Los Angeles County Department of Public Works (LADPW)
 - Responsible for product containment/removal from channel
 - Channel owner
- Neighbor Complaints
 - Strong odors
 - Residential

Press Coverage

Daily Breeze - Saturday, April 30, 2011

Oil firms told to create plan to fix leak

CARSON: Source of petroleum products bubbling in Dominguez Channel

PRESSTELEGRAM.COM SATURDAY, APRIL 30, 2011

Oil products are polluting channel to sea

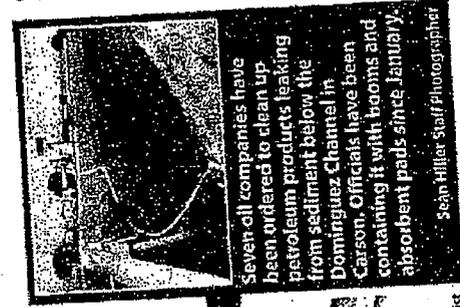
CARSON: Experts haven't determined which of seven companies is at fault.

By Sandy Mazza Staff Writer

The Carson Street bridge stretches over troubled waters. An oily sheen was reported floating along the surface of the Dominguez Channel just below Carson's main thoroughfare a few months ago.

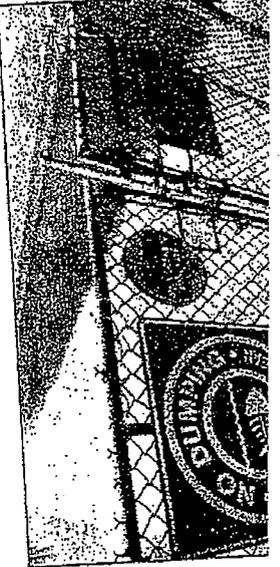
Investigators haven't been able to pin down the source of the problem, but they've determined the substance is petroleum products — mostly gasoline — bubbling up from beneath the sediment in the riverbed. Since January, they have been containing it with floating booms and absorbing the oil with pads.

This week, the Los Angeles Regional Water Quality Control Board ordered seven oil companies that operate pipelines and storage tanks in the



Seven oil companies have been ordered to clean up petroleum products leaking from sediment below the Dominguez Channel in Carson. Officials have been containing it with booms and absorbent pads since January.

Scan Hillier Staff Photographer

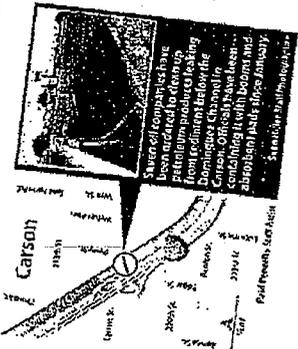


Paul Penzellia Staff Artist

oil and said the smell of oil sometimes "comes through his hair."

Whenever there's the slightest breeze, the color is red," he said. "Whenever I walk out the door, I get a breeze and I can smell it."

Seven oil companies have been ordered to clean up petroleum products leaking from sediment below the Dominguez Channel in Carson. Officials have been containing it with booms and absorbent pads since January.

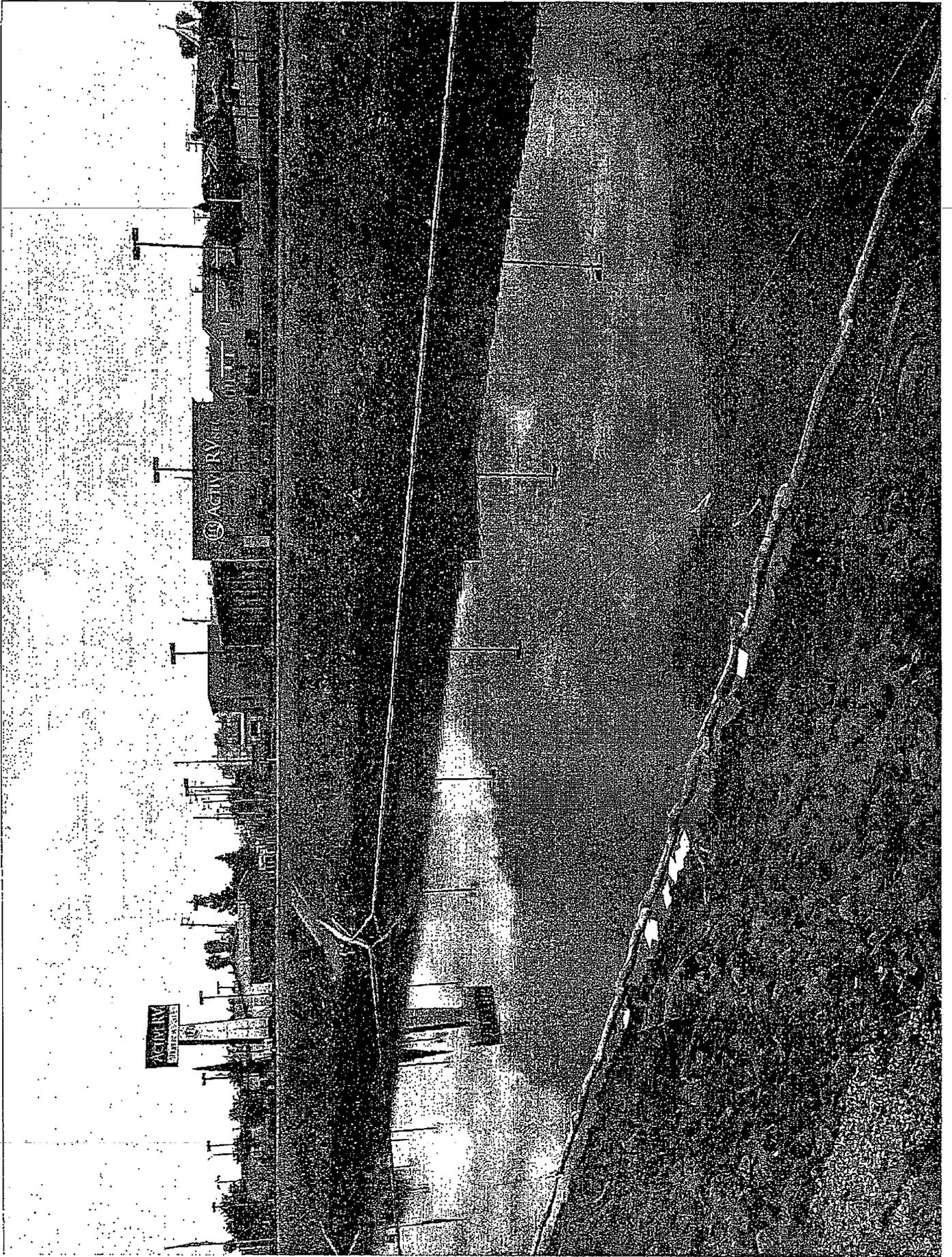


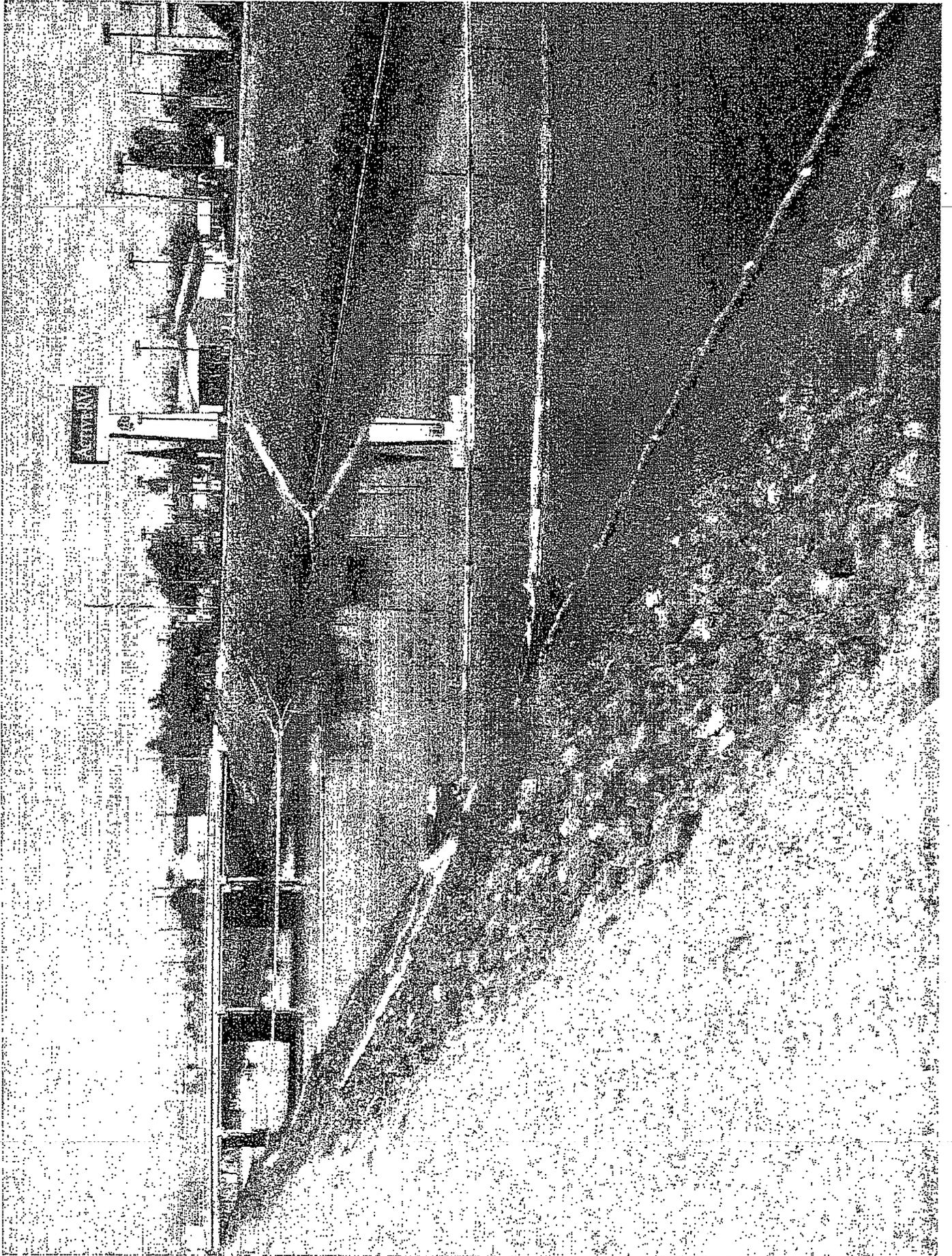
Seven oil companies have been ordered to clean up petroleum products leaking from sediment below the Dominguez Channel in Carson. Officials have been containing it with booms and absorbent pads since January.

- Daily Breeze
- 4/30/2011
- Press-Telegram
- 4/30/2011

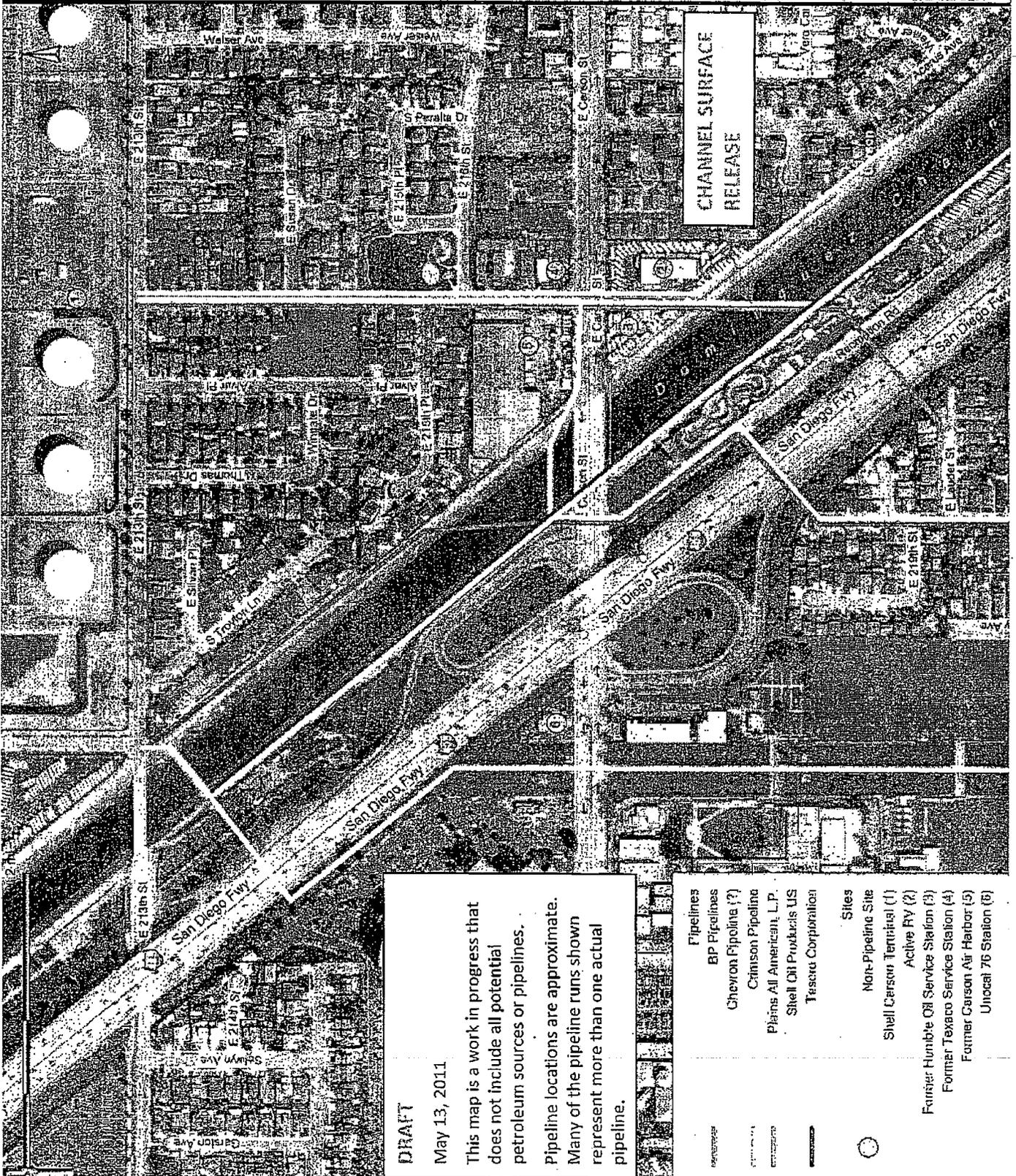


Water Boards





Dominguez Channel Release Vicinity Facilities



DRAFT

May 13, 2011

This map is a work in progress that does not include all potential petroleum sources or pipelines.

Pipeline locations are approximate. Many of the pipeline runs shown represent more than one actual pipeline.

- Pipelines**
- BP Pipelines
- Chevron Pipelines (?)
- Crimson Pipeline
- Plains All American, L.P.
- Shell Oil Products US
- Tascoro Corporation
- Sites**
- Non-Pipeline Site
- Shell Carson Terminal (1)
- Active RV (2)
- Former Humble Oil Service Station (3)
- Former Texaco Service Station (4)
- Former Carson Air Harbor (5)
- Unocal 76 Station (6)

Petroleum Facilities (1/3)

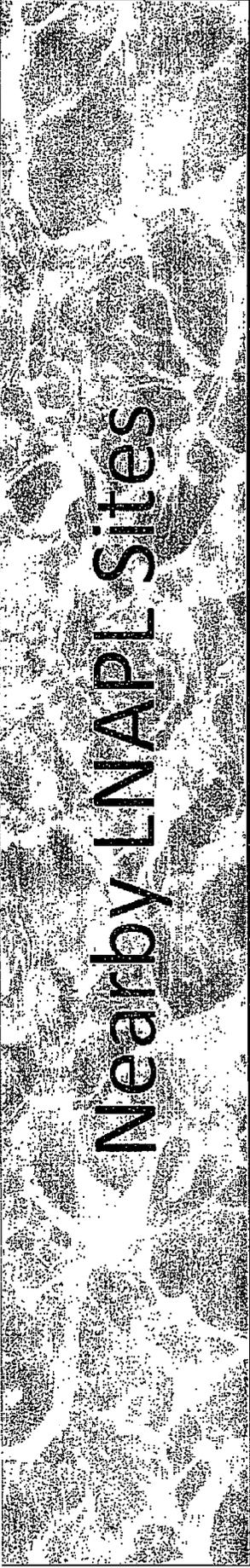
- Pipelines
 - Chevron EMC (former Union Oil)
 - Crimson Pipeline (former Union Oil)
 - Shell Oil Products US
 - Tesoro Corporation
 - BP Pipelines
 - Plains All American Pipeline, L.P.

Petroleum Facilities (2/3)

- Underground Storage Tanks (USTs)
 - ConocoPhillips Company (Union 76 Station)
 - Prowell Family Trust (former Humble Oil Gas Station)
 - Chevron EMC (former Texaco service station)

Petroleum Facilities (3/3)

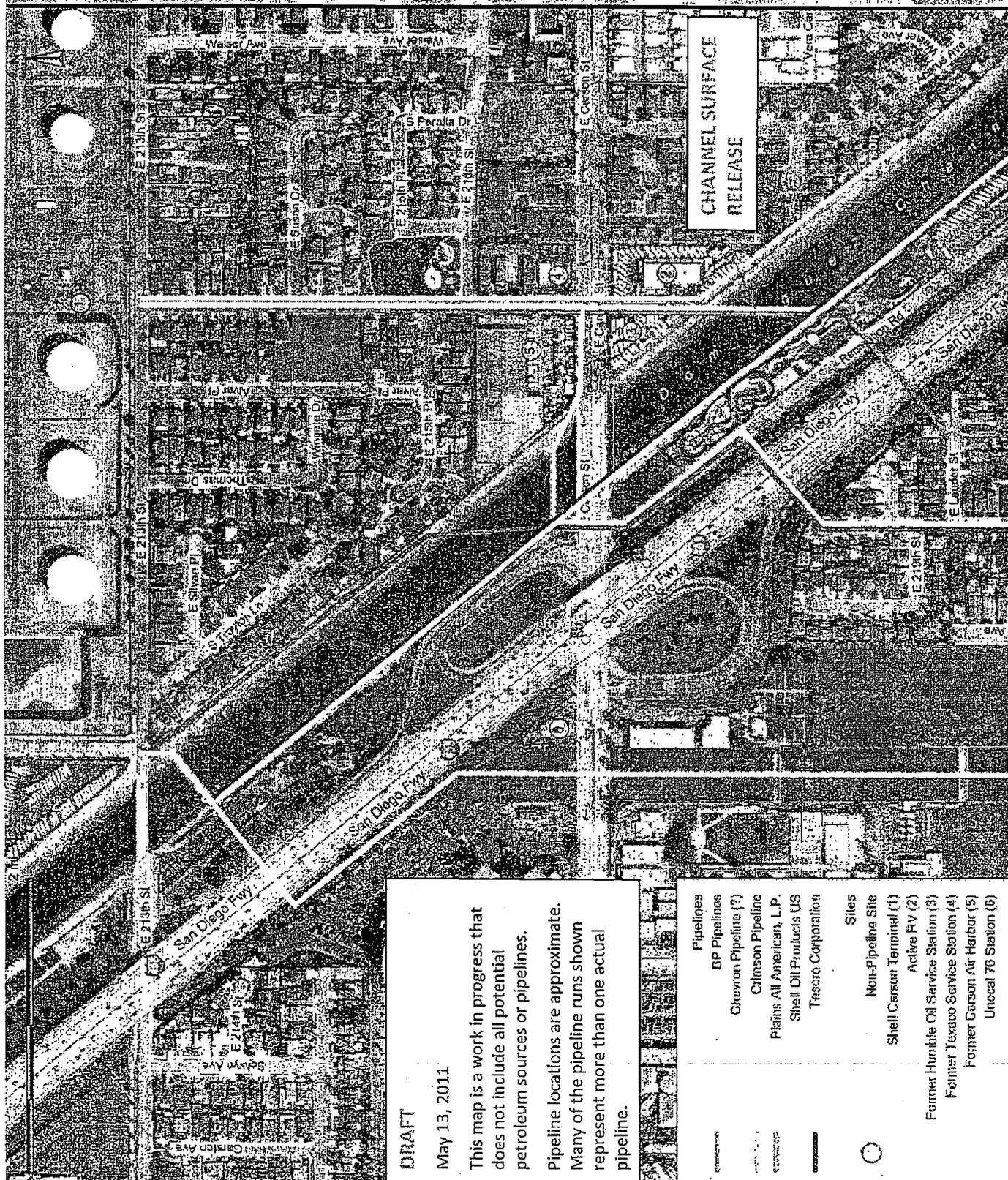
- Other
 - Shell Oil Products US (Carson Air Harbor)
 - Waste Oil Tank / Former Septic System
 - Shell Carson Terminal
 - Tank Farm (with pipeline connections)



Nearby LNAPL Sites

- Perry Street (Shell Oil)
 - Root casts
- Carson Air Harbor (Shell Oil)
 - In one well
 - ROST responses across southern half of site
- Unocal 76 Station
 - In GWM wells
- Active RV
 - Septic leach pit (1954)
- Former Texaco (Chevron EMC)

Dominguez Channel Release Vicinity Facilities



DRAFT

May 13, 2011

This map is a work in progress that does not include all potential petroleum sources or pipelines.

Pipeline locations are approximate. Many of the pipeline runs shown represent more than one actual pipeline.

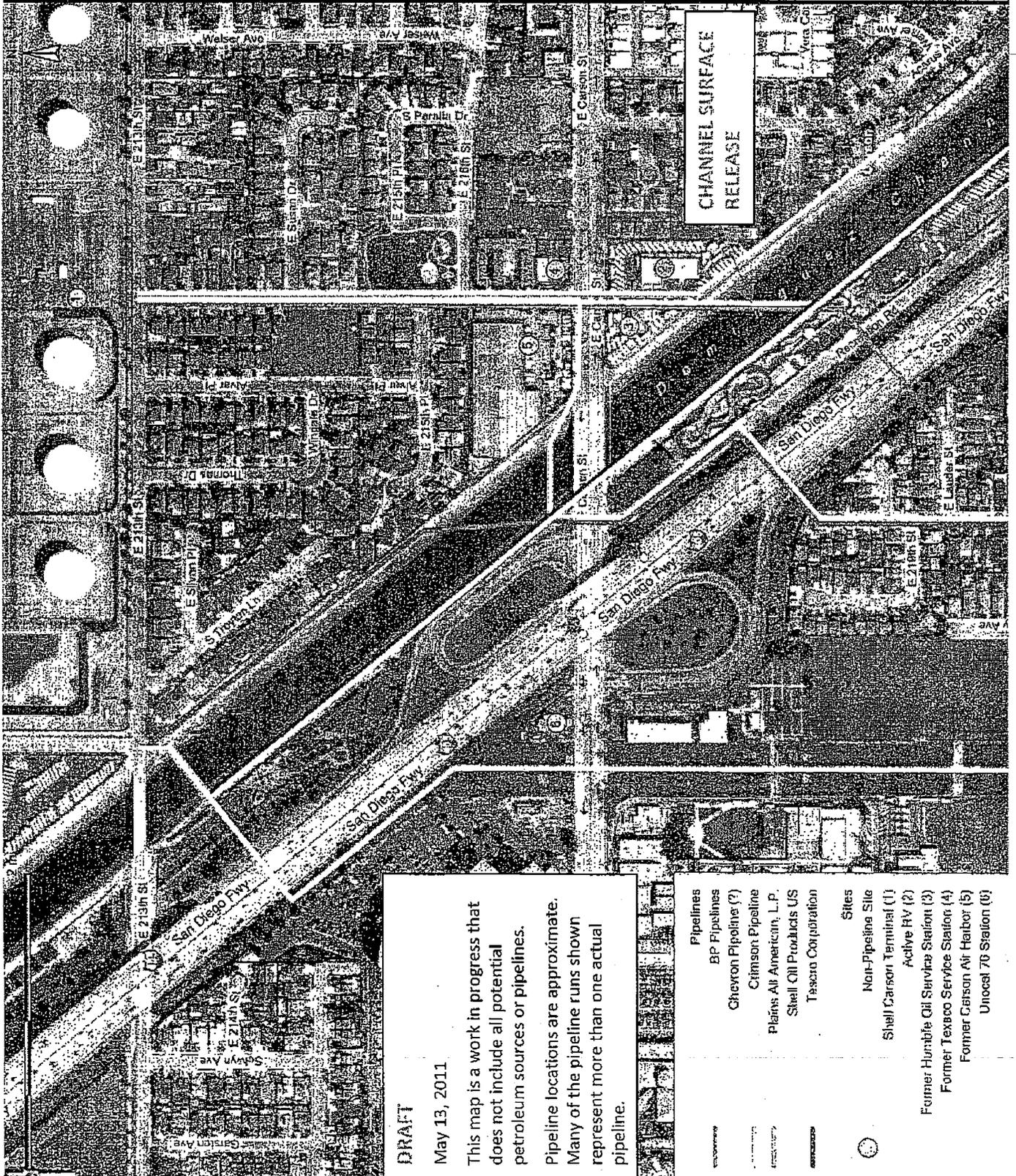
- | | |
|--|---------------------------------------|
| | Pipelines |
| | BP Pipelines |
| | Chevron Pipeline (?) |
| | Crimson Pipeline |
| | Plains All American, L.P. |
| | Shell Oil Products US |
| | Tesoro Corporation |
| | Sites |
| | Non-Pipeline Site |
| | Shell Carson Terminal (1) |
| | Active RV (2) |
| | Former Humble Oil Service Station (3) |
| | Former Texaco Service Station (4) |
| | Former Carson Air Harbor (5) |
| | Unocal 76 Station (6) |



Recreation Road

- Recreation Road
 - City of Carson reported “substantial” petroleum impact during soil excavation in past.

Dominguez Channel Release Vicinity Facilities



CHANNEL SURFACE
RELEASE

DRAFT
May 13, 2011

This map is a work in progress that does not include all potential petroleum sources or pipelines.

Pipeline locations are approximate. Many of the pipeline runs shown represent more than one actual pipeline.

- | | |
|---|---------------------------------------|
|  | Pipelines |
|  | BP Pipelines |
|  | Chevron Pipelines (?) |
|  | Crimson Pipeline |
|  | Plains All American, L.P. |
|  | Shell Oil Products US |
|  | Tascoro Cooperation |
|  | Sites |
|  | Non-Pipeline Site |
|  | Shell Carson Terminal (1) |
|  | Active RV (2) |
|  | Former Humble Oil Service Station (3) |
|  | Former Texaco Service Station (4) |
| | Former Garrison Air Harbor (5) |
| | Unocal 70 Station (6) |



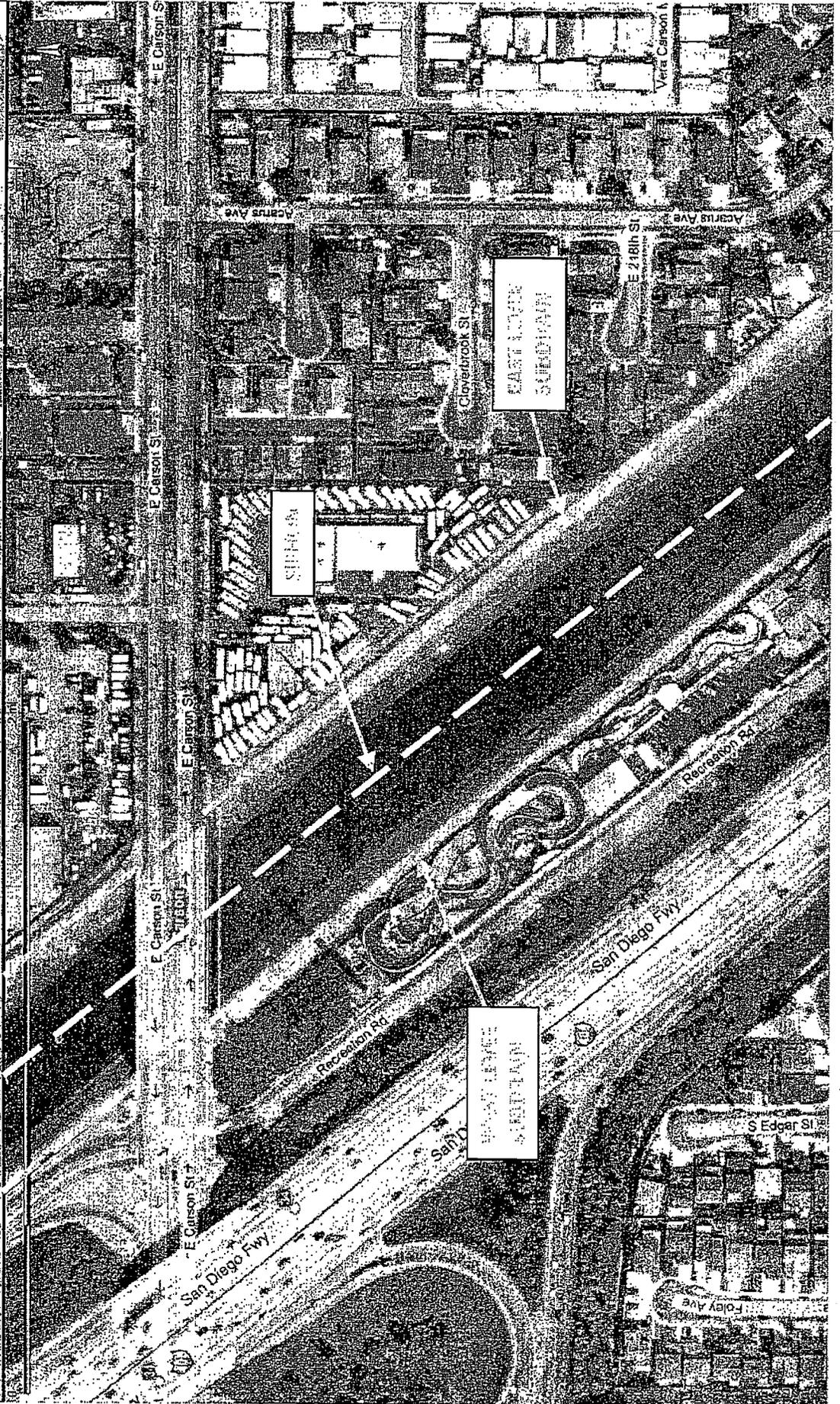
Channel Piping

- Subdrain System
 - Horizontal piping on both sides of channel
 - Perforated
 - Approximately 20 feet down from levee tops
 - Horizontal drain to channel every 400' with manhole access
 - Fuel in subdrain piping
 - Discharges to Channel at low tide
 - Different colors on east/west sides

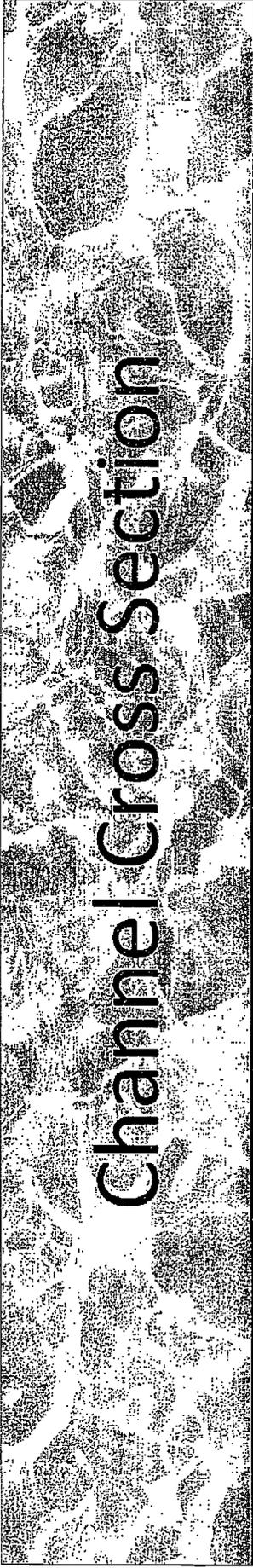
Channel Piping

- Siphon System
 - Below center of channel
 - Used for dewatering during channel construction

Dominguez Channel Subdrains and Siphon



Channel Cross Section



WEST

EAST

