



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Acting Secretary for
Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown Jr
Governor

July 18, 2011

Mr. Brian Lloyd, Vice President
Eni Petroleum
1201 Louisiana Street, Suite 3500
Houston, TX 77002

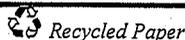
DESIGNATION OF ADMINISTERING AGENCY, GARDENA VALLEY NO. 5 LANDFILL, CARSON, CA (FILE NO. 61-046, CI-6764, CAO No. 93-061)

Dear Mr. Lloyd:

The ten-acre Gardena Valley No. 5 Landfill (Landfill) is a closed municipal and industrial waste landfill that is part of the 76-acre former Golden Eagle Refinery (Refinery) site located at 21000 S. Figueroa Street, Carson, California. The Landfill ceased accepting waste in 1963 and currently is undergoing postclosure maintenance pursuant to Los Angeles Regional Water Quality Control Board (Regional Board) Waste Discharge Requirements (WDRs) Order No. 87-12 (adopted January 26, 1987) and Cleanup and Abatement Order (CAO) No. 93-061 (issued September 27, 1993 and last amended on September 29, 2009). Eni Petroleum (Eni) is the party responsible for the postclosure maintenance of the Landfill, including implementing an evaluation monitoring program (EMP) pursuant to section 20425 of title 27 of the California Code of Regulations (27 CCR). Simultaneously, Eni, through its consultant, Arcadis, is conducting additional assessment of the Refinery, to adequately define the extent of volatile organic compound (VOC) impacts as part of a Remedial Action Plan (RAP) approved by the California Department of Toxic Substances Control (DTSC) in July, 1994. The RAP was developed pursuant to a 1993 Consent Order (Consent Order) between DTSC and Golden Eagle Refining Company (Golden Eagle), the Refinery facility owner at the time, that includes investigation and remediation of the contamination of air, soil, surface water, and groundwater at the site as a whole.

California Health and Safety Code (HSC), division 20, chapter 6.65 sets forth a site designation process that allows a responsible party who agrees to carry out a site investigation and remedial action to request a single state or local agency to oversee the site investigation and remedial action. In our letter of April 21, 2011, we expressed concern that the Landfill and Refinery are continued to be regulated as remediation sites under the authority of DTSC and Regional Board staff, the boundary between the two areas may allow for potential duplication or limitation in remediation of the site in its entirety. In order to maximize the coordinated remediation of the Landfill and Refinery portions of the site, on April 11, 2011, via email correspondence, Regional Board and DTSC staff agreed that on-going regulatory oversight for the site as a whole should continue pursuant to the Consent Order and the RAP, which includes groundwater monitoring and remediation, final cover design, and postclosure maintenance requirements for the Landfill. Your letter of July 5, 2011, through your legal counsel, Greenberg Glusker Fields Claman & Machtinger LLP, confirmed your acceptance of DTSC as the administering agency for the Landfill.

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.

Mr. Brian Lloyd
Eni Petroleum

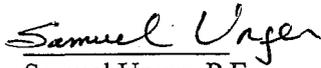
- 2 -

July 18, 2011

HSC division 20, chapter 6.65 specifies that an administering agency consult with other "Appropriate Agencies" or "Support Agencies" when issuing permits or other forms of authorization not normally within its jurisdiction. Thus, Regional Board staff is available to provide technical support to DTSC as necessary. Specifically, Regional Board staff is available to review all submittals regarding final cover design and construction, landfill gas collection and destruction system design and construction, and groundwater monitoring and remediation systems, as requested by you or DTSC staff.

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

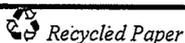
Sincerely,



Samuel Unger, P.E.
Executive Officer

cc: Mr. Daniel Zogaib, Department of Toxic Substances Control
Ms. Cindy Chen, Los Angeles County Environmental Health Division – Solid Waste Program
Mr. W. Cedric Johnson, Glory Christian Fellowship International, Inc.
Mr. Roger J. Holt, Greenberg Glusker
Ms. Alison Jones, Arcadis

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.