

COMMUNITY UPDATE

The mission of DTSC is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products.

Former Naval Petroleum Reserve No. 1, U.S. Department of Energy, Draft Removal Action Work Plan; AOC 033-007

Available for public review and comment from March 28 to April 26, 2018

Para información en español por favor comuníquese con Elsa Lopez al número (818) 717-6566.

The California Department of Toxic Substances Control (DTSC) invites public comment on the *Draft Removal Action Work Plan (Draft RAW)*; *Area of Concern (AOC) 033-007*, prepared as part of the former Naval Petroleum Reserve (NPR-1) Closure Project.

The former NPR-1 is located in the Elk Hills Oil Field and consists of about 74 square miles of land in Kern County, California. AOC 033-007 is a former drilling mud sump within the former NPR-1. It was in use during the drilling of the adjacent well, 26-14B, in 1953 and has been out of service since that time.

This Community Update provides information on California Environmental Quality Act (CEQA), What is Being Proposed, Site Location, Site History and AOC Background, Previous Site Investigations, Removal Action Objectives, Clean-up Alternatives, Proposed Alternative, Next Steps, Where to Find Documents and DTSC Contact Information.

CEQA: As required by California Law, DTSC has performed a review of the proposed Draft RAW in accordance with CEQA. Based on that review, DTSC has determined that the project will not have any significant effect on public health or the environment. DTSC proposes to issue a CEQA Mitigated Negative Declaration for this project. The CEQA Mitigated Negative Declaration is being circulated for a 30-day public review period from March 28 through April 26, 2018. Public comments must be postmarked or e-mailed to DTSC by April 26, 2018.

DTSC Environmental Justice and Tribal Affairs (EJTA) has reviewed the Tribal Outreach process utilized by the U.S. Department of Energy (DOE) and concurs that this process meets with DTSC's EJTA outreach and consultation objectives. Per request of the Tribes, a monitor will be on site during soil excavation activities.

What is Being Proposed?

The DOE proposes excavation and off-site disposal of 72 cubic yards of lead-contaminated soil at AOC 033-007. The Draft RAW provides a description of AOC 033-007 and the proposed cleanup activities. These corrective measures are necessary to obtain DTSC approval for closure of AOC 033-007 and a "No Further Action" (NFA) designation.

Public Comment Period



**30-day Public Comment
Period March 28 to
April 26, 2018**

DTSC encourages you to review and comment on the Draft RAW and CEQA Mitigated Negative Declaration for AOC 033-007. The Draft RAW, CEQA Mitigated Negative Declaration, and other project documents are available for review at locations listed on page 3.

DTSC will make a final decision after all public comments have been reviewed. Please submit public comments postmarked or e-mailed by April 26, 2018, to:

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A public meeting has not been scheduled for this project.



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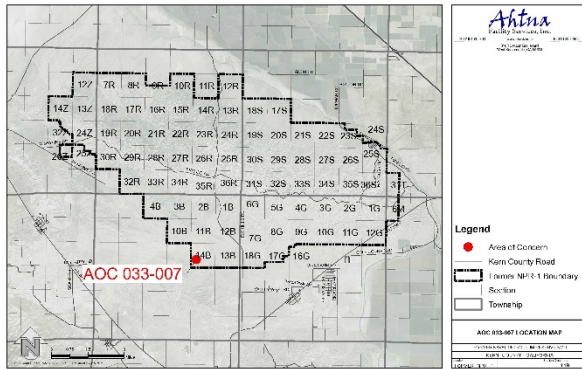
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Site Location: The former NPR-1 is divided into a series of townships and ranges. AOC 033-007 is located in the southwest portion of the former NPR-1 in grid 14B, Section 14, T31S/R23E. AOC 033-007 is approximately 0.21 acres in size. AOC 033-007 is within an active oil field, which is closed to the public.

Previous Site Investigations: In 2013 and 2014, DOE conducted a Confirmatory Investigation at AOC 033-007 to assess whether there were releases of lead into the surface and subsurface soil due to past U.S. Government operations at the AOC.



AOC 033-007 Location Map

Results of both the investigation indicated lead concentrations were greater than the risk-based screening level in surface soil along the northwestern edge of the berm surrounding the sump. DOE recommended removal of approximately 108 tons of surface soil containing elevated lead concentrations.

Removal Action Objectives: The primary objective of the Draft RAW is to propose a preferred cleanup approach that prevents or reduces potential risks to human health. The Draft RAW summarizes previous studies, presents four remediation alternatives, and a recommendation for the most appropriate cleanup option for the site, including procedures for achieving proposed cleanup goals.

Site History and AOC Background: NPR-1 was created by an Executive Order in 1912 to preserve potential petroleum resources for national defense purposes. Pursuant to Public Law 104-106, passed in February 1996, DOE was required to sell the United States’ lands and hydrocarbon interests in NPR-1. DOE sold the Federal Government’s interests in NPR-1 to Occidental Petroleum Corporation (Occidental), effective October 1, 1997, which operated the Elk Hills Oil Field under the name Occidental of Elk Hills, Inc. In 2014, Occidental transferred the property to California Resources Corporation, who now operates the Elk Hills Oil Field under the name of California Resources Elk Hills, LLC.

Clean-up Alternatives: The Draft RAW presents an evaluation of alternatives that could be used to mitigate potential health risks at AOC 033-007. These alternatives are evaluated, with respect to Federal and State criteria, for short- and long-term effectiveness, feasibility, and cost. The following alternatives were considered for remediation at AOC 033-007.

DOE and DTSC entered into an Agreement for Site Assessment in 1998 that was subsequently amended and, in 2008, a Corrective Action Consent Agreement was signed in which DOE agreed to complete the corrective action process at 131 Solid Waste Management Units and/or AOCs, including AOC 033-007.

1. No Action: This alternative proposes to leave the contaminated soil in place and, therefore, not implementing corrective measures at the site.
2. Land Use Controls: This alternative proposes to leave lead-contaminated soil in place and limit access by means of institutional controls and physical fencing of the site.
3. Excavation and Off-site Disposal: This alternative proposes to remove contaminated soil from within the AOC and conduct post-excavation soil sampling to confirm that soil cleanup goals are met.
4. Capping in place with land use controls: Under this alternative, an engineered clean soil cap would be placed over the site to provide a barrier to exposure and prevent access to contaminated soils. The site would then require long-term routine maintenance and would need to be secured and land use

AOC 033-007 is one of 14 AOC 033 drilling mud sumps. These drilling mud sumps serviced wells in the 1940s and 1950s within the Elk Hills Oil Field. AOC 033-007 is not identified individually within the Resource Conservation and Recovery Act Facility Assessment; however, it was listed in the Corrective Action Consent Agreement as the 14B Sumps.

restrictions to protect the cap integrity and prevent unauthorized intrusive activities.

Alternative 1 was determined to be not protective of human health as contaminated soil would remain on site without controls. Alternative 2 is not recommended as it would not treat the contaminated soil and would instead rely on land use controls to prevent possible exposures to lead. Alternative 3 offers short-term and long-term effectiveness, is feasible, cost effective, and offers a high degree of protection for human health. Alternative 4 is not recommended due to the excessive cost necessary to implement and the fact that the contaminated soil would remain on site and need to be managed/controlled in the future.

Proposed Alternative: Based on the evaluation of clean-up alternatives, DTSC and DOE proposes Alternative 3. Excavation and Off-site Disposal of soil. This alternative proposes to remove the contaminated soil permanently within AOC 033-007 and store it in a permitted landfill. AOC 033-007 would be clean-closed with no further land use restrictions.

The following activities would be performed under the proposed alternative:

- Excavate 72 cubic yards of contaminated soil to an approximate depth of one (1) foot below ground surface, based on the results from previous sampling events.
- Collect post-excavation soil samples to confirm chemicals of concern are not present at levels that pose a risk to human health or the environment.
- Characterize and dispose of excavated soil at a permitted landfill.
- Backfill excavated areas with clean fill and re-grade.
- Complete surface restoration according to the *California Endangered Species Act Incidental Take Permit No. 2081-2013-029-04 (ITP)* and the *2017 ITP Amendment No. 1*.

In addition, the following controls designed to protect the surrounding community are proposed during cleanup activities:

- The removal action will be planned and conducted to minimize wind erosion and generation of airborne dust.

- Dust control measures will be implemented prior to the start of work and maintained each day by applying Best Management Practices, which will include: Wetting the soil, reducing vehicle speed, and cleaning vehicle tires. Dust monitoring and testing will be conducted to ensure dust stays at safe levels.
- Site visitors will be required to sign in, receive a Safety and Health briefing, and wear the appropriate Personal Protective Equipment.

Next Steps: Before making a final decision to approve or reject the proposed plan, DTSC will review and consider comments received during the 30-day public comment period from March 28 through April 26, 2018. After the close of the public comment period and prior to making a final decision on the Draft RAW, DTSC will prepare a Response to Comments document, which will list the comments received and how they were considered. The Response to Comments will be included in the Final RAW and placed in the Information Repositories established for the site.

Schedule for Proposed Removal Actions: The removal action is scheduled for completion between May 2018 and February 2019.

Where to Find the Documents? The Draft RAW, CEQA Mitigated Negative Declaration, and other related documents regarding the former NPR-1 Closure Project are available for review at the following Information Repositories:

Taft Library
27 Emmons Park Drive
Taft, CA 93268
(661) 763-3294

DTSC Clovis Office
1515 Tollhouse Road
Clovis, CA 93611
(559) 297-3901; Call for Appointment

Documents Available Online at the DTSC EnviroStor database:

http://www.EnviroStor.dtsc.ca.gov/public/profile_report.asp?global_id=80001254

(Click the “Community Involvement” tab)



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Whom to Contact for More Information: If you have any questions about this Community Update or the Draft RAW, please contact:

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