

# 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 060 and AOC 104 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) 060 and AOC 104*, prepared as part of the former Naval Petroleum Reserve No. 1 (NPR-1) Closure Project.

The former NPR-1 is located in the Elk Hills Oil Field and consists of approximately 74 square miles of land in Kern County, California. Area of Concern (AOC) 060 and AOC 104 are former landfills within the former NPR-1.

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 removal of approximately 3,660 cubic yards (cy) of contaminated soil and debris from AOC 060, and approximately 420 cy of contaminated soil and debris from AOC 104. The Draft RAW provides a description of both AOCs and the proposed cleanup activities for each. These corrective measures are necessary to obtain DTSC approval for closure of AOC 060 and AOC 104, 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 060 and AOC 104. The Draft RAW, CEQA Mitigated Negative Declaration, and other project related 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:

#### Thomas Berg

DTSC Project Manager  
1515 Tollhouse Road  
Clovis, CA 93611-0522  
Phone: (559) 297-3978  
E-mail:

[Thomas.Berg@dtsc.ca.gov](mailto:Thomas.Berg@dtsc.ca.gov)

A public meeting has not been scheduled for this project.



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**Site Location:** The former NPR-1 is divided into a series of townships and ranges. AOC 060, approximately 5 acres in size, is located in the northeastern portion of the former NPR-1 in grid 25S, Section 25, T30S/R24E, about one mile southwest of Tupman. AOC 104, approximately 0.37 acres in size, is located in the central portion of the former NPR-1 in grid 36R, Section 36, T30S/R23E, about one mile southwest of the intersection of Elk Hills Road and Skyline Road. Both sites are located within the former NPR-1, an active oil field that is closed to the public.

trash debris from approximately 1977 to 1987. The landfill was capped with approximately 2 feet (ft) of locally derived soil before 1988.

AOC 104 is known as the 36R West Landfill. In 1992, a majority of the surface debris at AOC 104 was removed. One pipe and a small amount of brick debris was later discovered and removed from the AOC in 1999.

**Previous Site Investigations:** Although AOC 060 and AOC 104 are referred to as landfills, observations and investigations in the 1990s revealed these AOCs are better described as surface scatters.

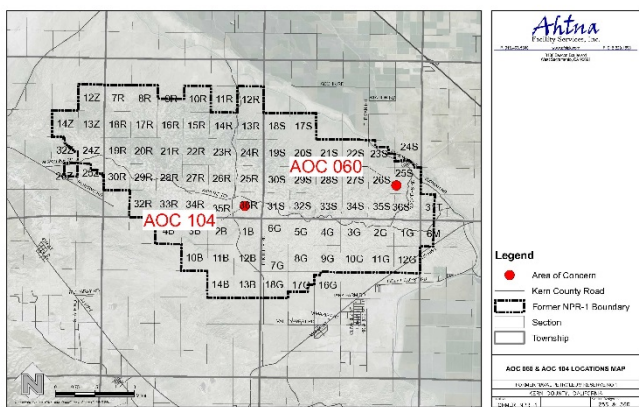
In 2012, Advanced Geophysical Services, Inc. conducted geophysical surveys to assess the extent of remaining buried refuse at AOC 060 and AOC 104. Metallic refuse was identified in the northeastern third of AOC 060; however, the survey was inconclusive for AOC 104.

Ahtna Facility Services, Inc., under contract with DOE, performed investigations at AOC 060 and AOC 104 to assess whether chemicals of potential concern (COPCs) that pose a risk to human health are present at the sites.

A 2013 test pit investigation revealed primarily construction-related debris (i.e., broken glass, piping, nails, etc.) within the northeastern third of AOC 060. Further investigation of this area in 2015 included test pit excavation and soil borings and revealed inert debris to a depth of 4 ft, and two potential ash layers. Based on the analytical results of the 2013 and 2015 investigations, arsenic, cadmium, and lead have been identified as chemicals of concern (COCs) at AOC 060. Dioxins and furans were identified as COPCs at AOC 060 due to elevated 2,3,7,8-tetrachlorodibenzo-p-dioxin toxic equivalents calculated from the 2015 investigation results.

In 2014, a Confirmatory Investigation at AOC 104, which included trenching and soil borings, revealed construction-related debris (e.g., wood, piping, bricks, etc.) to a depth of 3.5 ft and a potential brick layer. Based on the analytical results of this investigation, arsenic and lead have been identified as COCs at AOC 104.

**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 and presents seven remediation alternatives for AOC 060 and six



Location of AOC 060 and AOC 104

**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, the 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.

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 060 and AOC 104.

AOC 060, also known as the 26S East Landfill, was used for the disposal of non-hazardous, non-oily, construction and

remediation alternatives for AOC 104. The Draft RAW then provides the DOE recommended cleanup option for the sites, including procedures for achieving proposed cleanup goals.

**Clean-up Alternatives:** The Draft RAW evaluates a range of alternatives that could be used to mitigate potential health risks at AOC 060 and AOC 104. 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 060, and with the exception of Alternative 4, at AOC 104.

1. **No Action:** In accordance with regulatory guidance, the No Action alternative is analyzed as a baseline for comparison with other alternatives.
2. **Land Use Controls:** This alternative proposes to leave contaminated soil in place, limit access to the site, and restrict future use of the property through deed restriction.
3. **Capping with Land Use Controls:** This alternative proposes to place a cap of clean soil over the site to prevent migration of, or exposure to, COCs. Deed restrictions would limit post-closure land use, while engineered controls would limit post-closure accessibility.
4. **In Situ Soil Stabilization:** This alternative, which changes waste characteristics to immobilize contaminants, proposes remediation of COCs within AOC 060 and confirmation sampling once remediation is complete. This alternative was not considered for AOC 104.
5. **Ex Situ Soil Stabilization:** This alternative proposes excavation, followed by stabilization of contaminated soil. Once remediation is complete, confirmation sampling would be performed.
6. **Excavation, Waste Consolidation, and Capping with Land Use Controls:** This alternative proposes to remove contaminated soil and debris. Contaminated soil would be consolidated and covered with a cap of clean soil, and excavated debris would be disposed at a state-approved landfill. Post-excavation sampling would be conducted at the AOC to confirm soil cleanup goals have been met.
7. **Excavation and Offsite Disposal:** This alternative

proposes to remove contaminated soil and debris, and dispose it at state-approved landfills. Post-excavation sampling would be conducted at the AOC to confirm soil cleanup goals have been met.

Alternative 1 was determined to be not protective of human health. Alternatives 2, 3, and 6 were not recommended as these alternatives do not treat contaminated soil. Instead these alternatives rely on land use controls that require long-term maintenance and monitoring to prevent exposure. Alternatives 4 and 5 were not recommended due to the excessive cost necessary to implement. Alternative 7 offers short-term and long-term effectiveness, is feasible, cost effective, and offers a high degree of protection for human health.

**Proposed Alternative:** Based on the evaluation of the clean-up alternatives, DTSC and DOE recommend Alternative 7 (listed in the Draft RAW as Alternative 6 for AOC 104), Excavation and Off-site Disposal of soil. This alternative proposed to permanently remove approximately 3,660 cy of contaminated soil and debris from AOC 060 and approximately 420 cy of contaminated soil and debris from AOC 104 and store it in a permitted landfill.

Following excavation, screening and confirmation sampling of soil remaining at the AOCs would be conducted to verify cleanup goals are met. The excavations would then be backfilled, regraded, and restored.

The following activities would be performed under the proposed alternative:

- Excavate contaminated soil and debris to a depth of approximately 2 ft below ground surface (bgs) at AOC 060. Excavate discrete portions of AOC 060 to depths ranging from 4-12 ft bgs to remove additional contaminated soil.
- Excavate contaminated soil and debris to a depth of approximately 1.5 ft bgs at AOC 104. Excavate discrete portions of AOC 104 to 2.5-5.5 ft bgs to remove additional buried debris.
- Collect post-excavation soil samples to confirm COCs are not present at levels that pose a risk to human health and the environment.
- Characterize excavated soil and sort debris and dispose at a permitted landfill(s).



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- Backfill excavated areas deeper than 2 ft with clean fill and regrade.
- 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 construction 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 daily by applying Best Management Practices, including: 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 workers 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](http://www.EnviroStor.dtsc.ca.gov/public/profile_report.asp?global_id=80001254)

(Click the “Community Involvement” tab)

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

Thomas Berg  
Project Manager  
DTSC, 1515 Tollhouse Road  
Clovis, CA 93611-0522  
(559) 297-3978  
E-mail: [Thomas.Berg@dtsc.ca.gov](mailto:Thomas.Berg@dtsc.ca.gov)

Tim Chauvel  
Public Participation Specialist  
DTSC, 5796 Corporate Ave  
Cypress, CA 90630  
(714) 484-5487  
E-mail: [Tim.Chauvel@dtsc.ca.gov](mailto:Tim.Chauvel@dtsc.ca.gov)

For Media Inquiries Only  
Russ Edmondson  
DTSC Public Information Officer  
(916) 323-3372  
E-mail: [Russ.Edmondson@dtsc.ca.gov](mailto:Russ.Edmondson@dtsc.ca.gov)



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