



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
1515 Tollhouse Road
Clovis, California 93611



Edmund G. Brown Jr.
Governor

March 24, 2015

Subject: Soil Remediation at four sites within the former Naval Petroleum Reserve No 1, Elk Hills, California
– 30-day public comment period

Greetings:

The California Department of Toxic Substances Control (DTSC), the state agency responsible for the cleanup and management of hazardous waste and contaminated sites throughout California, will oversee the planned soil removal activities at four sites within the former Naval Petroleum Reserve No. 1 (NPR-1) in Kern County, California. The former NPR-1 continues to be an active oil field, now operated by California Resources Elk Hills, LLC, which is a wholly owned subsidiary of California Resources Corporation.

DTSC has prepared three Fact Sheets (enclosed) related to the four sites proposed by U.S. Department of Energy (DOE) for soil removal and cleanup. Two of the sites are addressed in a single Fact Sheet. The Fact Sheets provide an overview of the proposed removal activities at the facility previously owned by the DOE. The Fact Sheets provide information about site location, history and background, previous site investigations and actions, removal action objectives, proposed cleanup alternatives, recommended cleanup options, next steps, and contact information.

There is a 30-day comment period for local residents and stakeholders to review and comment on the three draft cleanup plans detailing the proposed activities at the four sites. The Fact Sheets contain information on where you can find and review the draft cleanup plans and other project-related documents. As part of our goal to ensure that communities have an opportunity to actively participate in the decision-making process, DTSC encourages you to review the Fact Sheets and provide your feedback by mail or e-mail. You can find contact information and instructions on how to send comment on each of the proposed cleanup actions in the attached Fact Sheets.

We greatly appreciate your participation in this process, in order to help DTSC better serve your needs and interests.

If you should have any questions, please contact me at (559) 297-3958 or by e-mail at michael.pfister@dtsc.ca.gov.

Thank you,

Michael Pfister, PG, CHG, CEG
Project Coordinator
Department of Toxic Substances Control
1515 Tollhouse Road
Clovis, CA 93611

Enclosures (3)

COMMUNITY UPDATE

The mission of DTSC is to protect California's people and the environment from harmful effects of toxic substances through the restoration of contaminated resources, enforcement, regulation and pollution prevention.

Former Naval Petroleum Reserve No. 1 Draft Removal Action Work Plan; AOCs 108 and 109 – U.S. Department of Energy

Para información en español por favor comuníquese con Marina Perez al número (818) 717 6569.

The California Department of Toxic Substances Control (DTSC) invites public comment on the Draft Removal Action Work Plan (RAW); Areas of Concern (AOCs) 108 and 109, 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 approximately 74 square miles of land in Kern County, California. AOCs 108 and 109 are inactive landfills within the former NPR-1. Reports by Bechtel Petroleum Operations, Inc. (BPOI) from 1999 state that AOCs 108 and 109 were inactive when BPOI began operation at the former NPR-1 in late 1984.

This Fact Sheet contains information about site location, history and background of the AOC, previous site investigations and actions, removal action objectives, proposed cleanup alternatives, recommended cleanup option, next steps, and contact information.

California Environmental Quality Act (CEQA): As required by California Law, DTSC has performed a review of the proposed Draft RAW in accordance with the 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.

What is Being Proposed?

The Draft RAW proposes to remove approximately 4,400 cubic yards (cy) of soil for disposal at an appropriate California landfill. The Draft RAW provides a description of AOCs 108 and 109 and the proposed cleanup activities. These corrective measures are necessary to obtain DTSC approval for closure of AOCs 108 and 109 and a "No Further Action" (NFA) designation.

Public Comment Period



**30-day public comment period
from March 25 through
April 27, 2015**

DTSC encourages you to review and comment on the Draft RAW. The Draft RAW and other project-related documents are available for review at the locations listed on the last page of this document.

DTSC will make a final decision after all public comments have been reviewed. Please submit written comments postmarked or emailed by April 27, 2015, to:

Mike Pfister

Project Coordinator
1515 Tollhouse Road
Clovis, CA 93611-0522
(559) 297-3958

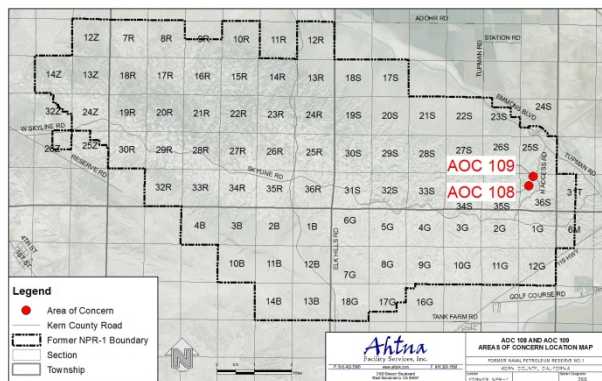
E-mail: michael.pfister@dtsc.ca.gov

A public meeting has not been scheduled for this project.

Site Location

The former NPR-1 is divided into a series of townships and ranges. AOCs 108 and 109 are located in the eastern portion of the former NPR-1 in grid 36S, Section 36, T30S/R24E. AOC 108 occupies an “L” shaped area approximately ¼-acre in size and consists of two disposal cells that run perpendicular to each other. AOC 109 consists of four waste disposal areas referred to as Areas 1, 2, 3, and 4.

Both of these former landfills are within an active oil field, which is closed to the public.



AOCs 108 and 109 Location Map

Site History and Background

The 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 U.S. Department of Energy (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 (CRC), who now operates the Elk Hills Oil Field under the name of California Resources Elk Hills, LLC (CREH).

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 AOCs 108 and 109. DTSC will oversee a removal action planned for AOCs 108 and 109. AOC 108, also known as the 134-36S Landfill, and AOC 109, also known as the 42-36S Landfill, are inactive solid waste disposal areas that previously functioned as solid waste landfills and primarily contain construction debris, concrete, glass, drums, metal, wood, and inert rubble within waste disposal cells.

Previous Site Investigations

AOCs 108 and 109 were first documented as inactive landfills in 1985 by Williams Brothers Engineering Company, who operated the former NPR-1 for the government between 1975 and 1985.

DOE was issued Health Permit #027084 by the Kern County Environmental Health Services Department (KCEHSD) for the former landfills; KCEHSD inspections of the landfills have occurred since the early 1990s.

BPOI, who operated the former NPR-1 for DOE from 1985 to 1998, conducted a series of trenching and sampling events at AOCs 108 and 109.

In 2005, test pits were dug and samples were collected at AOCs 108 and 109.

Based on the previous sampling events, California Code of Regulations, Title 22 Metals, PAHs, dioxins and furans, and TPH were identified as chemicals of potential concern (COPCs).

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 and the environment.

The Draft RAW summarizes previous studies, presents three alternatives, and then recommends the most appropriate cleanup option for the site, including procedures for achieving proposed cleanup goals.

Proposed Remediation Alternatives

The Draft RAW evaluates a range of alternatives that could be used to mitigate potential health risks at AOCs 108 and 109. 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 AOCs 108 and 109.

1. No Removal Action. This alternative proposes to leave the impacted soil in place, but limit access and restrict future use of the sites.
2. Excavation and Offsite Disposal. This alternative proposes to remove the impacted soil within AOCs 108 and 109 and conduct post-excavation soil sampling to confirm that soil clean-up goals are met.
3. Institutional Controls and Capping. This alternative proposes to place a cap of clean soil to prevent migration of or exposure to chemicals of concern. In addition, the sites would need long-term maintenance.

Recommended Action

Alternative 2 offers short-term and long-term effectiveness, is feasible, cost effective, and offers a high degree of protection for human health. Alternatives 1 and 3 were determined to be either not protective or having a moderate degree of protection for human health.

Based on the evaluation of the remediation alternatives, the Draft RAW recommends Alternative 2: Removing the debris and impacted soil, followed by post-excavation sampling. Approximately 4,400 cy of debris and impacted soil would be excavated from AOCs 108 and 109 and hauled to a permitted California landfill.

Confirmation sampling would be conducted to verify the remaining soil is below the residential human health screening levels. The excavation would then be backfilled with clean soil.

The following activities would be performed under the proposed alternative:

- Excavate debris and, based on visual observation, the underlying soil until debris is no longer present.
- Collect post-excavation soil samples to confirm COPCs are not present at levels that pose a risk to human health.

- Characterize and dispose of excavated soil at an approved landfill.
- Backfill excavated areas with clean soil and re-grade.

In addition, the following proposed controls designed to protect the surrounding community will be implemented 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 including wetting the soil, reduced vehicle speed, and cleaning vehicle tires to minimize track out.
- Dust monitoring and testing will be conducted to confirm compliance with National Ambient Air Quality Standards for PM₁₀.
- 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 the comments received during the 30-day public comment period. After the close of the public comment period, DTSC will prepare a Response to Comments document that will list the comments received and how they were considered prior to making a final decision on the Draft RAW. 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 in July of 2015.



Where to Find the Documents

The Draft RAW and other related documents regarding the former NPR-1 Closure Project are available for review at the following repository:

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

Documents Available Online at the DTSC EnviroStor database:
http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=15130019
(Click the “Community Involvement” tab)

Whom to Contact for More Information

If you have any questions about this Fact Sheet or the Draft RAW, please contact the following DTSC staff:

Mike Pfister
Project Coordinator
1515 Tollhouse Road
Clovis, CA 93611-0522
(559) 297-3958
E-mail: michael.pfister@dtsc.ca.gov

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

For Media Inquiries Only

Sandy Nax
Public Information Officer
(916) 327-6114
E-mail: sandy.nax@dtsc.ca.gov

Notice to Hearing-Impaired Individuals and Community Members that require Translation

DTSC can make all the public documents available in alternative format (i.e., Braille, large print, etc.) or in another language as appropriate, in accordance with state and federal laws. Please contact Tim Chauvel for more information.

TTY/TDD/STS users dial 711 (for the California Relay Service) and ask for Mike Pfister.

For more information about DTSC:

Visit our website at www.dtsc.ca.gov

