

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; Draft Interim Measures/Removal Action Work Plan; AOC 130-095, AOC 130-313, and AOC 130-726 – U.S. Department of Energy

Para información en español por favor comuníquese con Amanda Domínguez al número (310) 347-5784.

The California Department of Toxic Substances Control (DTSC) invites public comments on the *Draft Interim Measures/Removal Action Work Plan; AOC 130-095, AOC 130-313, and AOC 130-726*, prepared as part of the former Naval Petroleum Reserve No. 1 (NPR-1) Closure Project. Public comments will be received by DTSC until 5:00 p.m. on August 21, 2019.

The former NPR-1 is located in the Elk Hills Oil Field and consists of approximately 74 square (sq) miles of land in Kern County, California. The three Area of Concern (AOC) 130 subareas (095, 313, and 726) are in the eastern portion of the former NPR-1 (see map on page 2 for AOC 130 subarea locations).

This Community Update contains information about the site location, history, AOC background, previous site investigations and actions, removal action objectives, proposed alternatives, recommended cleanup options, next steps, and contact information.

California Environmental Quality Act: DTSC reviewed the proposed *Draft Interim Measures/Removal Action Work Plan* (Draft IM/RAW) in accordance with the California Environmental Quality Act (CEQA). DTSC prepared a Programmatic CEQA Document and Mitigated Negative Declaration for the Naval Petroleum Reserve No. 1 Closure Project and approved the document on March 27, 2018. The Addendum to the Programmatic CEQA Document, which was approved on May 20, 2019, includes additional AOC sites and demonstrates that DOE's remediation of multiple sites simultaneously will not have a negative effect on the environment. Based on that review, DTSC determined the project will not have a significant effect on public health or the environment.

What is Being Proposed?

The DOE proposes excavation and off-site disposal of approximately 89-263 cubic yards (cy) (134-395 tons or roughly 5-15 truckloads) of contaminated soil from AOC 130-095, AOC 130-313, and AOC 130-726.

Public Comment Period



**30-day Public Comment Period
from July 23 2019 through
August 21, 2019**

DTSC encourages you to review and comment on the Draft IM/RAW for AOC 130-095, AOC 130-313, and AOC 130-726. The Draft IM/RAW is available for review at the Taft Public Library, the DTSC Clovis office, and online at EnviroStor; see page 5.

DTSC will make a final decision after all public comments have been reviewed. Please submit your comments postmarked or emailed by August 21 2019, to:

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Email:

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A public meeting has not been scheduled for this project.



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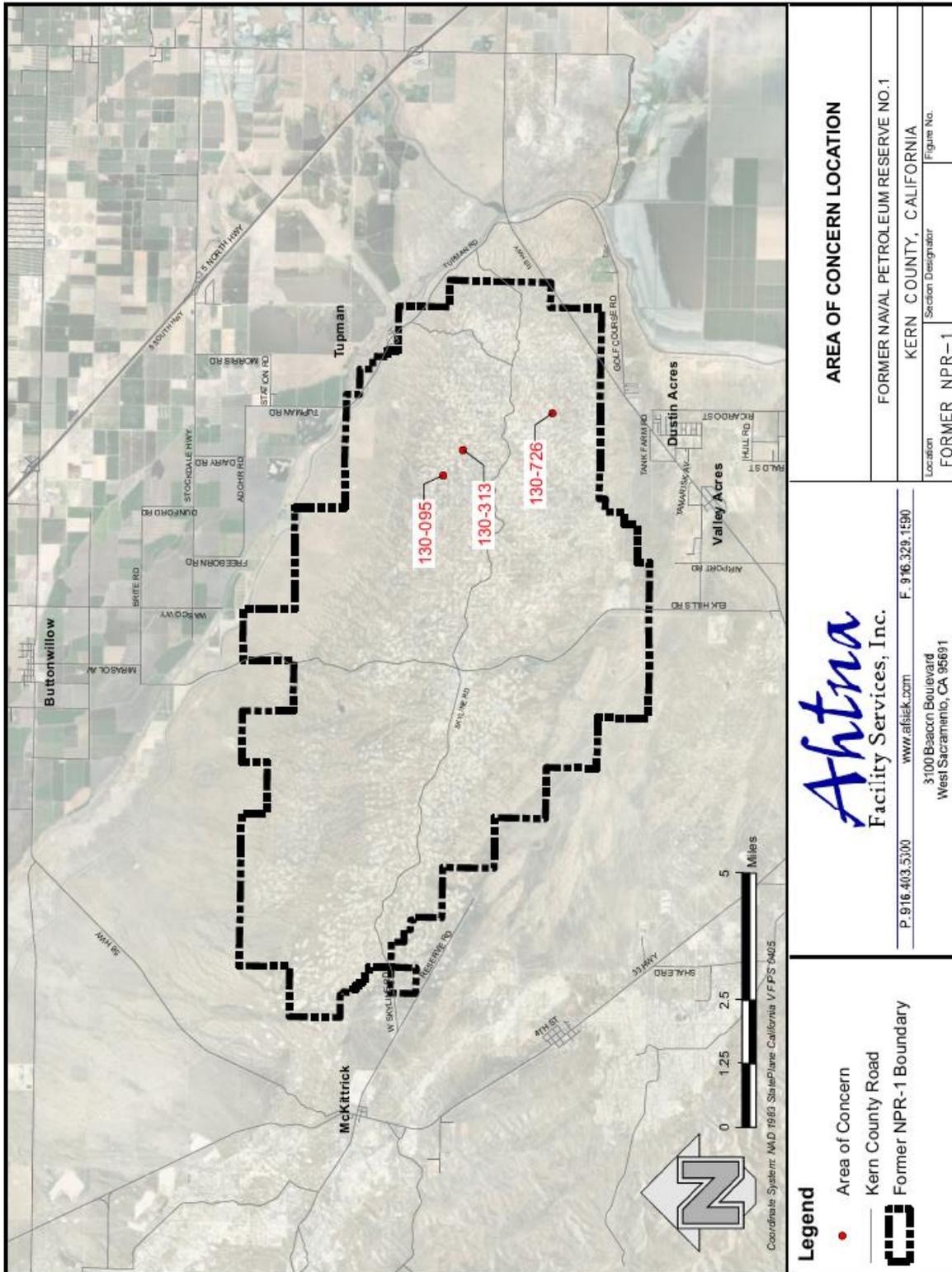
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Location map of AOC 130-095, AOC 130-313, and AOC 130-726



AREA OF CONCERN LOCATION	
FORMER NAVAL PETROLEUM RESERVE NO.1	
KERN COUNTY, CALIFORNIA	
Location	Section Designator
FORMER NPR-1	Figure No.

Ahtna
 Facility Services, Inc.
www.ahtna.com
 P. 916.403.5300 F. 916.329.1590
 3100 Bascom Boulevard
 West Sacramento, CA 95691

Legend
• Area of Concern
— Kern County Road
— Former NPR-1 Boundary



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The Draft IM/RAW provides a description of AOC 130-095, AOC 130-313, and AOC 130-726 and the proposed remediation activities. These corrective measures are necessary to obtain DTSC approval for closure of the three AOC 130 subareas and a “No Further Action” designation for each of them.

Site Location: These AOC subareas are located on different portions of the former NPR-1 and vary in size, ranging from approximately 0.14 acres to 0.37 acres. The three AOC 130 subareas are within an active oil field, which is closed to the public.

Site History and 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. Effective October 1, 1997, DOE sold the Federal Government’s interests in NPR-1 to Occidental Petroleum Corporation (Occidental), 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, which 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. 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 130-095, AOC 130-313, and AOC 130-726.

Previous Site Investigations: Assessments were conducted at the three AOC 130 subareas to determine whether there were releases of chemicals into the soil due to past U.S. Government operations.

Results have indicated the presence of arsenic concentrations greater than the site-specific soil action level of 26 milligrams per kilogram.

DOE and DTSC have recommended cleanup of the contaminated soil at these three AOC 130 subareas.

Removal Action Objectives: In the Draft IM/RAW, DOE proposes preferred cleanup approaches that prevent or reduce potential human health risks. The Draft IM/RAW summarizes previous investigation results, presents different removal action alternatives, and provides a recommended cleanup action based on the Evaluation Criteria (effectiveness, implementability, and cost).

Proposed Removal Action Alternatives: In the Draft IM/RAW, DOE evaluated the removal action alternatives with respect to Federal and State criteria, for short and long-term effectiveness, feasibility, and cost. The following alternatives were considered for these three AOC 130 subareas.

1. **No Action:** As required by the State, the No Action alternative has been included for the AOC 130 subareas to provide a baseline for comparisons among other remedial alternatives. The No Action alternative does not require implementing corrective measures at the sites and no costs would be incurred.
2. **Institutional Controls:** For this alternative, DOE proposes leaving the contaminated soil in place and limiting access by means of institutional controls and/or physical fencing of the sites.
3. **Clean Soil Cover:** Under this alternative, DOE proposed an engineered clean soil cover be placed over the sites to provide a barrier to exposure and prevent access to the contaminated soil. The sites would require long-term routine maintenance, need to be secured (i.e., implementing engineered controls, such as fencing), and have institutional controls to protect the cover integrity and prevent unauthorized intrusive activities.
4. **Excavation and Off-site Disposal:** Under this alternative, DOE proposes to remove and dispose of the contaminated soil from the AOC 130 subareas at an appropriate licensed facility. Post-excavation soil sampling would be used to confirm that the soil cleanup goal is met.



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AOCs and Recommended Actions:

AOC 130 is a collection of well pads distributed across the former NPR-1 where W-41, an arsenic-containing corrosion inhibitor was potentially used. An analysis of results from previous investigations at AOC 130 indicated that arsenic concentrations present in soil may have an impact on human health if exposure occurs.

AOC 130-095 (0.14 acres), AOC 130-313 (0.15 acres), and AOC 130-726 (0.37 acres) are well pads located throughout the former NPR-1, on the Upper Tulare Formation. Arsenic in soil is identified as the chemical of concern (COC) in these AOC 130 subareas.

DOE has recommended the Excavation and Off-site Disposal alternative to remediate an estimated 89-263 cy (56-166 cy from AOC 013-095, 16-46 cy from AOC 013-313, and 17-51 cy from AOC 013-726) (approximately 134-395 tons) of arsenic contaminated soil from the three AOC 130 subareas.

The alternative proposed for these three AOC 130 subareas (AOC 130-095, AOC 130-313, and AOC 130-726) is considered the most cost-effective and technically feasible option to achieve the cleanup goal and is deemed adequately protective of human health under future unrestricted residential land use scenarios. They are easily implementable and are anticipated to be acceptable to the community and landowner, while limiting future DOE liability.

The other alternatives were determined to be either not protective of human health as the contaminated soil would remain on-site without controls or not recommended because they would rely on institutional controls to prevent possible exposures to chemical concentrations; some alternatives were not recommended due to the excessive cost necessary to implement them.

Under the Excavation and Off-site Disposal alternative, the contaminated soil from AOC 130-095, AOC 130-313, and AOC 130-726 would be removed and disposed at a permitted landfill, as identified in the draft IM/RAW. The AOC 130 subareas would be remediated with no institutional controls required.

The following activities would be performed under the Excavation and Off-site Disposal alternative:

- Excavate contaminated soil to depths ranging from surface to 1.5 feet below ground surface (the depth will vary at each AOC 130 subarea), based on previous sampling results.
- Native American Monitors will be present at the AOC 130 subareas to ensure the removal action activities are conducted in accordance with the DTSC-approved Cultural Resources Management Plan (CRMP) and the CRMP Addendum.
- Collect post-excavation soil samples to confirm COCs are not present at levels that pose a risk to human health.
- Dispose of excavated soil at a permitted landfill, as identified in the draft IM/RAW.
- Backfill excavated areas with clean fill, as appropriate, and re-grade.

Protective Measures: The following controls are designed to protect the surrounding community:

- 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 include: Wetting soil, reducing vehicle speed, cleaning vehicle tires, and covering loads.
- Dust monitoring and testing will be conducted to confirm compliance with National Ambient Air Quality Standards.
- Site visitors will be required to sign in, receive a Safety and Health briefing, and wear the appropriate Personal Protective Equipment.



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Next Steps: Before making a final decision to approve or reject the proposed plan, DTSC will review and consider all public comments received during the 30-day public comment period. After the close of the public comment period and prior to making a final decision on the Draft IM/RAW, DTSC will prepare a Response to Comments document, which will list the comments received and how they were considered. The Response to Comments document will be included in the Final IM/RAW.

Schedule for Proposed Removal Actions: If the IM/RAW is approved, the remediation activities will be conducted between August and September 2019.

Where to Find the Documents: The Draft IM/RAW and other related documents regarding the former NPR-1 Closure Project are available for review at the following Repositories:

Taft Library

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

DTSC Clovis Regional Office

1515 Tollhouse Road
 Clovis, CA 93611-0522
 (559) 297-3978

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)

For More Information: If you have questions about this Community Update or the Draft IM/RAW, please contact the following DTSC staff:

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