

COMMUNITY UPDATE

Department of Toxic Substances Control - Our mission is to protect the people, communities, and environment of California from harmful chemicals by cleaning up contaminated sites, enforcing hazardous waste laws, and compelling the development of safer products.

Former Naval Petroleum Reserve No. 1; Draft Interim Measures/Removal Action Work Plans; AOCs 012-004, 020-002, 038-002, 074-002 and 074-003, 082-002, 115-002, and 125-001 – U.S. Department of Energy

The Department of Toxic Substances Control (DTSC) invites public comments on Interim Measures for the former Naval Petroleum Reserve No. 1 (NPR-1) Closure Project (Site). The **Draft Interim Measures/Removal Action Work Plans** (Draft IM/RAWs); **AOCs 012-004, 020-002, 038-002, 074-002 and 074-003, 082-002, 115-002, and 125-001**, and the proposed Addendum 2 to the Programmatic California Environmental Quality Act (CEQA) document are available for review. These and related documents can be found online or at the repositories listed below. DTSC will accept comments from November 16 to December 18, 2020.

Site Location: NPR-1 is part of the Elk Hills Oil Field. It is roughly 74 square (sq) miles of land in Kern County, California. The Site includes Areas of Concern (AOCs) — *012-004, 020-002, 038-002, 074-002 and 074-003, 082-002, 115-002, and 125-001* — on NPR-1 (see map on page 2 for AOC locations). AOCs are contaminated areas that require action to be taken to protect human health.

The AOCs are in different areas of NPR-1. They vary in size, ranging from roughly 0.02 acres to 0.81 acres. The AOCs are in an active oil field that is closed to the public.

What is Being Proposed?

The proposed Draft IM/RAWs have previous sample results, describe each AOC and propose cleanup options. These actions are needed for DTSC approve the closure of the AOCs and for a “No Further Action” designation for each of them.

The U.S. Department of Energy (DOE) proposes removing about 18,760 cubic yards (cy) (roughly 1,279 truckloads; 22 tons in each truck) of contaminated soil from AOCs *012-004, 020-002, 038-002, 082-002, 115-002, and 125-001*. DOE proposes Institutional Controls to restrict or manage use of AOC *074-002 and AOC 074-003*.

Where to Find the Documents: The Draft IM/RAWs and related documents about 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 (Call for appointment)

Documents Available Online at the DTSC EnviroStor database (click “Community Involvement” tab):

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

Public Comment Period

32-day Public Comment Period from November 16, 2020, through December 18, 2020

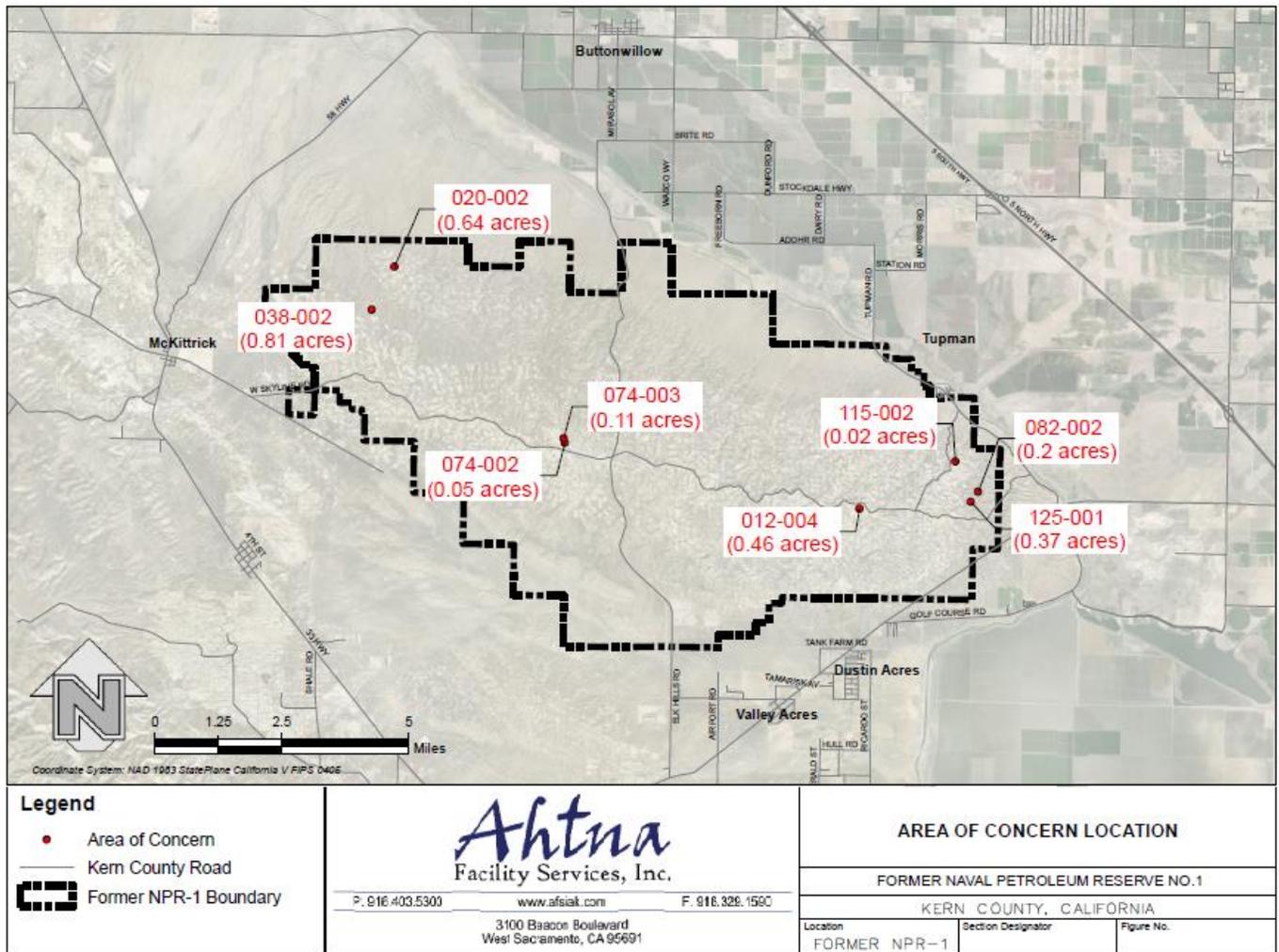
DTSC encourages you to review and comment on the Draft IM/RAWs for AOCs 012-004, 020-002, 038-002, 074-002 and 074-003, 082-002, 115-002, and 125-001, and the CEQA Addendum 2. The documents are available for review online or at the repositories. DTSC will make a final decision after all public comments are reviewed. Please submit your comments postmarked or emailed by December 18, 2020, to:

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Location map of AOC 012-004, AOC 020-002, AOC 038-002, AOC 074-002, AOC 074-003, AOC 082-002, AOC 115-002, and AOC 125-001



Site History and Background: NPR-1 was created by an Executive Order in 1912 to preserve potential oil resources for national defense purposes. Public Law 104-106 passed in February 1996 required DOE to sell the United States' lands and hydrocarbon interests in NPR-1. DOE sold these interests to Occidental Petroleum Corporation (Occidental) in October 1, 1997. In 2014, Occidental transferred the property to California Resources Corporation.

DOE and DTSC entered an Agreement for Site Assessment in 1998. In 2008, DOE signed a Corrective Action Consent Agreement. DOE agreed to clean up 131 AOCs, including the ones in this update.

Previous Site Investigations: Consultants for DOE assessed these AOCs to find out if chemicals were released due to past U.S. Government operations.

Results showed some chemicals onsite at levels that could be harmful to human health. These are known as contaminants of concern (COCs). The COCs found onsite were arsenic, hexavalent chromium (Cr⁺⁶), polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs) in soil and VOCs in soil gas.

Proposed Cleanup Action Options: The following options were considered for these AOCs:

1. **No Action:** This option means there would be no changes at the Site. This provides the baseline for comparing the options.
2. **Institutional Controls:** For this option, soil impacted by COCs is left in place. But, access would be limited, and/or physical fencing would be put around the Site. The landowner and DTSC will enter an agreement to manage use of the AOC.

3. **Clean Soil Cover:** For this option, clean soil is put over the AOC to provide a barrier and prevent access to the impacted soil. The AOC would require long-term, regular maintenance, need to be secured (i.e., adding fencing). To protect the cover and prevent unauthorized use, access would be limited.
4. **Limited Excavation with Land Use Controls:** For this option, DOE would remove soil near the surface and replace it with clean soil. This creates a barrier and prevents access to impacted soil at the AOC. The site would still need to be secured and access limited.
5. **Excavation and Off-site Disposal:** Under this option, DOE would remove and dispose of the impacted soil at an off-site licensed facility. Remaining soil and soil vapor is tested to ensure cleanup goals have been met. Clean soil is used to backfill the area.

AOCs and Suggested Actions:

DOE suggests Excavation and Off-site Disposal for the following AOCs:

AOC 012-004 has a sump and a catch basin in a former gas plant. The lower part of the drainage starts at the gas plant. It is about 0.46 acres. Naphthalene (as a PAH), and VOCs in soil and soil gas, are the COCs. About 943 cy of soil (64 truckloads) needs to be removed.

AOC 020-002 is a former disposal trench in a natural drainage area. It is about 0.64 acres. Arsenic is the COC. About 4,681 cy of soil (319 truckloads) needs to be removed.



AOC 038-002 is located down-slope from Well #314. It is about 0.81 acres. It has a 175 ft long by 10 ft high border to prevent drainage to other areas. Arsenic is the COC. About 10,800 cy of soil (736 truckloads) needs to be removed.

AOC 082-002 is one of a series of three sumps used, historically, to hold oil that overflowed from a former tank. It is about 0.2 acres. Arsenic and naphthalene (as a PAH) are the COCs. About 1,860 cy of soil (127 truckloads) needs to be removed.

AOC 115-002 is the former location of one 1,000-gallon waste oil underground storage tank. The AOC is about 0.02 acres. Arsenic and PAHs in soil, and VOCs in soil gas, are the COCs. About 411 cy of soil (28 truckloads) needs to be removed. About 550 sq ft of the parking lot near the AOC will be removed to create a slope for the cleanup.

AOC 125-001 is a drilling mud sump. It is about 0.37 acres. In 2019, a new well pad was built for Well 81H-G1 to the north of the AOC. The well covered some of the 2017-18 sample locations with soil. Arsenic and Cr⁺⁶ are the COCs. About 3,600 cy of soil (245 truckloads), including 65 cy of impacted soil and 100 cy of soil for sloping, needs to be removed.

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

- Remove impacted soil based on previous sampling results.
- Native American Monitors will be present at the AOCs to ensure cleanup activities are done based on DTSC-approved Cultural Resources Management Plan (CRMP) and the CRMP Addendum
- Sample soil and/or soil gas remaining onsite to confirm COCs are not at levels that pose a risk to human health
- Dispose of impacted soil at a permitted landfill
- Removed soil is replaced with clean soil
- Complete surface restoration in line with the *California Endangered Species Act Incidental Take Permit (ITP) No. 2081-2013-029-04* and the *2017 ITP Amendment No. 1*

DOE suggests Institutional Controls for AOC 074-002 and AOC 074-003. These AOCs are in active storage areas. AOC 074-002 has a filter accumulation pad. AOC 074-003 has a hazardous waste storage pad. They are in the 27R Waste Management Complex that

is currently in-use. Arsenic is the COC at both AOCs. It is found at depths of 2.5-9.5 feet below concrete structures and asphalt.

DOE proposes this option for these two AOCs because the majority of the COC is below concrete or asphalt which provides a barrier. Also, the COC is at low levels and deep in the soil. The two areas are active and will continue to be used in the oil production processes.

Protective Measures: The following actions will be taken to protect the surrounding community:

- Removal actions will be planned and conducted to minimize dust from moving offsite.
- Dust control measures will be performed daily before work begins based on best practices. These may include wetting soil, reducing vehicle speed, cleaning vehicle tires, and covering truckloads.
- Dust monitoring and testing will be done based on National Ambient Air Quality Standards.
- Oilfield access is restricted. Visitors must sign in, receive a Safety and Health briefing, and wear appropriate Personal Protective Equipment.



California Environmental Quality Act: DTSC reviewed the proposed Draft IM/RAWs in accordance with CEQA. DTSC prepared a Programmatic CEQA Document and Mitigated Negative Declaration for the Site Closure Project. Both documents were approved on March 27, 2018. Addendum 1 to the Programmatic CEQA Document, which included additional AOC sites and demonstrated that DOE's remediation of multiple sites simultaneously would not have a negative effect on the environment, was approved on May 20, 2019. DTSC reviewed these documents and determined the project will not have a significant effect on public health or the environment. The proposed Addendum 2 to the Programmatic CEQA Document includes additional future remediation sites and again demonstrates that DOE's simultaneous implementation of these multiple sites will not have a negative effect.

Next Steps: Before making a final decision on the proposed plans, DTSC will review and consider public comments received during the 32-day public comment period. After the close of the comment period, DTSC will prepare a Response to Comments document. This document lists the comments received and how they were considered prior to making a final decision. The Response to Comments document will be included in the Final IM/RAWs. This document will also be sent to anyone who includes their return address.

Schedule for Proposed Removal Actions: If the IM/RAWs are approved, the cleanup actions will begin in 2021.

DTSC Contacts: If you have questions about this Community Update or the Draft IM/RAWs, please contact the following DTSC staff:

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