

Communication from Public

Name: Pico Robertson Health and Safety Coalition
Date Submitted: 04/28/2022 03:18 PM
Council File No: 21-1025
Comments for Public Posting: Please see the attached cover note from the Pico Robertson Health and Safety Coalition with appended documents from CalGEM and the Los Angeles Regional Water Quality Control Board concerning the subsurface clean-up of the pipeline leak and spill at the West Pico Drill Site.

Sub-surface Clean-up of Underground Pipeline Leak and Surface Spill at West Pico Drill Site.

Cover Note from Pico Robertson Coalition with appended documents from CalGEM and the Los Angeles Regional Water Quality Control Board.

The Los Angeles Regional Water Quality Control Board opened their case about the subsurface leak and clean-up at the West Pico Drill Site on March 8, 2022 after having been informed in January 2022 about CalGEM's December 14, 2021 Notice of Violation that ordered the drill site's owner/operator PCEC to conduct a sub-surface clean-up.

A copy of CalGEM's Notice of Violation (NOV) is attached. The NOV cites PCEC for multiple violations of the California Code of Regulations for improper and illegal abandonment of a pipeline, for improper and poor maintenance practices, and for improper site restoration practices. It specifically orders a subsurface clean-up: "Spilled fluid and all impacted media, including surface and subsurface, must be cleaned-up."

Because the spill that reached the surface on December 11, 2021 emanated from a leaking underground pipeline that is 6 feet or more below the surface, the amount of subsurface leakage was necessarily greater and of longer duration than what finally reached the surface on December 11, 2021.

A citizen complaint to CalEPA in January 2022 prompted the Los Angeles Regional Water Quality Control Board to investigate whether it should assert regulatory jurisdiction. While CalGEM has the authority to order a clean-up, it does not monitor or supervise clean-ups of leaks and spills from oil facilities. That is a task handled by the State's Water Board.

The Water Board's web page for the case showing that it was opened on March 8, 2022 is here https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000018621 and a snapshot of that web page is appended to this cover note.

The Water Board's directive to PCEC to submit a workplan for site assessment testing as a prelude to any sub-surface clean-up is here https://documents.geotracker.waterboards.ca.gov/regulators/deliverable_documents/1781644523/SCP5_MN_West%20Pico%20Drill%20Site_Reg%20for%20Site%20Assmnt%20WP_04-15-22.pdf and a copy of the directive is appended to this cover note.

From experience, we know that the Water Board is a professional, methodical, and data driven agency. It supervises and directs site clean-ups in an iterative way.

First, the Water Board does a preliminary investigation to decide whether it should open a case. Then, if it opens a case, it directs the owner/operator to have a licensed profession prepare a testing workplan, which the Water Board then reviews until all necessary revisions are made. When the workplan is approved, the Water Board then directs the owner/operator to have a licensed professional conduct the testing and report the results to the Water Board, which the

Board reviews until all necessary supplemental testing and analysis as might be needed is completed. And then the Water Board directs the preparation of a workplan for clean-up as needed, proceeding through the same process to review and revise the workplan, and to direct the commencement of clean-up and the reporting of results until the Water Board can confirm the clean-up has been completed.

This process takes time because it is thorough and enforced. Getting to the clean-up stage can take a year or longer. Clean-ups can vary greatly in size, scope, and duration, depending on what the soil and ground water test results show.

In the West Pico Drill Site case, the exact location of the underground pipeline leak is still unknown because PCEC has not sent a video camera into the pipeline to determine where the leak happened or the exact nature of the pipeline failure. It is unknown whether the leak point was under the alley next to the Drill Site compound or under the compound itself. It is unknown how far the underground leak spread laterally, though we do know that the leaked fluid had to rise at least 6 feet to reach the surface.

To the extent the leak was located under the City alleyway, excavation might be less substantial than if the leak was located (or spread) under the Drill Site compound. The Drill Site compound has a concrete floor that PCEC has reported is more than 6 feet thick, and a 6,500 square foot support building is immediately adjacent to surface exit point of the above ground spill. Any demolition inside the Drill Site compound would be much more involved and consequential, and then would be followed up by reconstruction that would be more substantial and consequential than repaving the alley.

We know that a spill and subsurface leak occurred. We know that they were caused by violations of Federal, State, and City pipeline safety regulations that continued for 20 years. We know that these violations could have and should have been detected and remedied by proper Zoning Administrator reviews that did not happen and by other proper inspections that did not happen. **And we know that these violations and failures to conduct proper reviews have resulted in environmental impacts that should have been prevented by proper mitigation measures and enforcement.**

The ZA's granting of Categorical Exemption in the short-circuited PA2 review was improper because safety violations create real heightened risks of environmental impacts that preclude use of an exemption. Indeed, real environmental impacts were created by this negligence, and the risk of more and greater impacts remain in place.

City Council should grant NASE's appeal and overturn the Categorical Exemption from Environmental Review.

Documents follow on succeeding pages.



NOTICE OF VIOLATION

December 14, 2021

Violation I.D. 12242781

VIA EMAIL

Mr. Philip Brown, Agent
Pacific Coast Energy Company LP (B6127)
1555 Orcutt Hill Road
Orcutt, CA 93455
philip.brown@pceclp.com

Dear Mr. Brown:

SPILL/INCIDENT, PACIFIC COAST ENERGY COMPANY LEASE, BEVERLY HILLS FIELD

On December 11, 2021, California Geologic Energy Management Division (CalGEM) received notification from the Office of Emergency Services (Cal OES #21-7076) regarding a spill from a Pacific Coast Energy Company LP pipeline in the Beverly Hills field. This letter itemizes violation(s) of the California Code of Regulations, title 14 (CCR).

Maintenance of Production Facilities and Equipment: CCR section 1777 (a) states, "Operators shall maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources."

Out-of-Service Production Facility Requirements: CCR section 1773.5 (a) states in part that within "six months after the determination that a production facility is Out-of-Service, the following shall be required:

(1) Out-of-Service production facilities shall have fluids, sludge, hydrocarbons, and solids removed and shall be disconnected from any pipelines and other in-service equipment.

(6) Pipelines associated with Out-of-Service tanks and pressure vessels shall be removed or flushed, filled with an inert fluid, and blinded."

Well Site and Lease Restoration: CCR section 1776 (f) states that "Lease restoration shall include the removal of all tanks, above-ground pipelines, debris, and other facilities and equipment. Remaining buried pipelines shall be purged of oil and filled with an inert fluid. Toxic or hazardous materials shall be removed and disposed of in accordance with Department of Toxic Substances Control requirements".

Mr. Philip Brown, Agent
Pacific Coast Energy Company LP (B6127)
Violation I.D. 12242781
December 14, 2021

The subject violation is summarized in the table below:

Pipeline Description	Violation Description	Violation Number
WellSTAR Pipeline ID# 90324914	Pipeline leak	12242781

Spilled fluid and all impacted media, including surface and subsurface, must be cleaned-up. The pipeline must be abandoned to the standards specified in CCR section 1776(f). Additionally, a root cause analysis and action taken to prevent future occurrence must also be provided to CalGEM by January 11, 2022.

Pacific Coast Energy Company LP shall notify CalGEM during normal working hours (8:00 am to 5:00 pm) once the violations have been corrected for a re-inspection.

Failure to comply with the laws of California and CalGEM may result in enforcement action including, but not limited to, issuance of a civil penalty and/or order pursuant to Public Resources Code Sections 3106, 3224, 3235, 3236, and 3236.5.

If you have any questions, please contact Neda Tafi at (562) 637-4400 or neda.tafi@conservation.ca.gov.

Sincerely,

Grace P. Brandt Digitally signed by Grace P. Brandt
Date: 2021.12.14 13:04:12 -08'00'

Grace Brandt
Environmental and Facilities Unit Supervisor

cc: Los Angeles City Fire Department- lafdcupa@lacity.org
Pipeline and Facilities Program File



9101 WEST PICO BOULEVARD
LOS ANGELES, CA 90035
LOS ANGELES COUNTY
CLEANUP PROGRAM SITE ([INFO](#))
OPEN - SITE ASSESSMENT AS OF 3/8/2022 - [DEFINITION](#)
[PRINTABLE CASE SUMMARY](#) / [CSM REPORT](#)

CLEANUP OVERSIGHT AGENCIES
LOS ANGELES RWQCB (REGION 4) (**LEAD**) - CASE #: 1549
CASEWORKER: [MAJD NIMA](#)

[Summary](#) [Cleanup](#) [Action Report](#) [Regulatory Activities](#) [Environmental Data \(ESI\)](#) [Site Maps / Documents](#) [Community Involvement](#) [Related Cases](#)

Regulatory Profile

[PRINTABLE CASE SUMMARY](#)

CLEANUP STATUS - [DEFINITIONS](#)
OPEN - SITE ASSESSMENT AS OF 3/8/2022 - [CLEANUP STATUS HISTORY](#)
POTENTIAL CONTAMINANTS OF CONCERN
NONE SPECIFIED
FILE LOCATION

POTENTIAL MEDIA OF CONCERN
NONE SPECIFIED
DESIGNATED GROUNDWATER BENEFICIAL USE(S) - [DEFINITIONS](#)
MUN, AGR, IND, PROC

Site History

No site history available

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Los Angeles Regional Water Quality Control Board

April 15, 2022

Mr. Pat Vigeant
Senior Production Forman
Pacific Coast Energy Company LP
9151 West Pico Boulevard
Los Angeles, CA 90035

Via email only

SUBJECT: REQUIREMENT FOR SITE ASSESSMENT WORK PLAN

**SITE: WEST PICO DRILL SITE, 9151 AND 9101 WEST PICO BOULEVARD,
LOS ANGELES, CALIFORNIA (ASSESSOR IDENTIFICATION
NUMBERS 4332-002-049 AND 4332-005-044, SCP NO. 1549)**

Dear Mr. Vigeant:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura counties, including the above-referenced site.

The Regional Board has evidence that indicates that there is or has been a discharge of waste from the Pacific Coast Energy Company's West Pico facility, located at 9151 and 9101 West Pico Boulevard, Los Angeles, California (Site). The evidence includes information in the project files that an estimated 15 gallons of crude oil and produced water release occurred on December 11, 2021, at the Site from an underground pipeline. On March 9, 2022, Regional Board staff inspected the release location at the facility and confirmed that a discharge of waste had occurred at the Site. The release of the petroleum product to the subsurface environment has the potential to impact the subsurface soil and to degrade groundwater quality and the beneficial uses of the State's waters.

Based on our review of the available information, Regional Board staff has determined that site assessment must be conducted at the Site to assess the impacts to the subsurface environment that may have occurred due to the pipeline release, characterize the waste discharge, define the full extent of the soil impact laterally and vertically, and determine if cleanup of the subsurface environment is needed.

Therefore, you are hereby directed to prepare and submit a site assessment work plan by **June 30, 2022**, to this Regional Board to conduct the required site investigation.

LAWRENCE YEE, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

The required work plan should, at a minimum, include, but not be limited to, the following items:

1. Description of the proposed subsurface soil investigation at the release location, soil boring locations, proposed soil sampling from the subsurface soil, and proposed area of excavation, etc.
2. Accurately scaled site map and a site location map;
3. Proposed soil excavation area shown on an accurately scaled map;
4. Proposed soil sampling locations depicted on an accurately scaled map;

In addition, the work plan must address the following:

- a. All soil sampling shall be collected in accordance with US Environmental Protection Agency (USEPA) sampling Method 5035.
- b. All collected soil samples shall be analyzed for full scan volatile organic compounds (VOCs) in accordance with USEPA 8260B Test Method, and for total petroleum hydrocarbons (TPH) carbon chain in accordance with USEPA Test Method 8015B.
- c. A grab groundwater sample is required if groundwater is encountered during drilling of soil borings.

As presented in State Water Resources Control Board Resolution 92-49, professionals should be qualified, licensed where applicable, and competent and proficient in the fields pertinent to the required activities. Moreover, the technical report submitted to this Regional Board must be reviewed, signed and stamped by a California Professional Geologist, or a California Professional Civil Engineer with at least five years of hydrogeological experience. Furthermore, the California Business and Professions Code sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgments be performed by or under the direction of a registered geologist or registered civil engineer. A statement is required in the final report that the registered professional in responsible charge actually supervised or personally conducted all the work associated with the workplan and final report.

Should you have any questions or concern, please contact Mr. Majd Nima at (818) 296-7674 or via email at majd.nima@waterboards.ca.gov or Mr. Bizuayehu Ayele at (213) 576-6623 or via email at bizuayehu.aye@waterboards.ca.gov.

Sincerely,

 Digitally signed
by Majd Nima
Date: 2022.04.15
16:14:32 -07'00'

Majd Nima. PG
Engineering Geologist

cc (via email): Mr. Michael Salman ()