

Communication from Public

Name: Pico Roberston Health and Safety Coalition

Date Submitted: 04/18/2023 11:06 AM

Council File No: 21-1025

Comments for Public Posting: Please see the appended documents: an email (sent today, 4/18/23) from the Water Board to PCEC and especially the attached letter from the Water Board to PCEC concerning testing and clean up from the pipeline leak and spill that emanated on the surface in December 2021. KEY POINTS: * The Water Board has found PCEC soil and ground water testing is incomplete and has not followed previous Water Board directives. * The Water Board requires PCEC to submit a Work Plan by July 28, 2023 that proposes specific plans to complete testing as directed by the Water Board. The Water Board must approve the work plan. * Completing the required testing is necessary to fully delineate the depth and spread of contamination. * The Water Board tells PCEC in the attached letter (as it has previously communicated from earlier rounds of test results) that the test data so far already shows that additional clean up will be required by the Water Board. * The Water Board is again telling PCEC that it needs to do full testing and then cleanup the pipeline leak and spill from the soil and groundwater. *

Subject: West Pico Drill Site, assessment case status review letter

From: "Nima, Majd@Waterboards" <Majd.Nima@Waterboards.ca.gov>

Date: 4/18/2023, 10:10 AM

To: Philip Brown <philip.brown@pceclp.com>

CC: Jerome Summerlin <jsummerlin@PadreInc.com>, Dan Ringstmeyer <dan@buena-res.com>,
Michael Salman <>, "Ayele, Bizuayehu@Waterboards"

<Bizuayehu.Ayele@waterboards.ca.gov>

Hope all is well,

The California Regional Water Quality Control Board for the Los Angeles Region (Regional Board) provides copies of correspondence through e-mail. The attached is your copy of recent correspondence; only the addressee will receive a hard copy.

The letter is in Adobe Acrobat PDF format. You can obtain an Acrobat Reader free of charge at <http://www.adobe.com/products/acrobat/readstep2.html>.

Majd Nima, PG, C-57

Engineering Geologist | 213-576-6707

Los Angeles Regional Water Quality Control Board | 320 W. 4th Street, Suite 200 | Los Angeles, CA 90013



— Attachments: —

SCP5_MN_West Pico Drill Site_Assmnt Rept Review & Req for WP_04-18-23.pdf

333 KB

Los Angeles Regional Water Quality Control Board

April 18, 2023

Mr. Phillip Brown
Pacific Coast Energy Company, LP
1555 Orcutt Hill Road
Santa Maria, CA 93455

Via email only

SUBJECT: REVIEW OF SOIL SAMPLING AND EXCAVATION REPORTS AND REQUIREMENT FOR A WORK PLAN FOR ADDITIONAL ASSESSMENT

SITE/CASE: WEST PICO DRILL SITE, PACIFIC COAST ENERGY, 9101-9151 WEST PICO BLVD, LOS ANGELES (SITE CLEANUP NO. 1549, SITE ID NO. 2040661)

Dear Mr. Brown:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff reviewed the following technical reports (Reports), which were submitted by Padre Associates, Inc. and Buena Resources, Inc. (Consultants) on your behalf for the above-referenced site (Site), in response to the Regional Board staff work plan approval letter, dated June 7, 2022:

1. *Pre-Construction Soil Assessment Activities*, dated August 2022;
2. *Pipeline Abandonment and Supplemental Soil Assessment Activities*, dated October 2022; and (Reports); and
3. *Supplemental Soil Assessment Activities* dated November 2022.

The work plan approval letter approved the *Workplan PCEC Pipeline & Soil Removal* and required submittal of a technical report after the implementation of the work plan.

SUMMARY OF THE REPORTS

An unauthorized release of produced water was reported in December 2021 at the northwest corner of the Site. In response to the release, the facility operator, Pacific Coast Energy Company, LP (PCEC), completed the flushing and re-abandonment of seven pipeline segments that were historically utilized to transfer fluids between the two PCEC facilities located at 9101 and 9151 West Pico Boulevard. Prior to the initiation of the pipeline segment flushing and re-abandonment activities, pre-construction soil assessment activities were conducted in the area of the pipeline segments.

The Reports summarize the following site assessment, pipeline removal, soil excavation activities, and confirmation soil sampling activities and present the soil analytical results

NORMA CAMACHO, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

for the soil samples collected. The activities described in the Reports can be summarized as follows:

1. Five soil borings were advanced in the spill area. The total depth of the soil borings ranged from 7 feet (ft) below ground surface (bgs) to 20 ft bgs. A refusal was encountered at GP1 at 7 ft bgs, and the boring was terminated at that depth. GP5 was advanced to 20 ft bgs while the rest of the borings GP2, GP3, and GP4 were advanced to 16 ft bgs.
2. Soil samples were collected every 4 ft from all soil borings. A total of 19 soil samples were collected and submitted for total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs) analyses.
3. Following the removal of all soil and earth materials required to be excavated to provide access to the seven pipeline segments for the cutting and capping and flushing activities, a total of seven soil confirmation samples, SS1 through SS7, were collected from the bottom and side walls of the pipeline repair excavation at depths of approximately 4 to 6 ft bgs. The seven soil samples were submitted for TPH and VOCs chemical analyses.
4. Following the excavation completion and backfilling, two hollow-stem drill holes were advanced. These soil borings were DH-6 (near GP-5) and DH-7 (near GP-4), they were advanced to a total depth of 45 ft bgs at DH-6 and 25 ft bgs at DH-7. A total of 14 soil samples were submitted for TPH and VOCs analyses.
5. No groundwater was encountered within the pipeline excavation at depths of 6 ft.

SUMMARY OF THE FINDINGS

The Reports findings can be summarized as follows:

1. Soil samples from soil boring GP5, advanced to 20 ft bgs, contained up to 100 milligrams per kilogram (mg/kg) of TPH as gasoline (TPH_g) at 20 ft bgs. Soil samples collected at 4, 8, and 12 ft bgs from GP5 contained 60, 59, and 11 micrograms per kilogram (µg/kg) of benzene, respectively.
2. Hollow-stem boring DH-6 (adjacent to GP5) contained up to 1,800 mg/kg TPH as diesel (TPH_d) at 15 ft bgs.
3. Confirmation soil sample SS3, collected from the west floor of the excavation, contained 66 µg/kg of benzene, which exceeds the San Francisco Bay Regional Water Quality Control Board Tier 1 Environmental Screening Level (ESL) of 0.025 mg/kg for benzene for residential land use and leaching to groundwater evaluation.

4. Confirmation soil samples SS3 through SS7 contain TPH_g ranging in concentrations from 96 to 730 mg/kg and TPH_d from 1,000 to 2,200 mg/kg.

REGIONAL BOARD STAFF COMMENTS AND REQUIREMENTS

Based on our review of the Reports and Site information available in the case file, the Regional Board has the following comments and requirements:

1. Soil impacts in areas around the bottom confirmation soil samples SS3 and SS4 and the side wall sample SS7 are not fully delineated. The residual benzene and TPH in soil those areas need to be delineated vertically and laterally.
2. The bottom soil sample collected at 20 ft bgs from GP5 contained 100 mg/kg TPH_g. Soil samples from the adjacent DH-6 boring also contained TPH_g at 260 and 350 mg/kg at 15 and 20 ft bgs, respectively. The residual TPH in soil in this area needs to be delineated vertically and laterally.
3. The bottom soil sample collected at 20 ft bgs from GP5 contained 150 mg/kg TPH_d. Soil samples from the adjacent DH-6 boring also contained TPH_d at 1,800 and 370 mg/kg at 15 and 20 ft bgs, respectively. The residual TPH in soil in this area needs to be delineated vertically and laterally.
4. Soil boring GP1 was terminated at 7 ft bgs due to a refusal. A step out boring must be advanced in the same area to collect soil samples below 7 ft bgs to fill in the data gaps and for lateral and vertical delineation of soil impacts at that location.
5. By **July 28, 2023**, submit to this Regional Board a technical work plan to fill in the data gaps identified in items 1 through 5 above. The work plan should include, but not be limited, to the following:
 - a. Proposed soil borings to delineate soil impacts around the previous soil sampling locations of GP5, SS3, SS4, and SS7 laterally and vertically.
 - b. Proposed borings to delineate soil impacts in the area around GP5 and DH-6.
 - c. Proposed step-out soil boring to replace GP1. This replacement boring must extend to a minimum of 20 ft bgs.
 - d. Maps and figures showing soil boring locations and sampling and excavation locations.
6. Pursuant to Section III.G. of California State Water Resources Control Board, Resolution No. 92-49 (Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under California Water Code Section 13304), the Regional Board is requiring the cleanup of soil, soil vapor, and groundwater to

background concentrations; however, alternative cleanup levels may be proposed if:

- a. The discharger can demonstrate that cleanup to background is not technologically and economically achievable due to site conditions and remedial technologies available at the time; and
- b. Site cleanup levels shall be proposed for each medium pursuant to Chapter 15, Section 2550.4 of the California Code of Regulations.

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 regarding this letter, please contact Mr. Majd Nima at (213) 576-6707 or via e-mail at majd.nima@waterboards.ca.gov or Mr. Bizuayehu Ayele at (213) 576-6623 or via e-mail at bizuayehu.ayele@waterboards.ca.gov.

Sincerely,

Majd Nima, PG
Engineering Geologist

cc: Daniel P. Ringstmeyer, Buena Resources, Inc. (dan@buena-res.com)
Jerome K. Summerlin, Padre Associates, Inc.
(jsummerlin@PadreInc.com) Michael Salman ()