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
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1515 Tollhouse Road
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Enclosures (3)
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**


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:

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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.

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:

- 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:
(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:

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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

NOTICE TO HEARING IMPAIRED: TTY users may use the California Relay Service @ 711 or 1-800-855-7100. You may also contact the Public Participation Specialist listed at the end of this update.