



Department of Toxic Substances Control



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NOTICE OF EXEMPTION

To: Office of Planning and Research
1400 Tenth Street, Room 222
Sacramento, CA 95814

From: Sacramento Permitting and Corrective Action Branch
8800 Cal Center Drive
Sacramento, CA 95826

Project Title: BP West Coast Products LLC - BP Carson Refinery, East and West Retention Basins, Post Closure Permit

Project Location: **Specific:** 1801 East Sepulveda Boulevard
City: Carson **County:** Los Angeles

Description of Project: DTSC certified closure of the East and West retention basins of the BP Carson refinery (Refinery) in December 1997. DTSC has determined that the presence of hydrocarbon-impacted soil and groundwater at depth below the two basins could not unequivocally be proven to be the result of other sources. Under those conditions, DTSC has required BP West Coast Products LLC (BP) to provide post-closure care for the two closed basins over a 30-year period. Accordingly, BP has submitted a post-closure permit application which outlines the procedures to manage three primary functions: a. maintenance of closure structures, b. environmental monitoring; and c. maintenance of financial mechanisms to fund the post-closure activities. The resulting Post Closure Permit is written to cover a 10-year period. During the post-closure period, BP plans to occasionally use the two basins to store a variety of non-hazardous waters on a temporary basis. The post-closure permit includes specific conditions to regulate the occasional use of the two basins.

Site and Unit Description : In the refining process, ARCO, the previous operator, used water as a coolant for certain equipment. Under normal operating conditions, this process water was treated at the refinery's wastewater treatment plant and then discharged to the Los Angeles County Sanitation District (LACSD). The Refinery's process and storm water sewer systems were connected. Excess water from rainfall, together with untreated process water, was temporarily stored in the East and West Retention Basins.

The East and West retention basins, constructed in 1969, are located within the centrally positioned Main Refinery area which includes refining facilities, a cogeneration plant, the majority of the Refinery's product shipping facilities and a product storage area. The East and West retention basins are surface impoundments that are constructed with 4 inches of gunite sprayed over 4 by 4 inch steel mesh. They are sealed with a polyurethane coating that acts as a liner.

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The bottom two feet of the walls of the basins are supported by #2 crushed rock. The floors are supported by approximately 8 inches of silt and silty sand material. Surface dimensions are approximately 210 by 200 feet and 269 by 300 feet for the East and West Basins, respectively. The East Basin averages about 24 feet deep for a capacity of about 3.7 million gallons, while the West Basin is nearly 22 feet deep to accommodate a capacity of 10.8 million gallons.

Regulatory Status: In 1990, both impoundments became regulated under the new Federal Toxicity Characteristic rule. This change in regulatory status stemmed from a determination that water discharged to the impoundments contained benzene concentrations that historically exceeded the Toxicity Characteristic Leaching Procedure (TCLP) criterion. The basins were operated under interim status from 1990 to 1994. Arco implemented extensive improvements to the Refinery's wastewater processing system during 1994 and 1995. The purpose of these improvements was to replace the combined storm and process water capacity provided by the East and West Retention Basins, in conjunction with multiple projects. These projects have resulted in the current practice of only emergency use of the basins for storage of non-hazardous process water and storm water or fire deluge water.

An approved Closure Plan for the basins was implemented between August 1996 and March 1997. Closure procedures included the following:

- Decontamination – It was achieved by a two step cleaning process. First, the basin walls and associated pumps were rinsed with low pressure fire water. Second, the basin surfaces were scrubbed using a liquid detergent solution in conjunction with high pressure water.
- Crack Repair – Two types of cracks in the basin liners were repaired. Cracks subject to movement (expansion and contraction) were repaired using a silicon adhesive caulking and minor cracks were repaired using a Portland cement-based grout.
- Sealant Application – After decontamination and verification activities, the basins were coated with a layer of polyurethane.

Current and Proposed Activities: From 1994 to date, the Refinery has occasionally used the two basins to store a variety of non-hazardous waters on a temporary basis. The basins have been used for temporary storage of non-hazardous fire deluge system testing water. The basins have also been employed for temporary storage of non-hazardous commingled storm water and process water overflow when large storms occur. Once storm conditions subside, the Refinery must pump water from the basins to the LACSD wastewater treatment facility. BP plans to continue the current use of the two basins during the post-closure care period. The temporary intermittent use of the two basins will be subject to special conditions included in the BP Carson Refinery post-closure permit. During the same period of time, the provisions of the BP Carson Refinery post-closure permit will also be implemented. The three main requirements of the BP Carson Refinery post-closure permit will be: a. Maintenance of the basin liners and pumps by regular inspection and corrective action; b. Environmental monitoring, consisting of implementation of the revised RCRA Basin Corrective Action Groundwater Monitoring Plan; and c. Provision for financial mechanisms to fund the above post-closure activities throughout the 30 year post-closure care period.

Name of Public Agency Approving Project: Department of Toxic Substances Control
Sacramento Permitting and Corrective Action Branch

Name of Person or Agency Carrying Out Project: BP West Coast Products LLC

Exempt Status: Title 14, California Code of Regulations, Section 15061(b)(3)
With certainty, no possibility of a significant effect on the environment.

Reasons Why Project is Exempt:

1. A CEQA Negative Declaration was prepared and certified in support of the Closure Plan. The basins have not been operative since 1994, except under emergency storm conditions. Since final closure, there have been no reports of hazardous waste management in the basins. Recent inspections have revealed no structural failures or malfunctions.

2. The Closure Certification Report, as approved by an independent registered engineer, certified that the basins were closed according to the approved Closure Plan.
3. The monitoring program, included in the revised RCRA Basin Corrective Action Groundwater Monitoring Plan, is designed to fulfill the requirements for water quality monitoring and response programs pursuant to California Code of regulations Title 22, Division 4.5, Chapter 14.
4. Post-closure activities are carefully regulated to assure against the potential for any additional environmental concerns. BP will provide on-going inspection and maintenance activities of the gunite liner throughout the post-closure care period. A Refinery-wide corrective action program is being administered by the Los Angeles Regional Water Quality Control Board.
5. Continuous use of the basins will only involve storage of two types of non-hazardous liquids under specific scenarios. One of the uses involves the temporary storage of non-hazardous commingled storm water and process water overflow during large storms. The other use of the basins is the occasional storage of fire deluge system testing water. The system in place to monitor the hydrogeology underneath the two basins, has been determined to be adequate by the DTSC Geological Services Unit. The discharges from the basins are regulated pursuant to an Industrial Waste Discharge Permit by LACSD. The location of the basins is far from the property line and is within an area that is undergoing active remediation. Therefore, there is no potential for environmental impact from the future use of the basins. Based on an engineering and geologic review of the units, the proposed continued temporary intermittent use of the two retention basins for non-hazardous water, when properly operated and monitored, will not be detrimental to the refinery wide and regional groundwater remediation programs.

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Date: _____

Date received for filing at OPR: