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Secretary for  
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## Department of Toxic Substances Control



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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](mailto:michael.pfister@dtsc.ca.gov).

Thank you,

Michael Pfister, PG, CHG, CEG  
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Enclosures (3)

# COMMUNITY UPDATE

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 Draft Interim Corrective Measures Work Plan; AOC 056 Burn Site – U.S. Department of Energy

**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 Interim Corrective Measures Work Plan (ICM); Area of Concern (AOC) 056, 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. AOC 056 is a former surface trash scatter within the former NPR-1. An area, approximately 0.13 acres, of AOC 056 was also used as a localized dumping area where domestic refuse was burned and has come to be identified as the AOC 056 Burn Site.

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 ICM 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 ICM proposes to remove approximately 225 cubic yards (cy) of solid waste and soil from the AOC 056 Burn Site for disposal at an appropriate California landfill. Final excavation is not expected to exceed a total volume of 340 cy. The Draft ICM provides a description of the AOC 056 Burn Site and the proposed cleanup activities. These corrective measures are necessary to obtain DTSC approval for closure of AOC 056 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 ICM. The Draft ICM 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:

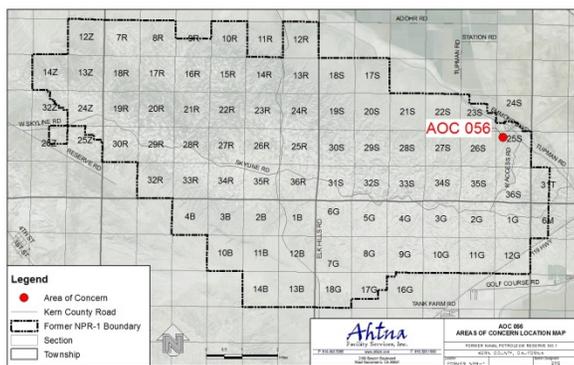
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A public meeting has not been scheduled for this project.

**Site Location**

The former NPR-1 is divided into a series of townships and ranges. AOC 056 is located in the eastern portion of the former NPR-1 in grid 25S, Section 25, T30S/R24E. The Burn Site portion of AOC 056 is approximately 0.13 acres and located on the north side of the North Flank Road, approximately 530 feet from the Elk Hills Elementary School gymnasium in Tupman, California.

AOC 056 is within an active oil field, which is closed to the public.



**AOC 056 Burn Site Location Map**

**Site History and Background**

The NPR-1 was created by an Executive Order in 1912 to preserve potential petroleum resources for national defense purposes. Pursuant to Public Law 104-106, passed in February 1996, the U.S. Department of Energy (DOE) was required to sell the United States’ lands and hydrocarbon interests in NPR-1. DOE transferred the Federal Government’s interests in NPR-1 to Occidental Petroleum Corporation (Occidental), effective October 1, 1997, which operated the Elk Hills Oil Field under the name Occidental of Elk Hills, Inc. In 2014, Occidental sold the property to California Resources Corporation (CRC), who now operates the Elk Hills Oil Field under the name of California Resources Elk Hills, LLC (CREH).

DOE and DTSC entered into an Agreement for Site Assessment in 1998 that was subsequently amended and, in 2008, a Corrective Action Consent Agreement was signed in which DOE agreed to complete the corrective

action process at 131 Solid Waste Management Units and/or AOCs, including AOC 056. DTSC will oversee a soil removal planned for the AOC 056 Burn Site.

AOC 056, also known as the 25S Surface Scatter, is inactive and contains a small localized Burn Site that was historically used for burning domestic refuse.

**Previous Site Investigations**

Williams Brothers Engineering Company, which operated the former NPR-1 for the government between 1975 and 1985, first documented AOC 056 as a surface trash scatter in 1985.

In 1997, Robert Parr, Assistant Director of the Center for Archaeological Research at California State University, Bakersfield, conducted an archaeological survey for proposed cleanup of the inactive surface scatter after a grass fire cleared vegetation from the burned area.

In 1998, Pacific Legacy located and recorded an archeological site at AOC 056 that it determined met the requirements for the National Register of Historic Places.

In 1999, Bechtel Petroleum Operations, Inc. (BPOI), which operated the former NPR-1 for DOE from 1985 to 1998, performed additional assessment of the Burn Site and proposed, in a corrective measures plan, remediating AOC 056 by excavating the area consisting of ash, debris, and impacted soil, and then transporting the waste to a hazardous waste landfill. However, there is no documentation to support that corrective measures were completed.

In 2003, DOE contracted with the United States Army Corps of Engineers (USACE) to remove approximately 11.6 tons of surface trash and debris from AOC 056, excluding the Burn Site.

The material was disposed at a Class III Landfill. During this time, soil samples were not collected because no hazardous materials were identified during the site survey and removal action.

In 2013, Ahtna Facility Services, Inc., contracted by DOE, conducted soil sampling at AOC 056 to assess



current site conditions. Only the Burn Site at AOC 056 was determined to contain chemicals of potential concern (COPCs).

Based on the 2013 sampling event, lead, dioxins, and furans have been identified as COPCs within the AOC 056 Burn Site.

### Interim Corrective Measure Objectives

The primary objective of the Draft ICM is to propose a preferred cleanup approach that prevents or reduces potential risks to human health and the environment.

The Draft ICM 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 ICM evaluates a range of alternatives that could be used to mitigate potential health risks at AOC 056. 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 AOC 056:

1. No Removal Action – with Land Use Controls. This alternative proposes to leave the debris and impacted soil in place, but limit access and restrict future use of the property.
2. Excavation and Offsite Disposal. This alternative proposes to remove debris and impacted soil within the AOC and conduct post-excavation soil sampling to confirm that soil cleanup goals are met.
3. Land Use Controls and Capping. This alternative proposes to place a cap of clean soil to prevent migration of or exposure to chemicals of concern.

### 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, DOE recommends Alternative 2: Removing the debris and impacted soil, followed by post-excavation sampling. Approximately 225 to 340 cy of impacted soil would be excavated from the AOC 056 Burn Site and hauled to a permitted California landfill.

Confirmation sampling will be conducted to verify the remaining soil is below cleanup goals. The excavation would then be backfilled with clean soil.

The following activities would be performed under the proposed alternative:

- Excavate impacted soil, based on the results from previous sampling event, visual observation and X-Ray Fluorescence (XRF) surveys.
- Monitoring of the site by a Cultural Resource Monitor during ground disturbing activities to make sure that sensitive resources are not impacted.
- Collect post-excavation soil samples to confirm COPCs are not present at levels that pose a risk to human health.
- Characterize and dispose of excavated soil at an approved landfill.
- Backfill excavated areas with clean soil and re-grade.

In addition, the following controls designed to protect the surrounding community are proposed during remediation 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 PM<sub>10</sub>.



- 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 that will list the comments received and how they were considered prior to making a final decision on the ICM. The Response to Comments will be included in the final ICM and placed in the information repositories established for the site.

### Schedule for Proposed Interim Corrective Measures

The removal action is scheduled for completion in the Spring of 2015.

### Where to Find the Documents

The Draft ICM 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:  
[http://www.envirostor.dtsc.ca.gov/public/profile\\_report.asp?global\\_id=15130019](http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=15130019)

(Click the “Community Involvement” tab)

### Whom to Contact for More Information

If you have any questions about this Fact Sheet or the Draft ICM, please contact the following DTSC staff:

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### For Media Inquiries Only

Sandy Nax  
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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](http://www.dtsc.ca.gov)

