

Central Valley Regional Water Quality Control Board

FILE

10 July 2012

NOTICE OF VIOLATION

Larry Bright
Valley Water Management Company
7500 Meany Avenue
Bakersfield, CA 93308

INSPECTION REPORT – VALLEY WATER MANAGEMENT COMPANY, EDISON FACILITY, KERN COUNTY

Enclosed is an inspection report for Valley Water Management Company's wastewater disposal operations at the Edison Racetrack Hill – Sec 24 facility which is regulated by Waste Discharge Requirements Resolution 58-349 (WDRs). At the time of the inspection, one surface impoundment contained wastewater partially coated with crude oil, and the sump is not netted, in violation of policy cited in the *Water Quality Control Plan for the Tulare Lake Basin*, Second Edition, revised January 2004.

The crude oil needs to be removed immediately. By **25 July 2012**, please submit documentation that all oil has been removed from the surface of the wastewater. Interim measures need to be taken to preclude any further entry of crude oil. By **15 August 2012** please submit a plan and time schedule describing permanent measures to be implemented that will prevent crude oil from entering the facility, or that the sump is going to be netted. If you have any questions, please contact Ryan West at (559) 445-6188 or by email at rwest@waterboards.ca.gov

[Signature]
FOR SHELTON R. GRAY
Senior Engineering Geologist

[Signature]
C. DEAN HUBBARD
Engineering Geologist
P.G. No. 6357

[Signature]
RYAN K. WEST
Engineering Geologist

Enclosure: Inspection Report

cc: Mike Toland, CDOGGR, Bakersfield
California Department of Fish and Game, Fresno

APPROVED
[Signature]
Supervising Engineer

OFFICE NO: 5F
Inspector: RKW

FACILITIES INSPECTION REPORT

Program Type: SUB-15

5D152013013 WDID NUMBER	VALLEY WATER MANAGEMENT COMPANY PARTY NAME	EDISON PLACE NAME
58-349 WDR ORDER NO	7500 MEANY AVENUE STREET	SECTION 24, T29S, R29E, MDB&M STREET
142624 REG MEASURE ID	BAKERSFIELD, CA 93308 CITY AND STATE	KERN COUNTY CITY AND STATE
06/20/2012 ACTUAL INSP. DATE (MM/DD/YYYY)	LARRY BRIGHT CONTACT PERSON	RUSSELL EMERSON ONSITE CONTACT PERSON
	(661) 410-7500 PHONE NO.	(661) 978-0982 PHONE NO.

Place ID: 222241
Party ID: 49654

— If this inspection is a Compliance Inspection of an NPDES facility, send a copy of this report to SWRCB's Division of Water Quality, Program Support Unit.

INSPECTION TYPE (Check One)

- "A" type compliance – Comprehensive inspection in which samples are taken. (EPA Type S)
- "B" type compliance – A routine nonsampling inspection. (EPA Type C)
- Noncompliance follow-up – Inspection made to verify correction of previously identified violation.
- Enforcement follow-up – Inspection made to verify that conditions of an enforcement action are being met.
- Complaint – Inspection made in response to a complaint.
- Pre-requirement – Inspection made to gather information relative to preparing, modifying, or rescinding requirements.
- Miscellaneous – Any inspection type not mentioned above.

If this is an EPA inspection not mentioned above, please note type.
(e.g. – biomonitoring, performance audit, diagnostic, etc)

(Type)

- Y Were VIOLATIONS noted during this inspection? (Yes/No/Pending Sample Results)
- N Was this a Quality Assurance-Based Inspection? (Yes/No)
- N Were bioassay samples taken? (Yes/No) (If yes, then Static or Flowthrough)

INSPECTION SUMMARY (REQUIRED) (500 character limit)

On 20 June 2012, I (Ryan K. West) inspected the Edison (Racetrack Hill – Sec24) facility. The facility is regulated by Waste Discharge Requirements Resolution 58-349 (WDRs). The facility contains 24 surface impoundments (sumps) used for percolation and evaporation of oil field wastewater. At the time of the inspection, one unnetted sump contained wastewater partially coated with crude oil. This is a **violation** regarding the disposal of oil field wastewater contained in the *Water Quality Control Plan for the Tulare Lake Basin*, Second Edition, revised January 2004 (Basin Plan).

INSPECTOR'S DATA:

Staff ID: 139472 SIGNATURE: Ryan K. West DATE: 7/10/12

For Internal Use: Reviewed by: (1) _____ (2) _____ (3) (RKW) 139472
CIWQS Entry Date: 06/22/2012 Regional Board File Number: _____ CIWQS Inspection ID: 8692134
CIWQS Coordinator

FACILITIES INSPECTION REPORT

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VIOLATION (IF APPLICABLE)

Date Occurred (MM/DD/YYYY): 06/20/2012

Date Determined (MM/DD/YYYY): 06/20/2012

DESCRIPTION (2000 Character Limit):

At the time of the inspection, three sumps contained wastewater partially coated with crude oil and the sumps are not netted to preclude the entry of birds and animals. This is a violation of policy regarding disposal of oil field wastewater cited in the *Water Quality Control Plan for the Tulare Lake Basin*, Second Edition, revised January 2004. (CIWQS Violation ID# 929180, NOV ID# 385841)

EPA SUGGESTED CHECKLIST

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Operations and Maintenance
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Laboratories	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Sludge Disposal
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Eff./Receiving Waters	<input type="checkbox"/> Self-Monitoring	<input type="checkbox"/> Other

Overall Facility Operation Evaluation (5=Very reliable, 3=Satisfactory, 1=Unreliable)

HISTORICAL INFORMATION

MOST RECENT ORDERS:		
ORDER NO.	DATE ADOPTED	TYPE
58-349	09/18/1958	WDRS

MOST RECENT INSPECTIONS:		
DATE	TYPE	VIOLATIONS?
05/13/2011	B	NO
05/06/2010	B	NO
05/21/2009	B	NO
05/09/2008	B	NO
04/26/2007	B	NO

MOST RECENT VIOLATIONS:	
VIOLATION ID	DATE

ADDITIONAL COMMENTS, SPECIAL INSTRUCTIONS, ITEMS FOR FOLLOWUP ON FUTURE INSPECTIONS, NOTES, ETC. (Attach additional pages, if necessary)

On 20 June 2012, I inspected Valley Water Management Company's (VWMC) oil field wastewater disposal operations at the Edison (Racetrack Hill – Sec24) facility. The facility is located in Section 24, T29S, R29E, MDB&M, Kern County. Wastewater disposal operations at the facility are regulated by Waste Discharge Requirements Resolution 58-349 (WDRs). Approximately 9,000 barrels per day of produced oil field wastewater is discharged at the Edison facility.

Global positioning system coordinates for the centroid of the facility are: longitude -118.821173, latitude 35.392863 (NAD 83).

The purpose of the inspection was to observe and document current wastewater disposal operations at the Edison facility to evaluate compliance with the WDRs. Russell Emerson of Valley Water Management Company accompanied me on the inspection. Photographs documenting conditions observed during the inspection are attached.

INSPECTION OBSERVATIONS

The Edison facility (Figure 1) contains 24 unlined surface impoundments (sumps) and an irrigation sprinkler system. Wastewater disposed at the Edison facility (a.k.a. Racetrack Hill – Sec 24) originates from the Racetrack Hill C-Plant, also operated by VVWC. Once at the Edison facility, the wastewater is gravity fed from one sump to the next in a downhill series. At the time of the inspection, all but two of the sumps contained wastewater. Mr. Emerson informed me that the two dry sumps are no longer used.

The “entry sump” is where wastewater from the Racetrack Hill C-Plant first enters the Edison facility. This “entry sump” is located at a high point on the facility where it can gravity feed to other sumps. At the time of the inspection, the entry sump contained wastewater with some crude oil floating on the surface of the water, near the perimeter of the sump (Photograph 1). Crude oil within the entry sump poses a threat to wildlife because the sump is not covered with netting.

Three sumps (entry sump included) are located on the high point of the property and the remainder of the sumps are located at lower elevations. Tamarack trees and small brush are present around the perimeter of many of the sumps at lower elevations (Photograph 2). At the time of the inspection, ducks were present in a few of the lower elevation sumps. Freeboard was sufficient in all of the sumps.

A sprinkler system is used at the facility for evapotranspiration of the wastewater. Vegetation on the hillsides is irrigated by the gravity fed sprinkler system. The infrastructure of the sprinkler system was recently changed out from aluminum piping to plastic piping.

CONCLUSIONS

- At the time of the inspection, the entry sump contained wastewater partially coated with crude oil and the sump is not netted. This is a violation of policy regarding disposal of oil field wastewater cited in the *Water Quality Control Plan for the Tulare Lake Basin*, Second Edition, revised January 2004. Oil needs to be removed and prevented from entering, or the sump needs to be netted.
- A 2011 aerial photo of the facility, (shown on Figure 1) shows crude oil within a few unnetted sumps (entry sump included), which indicates the problem is a recurring violation.



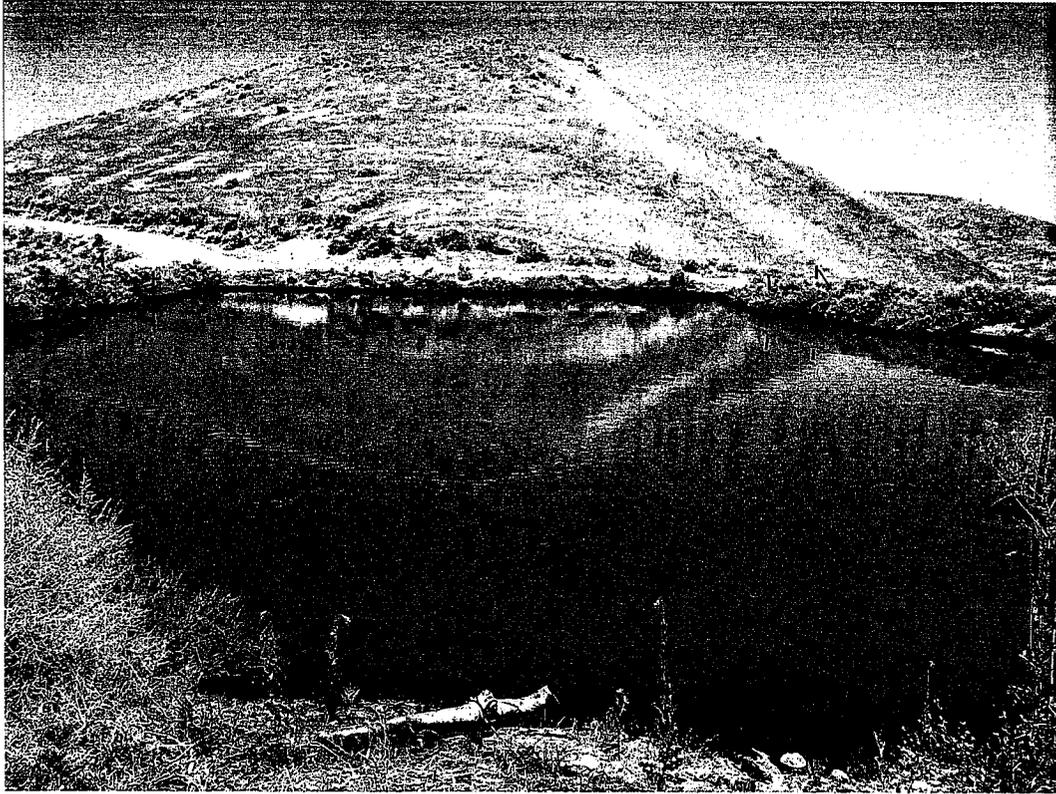
Map Source:
ESRI's ArcGIS Online Premium Services
Section 24, T29S, R29E, MDB&M



SITE MAP
RESOLUTION 58-349
VALLEY WATER MANAGEMENT COMPANY
EDISON (RACETRACK HILL - SEC24) FACILITY
KERN COUNTY

FIGURE 1

VALLEY WATER MANAGEMENT COMPANY
Racetrack Hill Facility, Edison
Section 24, T29S R29E, MDB&M
Inspection date: 20 June 2012



Photograph 1 - View of "entry sump" located at the high point of the facility.



Photograph 2 - View of two of the lower elevation sumps and vegetation.