

Central Valley Regional Water Quality Control Board

10 April 2015

FILE

NOTICE OF VIOLATION

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

CERTIFIED MAIL
7012 2920 0000 1430 0342

INSPECTION REPORT – VALLEY WATER MANAGEMENT COMPANY, FEE 34 FACILITY, EDISON OIL FIELD, KERN COUNTY

Central Valley Regional Water Quality Control Board staff (Staff) inspected the Fee 34 wastewater disposal facility (Facility) on 27 March 2015. Disposal operations at the Facility are regulated by Waste Discharge Requirements Order 92-11037 (WDRs). Staff's observations and comments are presented in the enclosed inspection report.

Staff observed oil produced water being discharged into eight surface impoundments (ponds) at the facility. Two gunite-lined wastewater ponds containing oily-wastewater did not have netting. Two unlined oil ponds had gaps between the netting and the ground surface. Freeboard appeared inadequate in the two oil separation ponds as well as in the two wastewater ponds. Wastewater has been discharged into the unlined impoundment known as the stormwater basin.

The Facility is in violation or threatened violation of the following sections of the WDRs:

1. Discharge Specification B.1 (WDRs, page 5), for wastewater effluent discharge to ponds that have not been demonstrated to meet the prescriptive construction criteria for classified waste management units.
2. Discharge Specification B.4 (WDRs, page 6), for presence of oil in ponds that are not covered or screened to preclude entry of bird or animal life.
3. Discharge Specification B.6 (WDRs, page 6), for failing to maintain a minimum of two feet of freeboard in all ponds

For a discussion of above violations, please refer to the enclosed inspection report.

By 15 May 2015, please submit documentation describing measures completed to address the netting repairs, including before and after photos.

If you have any questions regarding this inspection, please contact Zachary Jarvie at (559) 445-5455 or by email at Zachary.Jarvie@waterboards.ca.gov.



DANE S. JOHNSON
Senior Engineering Geologist
Professional Geologist No. 4239

Enclosure: Inspection Report

cc: Mike Toland, California Division of Oil, Gas and Geothermal Resources, Bakersfield
Jeffrey Single, California Department of Fish and Wildlife, Fresno

5F
OFFICE
92-11037
ORDER NO.

5D159073001
WDID
144517
REG MEASURE ID

FACILITIES INSPECTION REPORT

NON-15
PROGRAM
49654
PARTY ID

1/4
PAGE NO.
222263
PLACE ID

VALLEY WATER MANAGEMENT COMPANY <small>DISCHARGER NAME</small>	EDISON OIL FIELD, FEE 34 C-PLANT <small>FACILITY NAME</small>
7500 MEANY AVENUE <small>STREET ADDRESS</small>	SW ¼ SECTION 34, T29S, R29E, MDB&M <small>STREET ADDRESS</small>
BAKERSFIELD, CA 93308 <small>CITY, STATE, ZIP CODE</small>	EDISON, KERN COUNTY <small>CITY, STATE, ZIP CODE</small>
LARRY BRIGHT <small>DISCHARGER CONTACT PERSON</small>	RUSSELL EMERSON <small>FACILITY CONTACT PERSON</small>
(661) 410-7500 <small>TELEPHONE NO.</small>	(661) 978-0982 <small>TELEPHONE NO.</small>
lbright@vwwater.com <small>E-MAIL ADDRESS</small>	remerson@vwwater.com <small>E-MAIL ADDRESS</small>

GENERAL INSPECTION INFORMATION

Inspection Type: B Type Compliance Inspection Lead Inspector: Zachary Jarvie

3/27/2015 to 3/27/2015 9:20AM-10:30AM Clear Sunny

INSPECTION DATE(S) INSPECTION TIME GENERAL WEATHER CONDITIONS

INSPECTION ATTENDEE(S)

Zachary Jarvie <small>NAME</small>	Regional Water Board <small>COMPANY/AGENCY</small>	(559) 445-5455 <small>TELEPHONE NO.</small>	Zachary.Jarvie@waterboards.ca.gov <small>E-MAIL ADDRESS</small>
Russell Emerson <small>NAME</small>	Valley Water Management Co. <small>COMPANY/AGENCY</small>	(661) 978-0982 <small>TELEPHONE NO.</small>	remerson@vwwater.com <small>E-MAIL ADDRESS</small>
<small>NAME</small>	<small>COMPANY/AGENCY</small>	<small>TELEPHONE NO.</small>	<small>E-MAIL ADDRESS</small>

INSPECTION SUMMARY (for CIWQS entry – 500 character maximum)

The C-Plant Facility was inspected to determine compliance with Waste Discharge Requirements Order 92-11037 (WDRs). There are seven ponds on the facility that are used for separation and storage of oil field production wastewater. The following violations of the WDRs were noted. Discharge of wastewater to the unlined oil ponds and to the Stormwater Basin. Insufficient netting and inadequate freeboard.

INSPECTION VIOLATIONS SUMMARY (if applicable)

Identify VIOLATIONS noted during inspection in table below. For each violation documented entered into CIWQS, identify Violation ID and Violation Type, describe violation, and identify section of the WDRs or Water Code violated.

Label	Violation ID	Violation Type	Violation Description	Section of the WDRs Violated
V1	988958	Effluent violation	Discharge of high salinity water to ponds	Discharge Specification B. 1 (WDRs, page 5)
V2	988959	Order Condition	Oil in impoundments not covered with netting	Discharge Specification B. 4 (WDRs, page 6)
V3	988960	Order Condition	Failing to maintain a minimum of two feet of freeboard	Discharge Specification B. 6 (WDRs, page 6)

OTHER VIOLATIONS (if applicable)

SMR violations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Evaluated	Notes: The SMR review will be addressed in a separate cover.
File Review violations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Evaluated	Notes: The file review will be addressed in a separate cover.

Lead Inspector ID: 549144 Signature:  Date: 4/10/2015

Inspection Tracking Information Reviewed by: (1)  (2) _____ (3) _____
CIWQS Coordinator

Filename: VALLEY WATER MANAGEMENT COMPANY FEE 34 C-PLANT FACILITY, EDISON OIL FIELD CIWQS Entry Date: 4/10/2015 CIWQS Inspection ID: 20016588

FACILITY INFORMATION

Oil field production wastewater disposal facility.

FACILITY DESCRIPTION (e.g., total area in acres, number of waste management units, etc.)

Active

STATUS (active, inactive, closed)

Oil field production wastewater.

WASTE TYPES

Oil/Gas Extraction

FACILITY CLASSIFICATION

Surface impoundments.

DISPOSAL DESCRIPTION (e.g., composting, landfill, surface impoundment, etc.)

BACKGROUND

The C-Plant Facility is regulated under Waste Discharge Requirements Order 92-11037 (WDRs). The facility was last inspected on 18 September 2013.

INSPECTION GIS DATA

Description of Measured Point	Latitude	Longitude	Datum	Comments
Centroid of Facility	35.355071	-118.859904	NAD '83	

INSPECTION OBSERVATIONS AND FINDINGS

Describe observations and findings and identify those that document and reference each violation listed in the Inspection Violations Summary table by identifying the cited violation number within parentheses following the observation/finding (e.g., Exposed waste on top deck (V1)).

The facility was inspected to observe current wastewater disposal operations and evaluate compliance with the WDRs. Photographs were taken to document conditions observed.

Staff observed that oilfield produced wastewater was being discharged into eight ponds within the facility. Field readings for the Temperature, pH and Electrical Conductivity (EC) were taken in two of the ponds. EC is measured in microsiemens per centimeter ($\mu\text{S}/\text{cm}$).

- Two Oil Separation Ponds
 - gunite-lined ponds with netting, containing oil and wastewater
 - inadequate freeboard, less than 2 feet
- Two Wastewater Ponds
 - gunite-lined pond with no netting, containing oily-wastewater
 - according to Mr. Emerson skimmers are used twice per day to remove oil from these ponds
 - field readings from water taken from the southern wastewater pond were as follows;
 Conductivity (EC) 5,427 μS , pH 7.21, Temperature 25.5°C
 - inadequate freeboard, less than 2 feet
- One Shipping Pond
 - gunite-lined pond with netting, containing wastewater and oil
 - freeboard appears adequate
- Two Oil Ponds
 - unlined ponds, containing oil and wastewater
 - inadequate netting (See Photo 5)
 - freeboard appears adequate
- One Containment Pond (referred to as a Stormwater Basin)
 - an unlined pond with no netting
 - contains wastewater
 - Mr. Emerson state that the water in the pond was production wastewater
 - field readings of water taken from the pond were as follows;
 EC 3,975 μS , pH 8.38, Temperature 22.6 °C
 - no oil was observed in the pond
 - freeboard appears adequate

SAMPLING INFORMATION AND OBSERVATIONS

Were samples collected during the inspection? Yes No Are sample results included in report? Yes No
Did discharger collect split samples? Yes No

SAMPLE COLLECTION INFORMATION AND OBSERVATIONS

SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.
SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.

DISCUSSION OF SAMPLING RESULTS

Discuss sampling results (e.g., discuss whether sampling results show compliance with WDRs).

No samples were collected.

CONCLUSIONS

Summarize the conclusions of the inspection(s) below.

1. The two Oil Separation Ponds and the two Wastewater Ponds have insufficient freeboard (less than two feet) and are in violation of WDRs. Discharge Specification B. 6 of the WDRs states that a minimum of two feet of freeboard shall be maintained in all ponds.
2. Oily-wastewater observed within the two Wastewater Ponds (See Photos 3 & 4) is a violation of WDRs. Discharge Specification B. 4 of the WDRs states that ponds shall be free of oil coatings or be covered or screened to preclude entry of bird or animal life. These two ponds need to be netted.
3. The two Oil Ponds have insufficient netting (See Photo 5) and are in violation of WDRs. Discharge Specification B. 4 of the WDRs states that ponds shall be free of oil coatings or be covered or screened to preclude entry of bird or animal life.
4. Discharge of high-salinity wastewater to the ponds in excess of Basin Plan limits is a violation of the WDRs and poses a threat to groundwater.

Attachments Include: Attachment 1: Fee 34 C-Plant Facility



Photo 1. – Netted Oil Separation Ponds looking south

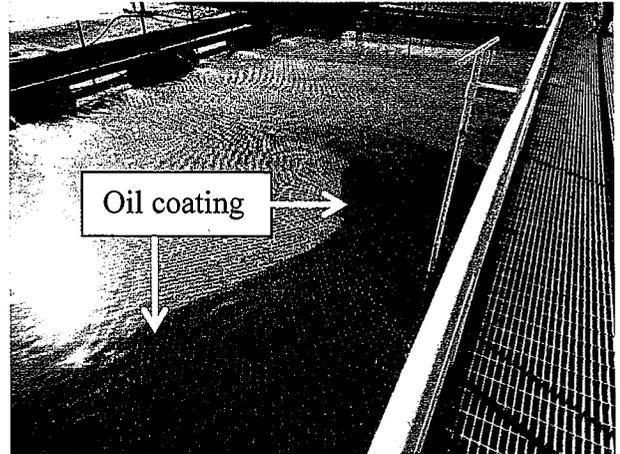


Photo 2. – Oil in the Oil Separation Ponds



Photo 3. – Wastewater Pond (southern) looking southwest

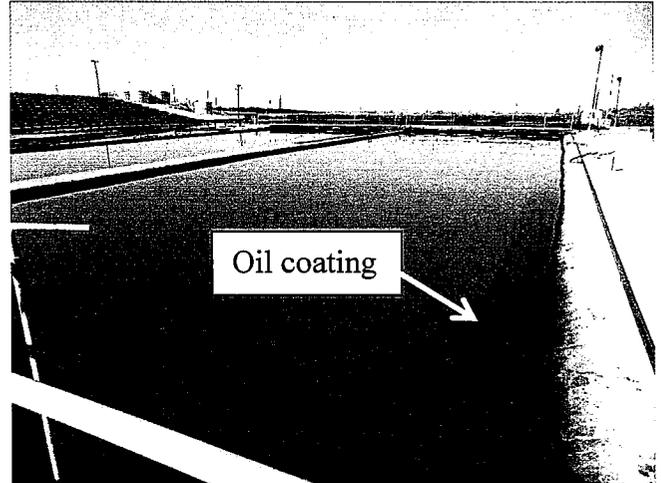


Photo 4. – Wastewater Pond (northern) looking southwest

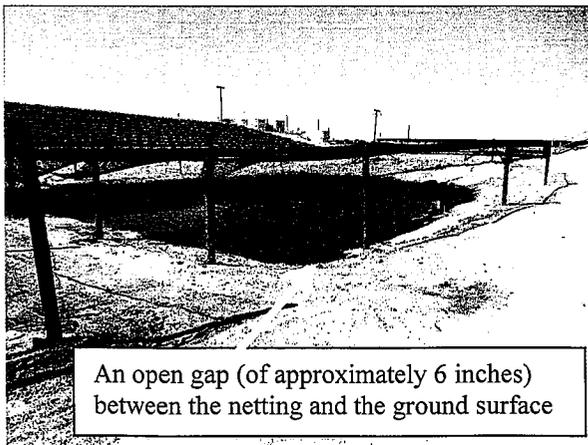


Photo 5. – Oil Pond (western) looking southwest

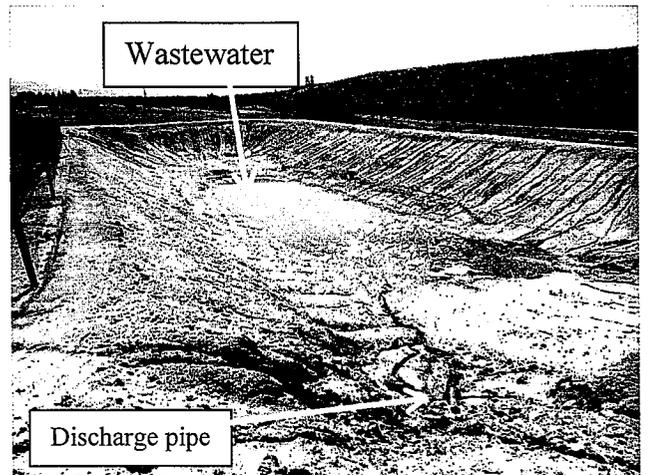
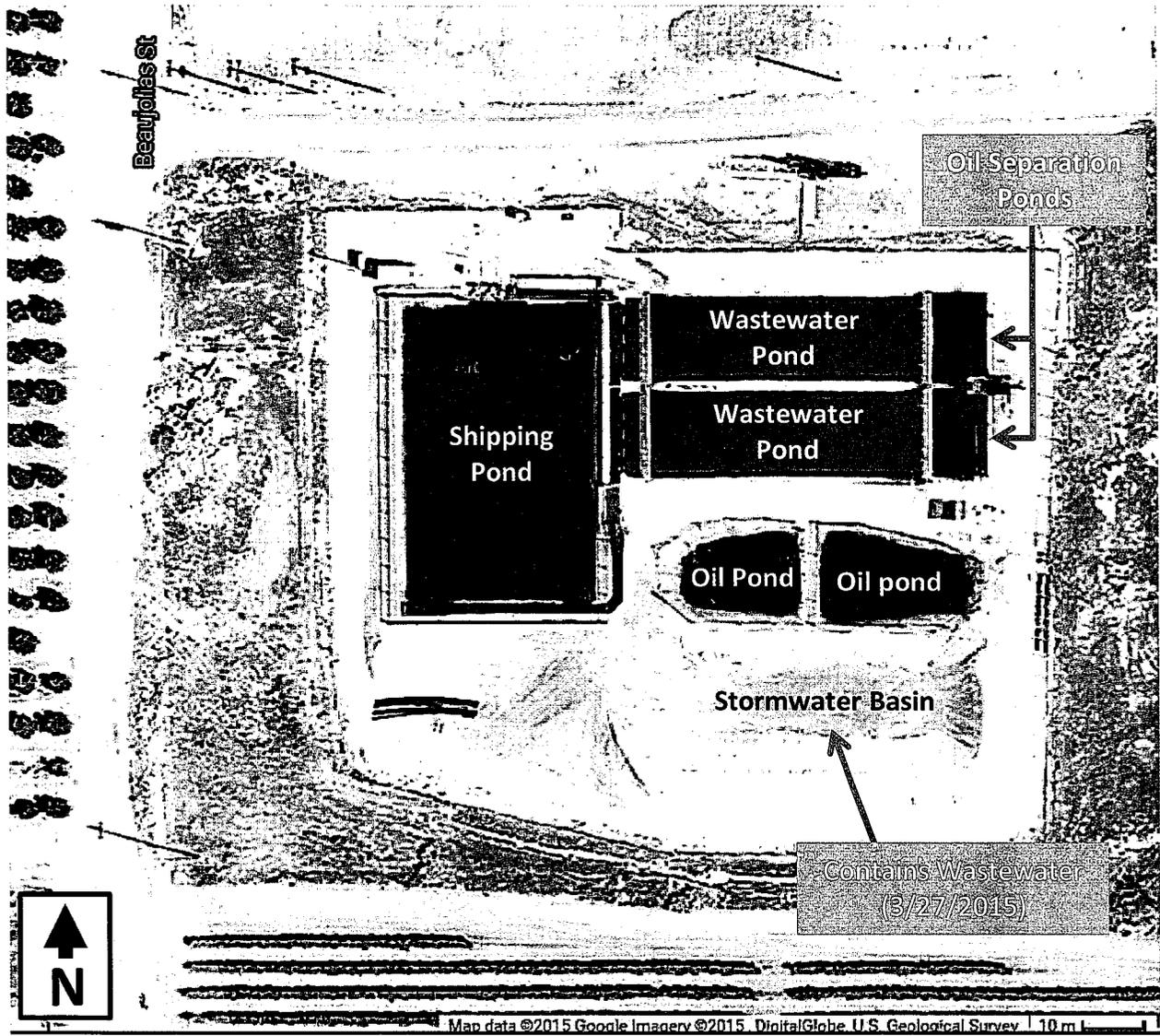


Photo 6. – The Storm Water Basin looking southeast



Attachment 1: Fee 34 C-Plant Facility

Map by ZJJ 04/10/2015