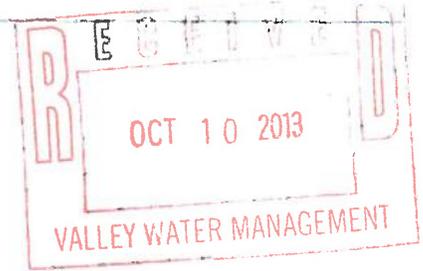




EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board



9 October 2013

NOTICE OF VIOLATION

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

CERTIFIED MAIL
7012 2920 0000 1430 3329

**INSPECTION REPORT – VALLEY WATER MANAGEMENT COMPANY, C-PLANT FACILITY,
EDISON OIL FIELD, KERN COUNTY**

Central Valley Regional Water Quality Control Board staff (Staff) inspected the wastewater disposal facility at the C-Plant Facility on 18 September 2013. Disposal operations at the facility are regulated by Waste Discharge Requirements Order 92-11037 (WDRs). Staff's comments and observations are presented in the enclosed inspection report.

Staff observed that oil field produced wastewater was being discharged into seven surface impoundments (sumps) at the facility. Two sumps (referred to as wastewater sumps; see Figure 1) appeared to have insufficient freeboard (approximately 1 foot of freeboard) and are in violation of the WDRs. Waste Discharge Specification B.6 of the WDRs states that a minimum of two feet of freeboard needs to be maintained in the sumps. The final sump in the series has recently been covered with netting to preclude wildlife.

Waste Discharge Specification B.1 of the WDRs states that wastewater discharged to sumps cannot exceed the following limits: electrical conductivity (EC), 1,000 micromhos per centimeter ($\mu\text{mhos/cm}$); chloride, 200 milligrams per liter (mg/L); and boron, 1.0 mg/L. Analytical results provided in Valley Water Management Company's 2013 annual monitoring report indicate that the wastewater contains an EC of 5,700 $\mu\text{mhos/cm}$, a chloride concentration of 1,800 mg/L, and a boron concentration of 14 mg/L, which exceed the salinity limits prescribed in the WDRs. Discharge of high salinity wastewater to sumps at the facility is a violation of the WDRs and poses a threat to groundwater.

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCCE, EXECUTIVE OFFICER

1685 E Street, Fresno CA 93706 | www.waterboards.ca.gov/centralvalley

Failure to comply with Waste Discharge Requirements Order 92-11037 can subject you to administrative civil liability (monetary penalties) at a rate of up to \$10 for each gallon discharged to the surface impoundments which exceeds the waste constituent limitations contained in Discharge Specification 1. of Order 92-11037. It is important that you promptly comply with the discharge limitations stipulated in Order 92-11037 to minimize your potential liability pursuant to California Water Code section 13350(e).

If you have any questions, please contact Ryan West at (559) 445-6188 or by email at Ryan.West@waterboards.ca.gov



DANE S. JOHNSON
Senior Engineering Geologist
PG No. 4239

Enclosure: Inspection Report

cc: Vincent Agusiegbe, CDOG&GR, Bakersfield

5F
OFFICE
92-11037
ORDER NO.

5D159073001
WQID
144517
REG MEASURE ID

FACILITIES INSPECTION REPORT

NON-15
PROGRAM
49654
PARTY ID

1/4
PAGE NO.
222263
PLACE ID

VALLEY WATER MANAGEMENT COMPANY
DISCHARGER NAME
7500 MEANY AVENUE
STREET ADDRESS
BAKERSFIELD, CA 93308
CITY, STATE, ZIP CODE
LARRY BRIGHT
DISCHARGER CONTACT PERSON
(661) 410-7500
TELEPHONE NO.
lbright@vwwater.com
E-MAIL ADDRESS

EDISON, C-PLANT FACILITY
FACILITY NAME
SW 1/4 OF SECTION 34, T29S, R29E, MDB&M
STREET ADDRESS
KERN COUNTY
CITY, STATE, ZIP CODE
RUSSELL EMERSON
FACILITY CONTACT PERSON
(661) 978-0982
TELEPHONE NO.
remerson@vwwater.com
E-MAIL ADDRESS

GENERAL INSPECTION INFORMATION

Inspection Type: B Type Compliance Inspection Lead Inspector: R. West
9/18/2013 to 09/18/2013 9:30 am Clear, Sunny
INSPECTION DATE(S) INSPECTION TIME GENERAL WEATHER CONDITIONS

INSPECTION ATTENDEE(S)

Scott Moore NAME	Central Valley Water Board COMPANY/AGENCY	(559) 445-5170 TELEPHONE NO.	smoore@waterboards.ca.gov E-MAIL ADDRESS
Russell Emerson NAME	Valley Water Management Co. COMPANY/AGENCY	(661) 978-0982 TELEPHONE NO.	remerson@vwwater.com E-MAIL ADDRESS
Mike Toland NAME	CDOGGR COMPANY/AGENCY	(661) 334-3662 TELEPHONE NO.	michael.toland@conservation.ca.gov E-MAIL ADDRESS

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). Oil field produced wastewater is discharged into seven surface impoundments (sumps) at the facility. The quality of wastewater discharged to sumps exceeds salinity limits prescribed in Discharge Specification B. 1 of the WDRs. Discharge of high salinity wastewater to sumps at the facility is a violation of the WDRs and poses a threat to groundwater.

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	955513	Effluent Violation	Disposal of high salinity wastewater to sumps.	Discharge Specification B.1
V2	955555	Order Conditions	Insufficient freeboard	Discharge Specification B.6
V3	393320	NOV	Notice of Violation letter describing facility violations	
V4				
V5				
V6				

OTHER VIOLATIONS (if applicable)

SMR violations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Evaluated	Notes:
File Review violations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Evaluated	Notes:

Lead Inspector ID: 139472 Signature: Ryan K. West Date: 10/8/13

Inspection Tracking Information Reviewed by: (1) [Signature] (2) _____ (3) (RKW) 139472
CIWQS Coordinator

Filename: WVMC, C-Plant Facility, Edison Oil Field, Kern County, Order No. 92-11037 CIWQS Entry Date: 09/26/2013 CIWQS Inspection ID: 13869583

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

Sub-15 Surface Impoundments

FACILITY CLASSIFICATION

Twenty-seven unlined surface impoundments and sprinkler irrigation system.

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

BACKGROUND

The C-Plant Facility (Figure 1) contains seven sumps that are used for oil separation and storage of oil field production wastewater. The C-Plant Facility accepts approximately 4.5 million barrels (189 million gallons) of oil field production wastewater per year from several small oil producers in the Edison Oil Field whose wastewater does not meet Basin Plan salinity limits for discharges to unlined sumps. The wastewater contains an electrical conductivity (EC) of 5,700 micromhos per centimeter ($\mu\text{mhos/cm}$), a chloride concentration of 1,800 milligrams per liter (mg/L), and a boron concentration of 14 mg/L. Wastewater from the C-plant Facility is piped to Valley Water Management Company's Race Track Hill Facility for disposal to unlined sumps.

INSPECTION GIS DATA

GIS Equipment used: _____

MANUFACTURER	MODEL	SERIAL NO.	DATUM	
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 (see page 4).

Staff observed that oil field produced wastewater was being discharged into seven sumps at the facility. Land in the immediate vicinity of the facility is used for farming. It appeared that grapes are being farmed immediately south of the facility (see Figure 1).

Wastewater enters the facility by means of inlet pipes (Photograph 1). The inlet pipes discharge wastewater into two oil separation sumps that are covered with netting (Photograph 2). The oil separation sumps are gunite-lined and contained wastewater coated with crude oil. From the oil separation sumps, the wastewater enters two gunite-lined sumps (hereafter referred to as "wastewater sumps") that are each approximately 125 feet in length and 45 feet wide (Photographs 3 and 4). The two wastewater sumps are equipped with built-in skimmers, that when lowered by an operator, skim crude oil off the wastewater. I did not observe any crude oil in the wastewater sumps (Photograph 4). Both of the wastewater sumps appeared to have insufficient freeboard (approximately 1 foot of freeboard). There are two unlined sumps (hereafter referred to as "oil sumps") that are used for storage of crude oil that is skimmed from wastewater. The two oil sumps were at maximum capacity and contained wastewater coated with a thin veneer of crude oil (Photograph 5). The last sump in the series is gunite-lined and is referred to as the shipping sump. Netting was recently constructed over the shipping sump to prevent wildlife from contacting crude oil (Photograph 6). The shipping sump contained wastewater coated with some crude oil near the northeast corner of the sump.

The storm water basin located at the southern portion of the facility was dry.

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

DISCUSSION OF SAMPLING RESULTS

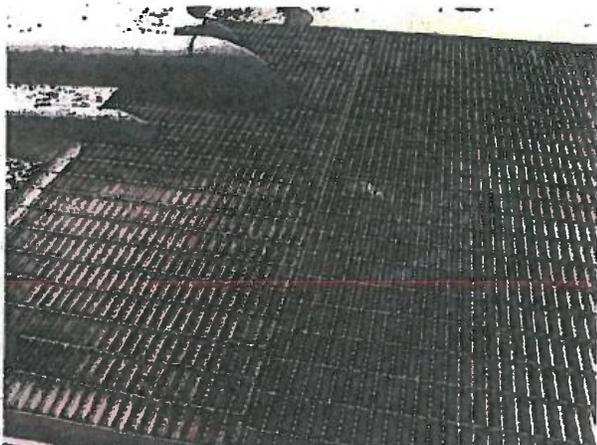
Discuss sampling results (e.g., discuss whether sampling results show compliance with WDRs).

CONCLUSIONS

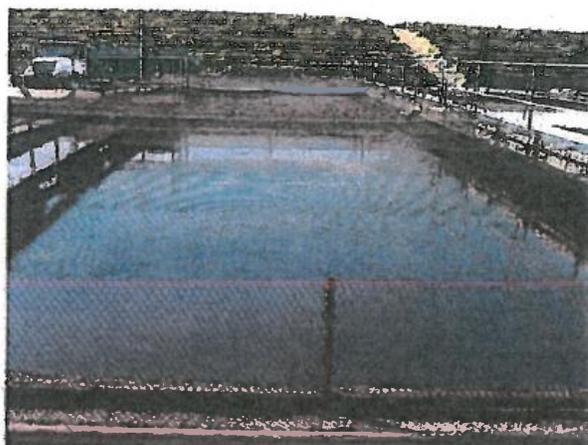
Summarize the conclusions of the inspection(s) below.

1. The shipping sump has recently been covered with netting to preclude wildlife. This resolves the Notice of Violation dated 28 June 2012 issued to Valley Water Management Company.
2. The two wastewater sumps appeared to have insufficient freeboard (approximately 1 foot) and are in violation of the WDRs. Waste Discharge Specification B.6 of the WDRs states that a minimum of two feet of freeboard needs to be maintained in the sumps.
3. Waste Discharge Specification B.1 of the WDRs states that wastewater discharged to sumps cannot exceed the following limits: EC, 1,000 μ mhos/cm; chloride, 200 mg/L; and boron, 1.0 mg/L. Analytical results provided in Valley Water Management Company's 2013 annual monitoring report indicate that the wastewater contains an EC of 5,700 μ mhos/cm, a chloride concentration of 1,800 mg/L, and a boron concentration of 14 mg/L, which exceed the salinity limits prescribed in the WDRs.
4. Discharge of high salinity wastewater to sumps at the facility is a violation of the WDRs and poses a threat to groundwater. The disposal of wastewater to sumps at the facility needs to cease.
5. The WDRs are outdated and need to be updated for conformance with current Central Valley Water Board policies, and State regulations and policies.

PHOTOGRAPHS



Photograph 1. – View of incoming wastewater pipes that discharge into the separation sumps.



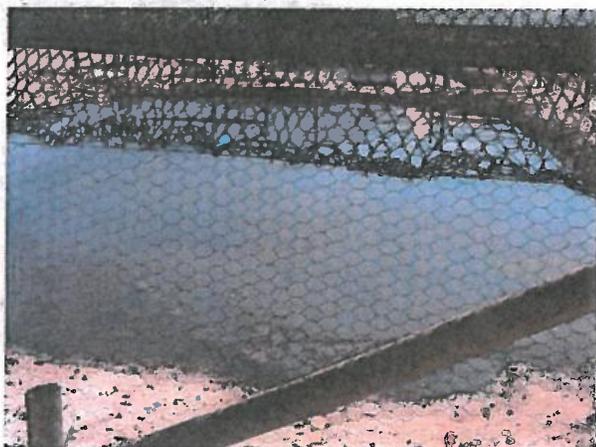
Photograph 2. – View of oil separation sumps.



Photograph 3. – View of a separation sumps and wastewater sumps looking west.



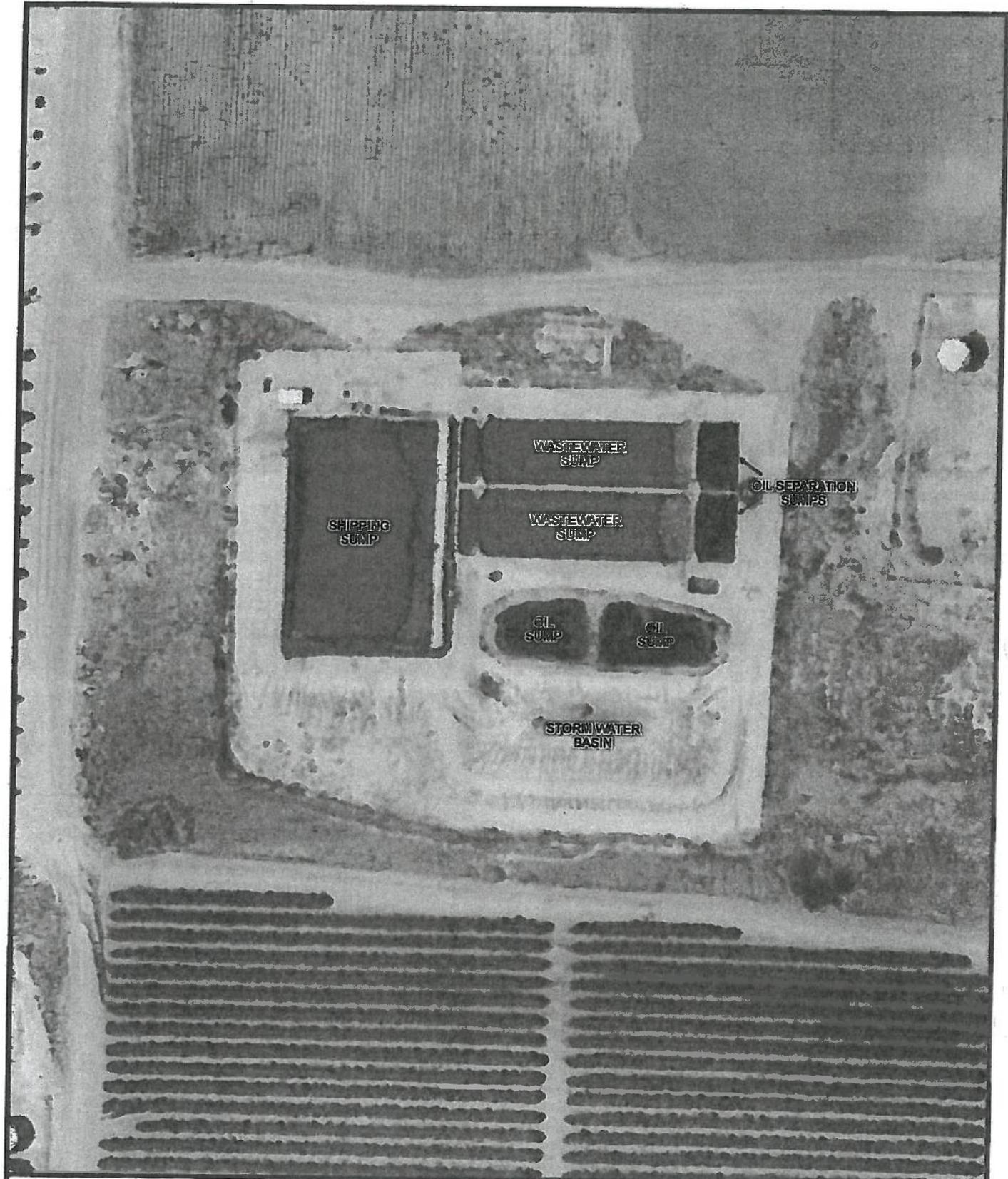
Photograph 4. – View of the wastewater sumps looking southeast.



Photograph 5. – View of the two unlined oil sumps.



Photograph 6. – View of the shipping sump.



Map Source:
ESRI's ArcGIS Online Premium Services
Section 34, T28S, R29E, MDB&M



SITE MAP
ORDER NO. 92-11037
VALLEY WATER MANAGEMENT COMPANY
EDISON FEE 34 (RACETRACK HILL, C-PLANT) FACILITY
KERN COUNTY

FIGURE 1