

**United States Environmental Protection Agency  
Region IX  
POLLUTION REPORT**

**Date:** Wednesday, March 25, 2009

**From:** Craig Benson

**Subject:** POLREP 21 and FINAL

Toro Creek

1073 Toro Canyon Road, Summerland, CA

Latitude: 34.4569000

Longitude: -119.5600000

<b>POLREP No.:</b>	21	<b>Site #:</b>	Z918
<b>Reporting Period:</b>	2/11/09 –3/18/09	<b>D.O. #:</b>	
<b>Start Date:</b>	1/12/2005	<b>Response Authority:</b>	OPA
<b>Mob Date:</b>	1/12/2005	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>	3/18/2009	<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>	3/18/2009	<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>		<b>Contract #</b>	EP-R9-05-01
<b>RCRIS ID #:</b>		<b>Reimbursable Account #</b>	
<b>FPN#</b>	117026		

**Site Description**

See POLREP 1 and POLREP 17 in the documents link at [www.epaosc.net/torocreek](http://www.epaosc.net/torocreek).

**Current Activities**

EPA has completed treatment system testing and improvements. These measures will reduce the likelihood that the system will malfunction and reduce the opportunities for corrosion and degradation of the material with which the system is constructed. EPA has fully transitioned site operation and maintenance activities to Santa Barbara County.

2/18/09

On-site: OSC Benson, 3 ERRS. ERRS crew exposed the effluent product piping exiting stages 1 and 2 of the 3-stage concrete clarifier and initiated clean-up and brush clearance within and adjacent to the upper enclosure area. ERRS completed preparations for United Fueling Systems (ERRS subcontractor) UST testing and piping modification work.

2/19/09

On-Site: OSC Benson, 3 ERRS, 1 United subcontractor. ERRS crew continued to clean and clear brush from the upper and lower enclosure areas and provided support to United for UST annular and secondary containment testing. United successfully completed the UST annular integrity test. There was an unsuccessful attempt to pressure or vacuum test the schedule 80 PVC encapsulating the 2 inch chemhose along its 900 foot gravity run from the upper enclosure clarifier to the lower enclosure UST. Segments of the PVC line at the upper enclosure concrete clarifier junction and within the UST excavation area were cut, exposing the intact chemhose. Boots were applied prior to the pressure and vacuum test attempts; however the PVC was unable to hold pressure or vacuum in its current configuration.

It was necessary to temporarily demobilize ERRS and ERRS subcontractor work at this point as fulfillment of the balance of the efforts were dependent on resolution of this issue with Santa Barbara County Fire Department (SBCoFD) Hazardous Materials Supervisor Ann Marie Nelson.

2/24/09

OSC Benson received notification from the Central Coast Regional Water Quality Control Board (RWQCB) that the County request for State Cleanup and Abatement Account (CAA) project funding to operate and maintain the Toro Creek system was approved. The use, accounting, and reimbursement procedures of the approved grant will be determined by the State Water Resources Control Board and County recipient.

2/25/09

OSC Benson discussed the unsuccessful PVC “secondary containment” test with SBCoFD Nelson. Ms. Nelson suggested an alternative test more appropriate to the fill riser design of the line. The 2 inch

chemhose itself (carrying the accumulated crude oil) is a single walled gravity feed system. The PVC was not designed as secondary containment per say, but rather as a chase meant to protect the chemhose from the environment. In this circumstance, the California UST standard calls for a 2 year hydrostatic testing requirement of the line (chemhose) capable of detecting a minimum release equivalent of 0.1 gallon/hour defined at 40 psi.

2/27/09

The ERRS Response Manager met on-site with Ms. Nelson, Santa Barbara County Deputy Fire Chief Chris Hahn, and a representative from Central Coast Tank Testing (CCTT) to determine the most appropriate method for conducting this hydrostatic test on the line. Over the next several days ERRS subcontracted CCTT for the product line test and all other pending subcontractor tasks were scheduled for remobilization on 3/9/09.

3/9/09

On-Site: OSC Benson, 1 ERRS, 2 United, 2 XERXES subcontractors. XERXES Corp. is the manufacturer of the Toro Creek UST. A XERXES crew reconfigured the UST from a dry to wet annular system as an improved method of UST interstitial monitoring of release detection under the State UST standard. A hydrostatic monitoring reservoir was installed atop an existing annular space port on end of the tank and the annular space and reservoir were filled with a brine solution. Final reservoir cover and sensor installation was scheduled for the United crew on the following day.

In preparation for the CCTT hydrostatic chemhose test, United installed a 2 inch ball valve (vertical inline orientation) in the chemhose atop the UST inside the sump riser to act as a product flow control or shut-off to facilitate the test of the product chemhose connecting the clarifier to the UST. In addition, United continued to work on UST sump riser and piping modifications.

3/10/09

On-Site: OSC Benson, 1 ERRS, 1 CCTT, 2 United subcontractors. CCTT successfully completed the hydrostatic chemhose test. The chemhose line was isolated by closing the newly installed ball valve at the UST, installing the test assembly in one of the clarifier risers and plugging the second riser. The chemhose line was filled with water from the primary stainless steel clarifier and all entrapped air was eliminated over a period of several hours. Once the chemhose line was completely full and stable and approximately 40 psi of pressure was applied at the ball valve end of the line, a one-hour testing cycle was initiated. The test revealed a total volumetric loss of 0.0125 gallon/hour, well under the 0.1 gallon/hour limit. At the conclusion of the test, the line was restored and the upper enclosure area was prepared for backfilling.

United completed all sump riser and piping modifications including a new man way with a spill containment bucket, swivel fill cap and observation port and new UST vent riser. United installed a hydrostatic monitoring sensor in the annular reservoir and wired the connection through a PVC conduit to a tank audible/visual alarm unit. The use of the existing solar panel/battery system precluded the need for a hard wire electrical system. The sensor/alarm system was tested successfully and the wet annular reservoir was topped with a final cover.

3/11/09

On-Site: OSC Benson, 4 ERRS. The ERRS crew completed the backfilling and grading of the UST lower enclosure area. This was accomplished by using a shooter truck to "shoot" pea rock to a depth of approximately 12-18 inches below the finish grade. The pea rock was moisture conditioned and vibraplate compacted to settle the rock into place. Native soil was then imported in lifts with a skid-steer, compacted and moisture conditioned to the finished grade.

OSC Benson and the ERRS crew discussed final on-site activities to be completed the next day and scheduled rental equipment pick-ups.

3/12/09

On-Site: OSC Benson, 4 ERRS, 2 Watkins subcontractors. The ERRS crew completed the upper enclosure backfill utilizing hand tools and applied a UV protective color coat to both effluent lines exiting the upper enclosure clarifiers. All site debris (non-haz) and green waste was consolidated into a staging area and was live-loaded for off-site disposal.

A Watkins Fence crew completed the repair/replacement of the security chain link fence surrounding the UST lower enclosure area.

Prior to demobilization, OSC Benson and the ERRS Response Manager conducted a detailed site-wide walk to ensure all "punch list" repair and enhancement activities were completed. OSC Benson scheduled an on-site transition day meeting with County officials on 3/18/09.

3/18/09

On-Site: OSC Benson, ERRS Response Manager, Ms. Nelson and County Public Works Department Water Agency (PWDWA) Chief Matt Naftaly. Mr. Naftaly and his staff will assume initial control of continuing system operation and maintenance. Ms. Nelson and County CUPA officials will regulate and work with Mr. Naftaly to ensure continued project compliance with State/County UST standards. Representatives from four oil service companies were also on-site at the request of Mr. Naftaly. The County will let a contract to conduct oil pump-out/transportation and possibly other services. The nature of this final EPA-County transition meeting was suitable as a pre-bid site inspection for the prospective bidders.

OSC Benson and the ERRS RM led the group on a full-site tour. All recent system enhancements (POLREPS 19-21 & Final) were reviewed and operational parameters discussed. The County was provided a notebook containing the recent testing certifications, tank diagram/gauging chart, chemhose hydrostatic test procedures, photographs, sump riser materials list and installation guides for the level sensor and alarm system. In previous correspondence and site visits, OSC Benson had already provided Mr. Naftaly with relevant site historical and operational and inspection materials.

Ms. Nelson provided Mr. Naftaly with forms and procedures to continue compliance with CUPA requirements and will be available to assist in the near future. Among these requirements are a biennial line test and monthly facility inspection by a Designated Operator.

The meeting was completed at 1400 hours and EPA departed the site.

#### **Planned Removal Actions**

Case Closed. Completion of the transition from EPA to Santa Barbara County for all continuing system operations is effective 3/18/09.

#### **Next Steps**

Transition complete. EPA off-site.

#### **Key Issues**

N/A

[response.epa.gov/torocreek](https://response.epa.gov/torocreek)