U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
USA Petroleum Refinery - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #1**
Initial
USA Petroleum Refinery

Ventura, CA
Latitude: 34.3311190 Longitude: -119.2931880

To:
From: Margaret Waldon, OSC
Date: 12/12/2012
Reporting Period: 08/15/12 - 12/12/12

1. Introduction

1.1 Background

Site Number:		**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	OPA	**Response Type:**	PRP Oversight
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:		**Start Date:**	
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	CDFG
FPN#:	E12904	**Reimbursable Account #:**	

1.1.1 Incident Category

PRP cleanup

1.1.2 Site Description

This former refinery is located in an unincorporated section of Ventura County (CA) and is comprised of a refinery, tank farm complex, loading rack, waste water treatment plant, ammonia plant, nitric acid plant, mechanical shop, administrative offices and warehouses that occupies approximately 98 acres. The refinery is located adjacent to the Ventura River. The refinery ceased operations in 1984.

1.1.2.1 Location

The facility is located at 4777 Crooked Palm Road, Ventura, CA, Unicorporated Ventura County. Crooked Palm Road and Hwy 33 are to the east of the facility. To the north of the facility is Brooks Institute, an art college. The Ventura River is located on the western side of the facility. An earthen drainage ditch that drains to the Ventura River is located on the southern boundary of the faciity.

GPS Coordinates: 34º 19’ 52.03” West; 119º 17’ 35.48” North

1.1.2.2 Description of Threat

The tank farm complex includes two 50,000 + capacity crude oil tanks that still contain approximately 2500 bbls of crude oil and approximarely 4800 bbls of fuel oil/flammable liquid remains in six other tanks. Most of the piping is still intact and leaks were observed in several areas within the site as evidenced by fresh oil staining on the ground. The USA Petroleum Refinery is directly adjacent to the Ventura River (25 meters to the west). The Ventura River is fed by upstream water shed that includes the Ojai and northern Ventura Co. areas. As a result, the river in this location flows year around. The river drains into the Pacific Ocean approximately 6 miles downstream. The River is habitat for numerous protected species adjacent to and downstream of the facility including the tide water goby, steelhead, red legged frog and numerous plants and birds. The facility is believed to be directly connected to the river through an 24" drainage pipe that goes from the API separator pond in the southwest corner of the facility directly to the river. In addition, there is a grated culvert on the southern end of the pond. It is not known where this drains to, however, west of the culvert there appears to be a valve vault between the API Separator Pond culvert and the River. Based on conversations with facility personnel and contractors, all of the drainage from this facility is routed into the API separator pond. The 24' drainage pipe has a gate valve on it that appears to be in the open position. The exact location of the outfall end is still being determined, but is estimated by Ventura Co. Environmental Health to enter into the river approximately 25 meters directly west of the API separator pond. The facility has been abandoned since 1984 and has maintained minimal maintenance since operations have ceased. As a result there are numerous leaking pipelines, tanks and production vessels

throughout the property. In the event of rain, that free oil could be transported through the site drainage into the API Separator pond. In addition to these connections, there is evidence that the facility has flooded due to its location in the Ventura River Flood Plain. During the November 29, 2012 sample collection effort, wardens from the California Department of Fish and Game identified vegetation with high water/oil marks on plants between the API Separator Pond and the River. During conversations with the caretaker during the initial site visit, he indicated that historically the facility had flooded during large precipitation events which have resulted in water nearly reaching the front gate and that there was standing water on most of the refinery including the tank farms. During the second sampling event on December 6, 2012, OSC Wise located maps indicating the in the 1997 the facility had flooded and washed out the protective berms around the tank farms. These berms do not meet the current requirements pursuant to 40 CFR 112 on impermeability and would be subject to additional washout if the river was to breach its banks in the future. Based on these issues, this facility poses a high potential for a release of oil to the water of the U.S.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
OSCs Waldon and Wise conducted an initial assessment of the facility on Aug. 16. Several areas of oil staining were noted around piping, flanges, pumps, tanks, sumps, refinery equipment, and other areas in the facility.

Nov. 29, 2012 – USEPA CID Search of the facility under Search Warrant. OSCs Waldon and Wise were present during USEPA CID's search of the facility. Samples were taken from several areas from within the refinery including several tanks including Crude Oil tanks, ponds, stained soil areas, and waste in roll off boxes labeled "Non-Hazardous". The sample results will be used to characterize the waste and identify any disposal issues in the event of a Removal Action.

On December 6, 2012, OSC Wise aznd the START contractor collected additional sample material from the locations that were sampled on Nov. 29. This additional material was collected to provide the PRPs with split samples from the Nov. 29 sampling event and allow for additional sample material to be analyzed for additional target analytes as part of the EPA characterization of the site. In addition, the Ventura Co. Environmental Health identified other sample locations where process equipment and pipelines needed to be sampled to verify their contents. All of the samples were submitted to the Los Angeles Co. Sanitation Districts laboratory for analysis. The target analyses included total petroleum hydrocarbons, volatile organic compounds, semi-volatile organic compounds, California/RCRAI heavy metals, toxicity characteristic leaching procedure and the California solubility toxicity leaching procedure. The data is forthcoming.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Aug. 16, 2012 Initial site visit as a follow up to a complaint from Ventura Co. CUPA.

A Notice of Federal Interest was issued to the facility on August 23, 2012. The NOFI required USA Petroleum to identify a Project Manager that is capable of making decisions for or on behalf of USA Petroleum to oversee a cleanup that must be completed by December 31, 2012. Specifically, the NOFI requires USA Petroleum to removal all oily sludge, oil contaminated soil, oil contaminated debris, oily water, and refining chemicals. The facility requested and received an extension to complete cleanup actions by Jan. 31, 2012.

2.1.2 Response Actions to Date
Aug. 16, 2012
Initial site visit as a follow up to a complaint from Ventura Co. CUPA
Aug. 23, 2012
Notice of Federal Interest was issued to the facility
Aug. 30, 2012
Facility identified a Project Manager that will oversee the cleanup work
Facility identified contractors that will be performing the work
Facility completed cleanup and mitigation of oil spills at the facility
Facility has closed off/blinded all access points to all Permit Required Confined Spaces and Confined Spaces
Sept. 7, 2012
Facility submitted a Workplan for refinery cleanup
Sept. 21, 2012
Facility provided a Sampling Plan for the soils in the areas where spills have occurred

Provide a description and schedule of the work completed by the PRP so far.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The PRP is USA Petroleum also known as USA Petrochem. USA Petroleum was issued a NOFI on August 23, 2012 by OSC Waldon. EPA is currently in negotiations with the PRPs for the issuance of Clean Water Act 311 Administrative Order on Consent.

2.1.4 Progress Metrics List what has been moved off site so far.

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

USA Petroleum (PRP) is currently cleaning up the site in accordance with the terms of the NOFI.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

USEPA will continue to monitor the PRP's progress. **The PRP is preparing a work plan to address all removal tasks on-site. The PRP is also working with the California Department of Fish and Game to procure stream bed alternation permits necessary to identify any outfalls from the API separator pond or from the facility in general.**

2.2.2 Issues

- **Waste Characterization: The PRP has been disposing of the crude oil tank bottoms removed from the tank as non-hazardous waste. The waste is a RCRA K-169 hazardous waste and needs to be characterized as such. The PRP's contractor has sent waste to the Chemical Waste Management facility in McKittrick, CA. This facility is not permitted to accept hazardous waste.**
- **The facility was issued the NOFI on August 23, 2012 and was given a January 31, 2013 deadline to complete the removal. Due to delays by the PRP, the cleanup is extremely behind schedule. Without a herculean effort by the PRP and their contractors, this deadline will not be able to be met. If the deadline is not met and barring any extention of the cleanup deadline, EPA will be prepared to take over and complete the cleanup on February 1, 2013**
- **The facility has been using domesticated goats and a llama to conduct brush control on-site. This practice needs to be reevaluated to insure the animals are not being contaminated or ingesting toxic compounds.**
- **The facility has been directed by both OSC Wise and Waldon to identify off-site outfalls and prevent the off-site flow of liquids from the facility.**

2.3 Logistics Section

Not Applicable

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

Not Applicable

3. Participating Entities

3.1 Unified Command

EPA Emergency Response is the Incident Commander for this incident.

3.2 Cooperating Agencies

USEPA CID
CA Dept of Fish and Game
Ventura County Environmental Health
Ventura Co. Fire Department
Ventura City Fire Department

4. Personnel On Site

Aug. 16, 2012
Maggie Waldon and Robert Wise, USEPA
Mike Connell, CA Dept. of Fish and Game
Erin O'Connell, Ventura County
David Wadsworth, Ventura County

Nov. 29, 2012
Maggie Waldon and Robert Wise, USEPA
Annette O'Connelly, USEPA CID
Jay Green, USEPA, CID
David Wadsworth, Ventura County
Mike Connell, CA Dept. Fish and Game
Chris Myers, START
Adam Smith, START
Maggie Tymkow, START

Dec. 6, 2012
Robert Wise, USEPA
Craig Whiteneck, EPA
Annette O'Donnelly, EPA CID
Adam Smith, START
Seth Heller, START
David Wadsworth, Ventura County.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

List Website

6.2 Reporting Schedule

Polrep Schedule

7. Situational Reference Materials

Not Applicable