

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

Date: Monday, February 11, 2008

From: Christopher Weden

Subject: Continuation of Cleanup and PCB Sampling Results

Greka Energy - Bradley 3 Island Lease

3851 Telephone Road, Santa Maria, CA

Latitude: 35.1540000

Longitude: -123.6070000

POLREP No.:	2	Site #:
Reporting Period:	01/26-02/11/2008	D.O. #:
Start Date:	1/24/2008	Response Authority: OPA
Mob Date:	1/24/2008	Response Type:
Demob Date:	1/26/2008	NPL Status:
Completion Date:		Incident Category: Removal Action
CERCLIS ID #:		Contract #
RCRIS ID #:		Reimbursable Account #
FPN#	E08904	

Site Description

The Bradley 3 Island Lease is an oil production facility with production wells, storage and separation facilities, oil pits and water injection facilities. On January 15th, an SPCC inspection was conducted at the Bradley 3 Island lease and accumulations of oil were observed in oil pits, catch basins and uncontained areas. The accumulations often reached capacity of containment, so that releases would likely occur in the event of any rain. Greka was advised to clean up the accumulations and provide adequate freeboard on the oil pits. On January 24, 2008, during heavy rainfall, OSC Wise observed the facility discharging oily water out of a containment area into a creek. The creek is habitat for the tiger salamander, an endangered species. In addition, areas which had oil accumulations had not been cleaned out and some were overflowing, discharging oil into areas with pathways to the creek.

Current Activities

Sampling of the oil from the transformers and soil around the spill by START and Greka's consultant has documented the presence of low levels of PCBs. The presence of PCBs has resulted in the issuance of a CERCLA General Notice Letter to Greka.

Vacuum trucks used the day of the PCB spill were sequestered at their locations until sampling documented that they were not contaminated with PCBs. In addition, semi-tractors with roll-off-bins trailers were that drove through the PCB exclusion zone were similarly sequestered at Bradley 3 Island until sampling documented that they were not contaminated.

At EPA and the California Department of Fish and Game's (DFG) direction, Greka has secured the Bradley lease to prevent unauthorized entry into the facility.

EPA, DFG and Greka's consultant met with the land owner of the creek and the ponds that the creek flows into. This group was provided a tour of the water flow in the creek and the ponds. This group then walked the creek to examine it for contamination and damage. At that time no dead salamanders were observed. START collected samples of water and sediment from the creek. The samples came back positive for PCBs above the action levels for the matrices of concern.

The U.S. Fish and Wildlife Service (USFWS) which has jurisdiction of the tiger salamander has indicated to both EPA and DFG that the creek and one of the ponds are habitat and breeding grounds respectively.

Greka's consultant has submitted a work plan to EPA for review to begin initial sampling inside the facility for PCBs. EPA is currently reviewing the work plan.

Planned Removal Actions

1. Initial characterization of PCB contamination inside the facility.
2. Removal of PCB contaminated soil and decontamination of production equipment inside the facility.

3. Characterization of the creek and ponds to fully characterize the extent of PCB contamination.
4. Decontamination or removal of PCBs from the creek.

Next Steps

1. EPA is currently reviewing the Greka's consultants work plan for initially characterizing the extent of surface contamination inside the facility. This plan must also be approved by the Santa Barbara County Fire Department which serves as the CUPA for that area.
2. OSC Robert Wise will requesting a Section 7 Endangered Species Act (ESA) Consultation of the affected areas from USFWS.

Key Issues

1. PCB action levels: 1ppm in facility soils, 40 ppb in creek and pond sediments and 1 ppb in creek and pond water.
2. ESA issues

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