

Dear Mr. Chandler,

Our community and neighborhood have been fortunate to have the expertise of Santa Barbara Channelkeepers review of the remediation of the Carpinteria Chevron/Venoco site. I support the Channelkeepers recommendations. My comments follow:

SCOPE OF CLEAN-UP

As an affected neighbor, and based on what I hear from other neighbors, I want nothing less than a total clean-up-- which I understand was the original RWQCB goal in 2001. There are 22 hotspots identified on the property, and likely additional which were not studied, such as the Pitas Point Odorant facility which is located on the property although the equipment is not owned by the Venoco. If full clean-up on the first 2 areas is not required, a poor precedent is set for future clean-up of the additional sites. Impatience, caused by delays by the responsible parties, is a poor reason to accept a half-solution. The proposal states:

There is a reasonable potential that the Site will be developed at some point in time. In conjunction with this development, the soils left on-site that are below the cleanup levels specified herein may be covered by concrete slabs, parking lots, roads, and/or other structures that will either minimize or eliminate the potential or contaminated sediments being transported to waters of the state. In such event, Chevron and Venoco reserve the right to petition the RWQCB to have certain requirements of this workplan withdrawn to reflect the changed circumstances.

Development may be years away, and the nature of future development on this site is very uncertain. Everything from parkland to mixed commercial residential (with likely residential behind the immediate Carpinteria Avenue streetfront) may occur. Clean-up should be done once, be thorough, and accomplish the goals both of any potential development needs and assuring for all time that there will not be, and has not been, offsite runoff pollution.

CLEAN-UP/TESTING/IRRIGATION ISSUES

The proposal states:

Additionally, the previously identified DDT, DDE, and DDD "Hot Spot" locations have not been affected by the irrigation and weed abatement activities previously completed at the Project Site by Venoco.

I provided RWQCB with photos documenting the extent of digging during the time the irrigation pipes were laid. Unfortunately photos do not convey the "on the site" experience of what went on. Ditches approximately 4 feet deep crisscross the property in the FNA. Dirt was extensively turned over and spread about. Looking at a map of the test sites and comparing the photos it is obvious that contaminated soil was trenched. Channelkeepers insistence on more complete sampling and more extensive potential soil removal, and

comment that some samples show more contamination at deeper levels, simply reflect common sense.

WATER SAMPLING/IMPOUNDING:

The proposal calls for impounding of runoff and testing of offsite discharge only after 2-3 inches of rain.

Water pumped from the Venoco site traverses a well used passive park and flows into the ocean at a popular surfing spot. Neighbors have noted oily contaminated water for years. Testing should include: the path under the trestle bridge, areas in the park where water flows, and at the mouth of Higgins Creek near the ocean to assure the community it is safe from contamination.

Impounded water may put nearby homes at risk for flooding. In the past when water accumulated nearby homes were flooded. The plan must avoid the risk, but not at the expense of full monitoring of the discharge. The suggestion that there are times when it could be too dangerous to monitor seem silly: As a resident since 1976 I cannot recall a time flooding or lightning would have made it dangerous to put on boots and traverse the property. Additionally, the suggestion that it would take 2 - 3 inches of rain to cause offsite runoff is simply not true - I have observed runoff from various portions of the property, including the subject area south over the "buffer zone," following far less rain. Similarly, the suggestion that monitoring only take place during "operating hours" seems disingenuous. Venoco operates on a 24 hour basis (indeed as neighbors listening to operations and associated alarms it seems like they operate more at night). In discussions of plant safety Venoco has claimed it always has adequate staff at the plant site to assure safety.

An abandoned oil well (probably dating to the late 1880s/early 1900s) is covered by boards and is located in Area 4, just west of the Pitas Point odorant facility near the RR tracks. It is not clear whether impoundment of water could include this old oil well site. (A few years ago, when viewing the property with city personnel, one could poke sticks through holes in the boards into the tar/oil.) It is not clear whether in the event of flooding/impoundment this well area could be flooded. I do not believe the maps used in connection with this project show the well, and it would be appropriate to address any potential for cross contamination.

PLAN CONDITION UNCERTAINTY

The proposal states:

Based on site conditions at the time of the excavation activities and any permit restrictions placed on the excavation activities and associated truck traffic by the city of Carpinteria, the RWQCB staff may revise excavation requirements in Drainage Area No. 4.

Please explain the phrase "based on site conditions at the time of excavation"- Can this language be referring to or in any way interact with conditions proposed to be imposed by the Paredon Project, or any other project contemplated by Venoco? If so, the concerns should be explicitly stated. The clean-up project should not be downgraded or scaled back in any form based on landuse proposals by Venoco which are not acknowledged or discussed in the clean-up plan—contingencies should be anticipated and planned for. For example, the Paredon project proposes as mitigation a sidewalk along Dump Road—clean-up conditions proposing any curbs should coordinate the two, ideally by imposing the more protective and complete of the combined mitigations, a sidewalk to ensure continued safe public

hiking/biking access along Dump Road.

REVEGETATION

The proposal states:

Following confirmation that the cleanup goals have been met, the construction contractor will moisture condition the resulting surface and contour the surface to match existing topography, and reestablish vegetation and surface drainage.

A specific plan for revegetation should be in place and native vegetation should be used, reflecting City policies for open space given the fact that the area has been considered for open space use and in fact was once part of a Venoco proposal to donate the land to the City.

SEAL SANCTUARY/PUBLIC ACCESS/SANDBLAST AREA CLEAN-UP

The former sand blast area (FSBA) is immediately adjacent to an area of great biological and recreational importance to the community. The Harbor Seal Haulout and Rookery are immediately below the bluff below the Sandblast area. The trail used by the public to the Harbor Seal Overlook, and year-round along the bluffs edge and to the ocean to the east, passes within 5 – 20 feet of the haybales surrounding the Sandblast area. There is no other access to the Harbor Seal Overlook, and along the bluff trail, from the west (Dump Road side.) The plan must explicitly describe/allow for the public to pass by the Sandblast area during clean-up of the area.

Each year 60-70 pups are born at the rookery, and harbor seals haul out year-round (See Paredon EIR). The city closes the beach by ordinance from Dec 1st to May 31st. Clean-up work should not occur in the Sandblast area during beach closure, and provision should be made to allow trail users to continue year-round during clean-up. Previous work in the area has required a marine mammal observer to ensure the seals are not disturbed. The seals attract a large number of visitors--- the last several years approximately 20,000 visitors have come to see the seals between Jan and May when records are kept by the Sealwatch volunteers. It would be safe to say about half or 10,000 people come from the west of location of the sandblast area. I would estimate a similar number of people use the trail during the summer/fall months.

It should be noted that although the haybales have been in place for several years they have not been maintained and water continues to flow from the area. For this reason I would ask for soil testing in the southern drainage from the FSBA and at the ocean edge where the seals haulout. Due to the nature of the area there must be a plan for revegetation--with natives, and a maintenance bond should be required.

CONDITION COMPLIANCE

The proposal states (as just one example):

Padre has updated the site-specific Site Health and Safety Plan (HSP) originally prepared for the initial soil and groundwater assessment activities completed at the Project Site in late 2002. The updated HSP (attached as Appendix A) includes procedures, equipment, and materials/supplies employed to protect worker and community health and safety during the course of the planned soil excavation and off-site disposal activities. The HSP also includes provisions for daily tailgate safety meetings, and the procedures required for daily general work.

Venoco has plans in place currently to protect their plant workers yet in 2 separate instances I am aware of these safety plans have been ignored. The people working on the installation of the irrigation pipes were bare-chested and wore no protective clothing even though they were up to their armpits in trenches. On 8/08/07 Venoco attempted to clean a wastewater tank which resulted in over one hundred (100) 911 calls because of strong chemical odor in the Arbol Verde/Concha Loma neighborhood (and perhaps beyond). No workers wore protective clothing or masks while cleaning the tanks. What measures will be in place to ensure conditions for worker safety, or for that matter any other clean-up project conditions, in fact are carried out? There must be monitoring provisions that effectively assure community safety and fulfillment of the plans at all stages.

NEIGHBORHOOD NOTIFICATION

The proposal states:

Padre will mark the planned excavation area at the Project Site with white paint and lath, and notify Underground Service Alert of the planned soil excavation activities at the Project Site a minimum of 48-hours prior to the initiation of soil excavation activities to provide utility clearance at the Project Site. Additionally, Padre will notify the RWQCB, the County of Santa Barbara Fire Protection Division, the city of Carpinteria, Venoco, and Chevron approximately two weeks prior to beginning the planned soil remediation activities.

Neighbors should also be added to the notification list, and a "layman's" explanation appended. Dust suppression measures should be required.

CONCLUSION Thank you for your continued attention to our community's safety. It is important that your agency approach this project in the context of the known additional contamination in the entire Venoco site, and provide a model, by total clean-up, for eventual total clean-up of the area. Again, past delays are no reason not to require complete remediation. Thank you.

Sincerely,



Susan Allen
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Carpinteria, CA 93013



Protecting and Restoring the Santa Barbara Channel and Its Watersheds

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September 23, 2008

Rich Chandler
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
Via Electronic Mail: rchandler@waterboards.ca.gov

Re: Final Technical Work Plan – Chlorinated Pesticide-Containing Surface Soil Removal Plan and Associated Engineering Controls, Former Chevron Oil and Gas Processing Facility, 5675 Carpinteria Avenue, Carpinteria, CA

Dear Mr. Chandler:

Please accept the following comments on the Final Technical Work Plan (TWP) proposed by Venoco, Inc. and Chevron Environmental Management Company for the Oil and Gas Processing Facility at 5675 Carpinteria Avenue in Carpinteria, California, which are hereby submitted by Santa Barbara Channelkeeper. Santa Barbara Channelkeeper is a local non-profit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds. Channelkeeper has several members who live in close proximity to the Carpinteria Oil and Gas Facility (COGF) at 5675 Carpinteria Avenue and thus have a vested interest in the timely and thorough clean-up of contaminated soils on the property.

Channelkeeper has conducted an in-depth review of the public records documenting the protracted negotiation between the Central Coast Regional Water Quality Control Board (RWQCB) and Venoco, Inc. and Chevron Environmental Management Company, the responsible parties (RPs), to arrive at a clean-up plan for the contaminated soils at the COGF. We submitted written comments and oral testimony earlier this year on the initial proposed work plan, and are heartened to see that many of our recommendations and the community's concerns were taken into account in the revised clean-up now before us. We believe it is a substantial improvement over the prior version, yet we continue to have some of the same concerns with the revised plan that we outlined in our previous comments. We trust that the RWQCB will correct these deficiencies in a timely fashion so that the site is cleaned up in short order to levels that are truly protective of the environment and public and aquatic health.

Soil Assessment

With regard to the soil assessment activities in the Former Nursery Area (FNA) summarized on page 8, Channelkeeper notes again that chemical analyses were completed for only 35 of the 72 soil samples collected from in May 2007; many of the samples collected from lower depths were not evaluated by the lab at the RPs' request because the shallower samples from those same areas revealed lower DDX levels than the RPs' previously proposed threshold of 394

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µg/kg. It appears that the failure to analyze the other 37 samples was due to a supposition that chlorinated pesticide levels would be lower at greater depths and if surface levels were sufficiently low, there was no need for analysis at lower depths. However, existing sampling results showed increases in concentrations at lower depths for some sample locations: 52107-3A / 3B and 52207-15B / 15C (see table below). This points to the need for additional soil assessment, because it may well reveal additional hot spots in need of remediation. If chemical analyses of additional soil samples reveal levels of DDT, DDE, DDD and other chlorinated pesticides that exceed the revised remediation goals, soils in these additional areas must also be removed.

Sample ID	Depth	DDX	Dieldrin	Lindane	Chlordane
5207-3A	0-6	1,160	210	29	64
5207-3B	6-12	2,080	320	47	160
52207-15B	6-12	82.7	8.2	ND	ND
52207-15C	12-18	412	24	ND	ND

Erosion and Sediment Control

On page 7, the TWP asserts that fate and transport modeling completed by Geomega has demonstrated that "there is no reasonable potential for pesticide-containing soil located outside Drainage Area No. 4 to be transported to Waters of the State", and therefore the straw bale berms and silt fences can and will be removed. In reality, however, modeling by Geomega has demonstrated the opposite. The results of Geomega's RUSLE2 modeling (which estimates soil loss, sediment yield and sediment characteristics from erosion caused by rainfall and its associated overland flow), as presented on pages 10-11 and in Table 4-3 of the Geomega report, clearly show that soil erosion will occur at a rate ranging from 0.38 to 1.1 tons per acre per year from watershed 1, 0.41 to 1.2 tons per acre per year from watershed 2, and 0.31 to 0.88 tons per acre per year from watershed 3. These three watersheds are of concern because they are in the Buffer Zone and Former Nursery Area where contaminated soils exist and because of the topography of the site; as the Geomega report notes on page 8, surface water generally runs southwest and thus erosion from these three watersheds will eventually transport sediment to watershed 4 and the southwest corner discharge point. See pages 4-6 of internal RWQCB memo, "Chevron-Venoco Carpinteria DDX Status Update," dated July 25, 2006 (attached as Exhibit A), for a more in-depth analysis of this issue.

The facts are that some contaminated soil will still remain after remediation in these three watersheds, that some volume of that contaminated soil will migrate toward the site's discharge point, and that some of that contaminated soil may be carried in suspension (rather than dissolving in water). Given these facts, Channelkeeper recommends that the existing straw bale berms and silt fences not be removed and further, that a more sophisticated sediment filter capable of completely filtering out contaminated fine sediment be installed and be monitored frequently.

The existing straw bale berms and silt fences should remain and be maintained because they provide an added level of protection to help ensure that the contaminated soils remaining after the proposed remediation will not erode and be transported to other areas onsite or migrate offsite. The RPs' desire to remove them because they provide a visual reminder to the

community of the remaining contamination at the site is an insufficient rationale for the removal of measures that are already in place and that will minimize erosion and sediment transport at minimal cost to the RPs.

With regard to the proposed sediment filter, Channelkeeper strongly objects to the characterization of the sediment filter in the revised workplan as simply a "monitoring device," which reflects an attempt by the RPs to justify the use of an inadequate sediment filter. The primary purpose of the filter should be to control sediment; we fail to see how this function can be characterized as "incidental," nor the need for sediment control as "redundant." Although sediments that contain concentrations of chlorinated pesticides in excess of the newly proposed remediation goals will be removed, some contaminated sediments will still remain after remediation, and as noted above, Geomega's own modeling indicates that tons of sediment will eventually migrate toward the discharge point at the southwest corner of the site. The RWQCB itself found that a more effective sediment filter is a critical component in preventing migration of DDX-laden soil to offsite surface Waters of the State (see pages 3-4 of Exhibit A, as well as pages 3-5 of the April 25, 2006 letter from Executive Officer Roger Briggs to David Craig and Stephen Greig, attached as Exhibit B).

RWQCB Email to Chevron-Venoco Re Carpinteria Facility DDX, October 4, 2006 draft (attached as Exhibit C) at page 2 notes that the soil retention rate for the proposed sediment filter is only 90% under perfect conditions, indicating that at least 10% of potentially contaminated soil could pass through the filter. As noted in Exhibit C, the intended application of the type of filtration system proposed is to serve as a partial control for temporary needs such as construction sites and as a mechanism to reduce clean sedimentation, not to treat or remove toxic sediment, as is the case here.

Moreover, the TWP fails to provide necessary detail about the proposed sediment filter, such as design capacities, expected flow rates and volumes, entrained and filtered sediment volumes, retention volumes and times.

In addition, the maintenance and monitoring for the sediment filter as proposed is insufficient. The sediment filter should be inspected more than just once a year and after *significant* rain events ("significant" is undefined) *as necessary* (emphases added); inspections and necessary repairs should be conducted after storms of 0.25 inches (see justification below under Monitoring Plan section) and before all predicted rain events of this magnitude or greater. Furthermore, the TWP proposes no routine chemical sampling of sediment retained by the filter. The Monitoring Plan (TWP Appendix C) implies that sediment samples will be collected and analyzed only if DDT, DDE or DDD is detected in the rare samples that will be taken of stormwater passing through the filter. *All* sediment retained by the filter must be sampled and analyzed, regardless of discharge detections. If these constituents are detected in the sediment, it must be excavated and disposed offsite.

Finally, more specificity is needed with regard to the closing of the gate valve to ensure that contaminated water is not discharged from the site for an extended period of time. The length of time between sample collection, receipt of sampling results and closure of the gate valve must be clearly articulated in the TWP and Monitoring Plan, with a commitment to close the gate valve immediately upon receipt of sampling results that show detectable levels of any chlorinated pesticides. In addition, if and when the gate valve is closed, the TWP must include a commitment to *immediately* remove impounded water to ensure that contaminated water does not percolate to groundwater.

Therefore, Channelkeeper strongly urges the RWQCB to condition their approval of the TWP with requirements for the RPs to: 1) install and adequately maintain a more appropriate, substantial and effective filtration treatment system (including pumps, valves, piping, filter structures and media, episodic flow storage, etc.) capable of preventing the offsite movement of contaminated sediment; 2) maintain the existing straw bales and silt fences; 3) conduct more frequent inspections of the filter and sampling of sediment retained by the filter; and 4) provide for more timely removal of contaminated impounded water behind the gate valve when closed. These conditions are particularly important in light of the fact that the proposed TWP is being considered as a final rather than an interim remediation action.

Removal of Detectable DDT, DDE and DDD from On-Site Waters of the State

The TWP should include removal of all detectable chlorinated pesticides from on-site waters of the State, not just DDT, DDE and DDD.

Railroad Drainage Ditch

Channelkeeper continues to recommend additional sampling in areas immediately downstream of the Railroad Drainage Ditch that are heavily used by the public, including Tar Pits park and the outfall of Higgins Creek into the Pacific Ocean, to determine if site discharges have impacted water and sediment quality in these areas. If analyses of these samples reveal additional contamination, removal of these additional contaminated soils must be included in the TWP.

Removal of DDT, DDE, DDD and other chlorinated pesticides from Drainage Area 4

The revised TWP includes new language stating that only "reasonably accessible" DDT, DDE, DDD and other chlorinated pesticides "that have a reasonable potential of being transported to Waters of the State" will be removed from Drainage Area 4. This additional language appears to weaken this remedial action significantly and is impermissibly vague. Channelkeeper strongly urges the RWQCB to require that this language be deleted or very clearly and narrowly defined.

Channelkeeper also continues to object to the assertion in the TWP that if verification soil samples indicate detectable concentrations of DDT, DDE and DDD constituents, then requirements for additional excavation to depths of greater than 18 inches "will be *discussed* in the field with the RWQCB" (emphasis added). The TWP must include a commitment by the RPs to a concrete removal plan in the event that verification samples indicate detectable levels of *any* chlorinated pesticides (not just DDT, DDE and DDD). A non-committal reference to a discussion with the RWQCB is inadequate. Given the extended period of time it took for the RPs and the RWQCB to negotiate the subject TWP, we urge that specific actions be identified up front in the TWP regarding additional remediation in the event that verification samples show continuing detectable levels of pesticides.

Removal of DDT, DDE, DDD and Other Pesticides from Project Site

Channelkeeper supports the inclusion of more stringent remediation goals for DDT, DDE and DDD. However, we are concerned that even these lower levels proposed in the current TWP will not be low enough to avoid exceedences of the California Toxics Rule (CTR) when considering the additive toxicity of these constituents.

Using Geomega's equation of $C_w = C_s / K_D$ (where K_D is Geomega's partitioning coefficient of 196,000) to convert the CTR aqueous concentration (C_w) standards for inland waters to equivalent sediment concentrations (C_s) (see page 15 of Geomega report), we get 116 $\mu\text{g}/\text{kg}$ for DDT ($0.00059 \mu\text{g}/\text{L} * 196,000$), 163 $\mu\text{g}/\text{kg}$ for DDD ($0.00083 \mu\text{g}/\text{L} * 196,000$), and 116 $\mu\text{g}/\text{kg}$ for DDE ($0.00059 \mu\text{g}/\text{L} * 196,000$).

Let us assume that a post-remediation verification sample has the maximum allowable concentrations of 90 µg/kg DDT, 30 µg/kg DDE, and 90 µg/kg DDD. Using the additive toxicity equation delineated in finding #29 of the RWQCB's 2004 Cleanup and Abatement Order (CAO No. R3-2004-0081 at page 6), where

$$\text{measured DDT}/116 \mu\text{g/kg} + \text{measured DDD}/163 \mu\text{g/kg} + \text{measured DDE}/116 \mu\text{g/kg} = n$$

where $n < 1$ is acceptable but $n =$ or > 1 is unacceptable,

and plugging in these maximum allowable concentrations, we arrive at an n equal to 1.587 ($90/116 \mu\text{g/kg} + 30/116 \mu\text{g/kg} + 90/163 \mu\text{g/kg} = 0.776 + 0.259 + 0.552$), which is unacceptable and will not be adequately protective of water quality. Channelkeeper therefore urges the RWQCB to formulate and require remediation goals that will ensure that water quality will be protected when considering the additive toxicity of DDT, DDE and DDD.

Finally, as noted above, Channelkeeper also urges the RWQCB to require that the TWP include specific remediation actions to remove any residual contamination identified in verification sampling.

Monitoring Plan

Table 1 on page 19 (justification for Action 4) denotes that Geomega's modeling suggests it takes at least 3-4 inches of rain to generate enough runoff to produce a discharge from the site. This suggestion calls Geomega's modeling into serious question, because on the two occasions (January 28, 2007 and April 20, 2007) that Santa Barbara Channelkeeper collected samples of discharges from the southwest corner of the site, Santa Barbara County official daily rainfall records from the Carpinteria Fire Station indicate 2.25 inches of rain on January 28, 2007 with 0.08 inches on the preceding day, and 0.31 inches of rain on April 20, 2007 with no rain on the preceding day,¹ significantly less than Geomega's modeling assumption.

Even the proposed Monitoring Plan contradicts the modeling, in that it assumes collection of surface water runoff during "substantial" rain events, which are defined as a minimum of 0.5 inches of rainfall over a six-hour period. If the Geomega modeling were accurate, no discharge would occur with this level of rainfall and thus no samples could be collected. Using a more conservative estimate that runoff may be generated with more than 0.5 inches of rain, County records indicate that there were 96 such days from 1998-2008. This underscores the importance of having an effective sediment filter in place to capture any contaminated sediment that might be transported through runoff from the site.

The proposed Storm Water Monitoring Plan is inadequate. The Plan states that sample collection will occur after more than 0.5 inches of rain over a six-hour period but will not be conducted if dangerous weather conditions exist (flooding, electrical storm, etc.), when storm water discharges begin after scheduled facility operating hours, or when storm water discharges are not preceded by three working days without discharge. These overly restrictive conditions will likely result in an extremely low number of samples, if any. Channelkeeper therefore urges the RWQCB to condition their approval of the TWP with a directive to broaden these criteria to enable the collection of a greater number of samples in order to satisfactorily verify the effectiveness of the remediation.

¹ Santa Barbara County Flood Control District Official Daily Rainfall Record, <http://www.countyofsb.org/pwd/water/downloads/hydro/208dailys.pdf>

In addition, the surface water samples collected for chemical analyses must be analyzed for Chlordane, Dieldrin and Lindane in addition to DDT, DDE and DDD. Similarly, the sediment samples to be collected upstream of the sediment filter should be analyzed for all these constituents as well. Channelkeeper further recommends that a sediment sample also be collected immediately downstream of the sediment filter and analyzed in order to assess the efficacy of the filter. The annual reports submitted to the RWQCB should include not only the findings of the surface water sampling but also the sediment sampling, and should be made available to the public. We urge the RWQCB to condition TWP approval with the aforementioned modifications to the Monitoring Plan.

Construction of Second Surface Water Discharge Conveyance

Channelkeeper fails to see the need for the construction of a second surface water conveyance and discharge point for Dump Road runoff, and we are concerned about the implications of creating a new and separate discharge point in light of the DDX issues and in the context of the entire COGF (i.e. discharges from Basin 861). Moreover, Dump Road is the private property of Venoco, not a public roadway, and its runoff to surface water should be regulated as a Venoco discharge. This new discharge should therefore be included in Venoco's existing site permit, along with the usual monitoring, maintenance and reporting requirements.

Sand Blast Area

A commitment to additional excavation must be included in the TWP in the event that verification samples reveal that the remediation goals have not been met. Finally, since this area is in close proximity to the harbor seal sanctuary, precautions should be taken to ensure that noise from clean-up activities does not disturb the harbor seals, and that the public continues to have access to the trail leading to the Harbor Seal Overlook during remediation.

Thank you for the opportunity to comment on the proposed Final Technical Work Plan for contaminated soils at the COGF. Channelkeeper looks forward to working with the RWQCB to ensure that a clean-up action that is embraced by the community and is fully protective of human health and the environment moves forward in a timely manner. Please do not hesitate to contact me should you have any questions regarding the above comments.

Sincerely,



Kira Redmond
Executive Director

Cc: Dave Durlinger, City of Carpinteria
Jackie Campbell, City of Carpinteria
Susan Allen, Carpinteria Seal Watch
Vera Bensen, Carpinteria Valley Association
Linda Krop, Environmental Defense Center
Donna Jordan, Concerned Carpinteria Citizen
Amrita Salm, Concerned Carpinteria Citizen
Tim Robinson, Concerned Carpinteria Citizen
Audrey & Michael Rant, Concerned Carpinteria Citizens
Sally & Terry Eagle, Concerned Carpinteria Citizens
John & Thelma Schmidhauser, Concerned Carpinteria Citizens
Nan Deal, Concerned Carpinteria Citizen

EXHIBIT A

CHEVRON-VENOCO CARPINTERIA DDX STATUS UPDATE (David Schwartzbart, RWQCB July 25, 2006)

REFERENCES:

- Geomega March 28, 2005 "An Analysis of DDX Soil Distribution and Potential Impacts on Receiving Waters and Sediment...", which contains Site erosion and DDX solubility predictions (Modeling Report).
 - February 2006 workplan, the most recent and current workplan (Workplan)
 - Board April 25, 2006 letter responding to the Workplan (Board Letter)
 - July 5, 2006, 1438 Email from Jerry Ross to Sheila Soderberg with unsigned Geomega letter attached (Ross Email 1).
 - July 5, 2006, 1446 Email from Jerry Ross to Sheila Soderberg with additional cost estimate information attached (Ross Email 2).
 - July 18, 2006, 0853 Email from Jerry Ross to Lori Okun, Sheila Soderberg and David Schwartzbart with additional sediment filter information attached (Ross Email 3).
- Handwritten notes on the left:
JULY 18 0852
↓ 0353
0 07/15 email

Assuming all necessary Chevron/Venoco commitments made since submittal of the Workplan are properly incorporated into a new workplan, the following are the only issues we are still attempting to resolve.

PENDING ISSUES

- DDX Solubility — MDL > CTR standard ✓
- Cost Estimate — \$ 1.5 million, 24 months
- Discharge Treatment = Site Southwest Corner Filter — ok for year 1, 2007
- Site Erosion — → erosion check 10/2/06

The three Ross Emails are Chevron/Venoco's latest attempt to resolve the pending issues. This note comments on the three Ross Emails and is organized by pending issue.

DDX SOLUBILITY

DDX solubility is a concern because the Workplan proposes to leave DDX exposed at the land surface, where, if it dissolves into rainwater, it could pass through the proposed southwest corner filter to surface water and could percolate to groundwater. The Modeling Report somewhat addresses the issue by calculating soil DDX solubility based largely on partitioning coefficients. But it doesn't actually calculate the soil concentration predicted to cause dissolved fraction exceedance of the CTR standard. It merely applies the calculations to soil concentrations detected in the offsite railroad ditch and finds only one would cause CTR exceedance. That single railroad ditch soil sample contained 630 ppb DDX and was predicted to yield 0.0032 ppb dissolved DDX (CTR standard = 0.00059 ppb). All other railroad ditch soil DDX concentrations were well below 100 ppb.

Ross Email 1 proposes reducing the soil DDX cleanup level from 1000 ppb to 630 ppb, purportedly to prevent solubility above the CTR standard. (A relatively small volume of Site soil contains between 630 ppb and 1000 ppb, so this does not represent a large increase in excavation

and offsite disposal.) But Modeling Report pages 14 and 15 equations, partitioning coefficients and TOC measurements result in this equation:

$196,000 = \text{soil DDX concentration} / \text{dissolved DDX concentration}$

That equation predicts soil DDX concentrations of ~ 116 ppb will yield 0.00059 ppb dissolved DDX, the CTR standard (assuming no suspended fraction) protective of fresh surface water. Similar analysis could be conducted for groundwater protection by inserting the most stringent groundwater standard rather than the CTR standard in the denominator.

Thus, Modeling Report calculations indicate the 630 ppb soil DDX cleanup level proposed by Ross Email 1 does not adequately protect surface water from dissolved fraction and the soil cleanup level for this purpose should be roughly 116 ppb.

COST ESTIMATE → MATCHES FOR PROPOSED COST
→ INSERTS #4

The Board Letter points out the Workplan does not include all costs of the proposed onsite disposal alternative by stating "...[Workplan] Appendix F does not include the associated costs of removal of on-site waters of the state, construction of the Site southwest corner filter, ongoing monitoring, maintenance, repair and reporting of all containment structures and possible depreciated real estate values." Ross Email 2 adds to Workplan Appendix F. With incorporation of the Ross Email 2 into the Workplan, the following problems remain. I did not critically consider actual dollar amounts reported for various tasks.

The cost to remove onsite waters of the state remains unaccounted for. *yes*

Ross Email 2 construction costs for the southwest corner filter are based on the deficient fiber rolls/silt fence design. The Board Letter notified of such filtration deficiencies. Construction of a proper filtration treatment system (e.g., including pumps, valves, piping, filter structures and media, episodic flow storage, etc.) is undoubtedly much more expensive than fiber rolls and silt fences proposed.

Ross Email 2 monitoring and maintenance costs appear to be based on inadequate structures and procedures proposed by the Workplan. The Board Letter notified of such inadequacies.

Ross Email 2 does not include monitoring, maintenance, repair and reporting costs for containment structures other than the (deficient) southwest corner filter, such as curb and gutter runoff diversions and western perimeter inward slope.

Total cost for the proposed onsite disposal alternative specified by Ross Email 2 (\$1,919,585, though the convoluted presentation is unclear) appears to be less than that proposed by the Workplan (\$2,110,000). Yet Ross Email 2 should add tasks omitted from the Workplan that would increase the total cost above the Workplan projection.

The Ross Email 2 claim of no property depreciation because contamination left onsite "...is below residential standards and will not impair the ability to develop the property." appears inaccurate. While remaining soil DDX concentrations will not exceed residential PRG, those soils will not necessarily be safe for all future uses and configurations, which is why permanent deed restriction is necessary. For example, 1) PRG levels do not consider indirect exposures to receptors, such as human consumption of vegetables grown in contaminated soils (in the case of residential PRG) or human inhalation of dust from truck traffic (in the case of industrial PRG) and 2) future excavated

Handwritten notes:
196,000 = soil DDX concentration / dissolved DDX concentration
116 ppb soil DDX concentration yields 0.00059 ppb dissolved DDX

Handwritten notes:
Line #5
1,919,585
2,110,000

soils must not be configured to increase their migration potential to water and must not be disposed offsite as clean soils. Further, development of the property will require special procedures not needed for clean soils. Would you pay the same for a house with DDX in the backyard and a deed restriction as one without same, or, if you were a development contractor, would you bid the same to develop property with soil DDX as without it?

DISCHARGE TREATMENT = SITE SOUTHWEST CORNER FILTER

Because the Workplan proposal leaves DDX-containing soil exposed at the land surface with little erosion prevention, the Workplan proposes filtering Site runoff before discharge to surface water with fiber rolls and silt fences. The Board Letter pointed out the light duty, temporary nature of the design, questioned missing design components and, most importantly, stated its likely incapability to retain all sediment potentially containing DDX. Ross Email 3 presents additional information apparently written by Padre Associates Inc.

Ross Email 3 attached figure depicting "Sediment Filter Details" is merely Workplan Plate B-1 with no additional information.

The Ross Email 3 attachment states that shallow slopes above, at and below the Site southwest corner discharge point create ponding there to the extent that neighbors kayak in it. The specific impact of the ponding on proposed filtration is not described, though it is inherently counter to proper function of a gravity driven filtration system. Many related issues are not addressed, for example, 1) depth of ponding relative to height of filters, 2) possible water flow through a filter multiple times in both directions, 3) possible water flow over a filter, 4) possible filter submergence for appreciable times, accelerating its degradation, etc. These are again indications of haphazard application, rather than engineered design.

The Ross Email 3 attachment states a standard specification for fiber roll sediment carrying capacity of 30 pounds of sediment per foot of fiber roll. The fiber roll presumably fails structurally, becomes clogged and/or fails to filter if carrying more than 30 pounds per foot. Recall 1) Modeling Report Page 12 states "The average value of soil erosion for the aggregate of watersheds 1 - 6 is ~ 1 tons/acre/yr (3,600 kg/yr; 0.006 inches/yr).", 2) Watersheds 1 - 6 drain to the Site southwest corner and 3) Watersheds 1 - 6 cover roughly 21 acres. Therefore, the Modeling Report predicts roughly 21 tons of sediment erode from areas upstream of the proposed filter every year with some portion passing through the proposed filter. It is unknown how the fiber roll sediment carrying capacity of 30 pounds per linear foot compares to the amount of sediment expected to encounter the fiber rolls.

The Ross Email 3 attachment discussion of the role of filter "flow thru ports" is unclear. It appears the ports allow flow of unfiltered water to moderate distribution of water and sediment throughout the entire filter system, while relying on a silt fence at the downstream extent of the filter system to retain sediment passing through the rest of the filter system.

The Ross Email 3 attachment addresses permanence of the filter system by only discussing its framing constructed of redwood versus steel. Redwood stake versus steel stake framing is only one aspect of the system and not as critical to rapid system failure as fiber roll and silt fence filtering media. Again, fiber rolls and silt fences are designed, intended and marketed as cheap, temporary and partial controls for temporary needs such as construction sites or where they are expected to be replaced frequently.

The Ross Email 3 attachment states "*Published test results indicate that the percentage of soil retained by the proposed structure is 90%.*" This is undoubtedly for an assumed grain size with ideal flow conditions and ideal system design, construction and integrity. The 90% retention rate likely drops appreciably with deviation from assumed and ideal conditions - we've all seen blown out silt fences and fiber rolls providing 0% sediment retention. Nevertheless, the 10% passing expectation again illustrates the intended application for this type of system is where *reduction of clean* sedimentation is desired, not complete treatment or removal of toxic sediment, such as the current case. The attachment attempts to justify the 10% passing by stating the 10% would be from Watershed 4, which will be clean. This may be valid immediately after Watershed 4 is cleaned but will not be after predicted migration of DDX containing soils from Watersheds 1, 2 and 3 to Watershed 4 and the discharge point, as discussed elsewhere. Thus, by design and purpose, the proposed filtration is inadequate in even ideal conditions.

The Ross Email 3 attachment states the filter will be inspected annually and after storms of > 0.5 inches of rain in 6 hours. Inspections and repairs should also be conducted after storms of lesser magnitude.

The attachment mentions a proposed gate valve at the discharge point without including any related details. For example, while temporary tanks and vacuum trucks are mentioned, there apparently is no provision for permanent onsite storage associated with (or independent of) the gate valve.

The attachment states sediment retained by the filter will be sampled, analyzed and properly disposed only after DDX is detected in discharge that passed through the filter. Characterization and proper disposal of retained sediment should be conducted independent of discharge detections.

SITE EROSION

Common and geologic sense and the Modeling Report indicate the Site will erode, which is primarily why this is a Board case at all. But Ross Email 1 is now essentially claiming erosion only occurs from the downgradient corner of the Site. The Ross Emails include a brief, unsigned Geomega letter from Susan McCaffery, Ph. D. (Geomega Mathematical Scientist) and Andy Davis, Ph. D. (Geomega Director of Geochemistry). The Geomega letter is further discussion of the Modeling Report and contains no new data or analysis. It essentially concludes proposed removal of the Site western drainage channel and of all DDX from the Site downgradient corner (Site watershed 4) will result in no offsite transport of DDX-containing sediment exposed at the surface of the rest of the Site.

Chevron is reversing cause and effect. The western drainage channel does not cause flow but is a result of flow. It was installed to intercept Site flow that was actually or potentially crossing the Site western boundary and entering backyards of adjacent housing, and to channel that flow to the Site southwest corner. To prevent flow from entering backyards to the west after removal of the western drainage channel, the Workplan proposes grading the western Site perimeter down toward the Site interior. This may result in creation of another drainage course at the foot of the graded slope, roughly where the western drainage channel now is. Flow (channel or sheet) exists onsite because of rainfall, slope, cover, land surface type, etc., not because of the presence of a channel.

Modeling Report Figure 4-3 divides Site areas with DDX contaminated soils into Watersheds 1 through 4 with Watersheds 5 and 6 adjacent but containing little or no DDX. Watershed 1

(4)

includes portions of the Nursery Area and portions of the Buffer Zone, Watershed 2 is primarily in the Buffer Zone, Watershed 3 includes portions of the Nursery Area and portions of the Buffer Zone and Watershed 4 is primarily in the Buffer Zone. Scaled maps indicate Watersheds 1, 2 and 3 cover roughly 15 acres.

Modeling Report calculations are based on remediation slightly different from that proposed by the Workplan, but, because some Workplan terms are more protective and others less protective than Modeling Report assumptions, Modeling Report calculations and results roughly apply to Workplan proposals.

The following Modeling Report statements illustrate its prediction of DDX-containing soil erosion from Watersheds 1 through 3 (assuming execution of the Workplan proposal to remove all DDX from Watershed 4, just upstream of the Site discharge point).

- Page 12: *"The average value of soil erosion for the aggregate of watersheds 1-6 is ~ 1 tons/acre/yr (3,600 kg/yr; 0.006 inches/yr)."*
- Page 17: *"...post-remedial DDX soil concentrations will be...averaging 340 and 44 ug/kg in the FNA [Former Nursery Area] and BZ [Buffer Zone], respectively..."*
- Page 9 (and preceding pages) describes the USDA Soil Conservation Service Runoff Curve Number (RCN) method of predicting the percentage of precipitation that runs off a site. RCN can be in the range of 0 to 100, with 0 indicating all precipitation is retained and 100 indicating all precipitation runs off. Page 9 concludes the RCN range for the Site is ~ 50 – 90.
- Table 4-2 depicts mean slopes and slope lengths for watersheds 1 – 4, as follows:

Watershed	from Table 4-2	
	Mean Slope (%)	Slope Length (feet)
1	1.82	737
2	2.10	424
3	1.50	698
4	1.70	477

- The Modeling Report utilizes RUSLE2 to predict magnitude of Site soil erosion. As described on page 12, Table 4-3 reports results as a range dependant on various assumptions, as follows:

Watershed	from Table 4-3		
	Predicted Soil Erosion (tons/acre/year)		
1		Range 0.33 – 1.1, Mean 0.715	0.33 to 0.99
2	0.41	Range 0.35 – 1.2, Mean 0.775	0.35 to 1.1
3	0.31	Range 0.27 – 0.88, Mean 0.575	0.27 to 0.88
4	0.34	Range 0.30 – 0.97, Mean 0.635	0.30 to 0.97

To summarize, the Modeling Report predicts, after Workplan proposed remediation, roughly 8.4 tons (average ~ 0.7 tons/acre X ~ 12 acres) of soil with tens and hundreds ppb DDX will erode every year from Watersheds 1, 2 and 3 and roughly

(5)

1.6 tons (~.6 tons/acre X ~2.7 acres) of soil will erode every year from Watershed 4. Drainage patterns are from Watersheds 1, 2 and 3, through Watershed 4, then offsite from the downstream southwest corner of Watershed 4. No mechanism is proposed to prevent DDX containing soil from migrating from Watersheds 1, 2 and 3, through Watershed 4, and to the Site southwest corner discharge point, as predicted by the Modeling Report.

Wastestream contaminant load is critical to proper treatment system design, construction, monitoring and maintenance.

The Geomega letter by McCaffery and Davis is an unsigned attachment to an email submitted by Jerry Ross, Esq. McCaffery is apparently a mathematician who makes no claim as a CA registered PG or PE and is not listed as registered on the CA Board for Geologists and Geophysicists website. Although Jerry Ross reportedly stated Andy Davis is a CA PG, the CA Board for Geologists and Geophysicists website lists no Andy Davis or Anthony Davis as a CA PG. There is a Terrance Anthony Davis from Corona, Riverside County, CA recently registered as PG and EG, but it's unlikely he is Geomega's Andy Davis because Geomega Davis signs his name Andy Davis, Ph.D.; Corona Davis is not in Boulder, CO, as is Geomega Davis; Corona Davis is EG and Geomega Davis represents as geochemist; and Corona Davis got licenses within the last several years and Geomega Davis is possibly 50 years old. Jerry Ross makes no claim to be a CA registered PG or PE and is not listed as registered on the CA Board for Geologists and Geophysicists website. Assuming Ross, McCaffery and Davis are also not CA registered CE, if signed, the McCaffery and Davis "expert opinion" on erosion potential might constitute unlicensed practice of geology in CA.

MISCELLANEOUS

Ross Email 3 1) again claims the Modeling Report predicts DDX contaminated soil will not migrate to the southwest corner filter, which is not true, as described above, 2) claims southwest corner sampling over the past two rain seasons has not detected DDX in discharge, which is true (at least for 04-05 winter) although this was with plastic covered straw bale DDX perimeter in place, plastic and fiber rolls in drainages and 0.1 ppb DDX MRL and 3) again claims analogous discharges are not regulated similarly, yet historic agricultural lands cited are not analogous to the Site.

CONCLUSION

Today's note comments on remaining issues, assuming Ross Email modifications are incorporated into the Workplan. The Modeling Report provides the most detailed and thorough numeric prediction and modeling to date regarding Site DDX solubility and Site soil erosion.

Ross Email 1 claims 630 ppb soil DDX protects surface water from soluble DDX, yet the Modeling Report predicts 116 ppb soil DDX yields 0.00059 ppb soluble DDX, the CTR standard for fresh surface water.

Ross Email 2 cost estimates for the proposed onsite disposal/containment alternative 1) exclude the cost to remove onsite waters of the state, as proposed, 2) include construction costs for deficient fiber roll/silt fence filters rather than more expensive proper filtration system, 3) appear to be based on inadequate structures and procedures in estimating monitoring and maintenance costs, 4) exclude monitoring, maintenance, repair and reporting costs for containment structures other than the (deficient) southwest corner filter, such as curb and gutter runoff diversions and

(b)

western perimeter inward slope, 5) do not seem to correlate with comparable Workplan costs, in some respects, 6) exclude property value depreciation.

Ross Email 3 statements reinforce the inadequacy of proposed fiber roll/silt fence filtration of Si surface water discharge by stating 1) water pools at the discharge/treatment point to the extent that people kayak in it, 2) fiber rolls are expected to carry 30 pounds of sediment per foot without comparison to the tons of sediment modeled to pass annually, 3) unclear explanation of flow-through ports suggesting they allow flow of unfiltered water, 4) permanence of filter frame could be improved but ignoring lack of permanence of filter medium, 5) filters are expected to allow 10% sediment passage (presumably as a minimum), 6) filter inspections and repairs will be conducted too infrequently to ensure integrity, 7) installation of a gate valve without related details or upstream storage and 8) analysis and disposal of retained sediment will be done only after DDX detection in water passing the filter.

Ross Email 1 (and attached Geomega letter) again claims soil containing DDX cannot erode from the Site despite contradictory modeling data (and common and geologic sense) submitted previously. Modeling Report analysis predicts, after Workplan proposed remediation, roughly 8.4 tons of soil with tens and hundreds ppb DDX will erode every year from Watersheds 1, 2 and 3 and roughly 1.6 tons of soil will erode every year from Watershed 4. Drainage patterns are from Watersheds 1, 2 and 3, through Watershed 4, then offsite from the downstream southwest corner of Watershed 4. No mechanism is proposed to prevent soil containing DDX from migrating from Watersheds 1, 2 and 3, through Watershed 4, and to the Site southwest corner discharge point, as predicted by the Modeling Report.

Ross Email 1 and attached Geomega letter offering "expert opinion" on Site erosion potential, in spite of contradictory Modeling Report analysis, might constitute unlicensed practice of geology in CA.

To summarize, documents submitted to date fail to adequately address 1) DDX solubility, 2) cost analysis (and thus infeasibility of remediation to background), 3) surface water discharge treatment and 4) predicted treatment need (i.e., contaminant load).



Dan Skopec
Acting Secretary

California Regional Water Quality Control Board

Central Coast Region



Arnold Schwarzeneg

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April 25, 2006

EXHIBIT B

Mr. David Craig
Chevron Environmental Mgt. Co.
9525 Camino Media
Room B 1045
Bakersfield, CA 93311

Mr. Stephen A. Greig
Venoco Inc.
5464 Carpinteria Avenue, #J
Carpinteria, CA 93013-1423

Dear Mr. Craig and Mr. Greig:

VENOCO (FORMERLY CHEVRON) CARPINTERIA OIL AND GAS FACILITY AND ASSOCIATED LANDS EXCEPT THE FORMER CARPINTERIA BURN DUMP, SANTA BARBARA COUNTY (SITE); NURSERY AREA (NA) AND ASSOCIATED REMEDIATION OF SOILS CONTAINING CHLORINATED PESTICIDE – NOTICE OF VIOLATION

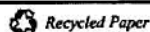
We reviewed the following materials for subject Site:

1. Padre Associates Inc. February 2006 "Update No. 2, Revised Technical Work Plan / Site Health And Safety Plan Chlorinated Pesticide-Containing Surface Soil Removal Plan And Associated Engineering Controls..." (Workplan)
2. David Craig April 6, 2005 "Carpinteria Oil and Gas Processing Facility..." letter.
3. Padre March 16, 2005 "Documentation of Surface Water Run-Off Sample Collection..." report.
4. Geomega March 28, 2005 "An Analysis of DDX Soil Distribution and Potential Impacts on Receiving Waters and Sediment..." report.
5. May 5, 2004, Regional Board "Cleanup or Abatement Order Number R3-2004-0081...Regarding DDT/DDE/DDD Discharge to Surface Water" (CAO).

The Workplan proposes permanent on-site disposal/containment of soils containing DDT, DDE and DDD (DDX). The following summarizes the main tasks proposed by the Workplan. In addition to the proposed tasks, the Workplan contains supplemental economic feasibility information.

1. Remove all detectable DDX from on-site waters of the state.
2. Remove all detectable DDX from a section of the "RR Ditch" immediately downstream of the Site.
3. Install a sediment filter at the Site southwest corner (Site discharge point to offsite surface waters of the state).
4. Monitor discharge from the Site southwest corner.
5. Remove all detectable DDX from on-site Drainage Area 4 (just upstream of the Site southwest corner).
6. Remove DDX > 1000 ppb from the Site Nursery Area (NA).

California Environmental Protection Agency



7. Construct curb/gutter run-on diversion at the north and northeast perimeters of the NA.
8. Remove on-site north-south drainage swale and change the existing grade to slope down toward the Site interior.

The Workplan fails to comply with some of the conditions that must accompany on-site disposal/containment and thus cannot be approved. Because you have purposely and repeatedly failed to incorporate necessary conditions into on-site disposal/containment proposals, you have effectively eliminated that alternative and chosen the default remediation strategy, removal and off-site disposal of all Site contaminants (the so-called "clean closure" alternative). Consequently, your submittal of an inadequate workplan is a violation of the CAO.

ANALYSIS

The Workplan is unacceptable and does not comply with CAO requirements for the following reasons:

1. Workplan Appendix F, "*Revised Remediation Feasibility Evaluation*," is incomplete and does not demonstrate economic infeasibility of remediation to a background condition. Appendix F is apparently intended to demonstrate economic infeasibility of removal and off-site disposal of all Site-DDX contaminated material compared to the proposed alternative, removal and off-site disposal of soil with only the highest DDX concentrations and on-site disposal/containment of the rest. All costs of both alternatives must be included for realistic cost comparisons of both alternatives. However, for the second alternative for permanent on-site disposal/containment, Appendix F does not include the associated costs of removal of on-site waters of the state, construction of the Site southwest corner filter, ongoing monitoring, maintenance, repair and reporting of all containment structures and possible depreciated real estate values. Those costs would likely be appreciable and might indicate complete removal and off-site disposal is not only feasible, but, in the long run, cheaper than the on-site disposal/containment proposed. Infeasibility of remediating the Site to background condition has not been demonstrated and thus, remediation to background (nondetect for DDX) is the default requirement. You have been notified several times that economic analysis must include all costs of the on-site disposal/containment alternative, yet you again failed to comply.
2. The Workplan references no deed notice/restriction. Deed notice/restriction is a necessary component of Workplan proposed permanent on-site disposal/containment of DDX contaminated soils. We have notified you of this requirement many times, most recently during the January 17, 2006, meeting regarding the forthcoming Workplan, in which you agreed deed notice/restriction would be included by reference in the Workplan. Your refusal to apply necessary

deed notice/restriction for on-site disposal/containment suggests you eliminated that alternative from consideration.

3. The Workplan presents the Site southwest corner filter essentially as a redundant, possibly unnecessary measure, but it appears to us to be a critical component in preventing migration of DDX-laden soil to offsite surface waters of the state. The ability of other proposed measures to permanently prevent migration of DDX-laden soil to offsite surface waters is unquantified in the Workplan. Those measures appear incapable of preventing such migration.

Reference 4 modeling of measures proposed by References 2, 3 and 4 -- some less protective and some more protective than those proposed by the current Workplan -- predicts discharge from the Site southwest corner of up to 3600 kg/yr sediment with up to 9 ppb DDX (Reference 4, page Ex-1). Both the current Workplan and References 2, 3 and 4 propose removal of Site soils with 1000 ppb or greater DDX.

These are some relevant differences between tasks proposed by the current Workplan and by References 2, 3 and 4 (ignoring the Site southwest corner filter, for the moment):

- a. The Workplan proposes removal of all detectable DDX from on-site Drainage Area 4 while References 2, 3 and 4 propose removal of only soil with > 1,000 ppb DDX.
- b. The Workplan proposes curb/gutter runoff diversion at the north and northeast perimeters of the Nursery Area while References 2, 3 and 4 propose no such structures.
- c. References 2, 3 and 4 propose clean fill cover in all areas where DDX > 1,000 ppb was removed while the current Workplan does not propose any cover.
- d. References 2, 3 and 4 propose removal of the on-site east-west channel and its replacement with a subsurface culvert. The current Workplan does not clearly propose removal of the east-west channel although it does propose removal of all detectable DDX from the channel.

The current Workplan proposal is more protective than that modeled by Reference 4 by removing all detectable DDX from Drainage Area 4 and by constructing runoff diversions. However, the Workplan is less protective by not applying "clean" cover over any remaining contaminated soil and by possibly not removing the east-west channel. The more protective factors are compromised by the less protective factors to possibly allow similar off-site discharge to that modeled (up to 3600 kg/yr sediment with up to 9 ppb DDX). Therefore, the Workplan proposal might allow off-site discharge of up to several thousand kg/yr sediment possibly containing single ppb DDX, if an adequate southwest corner filter were not in place.

Thus the Site southwest corner filter appears critical to preventing off-site discharge of DDX.

4. Workplan proposed construction of the permanent Site southwest corner filter utilizes techniques intended and suitable for temporary (not permanent) and partial (not complete) filtration. Workplan Plate B-1 proposes a combination of multiple approximately 12-inch-diameter fiber rolls and 3-foot-high silt fences. These structures are generally marketed and intended as temporary controls at sites with temporary needs, such as construction sites, and are intended to reduce sediment discharge, not necessarily completely prevent it. Fiber rolls and silt fences are constructed of light weight materials that physically degrade and deform under mild stress and chemically degrade with exposure to air, water and ultraviolet radiation of sunlight. It is unlikely they would maintain complete integrity through even a single average rain season. Plate B-1 depicts that where fiber rolls are stacked, the second and third flights contain "thru ports" and adjacent silt fences contain holes, allowing flow-through of water with no filtration. The "thru ports" and holes are intended to reduce overtopping of the entire structure during appreciable runoff events and illustrate the likely incapability of the system to adequately contain and filter all runoff generated during a predictable design event.
5. The Workplan presents no design criteria for Site southwest corner filter requirements and capacity. Design parameters such as expected flow rates and volumes, entrained and filtered sediment volumes and retention volumes and times are unknown, as are design capacities of proposed southwest corner filtration. This illustrates the somewhat haphazard design of the system. Again, this system design is possibly appropriate for temporary needs such as construction sites but inadequate for permanent application such as the critical Site southwest corner filter.
6. The Workplan proposed Site southwest corner filter appears incapable of retaining fine particles potentially transporting DDX through the filter. Dependant partly on overall configurations of retention areas and other features in conjunction with fiber rolls and silt fences, the fiber rolls and silt fences can retain runoff, allowing some sediment to settle out, and can filter some large particles from passing water. However, they are not intended for, and are generally incapable of, filtering fine particles entrained in passing water. At the Site, fine particles potentially provide preferential adsorption sites for DDX.
7. Workplan proposed monitoring of the integrity of the permanent Site southwest corner filter is inadequate. Workplan Appendix B specifies annual inspections of the filter before the rain season and possible inspections after significant rains. Fiber rolls and silt fences are generally light-duty, temporary means requiring frequent inspection and replacement to ensure their uninterrupted integrity.

8. The Workplan proposes no routine chemical sampling of sediment retained by the Site southwest corner filter. Workplan Appendix C, page C4 states or implies such sediment will be sampled only if DDX is detected in water passing through the filter. All sediment retained by the filter must be sampled and analyzed, regardless of whether DDX has passed through the filter. If DDX is detected in the sediment it must be excavated and disposed off of the site.
9. Workplan proposed sampling of liquid flowing through the Site southwest corner filter to offsite surface waters of the state is inadequate. Workplan Appendix C, page C3 specifies criteria triggering such sampling and concludes that likely no more than four sampling events will be conducted during each rain season. Because each discharge potentially contains DDX, each discharge must be sampled.
10. The Workplan does not address predicted DDX solubility and potential migration of dissolved DDX to waters of the state. Reference 4, pages 14 and 15 calculate that soil or sediment DDX concentrations greater than about 600 ppb result in soluble DDX in excess of CTR standards (i.e., 630 $\mu\text{g}/\text{kg}$ DDX in soil is predicted to yield .0032 $\mu\text{g}/\text{L}$ DDX dissolved in water). The Workplan proposes leaving soils with up to 1,000 ppb DDX on the site and exposed to rainfall with no provision to prevent DDX solution and subsequent migration in dissolved form. Proposed measures will not prevent, for example, dissolved DDX from migrating through the Site southwest filter to surface water or from migrating to groundwater.
11. Because stormwater contacting DDX-containing soils potentially contains dissolved DDX, stormwater retained on the site in the event of DDX detection in surface water discharged to the RR Ditch shall not be allowed to percolate to groundwater, as proposed by Workplan Appendix C, page C4.
12. The Workplan fails to specify sampling density for verification soil sampling and does not state that soils found by verification sampling to exceed approved criteria will then be excavated.
13. It is not clear that all on-site surface waters of the state will be removed. While the Workplan states the goal of removing all on-site waters of the state, and proposes procedures to remove the on-site north-south channel, it does not clearly propose or describe removal of the on-site east-west channel. Workplan page 13 merely states *"The process is underway of obtaining any government approvals that might be necessary to eliminate this temporary, man made ditch. This analysis will look at potential U.S. Department of Fish and Game approvals, Army Corp of Engineer permits (if applicable), and city of Carpinteria involvement as part of the grading permit process."* If the east-west channel remains in place, it continues to be a regulated receiving surface water of the state, while if it is removed (in addition to the north-south channel), the regulated receiving surface

water of the state nearest the Site is the channel just downstream of the Site southwest corner (so-called RR Ditch).

CONCLUSION

It appears you have effectively chosen to remediate the Site to background condition by purposely and repeatedly failing to properly pursue on-site disposal/containment. The Workplan again fails to include terms that you have repeatedly been informed must accompany on-site disposal/containment.

The Workplan constitutes continued noncompliance with the CAO by failing to propose measures that comply with CAO requirements. The Workplan 1) fails to demonstrate economic infeasibility of remediation to background condition and yet proposes on-site disposal/containment that relies on such a demonstration, 2) proposes permanent on-site disposal/containment without necessary conditions such as deed notice/restriction, 3) relies heavily on inadequate, temporary means for proposed permanent discharge filtration at the Site southwest corner and 4) contains other deficiencies described above.

Pursuant to State Water Resources Control Board Resolution No. 92-49, the Site must be remediated to the background condition (nondetect for DDX) unless demonstrated infeasible. Chevron's economic feasibility analysis has repeatedly omitted obvious, necessary, ongoing costs of the on-site disposal alternative in an apparent attempt to demonstrate the "clean closure" alternative is prohibitively more expensive. Because restoration to background has not been demonstrated infeasible, it is required.

Permanent on-site disposal/containment of residual DDX would require recordation of deed notice and restriction requiring ongoing operation, monitoring and maintenance of containment structures capable of preventing migration of Site DDX to waters of the state, yet the Workplan proposes no deed notice/restriction. We have notified Chevron/Venoco many times orally and in writing of this requirement – most recently in a January 17, 2006 meeting regarding the forthcoming Workplan, in which Chevron/Venoco agreed to comply – yet Chevron/Venoco has repeatedly failed to comply. Because Chevron/Venoco refuses to incorporate this necessary condition into permanent on-site disposal/containment proposals, on-site disposal/containment is not an option and restoration to background condition is required.

A critical component of on-site disposal/containment proposed by the Workplan is discharge filtration at the Site southwest corner, yet the Workplan proposes filtration by temporary, nondurable structures of inadequate capability with inadequate monitoring, operation and maintenance procedures. Chevron/Venoco's repeated failure to propose adequate disposal/containment measures disallows that alternative and requires restoration to background condition.

Chevron/Venoco must submit a plan on or before June 2, 2006, to excavate and legally dispose of all Site-generated DDX off of the site. This shall primarily entail, excavation of all on-site DDX-containing soil/sediment and of all off-site soil/sediment that contains Site-generated DDX, and legal off-site disposal of those soils/sediments. The plan shall comply with the CAO, although Chevron/Venoco has eliminated the on-site disposal/containment alternative therein.

Because Chevron/Venoco has repeatedly violated and continues to violate the CAO, we are proceeding to enforce the CAO and to pursue civil liabilities for its violation.

Requirements herein are not new requirements but are reiterations of CAO requirements and are issued pursuant to the CAO. Failure to comply will subject Chevron/Venoco to additional CAO enforcement and additional CAO noncompliance penalties.

Please direct technical questions or comments on these issues to **David Schwartzbart**, at (805) 542-4643 or dschwartzbart@waterboards.ca.gov and legal questions on these issues to Lori Okun at (916) 341-5165 or lokun@waterboards.ca.gov.

Sincerely,


Roger W. Briggs
Executive Officer

cc:

Mr. Jerome Summerlin, Padre Associates
Dr. Andy Davis, Geomega
Mr. Jerry W. Ross, Pillsbury Winthrop LLP
Ms. Lori Okun, State Water Resources Control Board, Office of the Chief Counsel
Mr. Tom Rejzek, Protection Services Division, Santa Barbara County Fire
Mr. Dave Durlinger, City of Carpinteria
Ms. Jennifer Christensen, Deputy County Counsel, Santa Barbara County
CA Dept. of Toxic Substances Control
Ms. Susan Allen
Ms. Linda Alkasem
Ms. Laura Camp
Ms. Kira Schmidt

EXHIBIT C

CONFIDENTIAL, ATTORNEY-CLIENT PRIVILEGED

EMAIL TO CHEVRON-VENOCO RE. CARPINTERIA FACILITY DDX
(10-4-06 Schwartzbart Draft)

Re. Chevron-Venoco Carpinteria Facility, DDX containing soil areas west of Dump Road (Site)

This email contains the following sections:

- INTRODUCTION
- CURRENT WORKPLAN, SOME CORRESPONDENCE AND TELECONFERENCES
- INTERIM MEASURE
- CONCLUSION

INTRODUCTION

This summarizes some recent case communications, notifies that Regional Board staff would temporarily (roughly 5 year timeframe) accept an adequate interim measure as an alternative to permanent remediation and asks whether Chevron and Venoco concur with the interim measure approach or prefer to pursue permanent remediation.

CURRENT WORKPLAN, SOME CORRESPONDENCE AND TELECONFERENCES

The following summarizes some pertinent points of recent communications and is not necessarily comprehensive. Recent communications are lettered A through I.

A. The most recent workplan submitted is the Padre Associates Inc. February 2006 "Update No. 2, Revised Technical Work Plan/ Site Health And Safety Plan Chlorinated Pesticide-Containing Surface Soil Removal Plan And Associated Engineering Controls..." (Workplan). The following summarizes the main tasks proposed by the Workplan.

1. Remove all detectable DDT, DDE and DDD (DDX) from onsite waters of the state.
2. Remove all detectable DDX from a section of the "RR Ditch" immediately downstream of the Site.
3. Install a sediment filter at the Site southwest corner (Site discharge point to offsite surface waters of the state).
4. Monitor discharge from the Site southwest corner.
5. Remove all detectable DDX from onsite Drainage Area 4 (just upstream of the Site southwest corner).
6. Remove DDX > 1000 ppb from the Site nursery area (NA).
7. Construct curb/gutter runoff diversion at the north and northeast perimeters of NA.
8. A) Remove onsite north-south drainage swale and B) grade down from the west Site boundary to the Site interior.

B. An April 25, 2006 Board response to the Workplan notified of Workplan deficiencies, some repeated from past iterations.

C. A May 24, 2006 Chevron/Venoco Petition for Review (Petition) specified (in part):

1. Removal of the onsite east-west drainage channel,

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2. Venoco and Chevron willingness to apply deed restriction,
3. Verification soil sampling density and removal of failing soils.

D. In a June 21, 2006 teleconference, Board, Chevron and Venoco staff discussed the following issues that remained outstanding:

1. NPDES permitting.
2. Economic infeasibility of clean closure was not demonstrated because cost of dirty closure was incomplete and unrealistically low.
3. Site southwest corner filter was critical.
4. Site southwest corner filter general design was inadequate.
5. Site southwest corner filter design specifics were lacking.
6. Site southwest corner filter general design was incapable of filtering fine particulate.
7. Site southwest corner filter integrity monitoring was inadequate.
8. Site southwest corner filter filtrate monitoring was inadequate.
9. Site southwest corner filter flowthrough monitoring was inadequate.
10. DDX solubility and dissolved fraction were not adequately addressed.
11. Restrictions and/or monitoring of water impounded onsite and percolated to groundwater (as contingency for southwest corner filter failure) were inadequate.

E. Jerry Ross submitted three emails, two dated July 5, 2006, and one dated July 18, 2006, that proposed additional terms or described existing ones, including:

1. Reduction of soil DDX cleanup levels from 1000 ppb to 630 ppb to begin to address solubility.
2. Additional cost estimate information that remained incomplete.
3. Additional site discharge filtration information that in some ways reinforces its inadequacy. The Ross Emails: 1) state shallow slopes above, at and below the Site southwest corner discharge point create ponding there to the extent that neighbors kayak in it. The specific impact of the ponding on proposed filtration is not described, though it is inherently counter to proper function of a gravity driven filtration system. 2) state a standard specification for fiber roll sediment carrying capacity of 30 pounds of sediment per foot of fiber roll. The fiber roll presumably fails structurally, becomes clogged and/or fails to filter if carrying more than 30 pounds per foot. It is unknown how the fiber roll sediment carrying capacity of 30 pounds per linear foot compares to the amount of sediment expected to encounter the fiber rolls. 3) do not clarify the role of filter "flow thru ports". It appears the ports allow flow of unfiltered water to moderate distribution of water and sediment throughout the entire filter system, while relying on a silt fence at the downstream extent of the filter system to retain sediment passing through the rest of the filter system. 4) address permanence of the filter system by only discussing its framing constructed of redwood versus steel. Redwood stake versus steel stake framing is only one aspect of the system and not as critical to rapid system failure as fiber roll and silt fence filtering media. 5) states "*Published test results indicate that the percentage of soil retained by the proposed structure is 90%.*" This is undoubtedly for an assumed grain size with ideal flow conditions and ideal system design, construction and integrity. The 90% retention rate likely drops appreciably with deviation from assumed and ideal conditions – failed silt fences and fiber rolls sometime provide 0% sediment retention. Nevertheless, the 10% passing expectation again illustrates the intended application for this type of system is where *reduction of clean* sedimentation is desired, not complete treatment or removal of toxic sediment, such as the current case.

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F. In a July 31, 2006 conference call, no significant revisions were proposed.

G. A David Craig August 21, 2006 email stated:

1. Reduction of the soil DDX cleanup level to 394 ppb, following Geomega's solubility calculations, but failing to consider additive toxicity of the three DDX constituents.
2. Culvert installation at the current east-west channel, discharging to offsite surface water at a new discharge point.
3. The Site southwest corner discharge filter will be inspected annually and after storms of > 0.5 inches of rain in 6 hours. However, inspections and repairs should also be conducted after storms of lesser magnitude.
4. A gate valve is proposed at the discharge point but related details were not included. For example, while temporary tanks and vacuum trucks are mentioned, there apparently is no provision for permanent onsite storage associated with (or independent of) the gate valve.
5. Sediment retained by the Site filter will be sampled, analyzed and properly disposed only after DDX is detected in discharge that passed through the filter. However, characterization and proper disposal of retained sediment should be conducted independent of discharge detections.

H. In an August 23, 2006 teleconference, Chevron clarified the proposed culvert in the current east-west channel discharge is intended to convey Dump Rd. runoff (on and from Venoco property) and not to carry DDX containing soils from west of Dump Rd. No detail was presented but a new and separate discharge point is a substantial issue that must be considered relative to immediate DDX issues and in the context of the entire oil and gas processing facility (e.g., Basin 861 discharges). Also, Dump Rd. is apparently not a public road but is Venoco property and its runoff to surface water should apparently also be regulated as a Venoco discharge.

I. SEPTEMBER 21, 2006 AGENCY-CHEVRON-VENOCO TELECONFERENCE

This was the most recent substantive agency-discharger communication.

Attendees: Jerry Ross, Dave Craig, Andy Davis, Susan McCaffery, Terry Anderson, Steve Greig, Sheila Soderberg, David Schwartzbart

Board staff stated the main issues for this discussion are probably erosion and solubility, though there remain other pending issues.

Geomega stated they included additive toxicity in some previous analyses.

There was general acknowledgement that Geomega solubility calculations assume equilibrium between water and contaminated soil and actual degree of equilibrium achieved and dilution during transport to site southwest corner and to groundwater are not quantified and might result in less than calculated dissolved concentration at equilibrium at site of solution.

There was very little discussion of RCN calculations and we quickly went to RUSEL2 erosion calculations as the more relevant issue. Geomega did not dispute their earlier RUSEL2 erosion modeling but stated it's only a model – that nevertheless considers all parameters possible, such

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as vegetation, soil type, slope, rainfall, etc. -- and reality, such as possible increasing vegetative cover with time, north-south fence with intergrown vegetation just west of the Nursery Area, etc., must also be considered. There was general acknowledgement that erosion/area/time results Geomega calculated do not mean that entire sediment volume leaves a given watershed every year, but that entire sediment volume moves some distance within and possibly beyond a given watershed every year; e.g., 8.4 tons of soil within Watersheds 1, 2 and 3 will move some distance every year, not 8.4 tons will leave those watersheds every year. The distance the 8.4 tons will migrate every year is not quantified.

Board staff reiterated the simple conceptual site model of DDX containing sediment eroding at Geomega's predicted volume/area/time, then creeping toward the Site southwest corner at a rate (distance/time) not currently quantified. Further, although the current proposal may be successful temporarily, eventual migration of polluted sediment to a treatment system capable of only partial filtration prior to discharge to waters of the state cannot be considered a permanent solution.

This, combined with planned land use changes possibly within the next 5 years, led to discussion of possibly implementing the current plan (or something similar, including agreements of recent teleconferences and several other conditions) as an interim measure. Conceptually, this seemed acceptable to Chevron but Board and Venoco stated the need to consider it further.

Board staff pointed out that reducing soil DDX cleanup level to the 100 ppb range indicated by solubility calculations, from the proposed 300 ppb range, would not require excavation of much additional soil. The group also discussed leaving the current temporary perimeter in place and erecting an additional interior perimeter (possibly silt fence) around more contaminated soil.

We concluded the meeting with Board staff taking the next steps of discussing the case further internally, then notifying all of next steps. This email is that notification.

INTERIM MEASURE

The current permanent remedial proposal essentially constitutes a temporary measure. DDX containing soils would remain exposed to erosion and solution but only at upgradient areas of the site (site watersheds 1, 2 and 3) a distance from surface waters of the state, onsite soil transport mechanisms would be reduced but not eliminated and the discharge treatment system just upstream of surface waters of the state would consist of fiber rolls and silt fences that provide only partial sediment removal and are temporary by nature.

Sediment transport times from site watersheds 1, 2 and 3 to the discharge point are not quantified, but, barring catastrophic events and with proposed and discussed mechanisms in place, are expected to be more than several years. Seemingly conservative calculations indicate the dissolved DDX fraction discharged to waters of the state from site soils with less than 132 ppb DDX (assuming equal concentrations of the three components) will not exceed California Toxics Rule standards.

Therefore the proposed and discussed controls are unacceptable as a permanent solution but could constitute acceptable interim measures until the site is developed in roughly 5 years, when permanent remediation would be implemented.

The proposed and discussed controls constituting an acceptable interim measure include the following fundamental elements. This is not necessarily a complete list, does not include

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elements necessarily associated with listed fundamental elements, obviously includes no detail and assumes performance adequacy of all elements.

1. Remove all detectable DDT, DDE and DDD (DDX) from onsite waters of the state.
2. Remove onsite waters of the state.
3. Remove all detectable DDX from a section of the "RR Ditch" immediately downstream of the Site.
4. Remove all detectable DDX from onsite Drainage Area 4 (just upstream of the Site southwest corner).
5. Remove DDX > 132 ppb from entire Site. (There is relatively little site soil with DDX concentrations between 132 ppb, which considers additive toxicity of dissolved fractions, and the currently proposed 394 ppb, which does not.)
6. Install a sediment filter at the Site southwest corner (Site discharge point to offsite surface waters of the state).
7. Install gate valve and associated storage and appurtenances at Site southwest corner discharge point.
8. Construct curb/gutter runoff diversion at the north and northeast perimeters of Site.
9. Grade down from the west Site boundary to the Site interior.
10. Maintain erosion control perimeter around all DDX containing soil.
11. Maintain additional internal erosion control perimeter around soils with highest DDX concentrations (possibly > 100 ppb DDX).
12. Monitor discharge from the Site southwest corner.
13. Monitor, maintain and report on all treatment and control structures.
14. Permit Site southwest corner discharge to surface water, as necessary.
15. Install and properly permit, monitor, maintain and report on second surface water discharge conveyance (including culvert in current east-west channel) and discharge point for Dump Rd. runoff.

Permanent site stability and DDX containment, deed restriction, economic analysis and possibly other terms required for permanent remediation would not be required for the interim measure.

If an interim measure is applied, the 2004 DDX Cleanup and Abatement Order would remain active and not complied with, though we would not pursue enforcement if and while the interim measure succeeds. We would reserve the right to enforce the DDX CAO back to original CAO due dates if the interim measure proves unsuccessful. The interim measure would be operated, maintained and monitored by Chevron/Venoco while in place and if unsuccessful, would be satisfactorily modified.

CONCLUSION

Please notify us by October 13, 2006 whether you intend to implement interim measures or pursue permanent remediation. Either way, a complete, independent and compliant workplan must be submitted. Because we have already reached agreement on many interim measure terms, if you are pursuing interim measures, an interim measure workplan would be due by November 10, 2006.

From: "Amrita Salm" <amritagf@gmail.com>
To: RChandler@waterboards.ca.gov
Date: 9/23/2008 8:59 PM
Subject: Carpinteria Venoco/Chevron Clean

Dear Mr. Chandler,

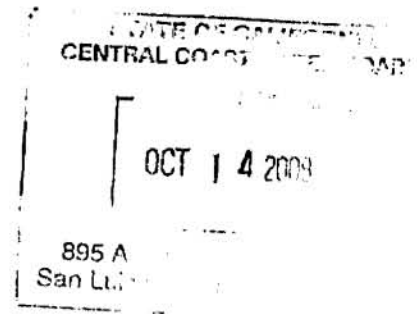
I have written you previously and again want to express my concerns about protecting the health and safety of all citizens here in Carpinteria. A thorough clean-up of the Chevron/Venoco, Carpinteria site is desperately needed. Those of us who live close to the site are fully aware of how Venoco operates and how many violations they have incurred over the years. It is time to clean it up.

I am in complete support of the recommendations made by Santa Barbara Channelkeepers and urge you to incorporate their recommendations into your final plan.

Kindly forward my comments to the Water Quality Control Board. Thank you for your consideration in helping all of us here in Carpinteria and the Central Coast.

Amrita M. Salm, Ph.D.
797 Arbol Verde Street
Carpinteria, CA 93013-2507

Dan A. and Rae Emmett
156 Rincon Point Road
Carpinteria, CA 93013
805.684.1078



September 26, 2008

Rich Chandler
Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Re: Final Technical Work Plan – 5675 Carpinteria Avenue, Carpinteria, CA

Dear Mr. Chandler:

We have read the very thorough comments of the Santa Barbara Channelkeeper on the Final Technical Work Plan proposed by Venoco, Inc. at 5675 Carpinteria Avenue in Carpinteria, California and strongly support their comments and a thorough and uncompromised environmental clean up of the site.

We are residents at Rincon Point where we have had a home for nearly thirty five years and have followed the long history of what we feel is poor environmental stewardship of the entire facility and its operations.

This has been apparent to us from years of jogging past and through the site, and paddling by it in kayaks.

The site is regrettably in the middle of an aging industrial complex located adjacent to prime single family residential neighborhoods, recreational and public spaces and a unique marine mammal sanctuary. The highest clean-up standards should apply and the highest vigilance on health and environmental standards should be applied here now and in the future.

We thank you in advance for your serious attention to this matter.

Sincerely,


Dan and Rae Emmett

From: "Sally Eagle" <sally.eagle@cox.net>
To: RChandler@waterboards.ca.gov
Date: 9/27/2008 12:48 PM
Subject: support ChannelKeeper's recommendations

Mr. Chandler, Please consider the points made by SB ChannelKeeper regarding the site cleanup of the Venoco Carpinteria Oil and Gas Facility. Protection of both citizens and marine and natural habits is so important.

The rules and regulations set forth are there for a purpose.

Sincerely,

Sally Eagle

1718 La Mirada Dr

Carpinteria, CA 93013

September 25, 2008

Rich Chandler
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

RE: Final Technical Work Plan: Chlorinated Pesticide-Containing Surface Soil Removal Plan and Associated Engineering Control, Former Chevron Oil and Gas Processing Facility, 5675 Carpinteria Ave., Carpinteria, CA.

Dear Mr. Chandler,

The Carpinteria Valley Association shares the concerns voiced by Santa Barbara ChannelKeeper in their letter to you of Sept. 23, 2008. Like them, we find the Work Plan inadequate, and demand a total cleanup of all contamination, nothing less. We also demand that this be done in a timely manner. This issue has been left hanging for far too long already.

We look forward to hearing back from you.

Sincerely,

Vera Bensen, President