



TIDELANDS
OIL PRODUCTION COMPANY

OFFICE (310) 436-9918 FAX (310) 495-1950

N68311.000556
NAVSTA LONG BEACH
SSIC #5090.3

November 17, 1992

Mr. L. H. Smith, Director
Environmental Protection Division
Department of the Navy
Long Beach Naval Shipyard
Long Beach, CA 90822-5099

Dear Mr. Smith:

We have received your letter expressing concern regarding the soil stored in the oil and gas production areas operated by Tidelands Oil Production Company West of Pier E Avenue. Please be assured that Tidelands is concerned with maintaining environmentally sound and safe operations.

The material in question came from oil and gas production facilities operated by Tidelands. Management of this material is an integral part of our oil and gas production operations. This material may have a small amount of heavy crude oil (17 API gravity) from Tidelands drilling and production operations. As you are probably aware, such material is exempt from RCRA, 40 CFR 241.4 (b)(5), excluded from CERCLA, and excluded from certain requirements of California's strict hazard waste regulations CCR 66261.24 (a)(1). The material would be considered, by all regulations, a non-hazardous waste.

Tidelands performs these operation for the City of Long Beach Department of Oil Properties which is acting as trustee for the State of California in the operation of these oil and gas producing properties. As such, we have no intention of leaving these properties or any others where they would present a risk to the environment, health or safety. At the time of your inquiry about this material Tidelands was in the process of removing it from the Pier E sites. All sites were cleared by October 30, 1992. Additionally we had already discontinued the use of this area for storage, and will refrain from using any navy lease areas for storage of this kind in the future as you have requested.

Starting the week of November 2 we are doing additional grading and maintenance of these sites. During this grading we will remove any observable crude oil from the site at that time. Wilmington crude oil is black in color, has a high viscosity, as is typical with low gravity crudes, and is easy to identify on the ground.

The bulk of your analysis seems to indicate that there is very little material in these area for concern. Most, if not all, of the levels of petroleum hydrocarbon shown on your analysis would be of little concern. We are concerned about the analysis and reporting of the one sample which indicated the presence of the volatile organics. The levels are not typical with any analysis we have done in the past nor are they typical of Wilmington crude oil. We would like to suggest that the next time you would like to take samples from facilities operated by Tidelands that you notify us prior to doing so. We would like to have our personnel present to review with you safety procedures for that facility and facilitate answering questions regarding your concerns.

It is the policy of Tidelands to only use facilities for waste disposal that are properly permitted to accept that waste stream. Additionally we inspect initially and periodically all facilities used for waste disposal. For your information only and not as a recommendation on behalf of Tidelands, we do use the following California facilities for waste disposal; BKK Landfill, West Covina; Gibson Oil and Refining, Bakersfield; Laidlaw Environmental Lokern Facility, Buttonwillow; and Venvirotek, Ventura. The material from Pier E was taken to two of the above facilities, Gibson and Venvirotek. We would be happy to supply you with address and phone number for each of the above facilities.

In order to answer any additional questions you may have I believe that an early meeting between our staffs, including appropriate representation from the Navy and the City of Long Beach, would be in our mutual interest. We believe that our clean-up efforts are appropriate for the material involved, but we would like to address any concerns which remain. Please contact me to discuss this mater or any others at (310) 495-9347. If I am unavailable please call Mr. Mark Shemaria, Chief Environmental Engineer at (310) 495-9358.

Sincerely,

Tidelands Oil Production Company, Operator



Wm. Terry Smith
President/General Manager

cc: X. Colazas, Director - Department of Oil Properties
M. Shemaria, Chief Environmental Engineer - Tidelands
SWDIVNAVFACENGCOM Code 1823
SWDIVNAVFACENGCOM Code 1823.AM
SWDIVNAVFACENGCOM Code 09C6
Central Files