



DEPARTMENT OF THE NAVY
LONG BEACH NAVAL SHIPYARD
LONG BEACH, CALIFORNIA 90822

N60258.000305
NSY LONG BEACH
SSIC #5090.3

IN REPLY REFER TO:

5090
Ser 106B/356
19 NOV 1993

Tidelands Oil Production Company
Attn: S. P. Ito - Area Supervisor
301 East Ocean Boulevard
Long Beach, California 90802

Gentlemen:

The purpose of this letter is to advise Tidelands Oil Production Co. (Tidelands) that it may be a potentially responsible party liable for a proportionate share of response/remediation costs as the results of a recent release at the Long Beach Naval Shipyard (LBNSY).

As you may be aware, the City of Long Beach has an agreement with the United States of America, acting by and through the Department of the Navy which stipulates the conditions of the fee simple title to Parcel S. In essence, the agreement stipulates that the City of Long Beach shall retain ownership and possession of and access to the oil production facilities and pipelines located on Parcel S so long as they remain in use by the City. On or about October 8, 1993, at approximately 4:00 P.M., Tidelands had a reported release of at least 25.5 gallons of production water and crude oil on the above-cited property.

The material underlying portions of Parcel S consists primarily of sandblast grit. This hillside is part of a solid waste management unit (SWMU) and as such is regulated under the LBNSY's Resource Conservation and Recovery Act (RCRA) Part B permit (Environmental Protection Agency [EPA] ID No. CA6170023109). Even though the production water and crude oil may not be a characterized substance under RCRA, the LBNSY's permit does require several actions to be taken when a release occurs at a SWMU. The actual response actions that were taken are detailed in enclosure (1).

The site of the release has also been designated Installation Restoration (IR) Site No. 11 and is governed under the Defense Environmental Restoration Program (DERP). Currently, a Remedial Investigation and Feasibility Study (RI/FS) is being conducted for this site in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). CERCLA provides joint and several liability for responsible parties at a contaminated site.

Tideland was advised to discontinue clean up at the site if sandblast grit was uncovered. A small area of grit was uncovered on the hillside and clean up activities were suspended in this area. As a result of ongoing operations, the recent release, and attempted removal/clean up activities at the site, please be advised that should there be any residual hydrocarbon contamination discovered, Tidelands may be a potentially responsible party liable for a proportionate share of response/remediation costs. Tidelands' removal/clean up resulting for the gathering line release in no way relieves the company from future responsibility. Further, LBNSY will not certify that your obligations and/or liability as a result of the subject release are complete or final.

Long Beach Naval Shipyard will keep Tidelands Oil Production Co. advised of any further obligations which may arise from the release at IR Site No. 11. If you have any questions, please do not hesitate to contact C. Anna Ulaszewski, IR Program Manager, at (310) 547-7868.

Sincerely,



L.H. SMITH
Deputy Occupational Safety, Health
and Environmental Officer
By direction of the Shipyard Commander

Copy to:

Mr. Craig O'Rourke
Facility Permitting Branch
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802

Mr. Alvaro Gutierrez
Base Closure Branch
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802

5090
Ser 106B/356

Mr. Joseph Joyce
Remedial Project Manager
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5181

Mr. Alan Lee
BRAC Environmental Coordinator (BEC)
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5181

SUMMARY OF RESPONSE ACTIONS RELATIVE TO
TIDELANDS OIL PRODUCTION COMPANY'S GATHERING LINE RELEASE
OCTOBER 8-9, 1993

The release was reported to the Long Beach Naval Shipyard (LBNSY) Security, which in turn reported it to the Naval Station Fire Department. Engine-1 responded, arriving on the scene at approximately 4:30 P.M. and remained on the scene until released by LBNSY's Spill Response Team at approximately 6:00 P.M. The Response Team had arrived at 4:55 P.M. Prior to the arrival of the Response Team, the Fire Department had constructed a dike of dirt to contain the release.

Additional containment activities conducted by the Response Team included, securing the storm drain at the bottom of the slope and flushing out the storm drain system servicing the area of the release. Team members also checked the outfall which services this area to determine if crude oil had been released to the waters of the West Basin of Long Beach Harbor; no evidence of a release was found. The U.S. Coast was notified at approximately 9:48 P.M. on October 8, 1993. Members of the Team remained on site until 7:30 P.M., October 9, 1993.

During the clean up conducted by Tidelands' contractor, Foss Environmental, a large portion of the slope was exposed and a section of the toe was removed. In order to provide additional support to the hillside, large concrete blocks were brought to the site by Shipyard personnel and placed along the remaining toe.

Encl (1)