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CalCapture CCS Project

Phase I Environmental Site Assessment Report

Prepared for:
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management subsidiary of California Resources
Corporation

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Facility ID: FA0004335	File No: 000895	Report Date: 02/27/2014
Facility Name: ELK HILLS POWER, LLC		Inspection Date: 02/24/2014
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RMP Submittal Date: 03/01/2012	Next RMP Submittal Date: 03/01/2017
Compliance Audit:	Next Compliance Audit:

NAME	TYPE OF PROCESS/PRODUCT	QUANTITY	CONCENTRATION	PROGRAM LVL
COGEN NOX REDUCTION	STORAGE AND INJECTION AMMONIUM HYDROXIDE	90,000 lbs	19 %	1

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	Violation #	General Requirements
	H096	Failure to comply with the provisions of this chapter pursuant to the time frames identified in Section 2745.1(b) if a stationary source has a process with more than a threshold quantity of a regulated substance as listed in Tables 1 or 2 of Section 2770.5. 19 CCR 4.5 2735.4(a)(1)
	H097	Failure to comply with the appropriate provisions of this chapter pursuant to the time frames identified in Section 2745.1(d) or (e) if a stationary source has a process with more than a threshold quantity of a regulated substance as listed in Table 3 of Section 2770.5. 19 CCR 4.5 2735.4(a)(2)
	H098	Failure to comply with the provisions of this chapter pursuant to the time frames identified in Section 2745.1(b) if a stationary source has a process with more than a threshold quantity of a regulated substance as listed in Tables 1 or 2 and Table 3 of Section 2770.5. 19 CCR 4.5 2735.4(a)(3)
	H099	Failure of the owner or operator of a stationary source to closely coordinate with the CUPA to implement the requirements of this chapter and to determine the appropriate level documentation required for an Risk Management Plan to comply with Sections 2745.3 through 2745.9 19 CCR 4.5 2735.5(a)
	H100	Failure to ensure that response actions have been coordinated with local emergency planning and response agencies. 19 CCR 4.5 2735.5(d)(3)
	H108	Failure to submit the Risk Management Plan information required by the USEPA to the USEPA, per the schedule below: 1. Three years after the date on which a regulated substance is first listed under Section 68.130, Part 68, Title 40 of CFR; or 2. The date on which a regulated substance is first present in a process, above the threshold quantity, as listed on Section 2770.5 Table 1 or 2. 19 CCR 4.5 2745.1(b)(2), 2745.1(b)(3)
	H109	Failure to submit a copy of the USEPA required Risk Management Plan information according to the time frame set forth in 2745.1(b) to the CUPA. 19 CCR 4.5 2745.1(c)
	H110	Failure of an existing stationary source to submit a Risk Management Plan to the CUPA after the owner or operator has received a notice from the CUPA requesting submission of a Risk Management Plan. The CUPA shall not require submission of the Risk Management Plan earlier than 12 months or later than 3 years after the notice has been issued to the owner or operator. 19 CCR 4.5 2745.1(d)
	H111	Failure to exclude classified information from the Risk Management Plan. 19 CCR 4.5 2745.1(j)
	H112	Failure to ensure that the Risk Management Plan is certified complete by a qualified person and the stationary source owner or operator. 19 CCR 4.5 2745.2(a)(1)
	H113	Failure of a new or modified stationary source to submit a Risk Management Plan to the CUPA prior to the date in which a regulated substance is first present in a process above the listed threshold quantity. 19 CCR 4.5 2745.1(e)
	H116	Failure to submit a de-registration to the United States Environmental Protection Agency and the CUPA within six months indicating that the stationary source is no longer covered. 19 CCR 4.5 2745.10(c)
	H117	Failure to submit a de-registration to the CUPA within six months indicating that the stationary source is no longer covered. 19 CCR 4.5 2745.10(d)
	H118	Failure to contact the CUPA within 30 days of a change of owner or operator to update the registration information. 19 CCR 4.5 2745.10(f)
	H120	Failure to correct and submit the emergency contact information in the Risk Management Plan required under Section 2740.1(d)(6) within one month of any change. 19 CCR 4.5 2745.10.5(a)(2)
	H121	Failure to notify the CUPA in writing of the intent to modify the stationary source at least five calendar days before implementing any modifications. 19 CCR 4.5 2745.11(a)(1)
	H123	Failure to notify the CUPA in writing of the intent to modify the stationary source no later than 48 hours following the modification where prenotification is not reasonable. 19 CCR 4.5 2745.11(a)(2)

	H119	Failure to revise, update, and submit the Risk Management Plan to the United States Environmental Protection Agency and the CUPA as follows: 1. At least once every five years from the date of its initial submission or most recent update required by section 2745.10(a)(2) through (7); 2. No later than three years after a newly regulated substance is first listed by the United States Environmental Protection Agency; 3. No later than the date on which on which a new regulated substance is first present in an already covered process above a threshold quantity; 4. No later than the date on which a regulated substance is first present above a threshold quantity in a new process; 5. Within six months of a change that requires a revised process hazard analysis or hazard review. 6. Within six months of a change that requires a revised offsite consequence analysis as provided in section 2750.7; 7. Within six months of a change that alters the program level that applied to any covered process. 19 CCR 4.5 2745.10(a)
	H122	Failure to revise, update, and submit the Risk Management Plan to the CUPA as follows: 1. At least once every five years from the date of its initial submission or most recent update required by section 2745.10(b)(2) through (7); 2. No later than three years after a newly regulated substance is first listed by the California Emergency Management Agency; 3. No later than the date on which on which a new regulated substance is first present in an already covered process above a threshold quantity; 4. No later than the date on which a regulated substance is first present above a threshold quantity in a new process; 5. Within six months of a change that requires a revised process hazard analysis or hazard Review. 6. Within six months of a change that requires a revised offsite consequence analysis as provided in section 2750.7; 7. Within six months of a change that alters the program level that applied to any covered process. 19 CCR 4.5 2745.10(b)
	H124	Failure of a new or modified stationary source to comply with Section 65850.2(b) of the Government Code prior to the issuance of a certificate of occupancy 19 CCR 4.5 2745.12
	H125	Failure to correct and submit the data required in the Risk Management Plan under sections 2745.5, 2745.6(j), and 2745.7(l) with respect to that accident within six months of the release or by the time the Risk Management Plan is updated under Section 2745.10, whichever is earlier. 19 CCR 4.5 2745.10.5(a)(1)
	H126	Failure to correct deficiencies within 60 calendar days from receipt of the notification of Risk Management Plan deficiencies. 19 CCR 4.5 2745.2(a)(3)(A)
	H127	Failure to include a registration in the Risk Management Plan that reflects all covered processes. 19 CCR 4.5 2735.5(b)(2)
	H128	Failure to complete the registration information required in Section 2740.1(d) and submit it with the Risk Management Plan to the United States Environmental Protection Agency, with a copy provided to the CUPA. 19 CCR 4.5 2740.1(a)
	H129	Failure to complete the registration information required in Section 2740.1(d) of this section and submit it with the Risk Management Plan to the CUPA. 19 CCR 4.5 2740.1(b)
	H130	Failure to submit a registration with a certification of accuracy to the CUPA (Upon request) prior to submittal of the Risk Management Plan. 19 CCR 4.5 2740.1(c)
	H131	Failure to include the data required in Section 2740.1 (d)(1) through (d)(20) in the registration. 19 CCR 4.5 2740.1(d)
	H135	Failure to maintain records supporting the implementation of this chapter for five years unless otherwise provided in Article 6 of this chapter 19 CCR 4.5 2775.1
	H136	Failure to closely coordinate with the CUPA to ensure that appropriate technical standards are applied to the implementation of this chapter. 19 CCR 4.5 2775.1(a)
	H137	Failure to request assistance from the CUPA when necessary to address compliance with this chapter or safety issues regarding unfamiliar processes. 19 CCR 4.5 2775.1(b)

		Program 1
	H106	Failure to submit an Risk Management Plan (RMP) which includes all requirements described in Section 2745.3 through 2745.5 and 2745.8 through 2745.9. 19 CCR 4.5 2735.5(b)(1), 2735.5(d), 2745.1(a)
	H114	Failure to submit in the Risk Management Plan the certification statement provided in Section 2735.5(d)(4) 19 CCR 4.5 2745.9(a)
	H132	Failure to prepare a worst-case release scenario analysis as provided in Section 2750.3. 19 CCR 4.5 2750.1
	H133	Failure to complete the five-year accident history as provided in Section 2750.9. 19 CCR 4.5 2750.1

		Program 2/3
	H103	Failure to develop a management system to oversee the implementation of the risk management program elements. 19 CCR 4.5 2735.6(a)
	H104	Failure to assign a qualified person or position who has the overall responsibility for the development, implementation, and integration of the risk management program elements. 19 CCR 4.5 2735.6(b)
	H105	Failure to document the names or positions and lines of authority defined through an organization chart or similar document when responsibility for implementing individual requirements of this chapter is assigned to persons other than the qualified person or position who has the overall responsibility for the development, implementation, and integration of the risk management program elements. 19 CCR 4.5 2735.6(c)
	H107	Failure to submit a Risk Management Plan which includes all requirements described in Section 2745.3 through 2745.9. 19 CCR 4.5 2735.5(b)(1), 2745.1(a)
	H115	Failure to submit in the Risk Management Plan a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete. 19 CCR 4.5 2745.9(b)
	H134	Failure to conduct a hazard assessment that complies with Sections 2750.2 through 2750.9. 19 CCR 4.5 2750.1
	H138	Failure of a stationary source whose employees will not respond to accidental releases of regulated substances to meet the following: 1. Inclusion in the community emergency response plan developed under Section 11003 of Title 42 of the United States Code. 2. Coordinated response actions with the local fire department for stationary sources with only regulated flammable substances held in a process above the threshold quantity. 3. Appropriate mechanisms are in place to notify emergency procedures responders when there is a need for a response. 19 CCR 4.5 2765.1(b)
	H142	Failure to develop, implement, and maintain at the stationary source an emergency response program that includes the following elements: 1. Procedures for informing and interfacing with the public and local emergency response agencies about accidental releases, emergency planning, and emergency response. 2. Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures. 3. Procedures and measures for emergency response after an accidental release of a regulated substance. 4. Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance are developed by the stationary source. 5. Training for all employees in relevant procedures and relevant aspects of the Incident Command System. 6. Procedures to review and update the emergency response plan to reflect changes at the stationary source are developed and employees are informed of these changes. 19 CCR 4.5 2765.2(a)

	H143	Failure to coordinate the emergency response plan with the community emergency response plan developed under Section 11003 of Title 42 of the United States Code. 19 CCR 4.5 2765.2(b)
	H145	Failure to promptly provide to the local emergency planning committee or emergency response officials information necessary for developing and implementing the community emergency response plan upon request. 19 CCR 4.5 2765.2(c)

		Program 2
	H146	Failure to compile and maintain the following up-to-date safety information related to the regulated substances, processes, and equipment: 1. Material Safety Data Sheets that meet the requirements of Section 5189 of Title 8 of CCR; 2. Maximum intended inventory of equipment in which the regulated substances are stored or processed; 3. Safe upper and lower temperatures, pressures, flows and compositions; 4. Equipment specifications; 5. Codes and standards used to design, build & operate the process. 19 CCR 4.5 2755.1(a)
	H147	Failure to ensure that the process is designed in compliance with recognized and generally accepted good engineering practices. 19 CCR 4.5 2755.1(b)
	H148	Failure to update the safety information when a major change occurs that makes the information inaccurate. 19 CCR 4.5 2755.1(c)
	H149	Failure to conduct a review of the hazards associated with the regulated substances, process, and procedures that identifies the following: 1. The hazards associated with the process and regulated substances; 2. Opportunities for equipment malfunctions or human errors that could cause an accidental release; 3. The safeguards used or needed to control the hazards or prevent equipment malfunction or human error; 4. Any steps used or needed to detect or monitor releases. 19 CCR 4.5 2755.2(a)
	H150	Failure to consult with the CUPA to decide which hazard review methodology is best suited to determine and evaluate the hazards of the process being analyzed. 19 CCR 4.5 2755.2(b)
	H151	Failure to determine whether the process is designed, fabricated, and operated in accordance with applicable standards or rules. 19 CCR 4.5 2755.2(c)
	H152	Failure to include the consideration of external events, including seismic events in the hazard review. 19 CCR 4.5 2755.2(d)
	H153	Failure to document the results of the hazard review and ensure that problems identified are resolved in a timely manner. 19 CCR 4.5 2755.2(e)
	H154	Failure to update the hazard review at least once every 5 years. 19 CCR 4.5 2755.2(f)
	H155	Failure to update the hazard review whenever a major change in the process occurs. 19 CCR 4.5 2755.2(f)
	H156	Failure to resolve all issues identified in the hazard review before startup of the changed process. 19 CCR 4.5 2755.2(f)
	H157	Failure to prepare written operating procedures that provide clear instructions or steps for safely conducting activities associated with each covered process consistent with the safety information for that process and address the following: 1. Initial startup; 2. Normal operations; 3. Temporary operations; 4. Emergency shutdown and operations; 5. Normal shutdown; 6. Startup following a normal or emergency shutdown or a major change that requires a hazard review; 7. Consequences of deviations and steps required to correct or avoid deviations; 8. Equipment inspections. 19 CCR 4.5 2755.3(a)(b)

	H158	Failure to ensure that the operating procedures are updated, if necessary, whenever a major change occurs and prior to startup of the changed process. 19 CCR 4.5 2755.3(c)
	H159	Failure to ensure that each employee presently operating a process, and each employee newly assigned to a covered process has been trained or tested competent in the operating procedures provided in Section 2755.3 that pertain to their duties. 19 CCR 4.5 2755.4(a)
	H160	Failure to provide refresher training at least every three years, and more often if necessary, to each employee operating a process to ensure that the employee understands and adheres to the current operating procedures of the process. 19 CCR 4.5 2755.4(b)
	H161	Failure to ensure operators are trained in any updated or new procedures prior to startup of a process after a major change. 19 CCR 4.5 2755.4(d)
	H162	Failure to prepare and implement procedures to maintain the on-going mechanical integrity of the process equipment. 19 CCR 4.5 2755.5(a)
	H163	Failure to train or cause to be trained each employee involved in maintaining the on-going mechanical integrity of the process in: 1. The hazards of the process; 2. How to avoid or correct unsafe conditions; 3. The procedures applicable to the employee's job tasks. 19 CCR 4.5 2755.5(b)
	H164	Failure to ensure that each contract maintenance employee is trained to perform the maintenance procedures developed under section 2755.5(a). 19 CCR 4.5 2755.5(c)
	H165	Failure to certify that they have evaluated compliance with the provisions of this article at least every three years to verify that the procedures and practices developed under this chapter are adequate and are being followed. 19 CCR 4.5 2755.6(a)
	H166	Failure to conduct the compliance audit by at least one person knowledgeable in the process. 19 CCR 4.5 2755.6(b)
	H167	Failure to perform or cause to be performed inspections and tests on process equipment that: 1. Follow recognized and generally accepted good engineering practices; 2. The frequency of inspections & tests must be consistent with applicable manufacturer's recommendations, industry standards or codes, good engineering practices and prior operating experience). 19 CCR 4.5 2755.5(d)
	H168	Failure to develop a report of the audit findings. 19 CCR 4.5 2755.6(c)
	H169	Failure to promptly determine and document an appropriate response to each of the findings of the compliance audit and document that deficiencies have been corrected. 19 CCR 4.5 2755.6(d)
	H170	Failure to retain the two most recent compliance audit reports conducted within the past five years. 19 CCR 4.5 2755.6(e)
	H171	Failure to investigate each incident which resulted in, or could reasonably have resulted in, a catastrophic release. 19 CCR 4.5 2755.7(a)
	H172	Failure to initiate an incident investigation within 48 hours of the incident. 19 CCR 4.5 2755.7(b)
	H173	Failure to prepare a summary of the investigation at the conclusion of the investigation that includes at a minimum: 1. Date of incident; 2. Date investigation began; 3. Description of incident; 4. Factors that contributed to the incident; 5. Recommendations resulting from the investigation 19 CCR 4.5 2755.7(c)
	H174	Failure to promptly address and resolve the investigation findings and recommendations. 19 CCR 4.5 2755.7(d)
	H175	Failure to document resolutions and corrective actions. 19 CCR 4.5 2755.7(d)
	H176	Failure to review the findings with all affected personnel whose job tasks are affected by the findings. 19 CCR 4.5 2755.7(e)

	H177	Failure to retain investigation summaries for five years. 19 CCR 4.5 2755.7(f)
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		Program 3
	H139	Failure to perform the Process Hazard Analysis by a team with expertise in engineering and process operations, including at least one employee who has experience and knowledge specific to the process being evaluated, and one member who is knowledgeable in the specific Process Hazard Analysis methodology being used. 19 CCR 4.5 2760.2(d)
	H144	Failure to address the following in the Process Hazard Analysis: 1. Establish a system to promptly address the teams findings and recommendations; 2. Assure that the recommendations are resolved in a timely manner and that the resolution is documented; 3. Document what actions are to be taken; 4. Complete actions as soon as possible; 5. Develop a written schedule of when these actions are to be completed; 6. Actions are communicated to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions. 19 CCR 4.5 2760.2(e)
	H178	Failure to document that equipment complies with recognized and generally accepted good engineering practices. 19 CCR 4.5 2760.1(d)(2)
	H179	For existing equipment designed and constructed in accordance with codes, standards, or practices that are no longer in general use, the owner or operator has determined and documented that the equipment is designed, maintained, inspected, tested, and operating in a safe manner. 19 CCR 4.5 2760.1(d)(3)
	H180	Failure to compile written process safety information pertaining to the hazards of the regulated substances in the process that includes the following: 1. Toxicity information; 2. Permissible exposure limits; 3. Physical data; 4. Reactivity data; 5. Corrosivity data; 6. Thermal and chemical stability data; 7. Hazardous effects of inadvertent mixing of different materials that could foreseeable occur. 19 CCR 4.5 2760.1(a)(b)
	H181	Failure to compile written process safety information concerning the technology of the process that includes the following: 1. A block flow diagram or simplified process flow diagram; 2. Process chemistry; 3. Maximum intended inventory; 4. Safe upper and lower limits for such items as temperatures, pressures, flows or compositions; 5. An evaluation of the consequences of deviations. 19 CCR 4.5 2760.1(a)(c)
	H182	Failure to conduct an initial Process Hazard Analysis on the covered processes no later than the date of submittal of the Risk Management Plan. 19 CCR 4.5 2760.2(a)
	H183	Failure to perform a Process Hazard Analysis that is appropriate to the complexity of the process and identifies, evaluates, and controls the hazards involved in the process. 19 CCR 4.5 2760.2(a)
	H184	Failure to work closely with the CUPA in deciding which Process Hazard Analysis methodology is best suited to determine the hazards of the process being analyzed. 19 CCR 4.5 2760.2(b)
	H185	Failure to compile written process safety information pertaining to the equipment in the process that includes the following: 1. Materials of construction; 2. Piping and instrument diagrams (P&IDs); 3. Electrical classification; 4. Relief system design and design basis; 5. Ventilation system design; 6. Design codes and standards employed; 7. Material and energy balances for processes built after June 21, 1999; 8. Safety systems (e.g., interlocks, detection, or suppression systems). 19 CCR 4.5 2760.1(a)(d)(1)

	H186	Failure to determine and document the priority order for conducting Process Hazard Analyses based on a rationale which include such considerations as extent of the process hazards, number of potentially affected employees, age of the process, and operating history of the process. 19 CCR 4.5 2760.2(a)
	H187	Failure to update and revalidate the Process Hazard Analysis at least every five years after the completion of the initial Process Hazard Analysis. 19 CCR 4.5 2760.2(f)
	H188	Failure to retain the Process Hazard Analysis and updates/revalidations for each covered process as well as the documented resolution of recommendations for the life of the process. 19 CCR 4.5 2760.2(g)
	H189	Failure to use one or more of the following methodologies that are appropriate to determine and evaluate the hazards of the process being analyzed: 1. What-If; 2. Checklist; 3. What-If/Checklist; 4. Hazard and Operability Study (HAZOP); 5. Failure Mode and Effects Analysis (FMEA); 6. Fault Tree Analysis; or, 7. An appropriate equivalent methodology 19 CCR 4.5 2760.2(b)
	H190	Failure to address the following in the Process Hazard Analysis: 1. The hazards of the process; 2. The identification of any previous incident which had a likely potential for catastrophic consequences; 3. Engineering and administrative controls applicable to the hazards and their interrelationships such as appropriate application of detection methodologies to provide early warning of releases. (Acceptable detection methods might include process monitoring and control instrumentation with alarms, and detection hardware such as hydrocarbon sensors.); 4. Consequences of failure of engineering and administrative controls; 5. Stationary source siting; 6. Human factors; 7. A qualitative evaluation of a range of the possible safety and health effects of failure of controls; and, 8. External events, including seismic events. 19 CCR 4.5 2760.2(c)
	H191	Failure to develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information. 19 CCR 4.5 2760.3(a)
	H192	Failure to develop and implement written operating procedures that address at least the following elements: 1. Initial startup; 2. Normal operations; 3. Temporary operations; 4. Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner; 5. Emergency operations; 6. Normal shutdown; 7. Startup following a turnaround, or after an emergency shutdown. 19 CCR 4.5 2760.3(a)(1)
	H193	Failure to develop and implement written operating procedures that address at least the following elements: 1. Consequences of deviation; and, 2. Steps required to correct or avoid deviation. 19 CCR 4.5 2760.3(a)(2)

	H194	Failure to develop and implement written operating procedures that address at least the following elements: 1. Properties of, and hazards presented by, the chemicals used in the process; 2. Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment; 3. Control measures to be taken if physical contact or airborne exposure occurs; 4. Quality control for raw materials and control of hazardous chemical inventory levels; 5. Any special or unique hazards. 19 CCR 4.5 2760.3(a)(3)
	H195	Failure to develop and implement written operating procedures that address at least the following element: 1. Safety systems and their functions. 19 CCR 4.5 2760.3(a)(4)
	H196	Failure to make operating procedures readily accessible to employees who work in or maintain a process. 19 CCR 4.5 2760.3(b)
	H197	Failure to review operating procedures as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. 19 CCR 4.5 2760.3(c)
	H198	Failure to certify annually that the operating procedures are current and accurate. 19 CCR 4.5 2760.3(c)
	H199	Failure to develop and implement safe work practices to provide for the control of hazards during operations such as logout/tagout; confined space entry; opening process equipment or piping; and control over entrance into the stationary source by maintenance, contractor, laboratory, or other support personnel. 19 CCR 4.5 2760.3(d)
	H200	Failure to provide refresher training at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands & adheres to the current operating procedures of the process. 19 CCR 4.5 2760.4(b)
	H201	Failure to prepare a training record which contains: 1. Identity of the Employee; 2. Date of training; 3. Means used to verify that the employee understand the training. 19 CCR 4.5 2760.4(c)
	H202	Failure to train each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process on the following: 1. Overview of the process; 2. Operating procedures; 3. Safety & health hazards; 4. Emergency operations including shutdown; 5. Safe work practices applicable to the employees job tasks. 19 CCR 4.5 2760.4(a)
	H203	Failure to establish and implement written procedures to maintain the on-going integrity of the process equipment. 19 CCR 4.5 2760.5(b)
	H204	Failure to train each employee involved in maintaining the on-going integrity of process equipment on the following: 1. Overview of the process and its hazards. 2. Procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner. 19 CCR 4.5 2760.5(c)
	H205	Failure to correct deficiencies in equipment that are outside acceptable limits before further use or in a safe and timely manner when necessary means are taken to assure safe operation. 19 CCR 4.5 2760.5(e)
	H206	Failure to establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures, and changes to stationary sources that affect a covered process. 19 CCR 4.5 2760.6(a)

	H207	Failure to implement the following: 1. Inspections and tests are performed on process equipment; 2. Inspection and testing procedures follow recognized and generally accepted good engineering practices; 3. The frequency of inspections and tests of process equipment is consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience; 4. Each inspection or test that has been performed on process equipment is documented and includes the date of inspection or test, name of the person who performed the inspection or test, serial number or other identifier of the equipment inspected or tested, description of the inspection or test performed, and the results of the inspection or test. 19 CCR 4.5 2760.5(d)
	H208	Failure to assure the following: 1. In the construction of new plants and equipment that equipment as it is fabricated is suitable for the process application for which it will be used. 2. Appropriate checks and inspections are performed to assure that equipment is installed properly and consistent with design specifications and the manufacturers instructions. 3. Maintenance materials, spare parts, and equipment are suitable for the process application for which they will be used. 19 CCR 4.5 2760.5(f)
	H209	Failure to ensure employees involved in operating a process and maintenance and contract employees whose job tasks would be affected by a change in the process are informed and trained in the change prior to start-up of the process or affected part of the process. 19 CCR 4.5 2760.6(c)
	H210	Failure to ensure the following considerations are addressed in the Management of Change procedures prior to any change: 1. The technical basis for the proposed change; 2. Impact of change on safety and health; 3. Modifications to operating procedures; 4. Necessary time period for the change; 5. Authorization requirements for the proposed change. 19 CCR 4.5 2760.6(b)
	H211	Failure to update process safety information if a management of change occurred that resulted in a change in the process safety information. 19 CCR 4.5 2760.6(d)
	H212	Failure to update operating procedures or practices if a management of change occurred that resulted in a change in the procedures or practices. 19 CCR 4.5 2760.6(e)
	H213	Failure to perform a pre-startup safety review for new stationary sources and for modified stationary sources when the modification is significant enough to require a change in the process safety information. 19 CCR 4.5 2760.7(a)
	H214	Failure to certify that they have evaluated compliance with the provisions of this article at least every three years to verify that the procedures and practices developed under the chapter are adequate and are being followed. 19 CCR 4.5 2760.8(a)
	H215	Failure to ensure that the pre-startup safety review confirms the following prior to the introduction of a regulated substances to a process: 1. Construction and equipment was in accordance with design specifications. 2. Safety, operating, maintenance & emergency procedures are in place and are adequate. 3. For new stationary sources, a PHA has been performed and recommendations have been resolved or implemented before startup, and modified stationary sources meet the requirements contained in the MOC. 4. Training of each employee involved in operating a process had been completed. 19 CCR 4.5 2760.7(b)
	H216	Failure to ensure that the compliance audit is conducted by at least one person knowledgeable in the process. 19 CCR 4.5 2760.8(b)
	H217	Failure to develop a report of the findings of the audit. 19 CCR 4.5 2760.8(c)

	H218	Failure to promptly determine and document an appropriate response to each of the findings of the compliance audit, and documented that deficiencies have been corrected. 19 CCR 4.5 2760.8(d)
	H219	Failure to retain the two most recent compliance audit reports. 19 CCR 4.5 2760.8(e)
	H220	Failure to investigate each incident which resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance. 19 CCR 4.5 2760.9(a)
	H221	Failure to initiate an incident investigation as promptly as possible, but not later than 48 hours following the incident. 19 CCR 4.5 2760.9(b)
	H222	Failure to establish an incident investigation team that consists of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident. 19 CCR 4.5 2760.9(c)
	H223	Failure to prepare a report at the conclusion of the investigation which includes at a minimum: 1. Date of incident; 2. Date investigation began; 3. A description of the incident; 4. The factors that contributed to the incident; and, 5. Recommendations resulting from the investigation. 19 CCR 4.5 2760.9(d)
	H224	Failure to review the incident investigation report with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable. 19 CCR 4.5 2760.9(f)
	H225	Failure to establish a system to promptly address and resolve the incident report findings and recommendations, including documentation of the resolutions and corrective actions. 19 CCR 4.5 2760.9(e)
	H226	Failure to retain the incident investigation reports for five years. 19 CCR 4.5 2760.9(g)
	H227	Failure to develop a written plan of action regarding the implementation of employee participation. 19 CCR 4.5 2760.10(a)
	H228	Failure to consult with employees and their representatives on the conduct and development of the Process Hazard Analysis and on the development of the other elements of process safety management. 19 CCR 4.5 2760.10(b)
	H229	Failure to provide employees and their representatives with access to the Process Hazards Analysis and to all other information required to be developed under this chapter. 19 CCR 4.5 2760.10(c)
	H230	Failure to issue a hot work permit for hot work operations conducted on or near a covered process. 19 CCR 4.5 2760.11(a)
	H231	Failure to ensure the hot work permit documents the following: 1. The fire prevention and protection requirements in 8CCR 5189 (Process Safety Management of Acutely Hazardous Materials) have been implemented prior to beginning the hot work operations. 2. The date(s) authorized for hot work. 3. The object on which hot work is to be performed identified. 19 CCR 4.5 2760.11(b)
	H232	Failure to keep the hot work permit on file until completion of the hot work operations. 19 CCR 4.5 2760.11(b)
	H233	Failure to perform the following: 1. Obtain and evaluate information regarding the contract owner or operator's safety performance and programs when selecting a contractor. 2. Inform the contract owner or operator of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process. 3. Explain to the contract owner or operator the applicable provisions of Article 7 (Emergency Response Program). 4. Develop and implement safe work practices consistent with the Section 2760.3(d) (operating procedures), to control the entrance, presence, and exit of the contract owner or operator and contract employees in covered process areas. 19 CCR 4.5 2760.12(b)

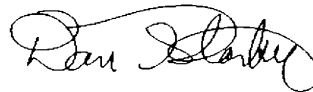
	H234	Failure to periodically evaluate the performance of the contract owner or operator in fulfilling the following: 1. Each contract employee is trained in the work practices necessary to safely perform his or her job. 2. Each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his or her job and the process, and the applicable provisions of the emergency action plan. 3. Document that each contract employee has received and understood the training required by this section. 4. Prepare a record which contains Training record contains the identity of the contract employee, date of training, and the means used to verify that the employee understood the training. 5. Each contract employee follows the safety rules of the stationary source including the safe work practices required by Section 2760.3(d) (operating procedures). 6. Advise the owner or operator of any unique hazards presented by the contract owner or operator's work, or of any hazards found by the contract owner or operator's work. 19 CCR 4.5 2760.12(c)
--	------	--

RECOMMENDATIONS/ COMMENTS:

No violations observed during the inspection

Violations were observed/ discovered as listed above. All violations must be corrected by implementing the action listed by each violation. All minor violations must be corrected within 30 days or as specified. KCEHSD must be informed in writing, certifying that the violations have been corrected. A false statement that the violations have been corrected is a violation of the law and is punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be re-inspected at any time.

You may request a meeting with the KCEHSD Program Manager to discuss the inspection findings and/or proposed corrective actions. The issuance of this Inspection Report does not preclude KCEHSD from taking administrative, civil, or criminal action as a result of the violations that were discovered or violations that have not been corrected within the time specified.



02/27/2014

Facility Rep. Signature

Title

Inspector Signature

Date



HAZARDOUS MATERIALS BUSINESS PLAN INSPECTION REPORT

Facility Name: ELK HILLS POWER, LLC		Facility ID: FA0004335
		File #: 000895
Site Address: 4026 SKYLINE RD TUPMAN, CA 93276		CERS ID: 10235623
Phone: (661) 763-2730	Consent Granted By:	Inspection Date: 02/24/2014
Inspection Type: ☒ Routine ☐ Reinspection		Reinspection required: ☐ Yes ☒ No
Inspection Element: BUS PLAN LARGE HIGH RISK >5 UNITS		

File/CERS Review Violations

V	Viol #	Summary	Code
	H335	FAILURE TO SUBMIT A HAZARDOUS MATERIALS BUSINESS PLAN	19 CCR 4 2729.2(a); HSC 6.95 25505(a)
	H344	FAILURE TO COMPLETE THE BUSINESS ACTIVITIES PAGE AND OR OWNER/OPERATOR IDENTIFICATION PAGE	19 CCR 4 2729.2(a)(1)
	H342	FAILURE TO COMPLETE/SUBMIT HAZARDOUS MATERIALS INVENTORY FORMS FOR ALL REPORTABLE HAZARDOUS MATERIALS	19 CCR 4 2729.2(a)(2); HSC 6.95 25504(a)
	H341	FAILURE TO COMPLETE THE HAZARDOUS MATERIALS INVENTORY RE-CERTIFICATION OR RE-SUBMITTAL	19 CCR 4 2729.4(b), 2729.5
	H337	FAILURE TO COMPLETE THE TRIENNIAL HAZARDOUS MATERIALS BUSINESS PLAN REVIEW AND RE-CERTIFICATION	HSC 6.95 25505(c)
	H346	INCOMPLETE ANNOTATED SITE MAP	19 CCR 4 2729.2(a)(3); HSC 25504
	H347	EMERGENCY RESPONSE PLAN AND PROCEDURES NOT INCLUDED OR NOT ADEQUATE	19 CCR 4 2731; HSC 6.95 25504(b)
	H353	TRAINING PROGRAM NOT INCLUDED OR IS NOT ADEQUATE	19 CCR 4 2732(a); HSC 6.95 25504(c)
	H340	PROPERTY OWNER WAS NOT NOTIFIED IN WRITING THAT A HAZARDOUS MATERIALS BUSINESS PLAN IS REQUIRED	HSC 6.95 25503.6
	H336	PROPERTY OWNER WAS NOT PROVIDED A COPY OF THE HAZARDOUS MATERIALS BUSINESS PLAN	HSC 6.95 25503.6

Onsite Inspection Violations

V	Viol #	Summary	Code
	H334	FAILURE TO ESTABLISH AND IMPLEMENT A HAZARDOUS MATERIALS BUSINESS PLAN	19 CCR 4 2729.1(a); HSC 6.95 25503.5(a)
	H343	FAILURE TO REVISE HAZARDOUS MATERIALS BUSINESS PLAN UPON A SUBSTANTIAL CHANGE	HSC 6.95 25505(b)
	H345	FAILURE TO UPDATE HAZARDOUS MATERIALS INVENTORY UPON A SIGNIFICANT CHANGE	19 CCR 4 2729.4(d); HSC 6.95 25505(b), 25510
	H348	TRAINING PROGRAM NOT IMPLEMENTED	19 CCR 4 2732(b); HSC 6.95 25504(c)
	H338	FAILURE TO REPORT A RELEASE OF A HAZARDOUS MATERIAL	19 CCR 4 2703; HSC 6.95 25507

Inspector: DAN R STARKEY

Inspection Date: 02/24/2014

SUMMARY OF OBSERVATIONS/VIOLATIONS

☒ No violations of hazardous waste laws/regulations were discovered. KERN CUPA greatly appreciates your efforts to comply with all the laws and regulations applicable to your facility.

☐ Violations were observed/discovered as listed below. All violations must be corrected by implementing the corrective action listed by each violation. If you disagree with any of the violations or corrective actions required, please inform the CUPA in writing.

ALL VIOLATIONS MUST BE CORRECTED WITHIN 30 DAYS OR AS SPECIFIED. CUPA must be informed in writing with a certification that compliance has been achieved. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be reinspected any time during normal business hours. If a second reinspection becomes necessary due to non compliance, a reinspection charge of \$100.00 per hour may be charged to the facility.

You may request a meeting with the Program Manager to discuss the inspection findings and/or the proposed corrective actions. The issuance of this Summary of Violations does not preclude the CUPA from taking administrative, civil, or criminal action.

Facility Name: ELK HILLS POWER, LLC

Facility ID: FA0004335
File #: 000895**INSPECTION COMMENTS:**

Change the quantity of Hydrogen listed in CERS from cf to lbs.

COMMENTS: Go to <http://www.co.kern.ca.us/eh/> (Hazardous Materials) for forms and information.

Inspector: DAN R STARKEY

Signature of Facility Representative:

Inspection Date: 02/24/2014



19 April 2012

Kern County Environmental Health Services
Unified Hazardous Materials/Waste Program
2700 "M" Street, Suite 300
Bakersfield, CA 93301

Subject: Summary of Observations/Violation
Elk Hills Power, LLC
FA ID: FA0004335 / FILE ID 000895

Mr. Joe Canas,

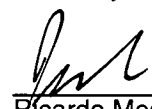
Elk Hills Power, LLC (EHP) has received the summary of observations/violation report from the onsite inspections you performed on March 1 and 27, 2012. EHP appreciates your time and assistance with helping to improve our California Accidental Release Program (CalARP) and Hazardous Material Business Plan (HMBP). EHP has completed a review of listed violations and has the following corrective actions and comments:

BP01: Although, EHP believes that this may not actually meet the criterion for a violation, the phosphate tank has been added to EHP's HMBP chemical inventory (see attachment 1). EHP believes the tank in question "Phosphate Batch Tank" is not a hazardous material storage tank that stores a sodium tripolyphosphate. This tank is an in-process mixing tank where HRSG drum water is mixed with Nalco BT4000, a sodium hydroxide solution, to control deposition in the boiler water drums and tube bundles. Nalco BT4000, a sodium hydroxide solution, which includes the chemical sodium tripolyphosphate is a component of this batched solution. The resulting solution mixture, a sodium hydroxide solution, is not classified as a hazardous material reportable within the HMBP. Upon your concurrence, EHP will delete the mixture tank from the HMBP inventory.

BP03: The labeling of GSU Transformer Diala Oil has been implemented on Unit 1 transformer, NFPA label is attached and the amount of oil is stamped on the equipment nameplate (see attachment 2). The other two transformers will be labeled during the fall facility outage. The facility cannot install label on the Unit 2 and Steam Turbine GSU Transformers due to electrical safety. The man lift cannot be raised near the live 230kV transformer line to install the label on the transformer.

If there are any questions, please feel free to contact me at (661) 763-2727 or Mr Sonnie Pineda at (661) 763-2725.

Sincerely,


Ricardo Medina
Team Leader
Elk Hills Power, LLC

RECEIVED

APR 24 2012

cc: M. Glavin - OEHI
R. Rodriguez - OEHI
S. Pineda - OEHI/EHP

KERN COUNTY
ENVIRONMENTAL HEALTH SERVICES

From: <Mark_E_Slezak@oxy.com>
To: <joe@co.kern.ca.us>
CC: <Mike_Glavin@oxy.com>, <Raymond_Rodriguez@oxy.com>, <Jerry_F_Korhonen@o...>
Date: 03/01/2012 7:08 PM
Subject: OEHI Elk Hills and Elk Hills Power Plant RMP Resubmissions
Attachments: Elk Hills Power 2012-02.RMP.pdf; OEHI 2011-12-09 RMP Resubmission.pdf

Joe,

It was nice meeting you today. Per our conversation, we are providing you copies of our CalARP Risk Management Plans in the attached PDF files. As we discussed, the OEHI Elk Hills facilities (7 processes) and Elk Hills Power (EHP) Plant process are all filed as Program Level 1 Prevention programs per CalARP Section 2735.4 - Applicability, for the reasons that:

1. Elk Hills Power Plant has been entirely acquired by Occidental Petroleum and is operated by OEHI. Consequently, EHP is no longer an off-site receptor for OEHI Elk Hills facilities and visa versa.
2. For the past five years there has not been an accidental release of a regulated substance that has led to offsite consequences, including death, injury, or response or restoration activities for an exposure to an environmental receptor.
3. None of the processes have worst case scenario endpoint distances that extend to a public receptor.
4. Emergency response procedures for these facilities are coordinated and unified (same reporting and response structure), and are coordinated with local emergency planning and response agencies.

Please let us know if you have any questions.

Regards,

Mark Slezak
HES Risk Engineering Leader
Occidental of Elk Hills, Inc.
661-412-5219
mark_e_slezak@oxy.com

ENVIRONMENTAL HEALTH SERVICES DEPARTMENT

MATTHEW CONSTANTINE, R.E.H.S., Director

2700 "M" STREET, SUITE 300
BAKERSFIELD, CA 93301-2370
Voice: (661) 862-8700
Fax: (661) 862-8701
TTY Relay: (800) 735-2929
Web: www.co.kern.ca.us/eh
E-Mail: eh@co.kern.ca.us



RESOURCE MANAGEMENT AGENCY

DAVID PRICE III, RMA DIRECTOR

Animal Control Department
Community and Economic Development Department
Engineering and Survey Services Department
Environmental Health Services Department
Planning Department
Roads Department

June 4, 2009

ELK HILLS POWER
ELK HILLS POWER, LLC
P O BOX 460
TUPMAN, CA 93276

Facility Name: ELK HILLS POWER, LLC
Facility Address: 4026 SKYLINE RD, TUPMAN
Facility CR #: 000895

Anniversary Date: November 5, 2008

CalARP Resubmit due date: November 5, 2013

California Accidental Release Prevention Program

Notification Letter: Anniversary Date on CalARP/RMP 5 Year Re-submittal

Kern County Environmental Health Services Department (KCEHSD) is providing you with the above referenced information concerning your facility's CalARP re-submittal date requirements. As required by Title 19, Section 2745.10, the facility's CalARP must be reviewed and re-submitted by the above date or earlier to the appropriate agencies.

1. Upon due date and/or prior, immediately submit the RMP Submit document to this Department and Federal EPA as required in Section 2745.10 of Article 3, Chapter 4.5, Division 2, of Title 19.
2. For Federal only facilities the RMP-eSubmit will be the acceptable format to the Federal RMP Reporting Center. Please provide our office a copy of the submittal as well.
3. For California only facilities the RMP Submit 2004 will be the acceptable format. Please provide our office a copy of the submittal.
4. For Federal facilities with California processes, the RMP-eSubmit is used for the Federal process and a separate RMP Submit 2004 format for all California listed processes shall be provided to our office.
5. An electronic copy of the submission in WORD only format must be sent to this office.
6. Please submit a copy of your facility's last compliance audit, hazard assessment, and emergency response/action plan to our office along with the RMP submittals.



Please also note your Kern County Facility ID number as indicated at the top of this letter, all future CalARP plan submissions, corrections and other correspondence must include this number.

If you have further questions regarding this matter, please contact me at (661) 862-8774.

Sincerely,

A handwritten signature in black ink that reads "Vicky Cheung". The signature is written in a cursive style with a long horizontal stroke at the end.

Vicky Cheung, REHS III
CalARP/ Hazardous Materials Specialist
Unified Hazardous Materials/Waste Program

95

Dan Starkey - Waste Generated in November 2003

From: <spineda@elkhills.com>
To: <dans@co.kern.ca.us>
Date: 12/06/2005 2:33 PM
Subject: Waste Generated in November 2003
CC: <jmcarthur@elkhills.com>, <spineda@elkhills.com>

Dear Mr. Dan Starkey,

In November 2003, Elk Hills Power a power plant company located in Tupman, California generated a large amount of Hazardous Waste. The waste description is: Corrosive Liquid, Basic, Inorganic, N.O.S., Water with Soda Ash, UN3266. This waste was generated because of the cleanup process on the fuel supply piping. The cleanup is due to large amount of oil contamination on the natural gas fuel supply pipeline for our two Combustion Turbine Engines.

The waste generated was sent to Chemical Waste Management facility (US EPAID CAT000646117) located in Kettleman City, California and was treated, recycled, and disposed properly per handling code 15/03 of the manifest. The amount of waste generated is 1,794 gallons. The manifest numbers are:

- 21814355
- 21814356
- 21814357
- 21814358
- 21814359

The Transporter of this waste is Philips West Industrial Services Corp (US EPAID CAD981685886).

During our internal Audit, EHP found that a Biennial Reporting to the DTSC was not submitted. EHP immediately contacted the DTSC to get more information if EHP needs to file a Biennial Report. Ms Betsy Vail of the DTSC informed EHP that a 2003 Biennial Report needs to be filed and also informed EHP to contact CUPA if there are any reporting requirements needed.

I am writing you this email asking if there are any reporting requirements EHP needs to be filed to reconcile the waste generated in November 2003.

Sincerely,

Sonnie Pineda
Plant Engineer
Elk Hills Power, LLC
4026 Skyline Road
Tupman, CA 93276
Work: (661) 763-2725
Cell: (661) 428-4119
Fax: (661) 765-2946



000895

RECEIVED

MAY - 6 2013

KERN COUNTY
ENVIRONMENTAL HEALTH SERVICES
Date: May 1, 2013

Mr. Dan Starkey
Hazardous Materials Specialist
Kern County Environmental Health Services Department
2700 M Street, Suite 300
Bakersfield, CA 93301

RE: RMP Report Update
Elk Hills Power, LLC (Facility ID: 3)
CalARP Program Level 1

Mr. Starkey,

Pursuant to the CalARP program (California Code of Regulations, Title 19, Division 2, Chapter 4.5 §2735.5(d)) Elk Hills Power, LLC is providing the update to the RMP Report demonstrating that the facility continues to meet Program Level 1 designation.

If you have any questions regarding the report, please contact Mr. Juan Campos, Environmental Advisor at (661) 763-2725 or Mr. Raymond Rodriguez, Sr. Environmental Advisor at (661) 412-5263.

Sincerely,


Armando Gonzalez
EHS Manager

cc:
J Lavoy, OEVC (e-copy)
J. Hegeman, OEHI (e-copy)
M. Glavin, OEHI (e-copy)
J. Korhonen (e-copy)
J. Pino (e-copy)

R. Rodriguez - OEHI(e-copy)
EHP File-26

Facility Name: Elk Hills Power, LLC

EPA ID This RMP is not submitted to EPA. This RMP in only state required submittal to KCEHS.

RMP Report for Elk Hills Power, LLC

Section 1. Registration Information

1.1 Source Identification: Facility ID: 3 There were no reportable accidents in the last 5 years.

a. Facility Name: Elk Hills Power, LLC

b. Parent Company #1 Name: Occidental of Elk Hills, Inc.

c. Parent Company #2 Name: Occidental Petroleum Corporation

1.2 EPA Facility Identifier:

1.3 Other EPA Systems Facility ID:

1.4 Dun and Bradstreet Numbers (DUNS):

a. Facility DUNS: 031845063

b. Parent Company #1 DUNS:

c. Parent Company #2 DUNS:

1.5 Facility Location Address:

a. Street 1: 4026 Skyline Road

b. Street 2:

c. City: Tupman

d. State: CA

e. Zip: 93276 -

f. County: Kern

Facility Latitude and Longitude:

g. Lat. (dd.ddddd): 35.280460 h. Long. (ddd.ddddd): -119.469117

i. Lat/Long Method: I3 Interpolation - Satellite

j. Lat/Long Description: PG Plant Entrance (General)

k. Horizontal accuracy measure (m): 10

l. Horizontal Reference Datum Code: 002 North American Datum of 1983

m. Source Map Scale Number:

1.6 Owner or Operator:

a. Name: Elk Hills Power, LLC

b. Phone: (661) 763-2730

Mailing address:

c. Street 1: PO Box 460

d. Street 2:

e. City: Tupman

f. State: CA

g. Zip: 93276 -

Facility Name: Elk Hills Power, LLC
EPA ID

1.7 Name and title of person or position responsible for part 68 (RMP) implementation:

- a. Name of person: Robert A. Barnes
b. Title of person or position: President and General Manager
c. Email address:

1.8 Emergency contact:

- a. Name: Armando Gonzalez
b. Title: HES Manager
c. Phone: (661) 412-5221
d. 24-hour phone: (661) 332-5903
e. Ext. or PIN:
f. Email address:

1.9 Other points of contact:

- a. Facility or Parent Company E-Mail Address: susie_geiger@oxy.com
b. Facility Public Contact Phone: (661) 412-5044
c. Facility or Parent Company WWW Homepage Address:

1.10 LEPC:

1.11 Number of full time employees on site: 25

1.12 Covered by:

- a. OSHA PSM: No
b. EPCRA 302: No
c. CAA Title V: Yes Air operating permit ID: S-3523

1.13 OSHA Star or Merit Ranking: No

1.14 Last Safety Inspection (by an External Agency) Date: 03/13/2013

1.15 Last Safety Inspection Performed by an External Agency: CUPA

1.16 Will this RMP involve predictive filing?: Yes

1.18 RMP Preparer Information:

- a. Name: Raymond Rodriguez
b. Telephone: (661) 412-5263
c. Street1: 10800 Stockdale Hwy

Facility Name: Elk Hills Power, LLC
EPA ID

d. Street2:

e. City: Bakersfield

f. State: CA

g. ZIP: 93311

Section 1.17 Process(es)

a. Process ID: 8 Program Level 1 Aqueous Ammonia 19 %

b. NAICS Code

221112 Fossil Fuel Electric Power Generation

c. Process Chemicals

c.1 Process Chemical (ID / Name)

11 Ammonia (conc 19 %)

c.2 CAS Nr.

7664-41-7

c.3 Qty (lbs.)

90,000

Section 2. Toxics: Worst Case

Toxics: Worst Case ID 2

2.1 a. Chemical Name: Ammonia (conc 19 %)

b. Percent Weight of Chemical (If in a mixture): 19 %

2.2 Physical State: Liquid

2.3 Model used: EPA's RMP*Comp(TM)

2.4 Scenario: Liquid spill & Vaporization

2.5 Quantity released: 90,000 lbs

2.6 Release rate: 27.9 lbs/min

2.7 Release duration: 10.0 mins

2.8 Wind speed: 1.5 m/sec

2.9 Atmospheric Stability Class: F

2.10 Topography: Rural

2.11 Distance to Endpoint: 0.30 mi

2.12 Estimated Residential population within distance to endpoint: 0

2.13 Public receptors within distance to endpoint:

a. Schools: No

d. Prisons/Correction facilities:

No

b. Residences: No

e. Recreation areas:

No

c. Hospitals: No

f. Major commercial, office or, industrial areas:

No

Facility Name: Elk Hills Power, LLC
EPA ID

g. Other (Specify):

2.14 Environmental receptors within distance to endpoint:

- a. National or state parks, forests, or monuments: No
- b. Officially designated wildlife sanctuaries, preserves, or refuges: No
- c. Federal wilderness areas: No
- d. Other (Specify):

2.15 Passive mitigation considered:

- a. Dikes: Yes d. Drains: No
- b. Enclosures: No e. Sumps: No
- c. Berms: No f. Other (Specify):

2.16 Graphic file name:

Section 3. Toxics: Alternative Release

Toxics: Alternative Release ID: 6

3.1 a. Chemical Name: Ammonia (conc 19%)

b. Percent Weight of Chemical (In In mixture): 19%

3.2 Physical State: Liquid

3.3 Model used: EPA's RMP*Comp(TM)

3.4 Scenario: Transfer hose failure

3.5 Quantity released: 1,530 lbs

3.6 Release rate: 21.4 lbs/min

3.7 Release duration: 2.0 mins

3.8 Wind speed: 3.0 m/sec

3.9 Atmospheric Stability Class: D

3.10 Topography: Rural

3.11 Distance to Endpoint: 0.10 mi

3.12 Estimated Residential population within distance to endpoint: 0

3.13 Public receptors within distance to endpoint:

- | | | | |
|---------------------|----|---|----|
| a. Schools: | No | d. Prisons/Correction facilities: | No |
| b. Residences: | No | e. Recreation areas: | No |
| c. Hospitals: | No | f. Major commercial, office, or Industrial areas: | No |
| g. Other (specify): | | | |

3.14 Environmental receptors within distance to endpoint:

- | | |
|---|----|
| a. National or state parks, forests, or monuments: | No |
| b. Officially designated wildlife sanctuaries, preserves, or refuges: | No |
| c. Federal wilderness areas: | No |

3.15 Passive mitigation considered:

- | | | | |
|----------------|----|---------------------|-----|
| a. Dikes: | No | d. Drains: | Yes |
| b. Enclosures: | No | e. Sumps: | No |
| c. Berms: | No | f. Other (Specify): | No |

3.16 Active mitigation considered:

- | | | | |
|-----------------------|----|--------------------------------|-------------|
| a. Sprinklers: | No | f. Flares: | No |
| b. Deluge system: | No | g. Scrubbers: | No |
| c. Water curtain: | No | h. Emergency shutdown systems: | No |
| d. Neutralization: | No | i. Other (Specify): | Check Valve |
| d. Excess flow valve: | No | | |

3.17 Graphic file name:

Section 4. Flammables: Worst Case --- No Data To Report

Section 5. Flammables: Alternative Release --- No Data To Report

Section 6. Accident History --- No Data To Report

Section 7. Prevention Program 3 --- No Data To Report

Section 8. Prevention Program 2 --- No Data To Report

Section 9. Emergency Response

9.1 Written Emergency Response (ER) Plan:

- | | |
|---|-----|
| a. Is facility included in written community emergency response plan? | Yes |
| b. Does facility have its own written emergency response plan? | Yes |

9.2 Does facility's ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?	Yes
--	-----

9.3 Does facility's ER plan include procedures for informing the public and local agencies responding to accidental releases?	Yes
---	-----

9.4 Does facility's ER plan include information on emergency health care?	Yes
---	-----

9.5 Date of most recent review or update of facility's ER plan:	12/18/2012
---	------------

9.6 Date of most recent ER training for facility's employees: 01/15/2013

9.7 Local agency with which facility's ER plan or response activities are coordinated:

- a. Name of agency: Kern County Fire Dept. Haz Mat
b. Telephone number: (661) 391-7000

9.8 Subject to:

- a. OSHA Regulations at 29 CFR 1910.38: No
b. OSHA Regulations at 29 CFR 1910.120: No
c. Clean Water Act Regulations at 40 CFR 112: Yes
d. RCRA Regulations at 40 CFR 264, 265, and 279.52: No
e. OPA-90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: No
f. State EPCRA Rules/Law: No
g. Other (Specify): CalARP

Executive Summary

Elk Hills Power, LLC, operates a nominal 550 megawatt, natural gas-fired, combined cycle power plant in western Kern County, approximately 25 miles west of Bakersfield, California. Elk Hills Power, LLC (EHP) is owned by Occidental Petroleum Corporation and operated by Occidental of Elk Hills, Inc (OEHI). EHP is located on 12 acres roughly in the center of the 74 square mile Elk Hills Oil Field. EHP is situated near the intersection of Elk Hills Road and Skyline Road. The power plant consists of two combustion turbine generators (CTGs), two heat recovery steam generators (HRSGs) and exhaust stacks, one steam turbine and associated auxiliary and support equipment. EHP uses selective catalytic reduction (SCR) system using aqueous ammonia for emission control of nitrogen oxides (NOx).

The land-use adjacent to the EHP is rural. The land use in the Elk Hills Oil and Gas Field is low-density industrial (oil and natural gas production and processing) with a gas processing plant adjoining the EHP on the west. Public roads cross the oil field but access off the public roads into the oil field is tightly controlled. There are no residences located on the oil field.

The facility is subject to the California Accidental Release Prevention Program (CalARP) because the amount of ammonia stored onsite exceeds the CalARP threshold quantity (TQ) of 500 pounds. A Risk Management Plan (RMP) to satisfy CalARP requirements must therefore be prepared for the aqueous ammonia process at the EHP plant. The facility is not subject to the Federal Chemical Accident Prevention Provisions of 40 CFR Part 68 because the concentration of ammonia in aqueous solution is less than 20 percent, which is below the cutoff threshold defined in §68.130, Table 1.

The facility falls under the provisions of CalARP Program Level 1 because:

- There have been NO accidental release in the previous five years of a regulated substance leading to an offsite impact involving death, injury, or response or restoration activities for an exposure of an environmental receptor.
- The potential impact of a worst-case spill of aqueous ammonia does not extend past the EHP/OEHI boundary.
- Emergency response procedures are coordinated with local emergency planning and response organizations.

The proposed safety systems, procedures, and administrative controls that are in place to prevent an accidental release of ammonia were reviewed through the California Energy Commission (CEC) licensing process. These procedures provide acceptable mitigation for potential accidental release scenarios. A seismic analysis was also conducted for EHP as part of the CEC licensing process. Based on this seismic analysis, the CEC and Kern County CBO concluded that the aqueous ammonia tanks and containment structure will be adequately constructed and maintained to provide adequate seismic safety in the event of a planning level earthquake under the CalARP program.

General Accidental Release Prevention Program and Chemical-Specific Prevention Steps

EHP/OEHI is very committed to the safety of its workers. EHP/OEHI has therefore implemented a number of measures to insure that it maintains a safe working environment. Individual components of the Accidental Release Prevention Program at the EHP include the following:

- * Detailed and comprehensive System and Plant Procedures for the ammonia system at the facility. These procedures include elements to prevent accidents from occurring and response steps to take if accidents do occur.
- * Comprehensive training and testing for all employees.
- * Establishment of detailed materials handling procedures.
- * Safe-work policies posted for all employees to review on a continual basis.

Description of the Process

The EHP uses a selective catalytic reduction (SCR) system using aqueous ammonia ("ammonia") for emission control of nitrogen oxides (NOx). The 19% ammonia is stored in twin 12,000 gallon capacity horizontal steel tanks. The storage tanks are located within a concrete secondary containment basin capable of holding more than 150 percent of the storage volume of one tank plus the volume associated with 24 hours of rain assuming a 25-year storm. Aqueous ammonia will be delivered by truck approximately every nine days (40-45 times per year). A typical truckload will contain 5,000 - 6,000 gallons of aqueous ammonia.

The truck unloading area has a concrete surface big enough to hold the entire delivery truck. The loading area slopes to a drain in the center of the loading area with a slight curb surrounding the loading area. The drain connects to the tank secondary containment structure. During unloading operations, a valve in the secondary containment structure is opened so that any spilled aqueous ammonia in the loading area will drain into the secondary containment structure. At all other times, the valve separating the loading area drain and the secondary containment area will be closed.

The liquid level in each tank is electronically monitored in a cabinet adjacent to the tank. Each tank is protected by a pressure relief valve on the top of the tank and manual drains with shut-off and excess flow valves at the bottom of the tank. Piping into each tank includes one fill line, one vapor return line, one tank drain line, one outlet line to the ammonia metering system, and one line for manual transfer of aqueous ammonia between the two tanks as needed. Ammonia detectors with audible alarms are located in the storage tank area and along the line delivering the aqueous ammonia to the vaporizer.

Each ammonia tank is the primary supply of ammonia for one SCR system. The SCR is an emission control system for nitrogen oxides in the CTG exhaust. Hot flue gas from the HRSG is used to vaporize the aqueous ammonia. The vaporizer and ammonia flow control unit consists of the vaporizer, steam piping, various valves, pressure regulators, high and low pressure sensors, ammonia detectors, and the supply line to the injection manifold on the SCR system. The gaseous ammonia is piped to the injection grid for the SCR system at a point upstream of the catalyst grid. At the catalyst bed, ammonia reacts with nitrogen oxides in the CTG exhaust to form water and elemental nitrogen.

Worst-Case Release Scenario

The worst-case scenario analyzed in the OCA is a total failure of one of the ammonia storage tank at night with the entire contents of the tank spilling into the secondary containment system. Ammonia then evaporates into the air from the resulting contained pool of aqueous ammonia. Peak emissions occur during the first 10 minutes of the release. The OCA was performed using the RMP*CompTM computer program released by the U.S. Environmental Protection Agency (EPA). RMP*CompTM computed an ammonia emission rate of 27.9 pounds per minute for the worst-case scenario. The distance at which the airborne concentration of ammonia drops below the toxic endpoint of 200 parts per million for the worst-case scenario is 0.3 miles. This worst-case impact does not extend off-site and there is no exposed residential population or sensitive receptors within the impact zone.

Accident Release Prevention and Emergency Response Policies

The EHP/OEHI is dedicated to maintaining a safe working environment and has implemented an Accidental Release Prevention Program at the EHP. The EHP/OEHI has prepared procedures that contain detailed accident prevention, including ammonia unloading, and emergency response procedures including mandatory check lists, requirements for the cross checking of actions or operations, detailed operational steps, and procedures for upset conditions.

Five Year Accident History

There have been no accidents exceeding reportable threshold quantities at the EHP facility in the previous five years.

Emergency Response Program

Facility Name: Elk Hills Power, LLC
EPA ID

EHP/OEHI maintains a written emergency response plan (Emergency Management Plan) that covers accidental releases of hazardous materials. The plan includes all aspects of emergency management, including adequate first aid and medical treatment, evacuations, notification of local emergency response agencies and the public, as well as post-incident decontamination of affected areas. To ensure proper functioning, emergency response equipment is regularly inspected and serviced. In addition, the Emergency Management Plan is regularly updated to reflect any pertinent changes taking place within our processes that would require a modified emergency response.

Facility Name: Elk Hills Power, LLC

EPA ID This RMP is not submitted to EPA. This RMP in only state required submittal to KCEHS.

RMP Report for Elk Hills Power, LLC

Section 1. Registration Information

1.1 Source Identification: Facility ID: 3 There were no reportable accidents in the last 5 years.

- a. Facility Name: Elk Hills Power, LLC
- b. Parent Company #1 Name: Occidental of Elk Hills, Inc.
- c. Parent Company #2 Name:

1.2 EPA Facility Identifier:

1.3 Other EPA Systems Facility ID:

1.4 Dun and Bradstreet Numbers (DUNS):

- a. Facility DUNS: 031845063
- b. Parent Company #1 DUNS: 70142740
- c. Parent Company #2 DUNS:

1.5 Facility Location Address:

- a. Street 1: 4026 Skyline Road
- b. Street 2:
- c. City: Tupman d. State: CA e. Zip: 93276 -
- f. County: Kern

Facility Latitude and Longitude:

- g. Lat. (dd.ddddddd): 35.280460 h. Long. (ddd.ddddddd): -119.469117
- i. Lat/Long Method: I3 Interpolation - Satellite
- j. Lat/Long Description: PG Plant Entrance (General)
- k. Horizontal accuracy measure (m): 10
- l. Horizontal Reference Datum Code: 002 North American Datum of 1983
- m. Source Map Scale Number:

1.6 Owner or Operator:

- a. Name: Elk Hills Power, LLC
- b. Phone: (661) 763-2730

Mailing address:

- c. Street 1: PO Box 460 d. Street 2:
- e. City: Tupman f. State: CA g. Zip: 93276 -

Facility Name: Elk Hills Power, LLC
EPA ID

1.7 Name and title of person or position responsible for part 68 (RMP) implementation:

- a. Name of person: Shawn Kerns
b. Title of person or position: President and General Manager
c. Email address:

1.8 Emergency contact:

- a. Name: Armando Gonzalez
b. Title: HES Manager
c. Phone: (661) 412-5221
d. 24-hour phone: (661) 332-5903
e. Ext. or PIN:
f. Email address: armando_gonzalez@oxy.com

1.9 Other points of contact:

- a. Facility or Parent Company E-Mail Address: susie_geiger@oxy.com
b. Facility Public Contact Phone: (661) 763-6114
c. Facility or Parent Company WWW Homepage Address:

1.10 LEPC:

1.11 Number of full time employees on site: 25

1.12 Covered by:

- a. OSHA PSM: No
b. EPCRA 302: No
c. CAA Title V: Yes Air operating permit ID: S-3523

1.13 OSHA Star or Merit Ranking: No

1.14 Last Safety Inspection (by an External Agency) Date: 03/08/2010

1.15 Last Safety Inspection Performed by an External Agency: CUPA - Kern County Environmental Health Services

1.16 Will this RMP involve predictive filing?: Yes

1.18 RMP Preparer Information:

- a. Name: Raymond Rodriguez
b. Telephone: (661) 412-5263
c. Street1: 10800 Stockdale Hwy

Facility Name: Elk Hills Power, LLC
EPA ID

d. Street2:

e. City: Bakersfield

f. State: CA

g. ZIP: 93311

Section 1.17 Process(es)

a. Process ID: 8 Program Level 1 Aqueous Ammonia 19 %

b. NAICS Code

221112 Fossil Fuel Electric Power Generation

c. Process Chemicals

c.1 Process Chemical (ID / Name)

11 Ammonia (conc 19 %)

c.2 CAS Nr.

7664-41-7

c.3 Qty (lbs.)

90,000

Section 2. Toxics: Worst Case

Toxics: Worst Case ID 2

2.1 a. Chemical Name: Ammonia (conc 19 %)

b. Percent Weight of Chemical (if in a mixture): 19 %

2.2 Physical State: Liquid

2.3 Model used: EPA's RMP*Comp(TM)

2.4 Scenario: Liquid spill & Vaporization

2.5 Quantity released: 90,000 lbs

2.6 Release rate: 27.9 lbs/min

2.7 Release duration: 10.0 mins

2.8 Wind speed: 1.5 m/sec

2.9 Atmospheric Stability Class: F

2.10 Topography: Rural

2.11 Distance to Endpoint: 0.30 mi

2.12 Estimated Residential population within distance to endpoint: 0

2.13 Public receptors within distance to endpoint:

a. Schools: No d. Prisons/Correction facilities: No

b. Residences: No e. Recreation areas: No

c. Hospitals: No f. Major commercial, office or, industrial areas: No

Facility Name: Elk Hills Power, LLC
EPA ID

g. Other (Specify):

2.14 Environmental receptors within distance to endpoint:

- | | |
|---|----|
| a. National or state parks, forests, or monuments: | No |
| b. Officially designated wildlife sanctuaries, preserves, or refuges: | No |
| c. Federal wilderness areas: | No |
| d. Other (Specify): | |

2.15 Passive mitigation considered:

- | | | | |
|----------------|-----|---------------------|----|
| a. Dikes: | Yes | d. Drains: | No |
| b. Enclosures: | No | e. Sumps: | No |
| c. Berms: | No | f. Other (Specify): | |

2.16 Graphic file name:

Section 3. Toxics: Alternative Release

Toxics: Alternative Release ID: 6

3.1 a. Chemical Name: Ammonia (conc 19%)

b. Percent Weight of Chemical (in in mixture): 19%

3.2 Physical State: Liquid

3.3 Model used: EPA's RMP*Comp(TM)

3.4 Scenario: Transfer hose failure

3.5 Quantity released: 1,530 lbs

3.6 Release rate: 21.4 lbs/min

3.7 Release duration: 2.0 mins

3.8 Wind speed: 3.0 m/sec

3.9 Atmospheric Stability Class: D

3.10 Topography: Rural

3.11 Distance to Endpoint: 0.10 mi

3.12 Estimated Residential population within distance to endpoint: 0

3.13 Public receptors within distance to endpoint:

- | | | | |
|---------------------|----|---|----|
| a. Schools: | No | d. Prisons/Correction facilities: | No |
| b. Residences: | No | e. Recreation areas: | No |
| c. Hospitals: | No | f. Major commercial, office, or Industrial areas: | No |
| g. Other (specify): | | | |

3.14 Environmental receptors within distance to endpoint:

- | | |
|---|----|
| a. National or state parks, forests, or monuments: | No |
| b. Officially designated wildlife sanctuaries, preserves, or refuges: | No |
| c. Federal wilderness areas: | No |

3.15 Passive mitigation considered:

- | | | | |
|----------------|----|---------------------|----|
| a. Dikes: | No | d. Drains: | No |
| b. Enclosures: | No | e. Sumps: | No |
| c. Berms: | No | f. Other (Specify): | No |

3.16 Active mitigation considered:

- | | | | |
|-----------------------|----|--------------------------------|----|
| a. Sprinklers: | No | f. Flares: | No |
| b. Deluge system: | No | g. Scrubbers: | No |
| c. Water curtain: | No | h. Emergency shutdown systems: | No |
| d. Neutralization: | No | i. Other (Specify): | No |
| d. Excess flow valve: | No | | |

3.17 Graphic file name:

Section 4. Flammables: Worst Case --- No Data To Report

Section 5. Flammables: Alternative Release --- No Data To Report

Section 6. Accident History --- No Data To Report

Section 7. Prevention Program 3 --- No Data To Report

Section 8. Prevention Program 2 --- No Data To Report

Section 9. Emergency Response

9.1 Written Emergency Response (ER) Plan:

- | | |
|---|-----|
| a. Is facility included in written community emergency response plan? | Yes |
| b. Does facility have its own written emergency response plan? | Yes |

9.2 Does facility's ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)? Yes

9.3 Does facility's ER plan include procedures for informing the public and local agencies responding to accidental releases? Yes

9.4 Does facility's ER plan include information on emergency health care? Yes

9.5 Date of most recent review or update of facility's ER plan: 12/14/2011

9.6 Date of most recent ER training for facility's employees: 12/15/2011

9.7 Local agency with which facility's ER plan or response activities are coordinated:

- a. Name of agency: Kern County Fire Dept. Haz Mat
b. Telephone number: (661) 391-7000

9.8 Subject to:

- a. OSHA Regulations at 29 CFR 1910.38: No
b. OSHA Regulations at 29 CFR 1910.120: No
c. Clean Water Act Regulations at 40 CFR 112: Yes
d. RCRA Regulations at 40 CFR 264, 265, and 279.52: No
e. OPA-90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: No
f. State EPCRA Rules/Law: No
g. Other (Specify): CalARP

Executive Summary

Elk Hills Power, LLC, operates a nominal 550 megawatt, natural gas-fired, combined cycle power plant in western Kern County, approximately 25 miles west of Bakersfield, California. Elk Hills Power, LLC (EHP) is owned by Occidental Petroleum Corporation and operated by Occidental of Elk Hills, Inc (OEHI). EHP is located on 12 acres roughly in the center of the 74 square mile Elk Hills Oil Field. EHP is situated near the intersection of Elk Hills Road and Skyline Road. The power plant consists of two combustion turbine generators (CTGs), two heat recovery steam generators (HRSGs) and exhaust stacks, one steam turbine and associated auxiliary and support equipment. EHP uses selective catalytic reduction (SCR) system using aqueous ammonia for emission control of nitrogen oxides (NOx).

The land-use adjacent to the EHP is rural. The land use in the Elk Hills Oil and Gas Field is low-density industrial (oil and natural gas production and processing) with a gas processing plant adjoining the EHP on the west. Public roads cross the oil field but access off the public roads into the oil field is tightly controlled. There are no residences located on the oil field.

The facility is subject to the California Accidental Release Prevention Program (CalARP) because the amount of ammonia stored onsite exceeds the CalARP threshold quantity (TQ) of 500 pounds. A Risk Management Plan (RMP) to satisfy CalARP requirements must therefore be prepared for the aqueous ammonia process at the EHP plant. The facility is not subject to the Federal Chemical Accident Prevention Provisions of 40 CFR Part 68 because the concentration of ammonia in aqueous solution is less than 20 percent, which is below the cutoff threshold defined in §68.130, Table 1.

The facility falls under the provisions of CalARP Program Level 1 because:

- There have been NO accidental release in the previous five years of a regulated substance leading to an offsite impact involving death, injury, or response or restoration activities for an exposure of an environmental receptor.
- The potential impact of a worst-case spill of aqueous ammonia does not extend past the EHP/OEHI boundary.
- Emergency response procedures are coordinated with local emergency planning and response organizations.

The proposed safety systems, procedures, and administrative controls that are in place to prevent an accidental release of ammonia were reviewed through the California Energy Commission (CEC) licensing process. These procedures provide acceptable mitigation for potential accidental release scenarios. A seismic analysis was also conducted for EHP as part of the CEC licensing process. Based on this seismic analysis, the CEC and Kern County CBO concluded that the aqueous ammonia tanks and containment structure will be adequately constructed and maintained to provide adequate seismic safety in the event of a planning level earthquake under the CalARP program.

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EHP/OEHI is very committed to the safety of its workers. EHP/OEHI has therefore implemented a number of measures to insure that it maintains a safe working environment. Individual components of the Accidental Release Prevention Program at the EHP include the following:

- * Detailed and comprehensive System and Plant Procedures for the ammonia system at the facility. These procedures include elements to prevent accidents from occurring and response steps to take if accidents do occur.
- * Comprehensive training and testing for all employees.
- * Establishment of detailed materials handling procedures.
- * Safe-work policies posted for all employees to review on a continual basis.

Description of the Process

The EHP uses a selective catalytic reduction (SCR) system using aqueous ammonia ("ammonia") for emission control of nitrogen oxides (NOx). The 19% ammonia is stored in twin 12,000 gallon capacity horizontal steel tanks. The storage tanks are located within a concrete secondary containment basin capable of holding more than 150 percent of the storage volume of one tank plus the volume associated with 24 hours of rain assuming a 25-year storm. Aqueous ammonia will be delivered by truck approximately every nine days (40-45 times per year). A typical truckload will contain 5,000 - 6,000 gallons of aqueous ammonia.

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Worst-Case Release Scenario

The worst-case scenario analyzed in the OCA is a total failure of one of the ammonia storage tank at night with the entire contents of the tank spilling into the secondary containment system. Ammonia then evaporates into the air from the resulting contained pool of aqueous ammonia. Peak emissions occur during the first 10 minutes of the release. The OCA was performed using the RMP*CompTM computer program released by the U.S. Environmental Protection Agency (EPA). RMP*CompTM computed an ammonia emission rate of 27.9 pounds per minute for the worst-case scenario. The distance at which the airborne concentration of ammonia drops below the toxic endpoint of 200 parts per million for the worst-case scenario is 0.3 miles. This worst-case impact does not extend off-site and there is no exposed residential population or sensitive receptors within the impact zone.

Accident Release Prevention and Emergency Response Policies

The EHP/OEHI is dedicated to maintaining a safe working environment and has implemented an Accidental Release Prevention Program at the EHP. The EHP/OEHI has prepared procedures that contain detailed accident prevention, including ammonia unloading, and emergency response procedures including mandatory check lists, requirements for the cross checking of actions or operations, detailed operational steps, and procedures for upset conditions.

Five Year Accident History

There have been no accidents exceeding reportable threshold quantities at the EHP facility in the previous five years.

Emergency Response Program

Facility Name: Elk Hills Power, LLC
EPA ID

EHP/OEHI maintains a written emergency response plan (Emergency Management Plan) that covers accidental releases of hazardous materials. The plan includes all aspects of emergency management, including adequate first aid and medical treatment, evacuations, notification of local emergency response agencies and the public, as well as post-incident decontamination of affected areas. To ensure proper functioning, emergency response equipment is regularly inspected and serviced. In addition, the Emergency Management Plan is regularly updated to reflect any pertinent changes taking place within our processes that would require a modified emergency response.



#895

November 04, 2008

Mr. Dan Starkey
Hazardous Material Specialist
2700 "M" Street, Suite 300
Bakersfield, CA 93301-2370

RECEIVED

NOV 5 2008

Subject: Risk Management Plan Program Level 2

KERN COUNTY
ENVIRONMENTAL HEALTH SERVICES

Dear Mr. Starkey:

Elk Hills Power is pleased to submit to Kern County Environmental Health Services Department the Elk Hills Power Risk Management Plan. This RMP is submitted at the request of Kern County environmental Health Services.

In May 2008, EHP was notified that KCEHSD re-evaluated the criteria under which EHP was determined to qualify for the RMP Program Level 1 and KCEHS determined that an RMP Program Level 2 would be more appropriate. Attached is the RMP disc copy, hard copy and the signed Certification Letter.

Elk Hills Power is not subject to Federal RMP requirement and therefore, does not have an EPA ID facility number. Per your request, EHP has used the RMP Submit program for the submittal of the information required by Cal-ARP program. However, the RMP Submit program has certain limitations which require EHP to indicate that we have ammonia with a concentration of 20% or greater (refer to sections 1.17.c.1 and 2.1.a) when this is not the case. The ammonia used on site is only 19% solution as indicated in Section 8 Prevention Program Description. All other information provided is true, accurate and complete.

Sincerely,

Patrick Ramsey
Plant Manager

Attachment:
RMP Submit CD
RMP Submit Hard Copy
Risk Management Plan
Certification Letter

Ecc:
J. Matranga - OEVC
M. Gallagher - SemGen
M. Teague - SemGlob

Certification Letter

Certification Statement for Program 2 Process(es)

Based on the criteria in 40 CFR 68.10, the distance to the specified endpoint for the worst-case accidental release scenario for the following process(es) is less than the distance to the nearest public receptor:

- [Ammonia Process]

Within the past five years, the process(es) has (have) had no accidental release that caused offsite impacts provided in the risk management program rule (40 CFR 68.10(b)(1)). No additional measures are necessary to prevent offsite impacts from accidental releases. In the event of fire, explosion, or a release of a regulated substance from the process(es), entry within the distance to the specified endpoints may pose a danger to public emergency responders. Additionally, uncontrolled runaway reactions may pose a danger to public emergency responder entering the distance-to-endpoint. Therefore, public emergency responders should not enter this area except as arranged with the emergency contact indicated in the RMP. The undersigned certifies that, to the best of my knowledge, information, and belief, formed after reasonable inquiry, the information submitted is true, accurate, and complete.



Signature

Patrick Ramsey

Print Name

Plant Manager

Title

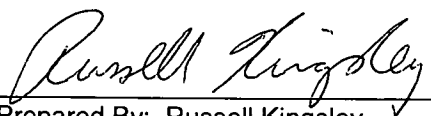
November 04, 2008

Date

EPA Facility ID # _C_ _A_ _R_ _0_ _0_ _0_ _1_ _0_ _8_ _4_ _9_ _8_



Risk Management Plan for Aqueous Ammonia Storage and Use


Prepared By: Russell Kingsley


Reviewed By: Howard Balentine

ENSR Corporation
October 2008
Document No.: 06205-120-004

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Appendices

- A** Standard Operating Procedure for the Unloading and Handling of Aqueous Ammonia
- B** Emergency Response Procedure
- C** Material Safety Data Sheet
- D** Hazard Assessment
- E** Incident Investigation Procedure and Incident Investigation Report
- F** Limited Seismic Evaluation of the Aqueous Ammonia System

1.0 Executive Summary

1.1 Introduction

Elk Hills Power, LLC, operates a nominal 550 megawatt, natural gas-fired, combined cycle power plant in western Kern County, approximately 25 miles west of Bakersfield, California. The Elk Hills Power Plant (EHP) is located on 12 acres roughly in the center of the 74 square mile Elk Hills Oil and Gas Field operated by Occidental of Elk Hills, Inc. (OEHI). The project site is situated near the intersection of Elk Hills Road and Skyline Road. The power plant consists of two combustion turbine generators (CTGs), two heat recovery steam generators (HRSGs) and exhaust stacks, one steam turbine, and associated auxiliary and support equipment. EHP is a joint venture between Sempra Generation and Occidental Energy Ventures Corporation.

The EHP employs a selective catalytic reduction (SCR) system using aqueous ammonia ("ammonia") for emission control of nitrogen oxides (NOx). The ammonia concentration is 19 percent and it is stored in two 12,000-gallon horizontal steel tanks. The storage tanks are located within a concrete secondary containment structure capable of holding more than 150 percent of the storage volume of one tank plus an allowance for precipitation from a 24-hour, 25-year storm event. Aqueous ammonia is delivered by truck to the facility approximately every nine days (40 to 45 times per year). A typical truckload contains 5,000 to 6,000 gallons of aqueous ammonia.

The facility is subject to the California Accidental Release Prevention Program (CalARP) because the amount of ammonia stored onsite exceeds the CalARP threshold quantity (TQ) of 500 pounds. This Risk Management Plan (RMP) was prepared to satisfy the CalARP requirements for the aqueous ammonia process at EHP.

The facility falls under the provisions of CalARP Program Level 2 because:

- The potential impact of a worst-case release of aqueous ammonia extends beyond the fenceline of the EHP. There are no exposed residential populations or sensitive receptors within the impact zone.
- The process is not subject to the federal Chemical Accident Prevention Provisions of 40 Code of Federal Regulations (CFR) Part 68 because the concentration of ammonia in aqueous solution is less than 20 percent, which is below the cutoff threshold defined in §68.130, Table 1.
- The process is not subject to the provisions of 29 CFR 1910.119, Process Safety Management Programs;
- There has not been an accidental release in the previous five years of a regulated substance leading to an offsite impact greater than the significant impact threshold; and
- Emergency procedures are coordinated with the local emergency planning and response organizations.

This Program 2 RMP is submitted at the request of the Kern County Environmental Health Services Department (KCEHSD). EHP prepared and submitted a Program 1 RMP in 2003. In May 2008, EHP was notified that KCEHSD reevaluated the criteria under which EHP was determined to qualify for the Program 1 level, and they determined that a Program 2 level RMP would be more appropriate. Note that as a modern, state-of-the-art power plant, EHP has in place emergency prevention and emergency response programs that meet or exceed the Program 2 level RMP requirements. This revised RMP incorporates those programs by reference into the RMP so that the Program level 2 requirements are satisfied. In addition, a Hazards Assessment and Seismic Analysis were conducted.

A hazard analysis was conducted in July 2008 to review the safety systems, procedures, and administrative controls that are in place to prevent an accidental release of ammonia. These procedures provide acceptable

mitigation for potential accidental release scenarios. An initial seismic analysis was conducted for EHP as part of the California Energy Commission (CEC) licensing process of EHP. Based on that seismic analysis, the CEC concluded that the aqueous ammonia tanks and containment structure were constructed to provide adequate seismic safety in the event of an earthquake. A seismic update was conducted in July 2008 to verify that the ammonia system has been adequately maintained and continues to meet seismic standards appropriate for the equipment.

1.2 Accidental Release Prevention and Emergency Response Policies

EHP is dedicated to maintaining a safe working environment and has implemented an Accidental Release Prevention Program at EHP. EHP issued an initial System and Plant Procedure (ref. PPM 8.18 Ammonia Handling) for the ammonia storage and forwarding system on March 18, 2002. The procedure is reviewed annually and was most recently updated November 3, 2006. The objective of the procedure is to detail the procedures for unloading aqueous ammonia. A copy of the ammonia unloading procedure is provided in **Appendix A**.

EHP has procedures in place that contain detailed accident prevention and emergency response procedures including mandatory checklists, requirements for the cross-checking of actions or operations, detailed operational steps, and procedures for upset conditions. The emergency response plan is provided in **Appendix B**.

1.3 General Description of the Stationary Source and Regulated Substances

1.3.1 Description of Stationary Source

The North American Industrial Classification System (NAICS) code for EHP is 221112, Fossil Fuel Electrical Generation. EHP is located in western Kern County, California, approximately 25 miles west of Bakersfield near the intersection of Elk Hills Road and Skyline Road. The plant site is approximately in the center of the 74 square mile Elk Hills Oil and Gas Field. Access to the Elk Hills Oil and Gas Field is restricted at Skyline Road.

The total aqueous ammonia storage is 24,000 gallons (approximately 36,000 pounds as ammonia) in two horizontal steel tanks. Aqueous ammonia drawn from the tanks is used for injection into the exhaust of two CTGs to control the emissions of NO_x into the atmosphere. The ammonia system incorporates the ammonia tanks, unloading equipment, pumping skid, vaporizer, piping, and the flow controller used to meter ammonia to the injection grid for the SCR control system. **Figure 1-1** shows a view of the ammonia tanks and their containment system. **Figure 1-2** shows a vaporizer on the ammonia injection skid.

As shown in **Figure 1-1**, both storage tanks are surrounded by a common concrete containment structure able to contain 150 percent of the storage volume of one tank with an allowance for precipitation based on a 24-hour, 25-year storm event. A sloped containment area around the adjacent unloading area drains to the containment structure. (Note: The unloading area is not shown in **Figure 1-1** since it is to the rear of the tanks in the picture.)

The truck unloading area consists of a concrete pad that is large enough for the entire delivery truck. The unloading area slopes to a drain in the center of the unloading area and there is a low curb surrounding the concrete pad. The center drain connects to the tank secondary containment structure. During unloading operations, a valve in the secondary containment structure is opened so that any spilled aqueous ammonia will drain into the secondary containment structure for the tanks. At all other times, the valve separating the unloading area drain and the secondary containment structure remains closed.



Figure 1-1 Aqueous Ammonia Storage Tank and Containment Structure

The TQ of ammonia for the CalARP program is 500 pounds. The maximum on-site storage of aqueous ammonia at EHP is approximately 36,000 pounds. Therefore, the EHP is subject to the CalARP program. In Kern County, the Adminstrating Agency (AA) for a CalARP program is the KCEHSD.

The major hazards represented by the ammonia process are the accidental release of a toxic substance (ammonia) due to spill or rupture of the storage vessel, associated piping system, or during a tanker truck unloading accident. According to the Hazard Assessment conducted for this process, the worst-case accident scenario is the complete failure of a single aqueous ammonia tank emptying into the secondary containment structure.

The land use in the Elk Hills Oil and Gas Field is low-density industrial (oil and natural gas production and processing) with a gas processing plant adjoining EHP on the west. Public roads cross the oil field, but access off the public roads into the oil field is tightly controlled. There are no residences located on the oil field.



Figure 1-2 Vaporizer at the Elk Hills Power Plant

1.3.2 Process Description

EHP purchases aqueous ammonia from one supplier. The supplier delivers ammonia approximately every nine days on a regular schedule. The tanker truck travels directly from the supplier's yard to EHP and then returns to the supplier's yard after the delivery. The driver makes no other deliveries. Administrative controls limit delivery of ammonia to one delivery truck at a time. Ammonia delivery is usually scheduled for daylight hours, but may occur at night under unusual circumstances.

The liquid level in each tank is electronically monitored in a cabinet adjacent to the tank. Each tank is protected by a pressure relief valve on the top of the tank and manual drains with shut-off and excess flow valves at the bottom of the tank. Piping into each tank includes one fill line, one vapor return line, one tank drain line, one outlet line to the ammonia metering system, and one line for manual transfer of aqueous ammonia between the two tanks. Ammonia detectors with audible alarms are located in the storage tank area and along the line delivering the aqueous ammonia to the vaporizer.

There are four steps in the handling of the aqueous ammonia from delivery to injection into the turbine exhaust. The following paragraphs summarize the steps taken. The detailed steps are contained the Elk Hills Power Policies and Procedures Manual (PPM) Section 8.18 Chapter 3.0, Operating Procedures, revision 2,

October 6, 2008. In the event of discrepancies between this document and the PPM, the PPM shall be the governing document.

1. Preparation for Receipt of Aqueous Ammonia

Steps involved in preparing for delivery include:

- Use of a delivery checklist;
- Accepting delivery by the plant operator;
- Confirmation of the amount of ammonia in the storage tanks to verify available volume of the intended storage tank;
- Verification of the contents and quantity of ammonia in the delivery truck. The tanker truck will not enter the facility until after the manifest and bill of lading are compared to the ordered amount of aqueous ammonia and approval is given for entry;
- Testing of safety equipment including eyewash station and safety shower;
- Review of material safety data sheets (MSDS);
- Donning of personal protective equipment by plant personnel involved in the unloading;
- Connecting the tanker to the ammonia system; and
- Unloading the ammonia.

2. Receipt of Aqueous Ammonia

EHP administrative controls will limit receipt of ammonia to one truck at a time. Once EHP gives approval to the driver to enter the facility, the truck travels at low speed (not to exceed 10 miles per hour) directly to the unloading area and parks in the unloading containment area adjacent to the ammonia tanks. The driver secures the truck from movement using wheel chocks. The driver and plant operator then follow their respective operating procedures, opening or closing valves as required and hooking up the inlet and vapor return hoses between the truck and the ammonia system. The truck engine has a safety interlock to prevent operation of the ignition when the truck is pumping. The truck operator operates valves on the truck while EHP personnel operate system valves.

Unloading is accomplished using a pumping and vapor recovery system on the truck. The driver operates the pump to transfer the contents of the truck to the storage tank. Unloading ceases when the plant operator determines the desired liquid level in the tank is reached. At the completion of unloading, all residual liquid and vapors in the unloading hoses and piping are evacuated to the truck prior to disconnection of the hoses. Unloading requires approximately one hour.

3. Supply Line to the Vaporizer

The supply lines from the aqueous ammonia tanks to the vaporizer are independent for the CTG trains. Each train has a single supply line of approximately 1-inch inside diameter that carries aqueous ammonia from the pumping skid to the vaporizer skid. The supply piping is double-walled: 1-inch carbon steel pipe inside to carry the aqueous ammonia and a fiberglass outer containment system. A separate 2-inch line is used to transfer aqueous ammonia between the two tanks, as necessary. For routine operation, the transfer line is terminated by valves on both ends that isolate the two tanks from each other. Most of the piping run from the pumping skid to the vaporizer skid is underground. For each supply system, not more than 15 feet of pipe is above

ground where it connects to the vaporizer. All above ground piping is protected from traffic by metal bollards. In addition, the access way adjacent to the vaporizer is restricted to maintenance vehicles only, and is not subject to normal traffic. The nominal pressure of aqueous ammonia in the supply lines is approximately 130 pounds per square inch (psi). Ammonia detectors with audible alarms are spaced approximately every 50 feet along the ammonia supply lines.

4. Vaporizer to Injection Manifold

Each ammonia tank is the primary supply of ammonia for one SCR system. The SCR is an emission control system for NO_x in the CTG exhaust. Hot flue gas from the HRSG is used to vaporize the aqueous ammonia. The vaporizer and ammonia flow control unit consists of the vaporizer, steam piping, various valves, pressure regulators, high and low pressure sensors, ammonia detectors, and the supply line to the injection manifold on the SCR system. The gaseous ammonia is piped to the injection grid for the SCR system at a point upstream of the catalyst grid. At the catalyst bed, ammonia reacts with NO_x in the CTG exhaust to form water and elemental nitrogen. A small percentage of ammonia passes the catalyst bed unreacted and exits the SCR with the exhaust gases. This unreacted ammonia, known as "ammonia slip", is regulated by the facility air quality operating permit as not to exceed 10 parts per million.

1.3.3 Process Flow Diagram

A simplified process flow diagram for the EHP ammonia system is shown as **Figure 1-3**.

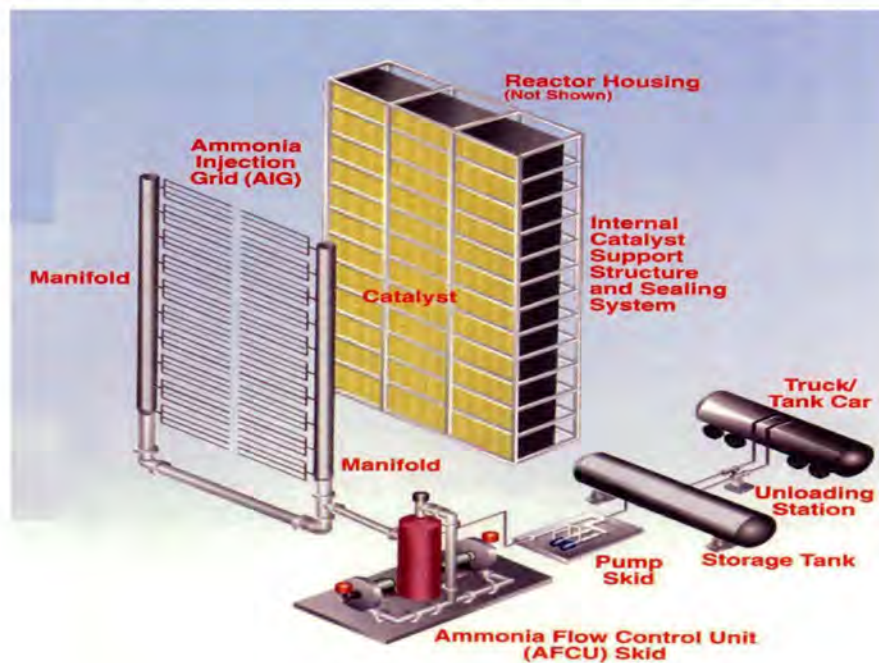


Figure 1-3 Simplified Process Flow Diagram

1.4 Hazards Analysis

A team composed of EHP and ENSR staff conducted a Process Hazards Analysis (PHA) on July 14, 2008 for the aqueous ammonia process at the facility. The team consisted of individuals experienced in operation and maintenance of the aqueous ammonia system, hazards analysis, safety management, environmental health

and safety issues, and performance of a PHA using appropriate techniques. A complete description of the PHA process is provided in **Section 4.0**, and the PHA worksheets are provided in **Appendix D**.

ENSR staff conducted a tour of the ammonia system and the main control room at the EHP facility and also interviewed the EHP personnel including the Plant Manager and Lead Operator. A combined "What-If" and "Guideword" approach was used to evaluate potential hazards in the ammonia system at the facility. Both approaches are approved methodology for conducting a PHA under the CalARP RMP and OSHA Process Safety Management (PSM) programs. The objective of this exercise was to identify potential deviations from normal operating and design conditions that could lead to a release of a regulated substance.

The PHA Team broke the ammonia process down into four "nodes": 1) unloading of ammonia, 2) ammonia storage, 3) delivery to the SCR, and 4) general site hazards. These nodes were broken down further into elements for evaluation. Elements are usually individual components that could fail, such as a valve, pump, or hose. Of the 52 elements defined for evaluation, the PHA Team did not identify any scenarios with the three highest criticality rankings of "Unacceptable", "Undesirable", or "Acceptable with Controls" which would require mitigation. 49 elements were rated as "Acceptable" and three had ratings of "Not a Hazard". One of the scenarios was judged acceptable but the PHA team determined that improvements to safety could be made. The scenario involved a potential collision between a vehicle and the pipeline, exiting the ground, from the pumps to the vaporizer. A recommendation was made to install crash barriers to prevent damage.

The ammonia plant has been operational five years and no maintenance and safety related issues have been identified. The plant has not required any safety related upgrades. The only difference between the "as-built" ammonia system and the original design is the installation of pressure dampeners to improve the operation of the plant.

1.5 Worst-Case Release Scenario

The worst-case scenario analyzed in the Offsite Consequence Analysis (OCA) is a catastrophic failure of one of the ammonia storage tanks at night with the entire contents of the tank spilling into the secondary containment system. Ammonia then evaporates into the air from the resulting contained pool. Peak emissions occur during the first 10 minutes of the release. The OCA was performed using the *RMP*Comp*TM computer program released by the U.S. Environmental Protection Agency (EPA).

*RMP*Comp*TM computed an ammonia emission rate of 27.9 pounds per minute for the worst-case scenario. The distance at which the airborne concentration of ammonia drops below the toxic endpoint of 200 parts per million (ppm) for the worst-case scenario is 0.3 miles. This worst-case impact extends beyond the fence line of the EHP but does not extend past the boundaries of the Elk Hills Oil and Gas Field. There are no exposed residential populations or sensitive receptors within the impact zone.

This worst-case scenario is an unlikely scenario for two reasons:

1. A complete ammonia tank failure is an improbable situation. As part of the licensing study for the EHP, the CEC concluded that a complete tank rupture was not a credible worst-case accident.
2. The OCA assumed conditions of F stability and 1.5 meters per second (m/sec) wind speed, the conditions recommended by the EPA for a RMP worst-case analysis. Stability conditions of F stability class only occur at night, but deliveries of ammonia normally occur during the day. Since a tank rupture is more likely when activity is occurring on the tank such as an unloading operation, a nighttime accident is less likely.

1.6 General Accidental Release Prevention Program and Chemical-Specific Prevention Steps

EHP is concerned with the safety of its workers and individuals living and working near the EHP. EHP has therefore implemented a number of measures to insure that it maintains a safe working environment. EHP's Accidental Release Prevention Program includes the following components:

- Detailed and comprehensive System and Plant Procedures for the ammonia system at the facility. These procedures include elements to prevent accidents from occurring and response steps to take if accidents do occur.
- Comprehensive training and testing for all employees.
- Establishment of detailed material handling procedures.
- Safe-work policies posted for all employees to review on a continual basis.

1.7 Five Year Accident History

There have been no reportable releases of aqueous ammonia from the EHP facility in the five years preceding the preparation of this RMP.

1.8 Emergency Response Program

The KCEHSD is the lead agency for local emergency planning and response. EHP coordinates emergency response and planning for the ammonia system with KCEHSD.

The most recent emergency response training of facility personnel was completed on May 27, 2008. The site is operated 24 hours per day with approximately 25 full-time employees. A typical shift consists of three to four employees plus administrative personnel. The ammonia process is monitored by the plant operator. Ammonia detectors with audible alarms are located in the tank area and at approximately 50 feet intervals along the ammonia supply lines to the vaporizers. There are two manual fire-water spray systems within 50 feet of the ammonia storage tank area.

The EHP Emergency Response Plan for Aqueous Ammonia Release was reviewed on February 14, 2008. The ammonia safety handling, loading and spill procedure was reviewed on November 3, 2006 and is applicable to all releases of ammonia, regardless of size. The procedure specifies immediate actions EHP will take during a spill event that include:

- Notification of the Lead Operator by the person who first notices the release event. The Lead Operator in turn will notify the Emergency Coordinator.
- The Emergency Coordinator will initiate notification of the federal, state, and local agencies that must be notified.
- Movement of all non-essential personnel to a safe assembly area upwind of the release. A wind sock at the adjoining gas plant can be used to assess wind direction during a spill event.
- Notification of plant personnel of the incident, determination if evacuation is necessary and, if necessary, implementation of an evacuation.
- Donning of personal protective equipment (PPE) by the EHP response team and gathering of equipment prior to approaching the spill site.

- Shut-off the spill if still underway, containment of the spill to prevent or minimize its movement offsite, and clean-up of the spill. The spill may be cleaned up by plant personnel, or at the discretion of the Emergency Coordinator, an outside contractor may be called in to assist with spill clean up.
- Completion of follow-up notifications to federal, state, and local agencies as required.

1.9 Planned Changes to Improve Safety

A Hazard Assessment was conducted for the ammonia process in July 2008 to identify any potential deviation from standard operating procedures, changes to system parameters or design requirements, or other deviations from design conditions. No significant changes were identified and all identified nodes were determined to be either "acceptable" or "not a hazard". One of the scenarios was judged acceptable, however, the PHA team determined that improvements to safety could be made. The scenario involved a potential collision between a vehicle and the pipeline, exiting the ground, from the pumps to the vaporizer. Although administrative controls limit the vehicle speed in the vicinity of the ammonia system and prevent vehicle access to the aboveground portion of the pipeline, physical controls like crash barriers would go further to improve the safety of the system. No additional physical or operational changes were identified to improve system safety.

EHP contracted with ENSR Corporation to conduct a seismic analysis for the aqueous ammonia system in September 2008. The seismic assessment identified one deficiency: the ammonia feed pipe that connects the vaporizer to the SCR includes a 9.5-foot span between structural supports. The American National Standards Institute (ANSI) recommends a maximum span of 8-feet for 1-inch pipe in water service. Although there are no standards published specifically for ammonia piping, the supports for ammonia piping should be spaced no less frequently than those for water piping. Therefore, a recommendation that intermediate supports be added to this section of the ammonia feed piping was offered.

Elk Hills Power is currently evaluating the recommended changes and will either implement the recommendations or document why management rejected the recommendation, as required by RMP regulations.

2.0 Five Year Accident History

There have been no reportable releases of aqueous ammonia from the EHP facility in the five years preceding the preparation of this RMP.

3.0 Offsite Consequence Analysis

The EPA has compiled guidance for the performance of offsite consequence analyses. This guidance is contained in the EPA document: Risk Management Program Offsite Consequence Analysis Guidance (OCAG) (EPA, 1999). For this RMP, the OCA analysis was performed using *RMP*Comp*TM program (Version 1.06), released by EPA for use in estimating releases of hazardous materials.

3.1 Worst-Case Release Scenario

3.1.1 Release Scenario Description and Release Parameters

EHP has two horizontal cylindrical storage tanks. Each tank can hold up to 12,000 gallons of aqueous ammonia. The aqueous ammonia tanks are contained within a concrete containment structure. The worst-case release scenario is hypothesized to be a release of the entire contents of the aqueous ammonia tank due to a catastrophic tank failure with formation of a liquid pool within the secondary containment structure. The secondary containment has sufficient volume to contain the entire contents of the tank and has a surface area of 1,330 square feet. The secondary containment is passive mitigation that is accounted for in the release calculations.

Emissions of ammonia are assumed to come from evaporation from the surface of a pool of aqueous ammonia. The rate of emissions is primarily a function of the surface area of the pool and the vapor pressure of the ammonia over the pool, with additional dependency on wind speed over the pool, the ambient temperature, and the molecular weight of the gas. For the worst-case release scenario, the surface area of the aqueous ammonia pool is assumed to be the area of the containment structure surrounding the ammonia tank. The available surface area of the containment pool is 1,330 square feet after allowing for the area of the tank saddles.

3.1.2 OCA Methodology

3.1.2.1 Meteorological Characteristics

Meteorologists have defined six "atmospheric stability classes", A through F, each representing a decreasing degree of turbulence in the atmosphere. The most turbulent condition is stability A, which is associated with light winds and very strong solar heating. Stabilities B and C are characterized by progressively weaker solar heating and stronger winds. Neutral, or D, stability occurs when winds are strong or when the sky is overcast. At night the earth's surface cools, causing the lower atmosphere to stabilize and become less turbulent. Stability E (moderately stable) corresponds to partly cloudy conditions with moderate winds. Stability class F (very stable) represents a very low level of turbulence due to overnight radiational cooling and weak winds. The OCAG requires that worst-case analyses be conducted using stability class F and 1.5 m/sec wind speed. These worst-case meteorological conditions occur only at night during fair weather.

The aerodynamic surface roughness of the area surrounding a facility governs the local micro-meteorological conditions affecting transport and dispersion in the vicinity of the facility. To describe aerodynamic surface roughness for modeling purposes, the OCAG establishes two roughness categories based on land-use in the vicinity of the process. "Urban" surface roughness indicates areas where there are many obstacles to the flow, such as industrial buildings or trees. "Rural" indicates that there are few large buildings within three kilometers of the plant site and the terrain is generally flat and unobstructed. By this definition, the vicinity of the EHP facility is classified as rural for purposes of modeling an accidental release.

3.1.2.2 Source Release Characteristics

As a result of a spill, aqueous ammonia will form a pool of liquid with ammonia evaporating from the surface. As the ammonia vaporizes, latent heat of vaporization is drawn from the surrounding air and from the liquid, limiting the energy (heat) available for further vaporization and therefore slowing the vaporization process. Consequently, the release of ammonia from a pool would be extended over time and not occur during a

10-minute period as suggested in the RMP guidance. The containment structure, by limiting the spread of the aqueous ammonia, limits the exposed liquid surface area, and consequently the rate of release of ammonia to the air and the resultant transport of ammonia downwind.

3.1.2.3 Ammonia Toxic Endpoint

Worst-case dispersion modeling to determine the distance to toxic endpoint was conducted using the EPA's *RMP*Comp*TM (Version 1.06) software. *RMP*Comp*TM implements the consequence analysis calculations set forth in the OCAG, resulting in the computation of the distance to the toxic endpoint. The toxic endpoint zone is defined by a circle centered at the emission source with a radius equal to the distance at which the concentration of the released toxic substance falls below a defined toxic endpoint. Beyond this distance, a release of the toxic substance under the given scenario would not be expected to pose a significant hazard to the public or the environment.

The toxic endpoint required by the EPA for ammonia is 200 ppm. This level is the Emergency Response Planning Guideline, Level 2 (ERPG-2), which was developed by the American Industrial Hygiene Association. An ERPG-2 is *"the maximum airborne concentration below which it is believed that nearly all individuals could be exposed for up to 1 hr without experiencing or developing irreversible or other serious health effects, or symptoms which could impair an individual's ability to take protective action."*

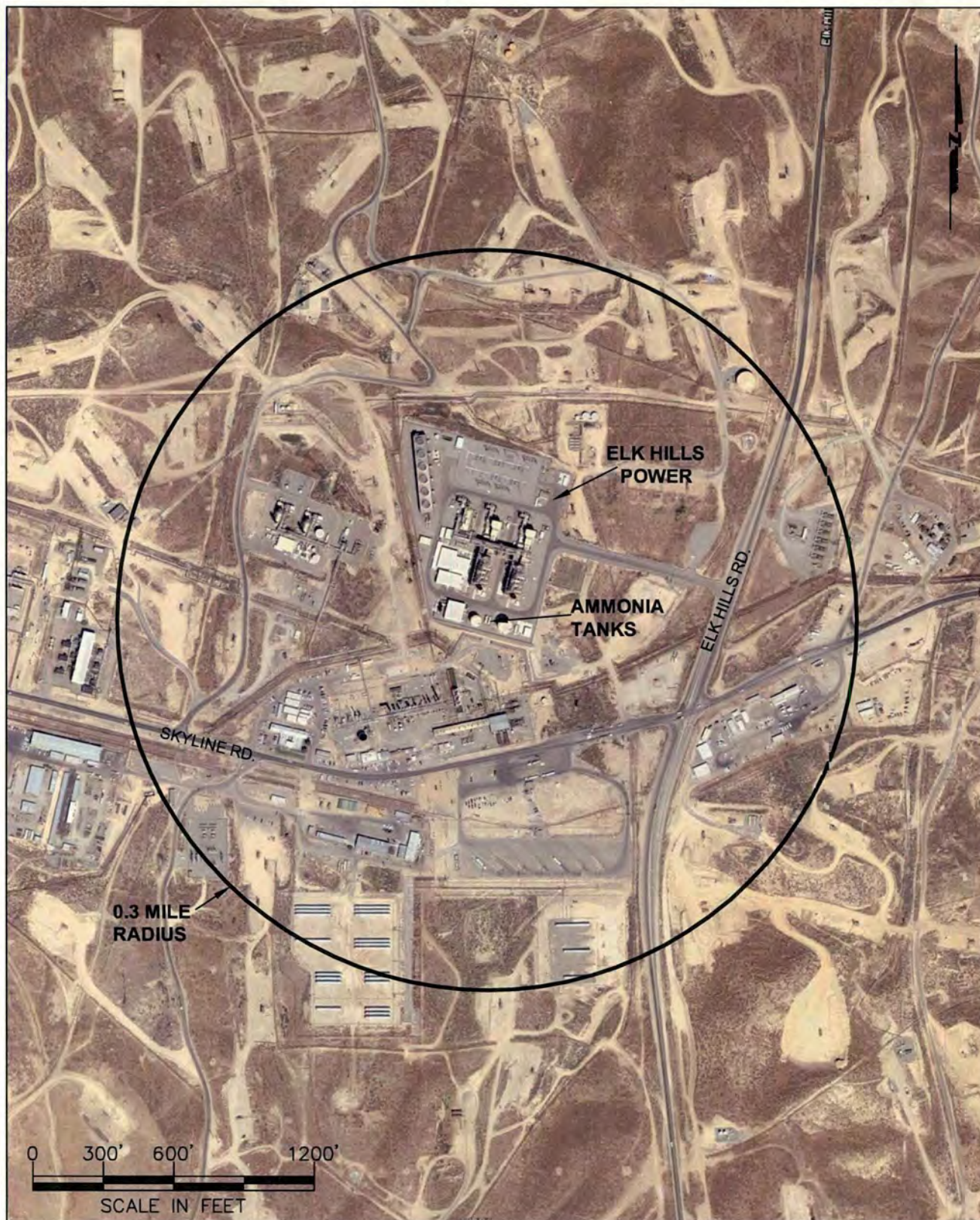
Within the toxic endpoint zone for ammonia, the outdoor concentration at a stationary receptor, averaged over 10 minutes, could exceed 200 ppm. Because this exposure level assumes a stationary receptor, it does not account for evasive or protective action that could be taken by an exposed individual. Actions that could reduce or eliminate exposure to ammonia include avoiding the plume transport path, relocating beyond the planning zone, or seeking shelter in a building.

3.1.3 OCA Results for the Worst-Case Scenario

The *RMP*Comp*TM model estimated an ammonia emission rate of 27.9 pounds per minute for a pool of aqueous ammonia with a surface area equivalent to the surface area of the containment structure. The distance at which the airborne concentration of ammonia drops below the ERPG-2 concentration level, known as the "endpoint distance", for the worst-case release scenario is approximately 0.3 miles (480 meters). As shown in **Figure 3-1**, a circle with this radius centered on the ammonia tanks extends past the EHP fenceline but does not extend off the Elk Hills Oil and Gas Field. There are no residences or other sensitive receptors within this zone of impact. **Table 3-1** presents the input and output of *RMP*Comp*TM for this worst-case scenario.

The RMP analysis is required to assess the potential hazard posed to specific receptors. These receptors include sensitive public receptors and environmental receptors. **Table 3-2** presents the definition of these two sets of receptors. There are no public receptors within the zone of impact of the worst-case release scenario.

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ENDPOINT DISTANCE FOR WORST CASE RELEASE SCENARIO

Elk Hills Power

FIGURE NUMBER:

3-1

DRAWN BY:

M. Scop

DATE:

11/29/2008

PROJECT NUMBER:

06205-120

SHEET NUMBER:

X

Table 3-1 RMP*Comp Results for Worst-Case Release Scenario

RMP*Comp Ver. 1.06

Results of Consequence Analysis

Chemical: Ammonia (water solution) 20%

CAS #: 7664-41-7

Category: Toxic Liquid

Scenario: Worst-case

Quantity Released: 12,000 gallons

Liquid Temperature: 77 °F

Mitigation Measures:

Diked area: 1,330 square feet

Dike height: 2 meters

Release Rate to Outside Air: 27.9 pounds per minute

Topography: Rural surroundings (terrain generally flat and unobstructed)

Toxic Endpoint: 0.14 mg/L; basis: ERPG-2

Estimated Distance to Toxic Endpoint: 0.3 miles (0.5 kilometers)

-----Assumptions About This Scenario-----

Wind Speed: 1.5 meters/second (3.4 miles/hour)

Stability Class: F

Air Temperature: 77 °F (25 °C)

Table 3-2 Public and Environmental Receptors Required for an Off-Site Consequence Analysis

Public Receptors	Environmental Receptors
• Schools • Residences • Hospitals • Prison and correctional facilities • Recreational areas • Major commercial, industrial, or other areas	• National or state parks, forests, or monuments • Officially designated wildlife sanctuaries, preserves, or refuges • Federal wilderness areas

3.2 Alternative-case Release Scenarios

Three additional scenarios were considered as potential alternative-case release scenarios. One potential accident scenario is the rupture of the tanker truck during an accident as the tanker truck approaches the facility. The ammonia supplier will make approximately 40 to 45 deliveries per year of ammonia to the EHP facility. In 1998, there were approximately 196,000 million vehicle miles traveled (VMT) by large trucks (greater than 10,000 pound gross vehicle weight) in the United States. In the same year, there were

approximately 392,000 accidents involving large trucks, while approximately five percent of accidents involved trucks carrying hazardous materials (DOT, 2002).

The number of serious accidents in 1998 involving hazardous materials was 340. The U.S. Department of Transportation (DOT) defines a serious accident as an accident that involves a fatality or major injury due to a hazardous material; closure of a major transportation artery or facility or evacuation of six or more persons due to the presence of a hazardous material; or a vehicle accident or derailment resulting in the release of a hazardous material (DOT, 2005). These statistics yield a large truck accident occurrence rate of approximately two crashes per million VMT, an accident rate involving hazardous material of approximately 0.1 per million VMT, and a serious accident rate involving a hazardous material release of 0.002 accidents per million VMT.

The ammonia delivery truck will originate in Bakersfield, less than 40 miles away. Assuming 45 deliveries of 40 miles per year (1,800 truck miles/year), the expected number of serious accidents involving ammonia deliveries to the EHP would be one per 278,000 years. Because of the very low probability of occurrence of this accident scenario, it is not a credible release scenario.

A complete break of the unloading hose is another alternative release scenario that was considered. A break of this type would result in a large pressure change in the ammonia delivery hose and produce an immediate ammonia release. However, check valves located on the tanker truck and ammonia tank are designed to sense the change in pressure due to this type of break and immediately shut down the flow of ammonia. The resulting ammonia spill would be then limited to the amount of ammonia contained in the hose. This does not represent the "worst" alternative release, and thus was not modeled.

For EHP, the alternative release scenario that was modeled was hypothesized to be a spill of duration of two minutes from a detached unloading hose during tanker truck unloading. The spill is assumed to be on concrete and is assumed to form an uncontained liquid pool 1.0 centimeter deep. The emission rate is based on the typical quantity of aqueous ammonia delivered (6,000 gallons), the elapsed time to offload this quantity (60 minutes) and the duration of an uncontrolled unloading accident. For this analysis, the alternative release is assumed to be uncontrolled for two minutes. A two-minute release is conservatively high for an unloading accident since the plant employee monitoring the off-loading operation has a remote switch by which he can remotely cutoff the transfer pump immediately if an accident occurs. In reality, it is unlikely that the pump would continue for even 30 seconds if an unloading accident were to occur, thus making this alternative analysis conservative.

The RMP/CalARP regulations allow use alternative meteorological conditions defined by the OCAG document for use in performing the alternative release analysis. These meteorological conditions are less restrictive than the worst-case conditions and are a wind speed of 3.0 meters per second and a D-stability class. For the alternative release scenario, the release rate is 21 lb/min and the distance to the ERPG-2 endpoint is 0.1 miles. The neighboring industrial facilities are the only public receptor within the alternative release impact distance. The output of the RMP*COMP model for the alternative release is given in **Table 3-3**.

Table 3-3 RMP*COMP Output for Alternative Release

RMP*Comp Ver. 1.07

Results of Consequence Analysis

Chemical: Ammonia (water solution) 20%

CAS #: 7664-41-7

Category: Toxic Liquid

Scenario: Alternative

Quantity Released: 1,530 pounds

Release Duration: 2 minutes

Release Rate: 100 gallons per min

Liquid Temperature: 77 °F

Mitigation Measures: NONE

Release Rate to Outside Air: 21.4 pounds per minute

Topography: Rural surroundings (terrain generally flat and unobstructed)

Toxic Endpoint: 0.14 mg/L; basis: ERPG-2

Estimated Distance to Toxic Endpoint: 0.1 miles (0.2 kilometers)

-----Assumptions About This Scenario-----

Wind Speed: 3 meters/second (6.7 miles/hour)

Stability Class: D

Air Temperature: 77 °F (25 degrees °C)

4.0 Program 2 Prevention Program

4.1 NAICS Code

The NAICS code for the facility is 221112 for Fossil Fuel Electric Power Generation.

4.2 Chemical Name(s)

The facility uses 19 percent aqueous ammonia.

4.3 Safety Information

A summary of the safety information for the aqueous ammonia system is presented in **Table 4-1**. A MSDS for aqueous ammonia is provided in **Appendix C**.

Table 4-1 Safety Information

Issue / Parameter	Information / Value
Material Safety Data Sheet	Electronic MSDS System on site, see Appendix C
Maximum Intended Inventory	12,000 gallons per tank (18,000 lbs as ammonia) 24,000 gallons total (36,000 lbs as ammonia)
Temperature	Upper Maximum: 200°F Lower Minimum: 70°F
Flow rate	Loading Maximum: 400 gallons per minute (gpm) Transfer Maximum: 60 gallons per hour
Vapor Piping	Maximum allowable Operating Pressure: 20 psi
Liquid Piping	Maximum allowable Operating Pressure: 20 psi
<u>Safety Relief Valves</u>	
PSV 1503	Vacuum Set Point: 0.5 psig Pressure Set Point: 25 psig
PSV 2503	Vacuum Set Point: 0.5 psig Pressure Set Point: 25 psig
PSV 1506	Pressure Set Point: 125 psig
PSV 2506	Pressure Set Point: 125 psig
Pumps	Minimum Suction Pressure: 40 psi Maximum Discharge Pressure: 50 psi
<u>Codes and Standards</u>	
Piping Design	Class 150 Carbon Steel ANSI/ASME B31.1
Tank Design	ASTM SA-516 Gr 70 ASME Section VIII Div 1 U Stamped

4.4 Hazard Assessment

4.4.1 Process Hazards Analysis Team

A team composed of EHP and ENSR staff conducted a PHA on July 14, 2008 for the aqueous ammonia process at the facility. The team consisted of individuals experienced in operation and maintenance of the aqueous ammonia system, hazards analysis, safety management, environmental health and safety issues, and performance of a PHA using appropriate techniques. The individuals involved in the PHA are listed in **Table 4-2**. Documentation of the PHA is provided in **Appendix D**.

Table 4-2 Process Hazards Analysis Participant

Staff Member	Affiliation	Role
Sonnie Pineda	EHP	Plant Engineer
Ray Cruz	EHP	Environmental/Instrument and Control Technician
Ricardo Salinas	EHP	Lead Operator
Howard Balentine, P.E.	ENSR	Facilitator / Engineer
Roy Hauger, P.E.	ENSR	Seismic Assessment Engineer
Snighda Metha	ENSR	Scribe
Russ Kingsley	ENSR	Technical Reviewer (offsite)

4.4.2 Process Hazard Analysis Methodology

The ammonia system was divided into four nodes for analysis during the PHA as shown in **Table 4-3**. The specified nodes represent individual steps in the process including 1) aqueous ammonia delivery and unloading, 2) ammonia storage, 3) vaporization and delivery to the SCR, and 4) general non-chemical site hazards. Once the ammonia has been evaporated and diluted by the blower immediately ahead of the SCR, its concentration is too low to be considered hazardous under the RMP program.

Table 4-3 Nodes Examined in the Process Hazards Analysis

Node	Description	Number of Elements
1	Ammonia delivery truck unloading	9
2	Ammonia storage	22
3	Ammonia tank to evaporator	10
4	General site hazards	11
Total		52

ENSR staff conducted a tour of the ammonia system and the main control room at the EHP facility and also interviewed the EHP personnel including the Plant Engineer and Lead Operator. A combined "What-If" and "Guideword" approach was used to evaluate potential hazards in the ammonia system at the facility. Both approaches are approved methodology for conducting a PHA under the CalARP, RMP and OSHA PSM programs. The objective of this exercise was to identify the following:

1. Changes in the "as-built" ammonia system from the original design;
2. Incidents of ammonia release in the past;

3. Deviations and new safety measures or improvements adopted since the previous PHA conducted in 2003; and
4. Potential deviations from normal operating and design conditions that could lead to release of ammonia.

The PHA was conducted using a prepared list of potential deviations from normal operation based on PHA assessments performed for ammonia systems at other power plants and known accidents at other facilities. The prepared list was then tailored for the EHP facility and operations. The PHA took into account how administrative and engineering controls reduce the probability of the occurrence of ammonia releases and the potential severity or consequence of a release. No significant deviations from the SOPs, original plant design or previous PHA were observed during this PHA. There have been no instances of ammonia release and no changes to the system were required to improve the safety of the system. Note, however, that two recommendations were made to improve system safety, the installation of crash posts to protect the ammonia piping and the installation of piping supports to reduce likelihood of piping damage during an earthquake.

The four nodes were broken down into 52 individual elements for review and evaluation during the PHA. The individual elements were subsequently ranked on a qualitative basis in terms of five potential probabilities of occurrence (**Table 4-4**) and five potential risks (severity) (**Table 4-5**) posed by the potential failure of the process element. The joint probability-risk score for a given element determines the criticality of that element. The criticality for each potential failure was determined by entering the probability and risk scores into the risk-probability Criticality Matrix established for the PHA. The Criticality Matrix is shown in **Figure 4-1**.

Table 4-4 Probability of Releases Used in the Process Hazards Analysis

Score	Name	Probability
1	Frequent	0-1 years (more than once per year)
2	Periodic	1-10 years (once per decade)
3	Occasional	10-100 years (during facility lifetime)
4	Possible	100-1,000 years
5	Improbable	Not likely to occur at all

Table 4-5 Severity of Consequence

Score	Name	Severity
A	Catastrophic	Death or damage and production loss > \$1M
B	Severe	Multiple or severe injury or loss from \$500K to \$1M
C	Marginal	Lost time injury or loss from \$25K to \$500K
D	Negligible	First Aid injury, operational problems only, or loss < \$50K
E	Not a Hazard	No injury or loss

Criticality Matrix Used for Process Hazards Assessment

	Probability				
	1 Frequent (once per year or more)	2 Reasonably Probable (once per decade)	3 Occasional (sometime during facility lifetime)	4 Possible (unlikely but possible)	5 Improbable (unlikely to occur)
A Catastrophic (death or severe damage)	1A	2A	3A	4A	5A
B Severe (severe injury or major damage)	1B	2B	3B	4B	5B
C Marginal (lost time injury or moderate damage)	1C	2C	3C	4C	5C
D Negligible (first aid injury or minor damage)	1D	2D	3D	4D	5D
E Not a Hazard	1E	2E	3E	4E	5E
	Unacceptable				
	Undesirable				
	Acceptable with Controls				
	Acceptable / Improbable				

Figure 4-1 Process Hazards Analysis Criticality Matrix

The PHA Team did not identify any scenarios during the PHA with the three highest criticality rankings of Unacceptable, Undesirable, or Acceptable with Controls. All the reviewed elements had a criticality score of Acceptable or Not a Hazard (Improbable). **Table 4-6** presents a breakdown of the final criticalities by node.

Table 4-6 Results of the Process Hazard Analysis

Node	Node Description	Count of Findings by Criticality					
		1 UNACCEPTABLE	2 UNDESIRABLE	3 ACCEPTABLE W/ CONTROLS	4 ACCEPTABLE	5 NOT A HAZARD	TOTALS
1	Ammonia truck unloading				8	1	9
2	Ammonia storage tank				20	2	22
3	Ammonia tank to evaporator				10		10
4	General site hazards				11		11
Totals					49	3	52

4.4.3 External Events

During the PHA, external events that could damage the ammonia system and/or cause a release were evaluated. These external forces included fire, high wind, lightning, flooding, plane crash, turbine generated projectiles, sabotage, high summer temperature, nearby gas pipeline accident and soil shrink and consolidation. No external forces were judged to pose a significant risk to the ammonia system at the EHP facility, and no mitigation measures were identified that would reduce the probability or consequences of an ammonia release caused by an external event. A summary of the PHA findings related to External Events is provided in **Appendix D**.

4.4.4 Human Factors

During the PHA, human factors that could damage the ammonia system and/or cause a release were also evaluated. These factors included operation and maintenance errors, inadequate housekeeping, inadequate display of process and safety information, control room staffing and operation and operator training. The PHA team observed that EHP has taken adequate measures to reduce the possibility of human errors and prevent any damage to the ammonia system. Some of the observations made include the following:

1. Employee staffing - Potential employees undergo a thorough physical check-up before being hired to ensure that they do not suffer from disabilities like color blindness and hearing disability. This ensures that the operators are not only able to read the signs and labels posted all across the facility but are also able to read, and understand the alarm signals on the control room monitors and also hear the alarms.
2. Operator training - All operators are trained to work in different departments at the facility. This ensures that the plant is running smoothly even if some operators are absent. Each operator works on a 12-hour shift. The shifts are rotated on a regular basis.
3. Control Room Operation- The control room consists of several computers and monitors. These are controlled using several mice. At a first glance it seems to be a complicated system but it is a fool-proof system. Each monitor has a dedicated mouse and it is highly unlikely that an operator can give a wrong command or click the wrong mouse. Separate monitors are assigned to different systems and they are color coded to eliminate any error. The alarms are not only audible in the control room, but they are also color coded and blink on the monitors to ensure visibility to the operator.

4.4.5 Identification of Potential Improvements for Safety

Even though all the scenarios examined in the PHA had criticalities of acceptable or better, one scenario was identified in which improvements to plant safety could be made. This scenario involves addition of crash protection barriers in front of the aboveground pipelines carrying ammonia from pumps to the vaporizer (Node 3-7). While the facility has operated safely since startup due to some administrative controls, installation of physical controls like bollards would improve plant safety involving the ammonia system.

Current administrative controls prevent vehicle access near the aboveground portion of the pipeline and also limit vehicle speeds on the facility. The speed limits in turn limit the energy that is available during a collision to cause damage. In addition, the small diameter of the ammonia piping will limit the amount of ammonia that could spill in the event of a piping break. Also, the low vehicle speed will increase the amount of time available for a driver to avoid an impending collision. As such, administrative controls and hardware constraints limit the potential severity of an ammonia spill associated with a vehicle collision. However, such administrative controls require active actions by the driver to avoid a collision and may be insufficient to prevent a vehicle accident due to inattention.

Passive collision prevention devices should therefore be installed around the aboveground portion of the ammonia lines to prevent a collision by a plant or contractor vehicle. Such controls will increase the safety of the ammonia system at the EHP. The protection could be of the form of permanent bollards or removable

crash barriers, such as are used in road construction, placed on the outward sides of the skid. However, removable barriers would themselves pose a potential hazard each time they were moved.

EHP has already adopted some significant measures to improve the safety of the ammonia system. EHP has changed the ammonia vendor from Pacific Diazo to Argo. Pacific Diazo supplied the ammonia from its facility in Los Angeles, whereas Argo supplies ammonia from its facility in Bakersfield. This has reduced the transportation time and the risk of ammonia release during transportation. The manager of Argo visits the EHP facility three times per month to inspect the offloading process and verify the documents. EHP has also adopted measures like covering both ends of the hose, during off-loading, with a tape to prevent pressured release of ammonia.

The ammonia system has been operational for five years and no maintenance and safety related issues have been identified. The plant has not required any safety related upgrades. No significant deviations from the SOPs, original plant design or previous PHA were observed during this PHA. There have been no instances of ammonia release and no changes to the system were required to improve the safety of the system. The only difference between the "as-built" ammonia system and the original design is the installation of pressure dampeners to improve the operation of the plant.

4.5 Operating Procedures

EHP prepared a standard operating procedure (SOP) for the unloading and handling of aqueous ammonia, PPM 8.18. This procedure addresses the safety precautions, communications, personnel protective equipment, and emergency response procedures necessary for safe handling of aqueous ammonia and maintenance of associated equipment. The latest revision of the SOP for the aqueous ammonia system was November 3, 2006. The SOP was reviewed most recently on July 14, 2008. A copy of the SOP is provided in **Appendix A**.

4.6 Training

EHP operators receive training and re-qualification in accordance with the Safety Management Plan for Ammonia Delivery, PPM 8.18.E3, not less than annually in all relevant ammonia handling, safety and emergency response procedures. Training records are maintained by the facility in personnel files as required by the Occupational Safety and Health Administration (OSHA). EHP reviewed the training program most recently in July 2008.

Supplier training and certifications are verified not less than annually by EHP. Qualification requirements are a condition of contract with any supplier.

4.7 Maintenance

EHP maintains the mechanical integrity of the ammonia system to ensure it meets design specifications and operates safely. The purpose of this mechanical integrity program is to ensure that the components used to process, store, and handle ammonia are maintained and operated safely so that they remain in good working order and leak free.

The facility conducts ongoing inspections, testing, and replacement of the critical items in the ammonia process performed by maintenance staff and reviewed by the Safety Coordinator. The basic inspection and testing procedures that are utilized at the facility are described herein. Replacement or refurbishment of equipment after a specified use period is also documented. The maintenance staff and operators are trained in the aspects of the ammonia system that are relevant to the employee's job task.

The facility has devised a specific maintenance program for the ammonia system. This program consists of the following tasks/elements:

- A Daily System Log to Record Operational Parameters of the System;

- Periodic Routine Operational Inspection and Testing;
- A Continuing Maintenance and Repair Program; and
- Keeping records of inspections in an accessible location.

The general rationale for the program is to provide:

1. Data on a daily basis that will alert the operator to changes in the process parameters that might indicate that the process is not performing properly which may indicate that further investigation or a more detailed inspection may be required;
2. Periodic testing and inspections to find and identify any deterioration in the systems that could lead to operational or safety problems;
3. Periodic maintenance and or replacement of critical components; and
4. Periodic audit inspections by trained personnel, not involved in the daily operation of the process, to verify that the processes are being maintained and operated with the quality and competence that is expected for EHP.

The maintenance or operations staff performs periodic inspections of the ammonia process equipment. In general, equipment is expected to last the lifetime of the plant. Regular visual inspection is the industry's standard method. The ammonia storage tank is an American Society of Mechanical Engineers (ASME)-coded vessel that is significantly over-designed for its intended use and, if taken out of service for maintenance, is pressure tested prior to refilling with aqueous ammonia. Throughout the maintenance, inspection, and operation of the ammonia equipment, the manufacturer's recommendations are followed.

4.8 Compliance Audits

The previous RMP for EHP was a Program 1 RMP. Under CalARP regulations, Program 1 facilities are not required to conduct program audits. The first RMP audit will be conducted within three years of the date of this RMP, and every three years thereafter. EHP will conduct the audits utilizing the EPA Guidance for Auditing Risk Management Plans and Programs.

4.9 Incident Investigation

EHP conducts incident investigations in accordance with PPM 8.03 – Incident Reporting. In the event of any discrepancy between this summary and PPM 8.03, PPM 8.03 is the controlling document.

An incident investigation must take place whenever an incident occurs and it must be completed within five (5) working days. The investigation will be conducted using the Incident Investigation Report and will be investigated by a committee of responsible Team Members and is meant to be fact finding, not fault finding. The purpose is to learn the true cause so that similar incidents can be prevented and determine facts bearing on legal liability. Another purpose of the investigation or fact finding is to prepare accurate documentation in case of possible litigation. From the investigation, a written report is completed for all serious incidents. The Team Member who investigates the incident completes the report. The report will contain the following information:

1. Detailed description of the incident, including answers to the following:
 - a. What happened?
 - b. Who (individual(s) and/or company(ies)) was/were involved?

- c. When did the incident occur?
- d. What injuries/property damage resulted?
- 2. Photographs taken.
- 3. Diagrams drawn of the scene.
- 4. Statement(s) from witness(es).
- 5. Conclusions should be developed regarding the physical cause of the incident, but should not deal with the placement of legal liability upon any party.

A copy of PPM 8.03 and the Incident Investigation Report is provided in **Appendix E**.

4.10 External Events Analysis Information

EHP contracted with ENSR Corporation to conduct a seismic analysis for the aqueous ammonia system in July 2008. The seismic evaluation was prepared in accordance with the Guidance for CalARP Seismic Assessments (CalARP, 2004). The guidance recommends that a Tier 1 seismic assessment report should at least contain the following:

1. Reason for performing the seismic evaluation;
2. Description of the scope of the structural/seismic hazard evaluated;
3. Characterization of the soil profile at the site;
4. Discussion of determination of the seismic hazards and the basis for the determination;
5. For each reviewed item, an assessment of its structural adequacy to resist the estimated seismic ground shaking of the site;
6. When obvious, recommendations for conceptual measures that will alleviate seismic deficiencies;
7. Recommendation for further study or detailed design for items that appear to be seismically deficient or for items which are clearly deficient but for which an adequate seismic risk reduction measure is not obvious;
8. Assessment of existing detection and mitigate systems and where appropriate, recommendations for new mitigative systems;
9. Signature and stamp from the Responsible Engineer;
10. Discussion of all deficiencies and recommendations identified during this evaluation regardless of whether or not they were contained in previous evaluation findings.

The seismic analysis concluded that:

- The storage tanks, skids and associated piping are deemed to have adequate structural integrity to resist the estimated seismic ground shaking of the site.
- The structural integrity of these systems was not observed to be compromised. Therefore, no recommendations for conceptual measures are offered.

- The ammonia feed pipe that connects the vaporizer to the SCR includes a 9.5-foot span between structural supports. ANSI recommends a maximum span of 8-feet for 1-inch pipe in water service. Although there are no standards published specifically for ammonia piping, the supports for ammonia piping should be spaced no less frequently than those for water piping.

A recommendation that intermediate supports be added to this section of the ammonia feed piping was offered. Each support should allow the pipe to move longitudinally for thermal expansion/contraction movements and each support should limit excessive horizontal movements (transverse to the longitudinal axis of the pipe), such that if the pipe moved from an earthquake, it would not fall off of the support.

No recommendations for further seismic study or detailed design were offered. The mitigation measures were determined to be adequate; therefore, no recommendations for new mitigative systems were offered.

The updated seismic analysis, signed by a California-registered Professional Engineer is provided in **Appendix F**.

5.0 Emergency Response Program

EHP maintains an Emergency Response Plan as PPM8.02. External emergency response for the EHP facility is coordinated with the KCFD. The facility has a written emergency response plan that covers potential ammonia spills from the EHP. The EHP facility coordinates emergency response planning with the KCFD. Specific procedures are also in place for notifying the federal, state, and local authorities, if a reportable spill occurs.

The EHP Emergency Response Plan is reviewed annually and was last updated February 14, 2008. The procedure is applicable to all releases of ammonia, regardless of size. EHP conducts emergency response training of facility personnel annually. A copy of the Emergency Response Procedure for an Aqueous Ammonia Release is provided in **Appendix B**.

The emergency response plan specifies immediate actions to be taken during and after a spill event. These actions include:

- Notification of the Lead Operator by the person who first notices the release event. The Lead Operator in turn will notify the Emergency Coordinator.
- The Emergency Coordinator will initiate notification of the applicable federal, state, and local agencies.
- Movement of all non-essential personnel to a safe assembly area upwind of the release. A wind sock at the adjoining gas plant can be used to assess wind direction during a spill event.
- Notification of plant personnel of the incident, determination if evacuation is necessary, and if necessary, implementation of an evacuation.
- Donning of PPE by the EHP response team and gathering of equipment prior to approaching the spill site.
- Shut-off of the spill if still underway, containment of the spill to prevent or minimize its movement offsite, and clean-up of the spill.
- Completion of follow-on notifications to federal, state, and local agencies as required.

6.0 Registration

The EPA program *RMP*Submit*TM prepares forms equivalent to EPA Form 8700-25. Because the facility is exempt from the federal RMP requirements due to the use of aqueous ammonia of less than 20 percent concentration, federal submittal of this RMP information for EHP is not required and, therefore, *RMP*Submit*TM was not prepared.



Elk Hills Power

RECEIVED

NOV - 6 2006

November 02, 2006

Mr. Dan Starkey
Hazardous Material Specialist
2700 "M" Street, Suite 300
Bakersfield, CA 93301-2370

KERN COUNTY
ENVIRONMENTAL HEALTH SERVICES

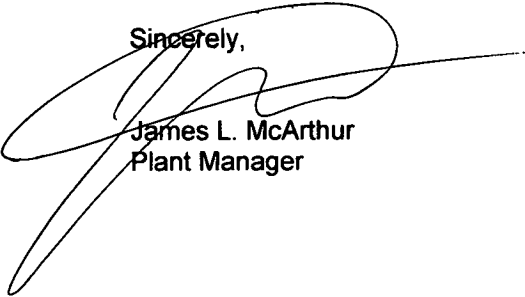
Subject: Risk Management Plan five year Resubmission

Dear Mr. Starkey:

Elk Hills Power is pleased to submit to Kern County Environmental Health Services Department the Elk Hills Power Risk Management Plan. This RMP is a resubmission requirement every five (5) years under Cal-ARP CCR Title 19. Attached is the RMP Submit 2004 disc copy, hard copy and the signed Certification Letter.

Elk Hills Power is not subject to Federal RMP requirement, therefore, we do not have an EPA ID facility number. Per your request, EHP has used the RMP Submit program for the submittal of the information required by Cal-ARP program. However, the RMP Submit program has certain limitations which require us to indicate that we have ammonia with a concentration of 20% or greater (refer to sections 1.17.c.2 and 2.1.a) when this is not the case. The ammonia used on site is only 19% solution as indicated in Section 2.1.b and the Process Description. All other information provided is true, accurate and complete.

Sincerely,



James L. McArthur
Plant Manager

Attachment:
RMP Submit 2004 Disc
RMP Submit 2004 Hard Copy
Certification Letter

Ecc:
J. Matranga - OEVC
O. Simoes - SemGen
R. Kelly - SemGlob
M. Teague - SemGlob

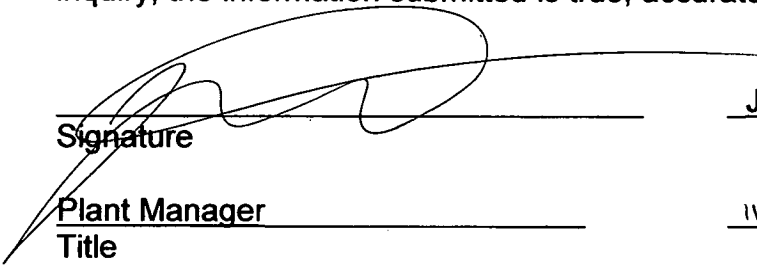
Certification Letter

Certification Statement for Program 1 Process(es)

Based on the criteria in 40 CFR 68.10, the distance to the specified endpoint for the worst-case accidental release scenario for the following process(es) is less than the distance to the nearest public receptor:

- [Ammonia Process]

Within the past five years, the process(es) has (have) had no accidental release that caused offsite impacts provided in the risk management program rule (40 CFR 68.10(b)(1)). No additional measures are necessary to prevent offsite impacts from accidental releases. In the event of fire, explosion, or a release of a regulated substance from the process(es), entry within the distance to the specified endpoints may pose a danger to public emergency responders. Additionally, uncontrolled runaway reactions may pose a danger to public emergency responder entering the distance-to-endpoint. Therefore, public emergency responders should not enter this area except as arranged with the emergency contact indicated in the RMP. The undersigned certifies that, to the best of my knowledge, information, and belief, formed after reasonable inquiry, the information submitted is true, accurate, and complete.


Signature

James L. McArthur
Print Name

Plant Manager
Title

11/02/2006
Date

EPA Facility ID # _C _A _R _0 _0 _0 _1 _0 _8 _4 _9 _8 _



**ABOVEGROUND PETROLEUM STORAGE ACT
INSPECTION REPORT**

Facility Name: ELK HILLS POWER, LLC		Facility ID: FA0004335
Site Address: 4026 Skyline Rd TUPMAN, CA 93276		CERS ID: 10235623
Phone: (661) 763-2730	Consent Granted By:	Inspection Date: 03/04/2015
Inspection Type: ☒ Routine ☐ Reinspection		Reinspection required: ☐ Yes ☒ No
Facility Classification:		

Tier I Qualified Facility	Tier II Qualified Facility	Non Qualified Facility
1,320 gal. - 10,000 gal. cumulative liquid petroleum storage capacity All containers 4,999 gal. capacity or smaller	1,320 gal. - 10,000 gal. cumulative liquid petroleum storage capacity One or more containers 5,000 gal. capacity or greater	10,001 gal. or more cumulative liquid petroleum storage capacity Spill Prevention, Control, & Countermeasure (SPCC) plan must be certified by a Professional Engineer (PE)

CONDITIONALLY EXEMPT FROM APSA REQUIREMENTS*:

FARMS DAIRIES NURSERIES LOGGING SITES CONSTRUCTION SITES

No AST Exceeds 20,000 Gallons and the cumulative storage capacity of the tank facility does not exceed 100,000 Gallons

Failure to comply with the following will result in loss of Exempt status

- * Conduct daily visual inspections of any storage tank storing a petroleum product
- * Allow the CUPA to conduct a periodic inspection of the tank facility
- * Install a secondary containment for each tank or group of tanks (if required by the CUPA)

** While farms, nurseries, logging sites, or construction sites are conditionally exempt from the requirements to prepare an SPCC Plan under APSA, these facilities are not exempt from federal SPCC requirements enforced by US EPA.*

OIL PRODUCTION FACILITIES

If a tank or other facility is used for a purpose other than oil and gas production, such as a diesel tank in a maintenance yard to service trucks that are used on the lease, then it is generally not a facility attendant to oil and gas production and therefore is not under the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources's (DOGGR) jurisdiction

General Violations

V	Viol #	Summary	Code
	H004	FAILURE TO PREPARE/IMPLEMENT A SPCC PLAN	40 CFR 112.3; HSC 6.67 25270.4.5(a)
	H087	FAILURE TO MAINTAIN A VALID PERMIT	HSC 6.11 25404.1
	H090	FAILURE TO SUBMIT AN ANNUAL TANK STATEMENT	HSC 6.67 25270.6(a)(1), 25270.6(a)(2)
	H091	FAILURE TO REPORT SPILLS OF ONE BARREL OR MORE	HSC 6.67 25270.8
	H092	FAILURE TO PAY FEES	HSC 6.67 25270.6(b)

Inspector: KEVIN BEAHM

Inspection Date: 03/04/2015

Spill Prevention, Control, & Countermeasure (SPCC) Plan Violations

V	Viol #	Summary	Code
	H001	SPCC PLAN IS NOT CERTIFIED BY A PROFESSIONAL ENGINEER (IF REQUIRED)	40 CFR 112.3(d); HSC 6.67 25270.4.5(a)
	H002	FAILURE TO MAINTAIN SPCC PLAN ON SITE	40 CFR 112.3(e)(1); HSC 6.67 25270.4.5(a)
	H005	FAILURE TO AMEND PLAN	40 CFR 112.5(a); HSC 6.67 25270.4.5(a)
	H006	FAILURE TO COMPLETE FIVE-YEAR PLAN REVIEW	40 CFR 112.5(b); HSC 6.67 25270.4.5(a)
	H008	FAILURE TO HAVE CERTIFICATION FOR TECHNICAL AMENDMENTS	40 CFR 112.5(c), 112.6(a)(2); HSC 6.67 25270.4.5(a)
	H022	FAILURE TO ADEQUATELY DESCRIBE THE FACILITY LAYOUT IN SPCC PLAN	40 CFR 112.7(a)(3); HSC 6.67 25270.4.5(a)
	H023	FAILURE TO ADEQUATELY DISCUSS FACILITY TRANSFER OPERATIONS	40 CFR 112.7(a)(3), 112.8(a), 112.8(d); HSC 6.67 25270.4.5(a)
	H024	SPCC PLAN DOES NOT MEET BASIC REQUIREMENTS	40 CFR 112.7, 112.7(a)(1); HSC 6.67 25270.4.5(a)
	H025	INCOMPLETE/INADEQUATE FACILITY DIAGRAM	40 CFR 112.7(a)(3); HSC 6.67 25270.4.5(a)
	H026	FAILURE TO ADEQUATELY DISCUSS REPORTING PROCEDURES FOR A DISCHARGE	40 CFR 112.7(a)(4); HSC 6.67 25270.4.5(a)
	H027	FAILURE TO ADEQUATELY ORGANIZE DISCHARGE PROCEDURES	40 CFR 112.7(a)(5); HSC 6.67 25270.4.5(a)
	H028	FAILURE TO PREDICT THE EXTENT OF A DISCHARGE WITHIN THE SPCC PLAN	40 CFR 112.7(b); HSC 6.67 25270.4.5(a)
	H029	FAILURE TO DISCUSS APPROPRIATE CONTAINMENT	40 CFR 112.7(c); HSC 6.67 25270.4.5(a)
	H030	IMPRACTICABILITY CLAIMS OF APPROPRIATE CONTAINMENT NOT DEMONSTRATED	40 CFR 112.7(d); HSC 25270.4.5(a)
	H035	NO PERSON DESIGNATED FOR DISCHARGE PREVENTION	40 CFR 112.7(f)(2); HSC 6.67 25270.4.5(a)
	H037	FAILURE TO DISCRIBE THE FACILITY'S SECURITY MEASURES	40 CFR 112.7(g); HSC 6.67 25270.4.5(a)
	H045	FAILURE TO ADEQUATELY DISCUSS FACILITY DRAINAGE	40 CFR 112.8(b); HSC 6.67 25270.4.5(a)
	H061	FAILURE TO ADEQUATELY DISCUSS BULK STORAGE TANKS	40 CFR 112.8(c); HSC 6.67 25270.4.5(a)

Site Inspection Violations

V	Viol #	Summary	Code
	H038	FAILURE TO IMPLEMENT SECURITY MEASURES FOR FACILITY	40 CFR 112.7(g); HSC 6.67 25270.4.5(a)
	H039	FAILURE TO ADEQUATELY DISCUSS LOADING/UNLOADING RACKS	40 CFR 112.7(h); HSC 6.67 25270.4.5(a)
	H040	FAILURE TO MAINTAIN SECONDARY CONTAINMENT SYSTEMS	40 CFR 112.7(h)(1); HSC 6.67 25270.4.5(a)
	H041	FAILURE TO PROVIDE WARNING TO PREVENT VEHICLE DEPARTURE	40 CFR 112.7(h)(2); HSC 6.67 25270.4.5(a)
	H042	FAILURE TO INSPECT DRAINS AND OUTLETS	40 CFR 112.7(h)(2); HSC 6.67 25270.4.5(a)
	H046	VALVES FOR DRAINAGE ARE UNCONTROLLED	40 CFR 112.8(b)(2); HSC 6.67 25270.4.5(a)
	H058	INADEQUATE DRAINAGE	40 CFR 112.8(b)(3), 112.8(b)(4); HSC 6.67 25270.4.5(a)
	H062	TANKS INCOMPATIBLE WITH STORED MATERIALS	40 CFR 112.8(c)(1); HSC 6.67 25270.4.5(a)
	H063	INADEQUATE SECONDARY CONTAINMENT	40 CFR 112.8(c)(2); HSC 6.67 25270.4.5(a)
	H064	CONTAINMENT NOT SUFFICIENTLY IMPERVIOUS TO OIL	40 CFR 112.8(c)(2); HSC 6.67 25270.4.5(a)
	H065	FAILURE TO CLOSE CONTAINMENT BYPASS VALVES WHEN NOT DRAINING RAINWATER	40 CFR 112.8(c)(3)(i); HSC 6.67 25270.4.5(a)
	H066	FAILURE TO INSPECT RUN-OFF FROM CONTAINMENT	40 CFR 112.8(c)(3)(ii); HSC 6.67 25270.4.5(a)
	H067	VALVES OPERATED WITHOUT RESPONSIBLE SUPERVISION	40 CFR 112.8(c)(3)(iii); HSC 6.67 25270.4.5(a)
	H069	FAILURE TO HAVE ADEQUATE CORROSION PROTECTION	40 CFR 112.8(c)(5); HSC 6.67 25270.4.5(a)

Inspector: KEVIN BEAHMInspection Date: 03/04/2015

Site Inspection Violations (continued)

V	Viol #	Summary	Code
	H074	CONTAINER INSTALLATION NOT PROPERLY ENGINEERED WITH HIGH LEVEL MONITORING DEVICE	40 CFR 112.8(c)(8)(i), 112.8(c)(8)(ii), 112.8(c)(8)(iii), 112.8(c)(8)(iv); HSC 6.67 25270.4.5(a)
	H075	LIQUID LEVEL SENSING DEVICES NOT TESTED	40 CFR 112.8(c)(8)(v); HSC 6.67 25270.4.5(a)
	H077	LEAKS NOT IMMEDIATELY ADDRESSED	40 CFR 112.8(c)(10); HSC 6.67 25270.4.5(a)
	H078	INADEQUATE SECONDARY CONTAINMENT SYSTEMS-PORTABLE TANKS	40 CFR 112.8(c)(11); HSC 6.67 25270.4.5(a)
	H079	IMPROPER MOBILE TANK POSITIONING	40 CFR 112.8(c)(11); HSC 6.67 25270.4.5(a)
	H080	BURIED PIPING NOT REPAIRED WHEN DETERIORATION FOUND	40 CFR 112.8(d)(1); HSC 6.67 25270.4.5(a)
	H081	BURIED PIPING IS NOT CATHODICALLY PROTECTED	40 CFR 112.8(d)(1); HSC 6.67 25270.4.5(a)
	H082	STAND-BY PIPING IS NOT CAPPED AND/OR LABELED	40 CFR 112.8(d)(2); HSC 6.67 25270.4.5(a)
	H084	FAILURE TO REGULARLY INSPECT ABOVEGROUND PIPING	40 CFR 112.8(d)(4); HSC 6.67 25270.4.5(a)
	H086	FAILURE TO WARN VEHICLES ABOUT ABOVEGROUND PIPING OR TRANSFER OPERATIONS	40 CFR 112.8(d)(5); HSC 6.67 25270.4.5(a)

Supplemental to SPCC Plan Violations

V	Viol #	Summary	Code
	H033	INADEQUATE INSPECTIONS/TESTS AND/OR WRITTEN RECORDS NOT MAINTAINED	40 CFR 112.7(e); HSC 6.67 25270.4.5(a)
	H034	FAILURE TO MEET EMPLOYEE TRAINING REQUIREMENTS	22 CCR 23 66273.36
	H036	FAILURE TO SCHEDULE AND CONDUCT SPILL PREVENTION BRIEFINGS	40 CFR 112.7(f)(1); HSC 6.67 25270.4.5(a)
	H068	FAILURE TO MAINTAIN ADEQUATE DRAINAGE RECORDS	40 CFR 112.8(c)(3)(iv); HSC 6.67 25270.4.5(a)
	H070	FAILURE TO MAINTAIN INSPECTION RECORDS	40 CFR 112.8(c)(6); HSC 6.67 25270.4.5(a)
	H072	TANKS NOT INTEGRITY TESTED PER INDUSTRY STANDARDS	40 CFR 112.8(c)(6); HSC 6.67 25270.4.5(a)
	H085	BURIED PIPING NOT TESTED AT INSTALLATION, MODIFICATION, CONSTRUCTION, RELOCATION, OR REPLACEMENT	40 CFR 112.8(d)(4); HSC 6.67 25270.4.5(a)

Exempt Facility Violations

V	Viol #	Summary	Code
	H093	EXEMPT FACILITY - NO DAILY INSPECTIONS	HSC 6.67 25270.4.5(b)(1)
	H094	EXEMPT FACILITY - FAILURE OF AN EXEMPT FACILITY TO ALLOW CUPA TO CONDUCT PERIODIC INSPECTIONS	HSC 6.67 25270.4.5(b)(2)
	H095	EXEMPT FACILITY-NO SECONDARY CONTAINMENT	HSC 6.67 25270.4.5(b)(3)

Inspector: KEVIN BEAHM

Inspection Date: 03/04/2015

SUMMARY OF OBSERVATIONS/VIOLATIONS

- ☒ No violations of aboveground petroleum storage act laws/regulations were discovered. KERN CUPA greatly appreciates your efforts to comply with all the laws and regulations applicable to your facility.
- ☐ Violations were observed/discovered as listed below. All violations must be corrected by implementing the corrective action listed by each violation. If you disagree with any of the violations or corrective actions required, please inform the CUPA in writing.

ALL VIOLATIONS MUST BE CORRECTED WITHIN 30 DAYS OR AS SPECIFIED. CUPA must be informed in writing with a certification that compliance has been achieved. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be reinspected any time during normal business hours. If a second reinspection becomes necessary due to non compliance, a reinspection charge of \$100.00 per hour may be charged to the facility.

You may request a meeting with the Program Manager to discuss the inspection findings and/or the proposed corrective actions. The issuance of this Summary of Violations does not preclude the CUPA from taking administrative, civil, or criminal action.

Facility Name: ELK HILLS POWER, LLC

Facility ID: FA0004335

CERS ID: 10235623

INSPECTION COMMENTS:

COMMENTS: Go to <http://www.co.kern.ca.us/eh/> (Hazardous Materials) for forms and information.



Inspector: KEVIN BEAHM

Signature of Facility Representative:

Inspection Date: 03/04/2015



HAZARDOUS MATERIALS BUSINESS PLAN (HMBP) INSPECTION REPORT

Facility Name: ELK HILLS POWER, LLC		Facility ID: FA0004335
Site Address: 4026 Skyline Rd TUPMAN, CA 93276		CERS ID: 10235623
Phone: (661) 763-2730	Consent Granted By:	Inspection Date: 03/04/2015
Inspection Type: ☒ Routine ☐ Reinspection		Reinspection required: ☐ Yes ☒ No
Inspection Element: BUS PLAN LARGE HIGH RISK >5 UNITS		

File/CERS Review Violations

V	Viol #	Summary	Code
	H335	Failure to adequately complete and submit a HMBP into the California Environmental Reporting System (CERS)	HSC 6.95 25505, 25508(a)(1), 25508(d)
	H344	Failure to complete and submit the Business Activities Page and/or Business Owner Operator Identification Page in CERS	HSC 6.95 25508(a)(1); 19 CCR 4 2729.2(a)(1);
	H342	Failure to complete and submit hazardous material inventory information for all reportable hazardous materials on site in CERS	HSC 6.95 25505(a)(1), 25506, 25508(a)(1)
	H341	Failure to annually review and electronically certify that the business plan is complete, accurate, and up-to-date in CERS	HSC 6.95 25508(c), 25508.2
	H346	Failure to complete and submit a site map with all required content in CERS	HSC 6.95 25505(a)(2), 25508(a)(1)
	H347	Failure to submit an adequate emergency response plan and procedures in CERS	HSC 6.95 25505(a)(3), 25508(a)(1)
	H353	Failure to submit an adequate training program in CERS	HSC 6.95 25505(a)(4), 25508(a)(1)
	H340	Failure to notify property owner in writing that a HMBP is required	HSC 6.95 25505.1
	H336	Failure to provide property owner a copy of the HMBP upon request	HSC 6.95 25505.1

Onsite Inspection Violations

V	Viol #	Summary	Code
	H334	Failure to adequately establish and implement a HMBP	HSC 6.95 25507
	H343	Failure to revise HMBP in CERS within 30 days upon a substantial change in the handler's operation	HSC 6.95 25508.1(f)
	H345	Failure to update Facility Information and/or Hazardous Materials Inventory in CERS within 30 days upon a significant change	HSC 6.95 25508.1(a)-(e)
	H348	Failure to provide initial and annual safety training to all employees and/or failure to document and maintain training records for 3 years	HSC 6.95 25505(a)(4)
	H338	Failure to report a release or threatened release of a hazardous material to the CUPA and to California Office of Emergency Services	HSC 6.95 25510(a)

Inspector: KEVIN BEAHM

Inspection Date: 03/04/2015

CONDITIONAL EXEMPTIONS FROM REPORTING REQUIREMENTS

Agricultural handlers are conditionally exempt from electronically submitting Emergency Response and Employee Training Plans in CERS if the following requirements are met:

- Owner/Operator annually submits the Facility Information and Hazardous Materials Inventory electronically into CERS
- Each location/building, where hazardous materials (i.e. pesticides, petroleum products, fertilizers, etc.) are stored, is posted with warning signs that meet the following requirements:
 - Shall be conspicuous and visible from any direction of probable approach
 - Shall be of such size that it is readable from 25 feet and shall be labeled as follows:

DANGER HAZARDOUS MATERIAL STORAGE AREA
 (the hazardous materials stored within shall be noted by category
 [i.e. pesticides, petroleum products, fertilizers, etc.])
ALL UNAUTHORIZED PERSONS-KEEP OUT - IN AN EMERGENCY, CONTACT:
 (list the name and phone number of an emergency contact person(s))

- Shall be repeated in an appropriate language other than English when persons who do not understand the English language may enter the posted location/building
- Owner/Operator provides training for all new employees and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material, including, but not limited to, familiarity with the emergency plans and procedures

Exempt Facility Violations

V	Viol #	Summary	Code
	H760	Failure to submit Emergency Response/Contingency Plan in CERS when not meeting agricultural handler exemption requirements	HSC 6.95 25507.1, 25508(a)(1); 19 CCR 4 2733, 2734
	H758	Failure to submit Employee Training Plan in CERS when not meeting agricultural handler exemption requirements	HSC 6.95 25507.1, 25508(a)(1); 19 CCR 4 2733, 2734
	H759	Failure to establish and submit a HMBP in CERS when not meeting remote unstaffed facility exemption requirements	HSC 6.95 25505, 25506, 25507, 25507.2, 25508(a)(1)

SUMMARY OF OBSERVATIONS/VIOLATIONS

☒ No violations of hazardous materials business plan laws/regulations were discovered. KERN CUPA greatly appreciates your efforts to comply with all the laws and regulations applicable to your facility.

☐ Violations were observed/discovered as listed below. **ALL VIOLATIONS MUST BE CORRECTED WITHIN 30 DAYS OR AS SPECIFIED.** CUPA must be informed in writing with a certification that compliance has been achieved. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be reinspected any time during normal business hours. If a second reinspection becomes necessary due to non compliance, a reinspection charge of \$100.00 per hour may be charged to the facility.

You may request a meeting with the Program Manager to discuss the inspection findings and/or the proposed corrective actions. The issuance of this Summary of Violations does not preclude the CUPA from taking administrative, civil, or criminal action.

INSPECTION COMMENTS:

COMMENTS: Go to <http://www.co.kern.ca.us/eh/> (Hazardous Materials) for forms and information.

Kevin Beahm

Inspector: KEVIN BEAHM

Inspection Date: 03/04/2015

Signature of Facility Representative:



HAZARDOUS WASTE GENERATOR INSPECTION REPORT

Facility Name: ELK HILLS POWER, LLC		Facility ID: FA0004335
Site Address: 4026 Skyline Rd TUPMAN, CA 93276		CERS ID: 10235623
		EPA ID #: CAR000108498
Phone: (661) 763-2730	Consent Granted By:	Inspection Date: 03/04/2015
Inspection Type: ☒ Routine ☐ Reinspection		Reinspection required: ☐ Yes ☒ No

Conditionally Exempt Small Quantity Generator (CESQG)	Small Quantity Generator (SQG)	Large Quantity Generator (LQG)
40 CFR §261.5(a) & (e)	22 CCR § 66262.34(d), 66262.34(d)(3); HSC § 25123.3(h)(1)	22 CCR § 66262.34; HSC § 25123.3
. 100 kg or . 220 lbs or . 27 gal per month	. 100 kg but . 1,000 kg or . 220 lbs but . 2,240 lbs or . 27 gal but . 270 gal per month	. 1000 kg or . 2,240 lbs or . 270 gal per month
. 1 kg or . 2.2 lbs or . 0.3 gals per month acute or extremely hazardous waste	. 1 kg or . 2.2 lbs or . 0.3 gals per month acute or extremely hazardous waste	. 1 kg or . 2.2 lbs or . 0.3 gals per month acute or extremely hazardous waste
. 100 kg or . 220 lbs or . 27 gal per month acute spill residue or soil		. 100 kg or . 220 lbs or . 27 gals per month acute spill residue or soil
Accumulation Time Limits		
22 CCR § 66262.34(b)	22 CCR § 66262.34(d)(2), 66262.34(d)(3)	22 CCR 66262.34(a)
90 days from date 100 kg limit is reached	≤180 days or ≤270 days (if greater than 200 miles)	≤90 days

General Violations - All Generators

V	VIOL #	Summary	Code
	H235	OPERATING WITHOUT A PERMIT	HSC 6.11 25404.1
	H236	EPA ID NUMBER INCORRECT OR INACTIVE	22 CCR 12 66262.12
	H248	MANIFEST/CONSOLIDATED MANIFEST NOT MAINTAINED FOR 3 YEARS	22 CCR 12 66262.40(a); HSC 6.5 25160.2
	H246	FAILURE OF OWNER/OPERATOR TO SEND GENERATOR MANIFEST COPIES TO DTSC WITHIN 30 DAYS	22 CCR 12 66262.23(a)(4)
	H251	IMPROPER HAZARDOUS WASTE DETERMINATION	22 CCR 12 66262.11, 66262.40(c)
	H260	HAZARDOUS WASTE LABELING STANDARDS NOT MET	22 CCR 12 66262.34(f)
	H277	OPERATING RECKLESSLY UNDER PERMIT	HSC 6.5 25186, 25186.2
	H296	USED OIL & FUEL FILTER HANDLING REQUIREMENTS NOT FOLLOWED	22 CCR 16 66266.130
	H297	HAZARDOUS WASTE NOT TRANSPORTED BY REGISTERED HAULER	22 CCR 13 66263.41; HSC 6.5 25163(a)
	H298	IMPROPER DISPOSAL OF HAZARDOUS WASTE	HSC 6.5 25189.5(a)
	H302	FAILURE TO MEET EXCLUDED RECYCLABLE MATERIALS REQUIREMENTS	HSC 6.5 25143.2, 25143.9
	E001	IMPROPER EMPTY CONTAINER MANAGEMENT	22 CCR 66261.7(e),(f),(i)

Inspector: KEVIN BEAHM

Inspection Date: 03/04/2015

Conditionally Exempt Small Quantity Generator - Violations

V	VIOL #	Summary	Code
	C001	IMPROPER TRANSPORTATION OF WASTE TO FACILITY	HSC 25163(c)
	C242	FAILURE TO CONDUCT EMPLOYEE TRAINING	22 CCR 12 66262.34(d)(2); 40 CFR 262.34(d)(5)(iii)
	C267	TANK/CONTAINER IN POOR CONDITION OR DAMAGED	22 CCR 12 66262.34(d)(2); 40 CFR 265.171
	C269	HAZARDOUS WASTE CONTAINER INCOMPATIBLE WITH MATERIAL STORED	22 CCR 12 66262.34(d)(2); 40 CFR 265.172
	C271	OPEN HAZARDOUS WASTE TANK/CONTAINER	22 CCR 12 66262.34(d)(2); 40 CFR 265.173
	C273	FAILURE TO CONDUCT WEEKLY HAZARDOUS WASTE STORAGE AREA INSPECTION	22 CCR 12 66262.34(d)(2); 40 CFR 265.174
	C299	FAILURE TO IMPLEMENT EMERGENCY PLAN	22 CCR 12 66262.34(d)(2); 40 CFR 262.34(d)(5)(ii)
	C303	FACILITY NOT MAINTAINED TO PREVENT FIRE/EXPLOSION/RELEASE	22 CCR 12 66262.34(d)(2); 40 CFR 265.31
	C305	FAILURE TO MAINTAIN FACILITY EMERGENCY EQUIPMENT	22 CCR 12 66262.34(d)(2); 40 CFR 265.33
	C306	FAILURE TO HAVE EMERGENCY EQUIPMENT	22 CCR 12 66262.34(d)(2); 40 CFR 265.32
	C308	INADEQUATE AISLE SPACE	22 CCR 12 66262.34(d)(2); 40 CFR 265.35
	H259	HAZARDOUS WASTE ACCUMULATION TIME LIMIT EXCEEDED	22 CCR 12 66262.34(b)(1)

Small Quantity Generator - Violations

V	VIOL #	Summary	Code
	H242	FAILURE TO CONDUCT EMPLOYEE TRAINING	22 CCR 12 66262.34(d)(2); 40 CFR 262.34(d)(5)(iii)
	H256	HAZARDOUS WASTE ACCUMULATION TIME LIMIT EXCEEDED	22 CCR 66262.34(d)
	H267	TANK/CONTAINER IN POOR CONDITION OR DAMAGED	22 CCR 12 66262.34(d)(2); 40 CFR 265.171
	H269	HAZARDOUS WASTE CONTAINER INCOMPATIBLE WITH MATERIAL STORED	22 CCR 12 66262.34(d)(2); 40 CFR 265.172
	H271	OPEN HAZARDOUS WASTE TANK/CONTAINER	22 CCR 12 66262.34(d)(2); 40 CFR 265.173
	H273	FAILURE TO CONDUCT WEEKLY HAZARDOUS WASTE STORAGE AREA INSPECTION	22 CCR 12 66262.34(d)(2); 40 CFR 265.174
	H276	INCOMPATIBLE WASTE STORAGE	22 CCR 12 66262.34(d)(2); 40 CFR 265.17(b), 265.177
	H281	FAILURE TO COMPLETE DAILY TANK, MONITORING, AND DISCHARGE INSPECTIONS	22 CCR 66262.34(d)(2); 40 CFR 265.201(c)(1), 265.201(c)(2), 265.201(c)(3)
	H299	FAILURE TO IMPLEMENT EMERGENCY PLAN	22 CCR 12 66262.34(d)(2); 40 CFR 262.34(d)(5)(ii)
	H303	FACILITY NOT MAINTAINED TO PREVENT FIRE/EXPLOSION/RELEASE	22 CCR 12 66262.34(d)(2); 40 CFR 265.31
	H305	FAILURE TO MAINTAIN FACILITY EMERGENCY EQUIPMENT	22 CCR 12 66262.34(d)(2); 40 CFR 265.33
	H306	FAILURE TO HAVE EMERGENCY EQUIPMENT	22 CCR 12 66262.34(d)(2); 40 CFR 265.32
	H308	INADEQUATE AISLE SPACE	22 CCR 12 66262.34(d)(2); 40 CFR 265.35

Large Quantity Generator - Violations

V	VIOL #	Summary	Code
	H237	FAILURE TO HAVE A CONTINGENCY PLAN	22 CCR 15 66265.51
	H240	CONTINGENCY PLAN INCORRECT OR NOT IMPLEMENTED	22 CCR 15 66265.52
	H245	FAILURE TO CONDUCT EMPLOYEE TRAINING	22 CCR 15 66265.16

Inspector: KEVIN BEAHMInspection Date: 03/04/2015

Large Quantity Generator - Violations (continued)

V	VIOL #	Summary	Code
	H258	HAZARDOUS WASTE ACCUMULATION TIME LIMIT EXCEEDED	22 CCR 12 66262.34(a)
	H268	TANK/CONTAINER IN POOR CONDITION OR DAMAGED	22 CCR 15 66265.171
	H270	HAZARDOUS WASTE CONTAINER INCOMPATIBLE WITH MATERIAL STORED	22 CCR 15 66265.172
	H272	OPEN HAZARDOUS WASTE TANK/CONTAINER	22 CCR 15 66265.173
	H274	FAILURE TO CONDUCT WEEKLY HAZARDOUS WASTE STORAGE AREAS INSPECTIONS	22 CCR 15 66265.174
	H275	REACTIVE AND IGNITABLE WASTE NOT 50 FT FROM PROPERTY LINE	22 CCR 15 66265.176
	H279	INCOMPATIBLE WASTE STORAGE	22 CCR 15 66265.17(b), 66265.177
	H289	FAILURE TO CONDUCT DAILY HAZARDOUS WASTE TANK INSPECTIONS	22 CCR 15 66265.195
	H286	FAILURE TO OBTAIN AND/OR MAINTAIN HAZARDOUS WASTE TANK ASSESSMENT	22 CCR 15 66265.192(a), 66265.192(h)
	H291	FAILURE TO MEET SECONDARY CONTAINMENT REQUIREMENTS	22 CCR 15 66265.193
	H292	FAILURE TO MEET TANK CLOSURE REQUIREMENTS AND DOCUMENTATION	22 CCR 15 66265.111, 66265.114, 66265.197
	H294	FAILURE TO MEET HAZARDOUS WASTE TANK RELEASE REQUIREMENTS	22 CCR 15 66265.196
	H301	FAILURE TO MAINTAIN FACILITY EMERGENCY EQUIPMENT	22 CCR 15 66265.33
	H304	FACILITY NOT MAINTAINED TO PREVENT FIRE/EXPLOSION/RELEASE	22 CCR 15 66265.31
	H307	FAILURE TO HAVE EMERGENCY EQUIPMENT	22 CCR 15 66265.32
	H309	INADEQUATE AISLE SPACE	22 CCR 15 66265.35
	H310	FAILURE TO MEET PRECAUTION REQUIREMENTS FOR REACTIVE AND IGNITABLE WASTE	22 CCR 15 66265.17(a)
	H312	FAILURE TO CONDUCT HAZARDOUS WASTE TANK CATHODIC INSPECTION	22 CCR 15 66265.195(b)
	H313	FAILURE TO MAINTAIN SECURITY OF HAZARDOUS WASTE AREA	22 CCR 15 66265.14
	A268	FAILURE TO STORE HAZARDOUS WASTE IN CONTAINERS/TANKS THAT MEET THE AIR EMISSIONS REQUIREMENTS	22 CCR 15 66265.178

Universal Waste Generator - Violations

V	VIOL #	Summary	Code
	H317	FAILURE TO MANAGE BATTERIES AS UNIVERSAL WASTE	22 CCR 23 66273.2(a)
	H318	FAILURE TO CONDUCT EMPLOYEE TRAINING	22 CCR 23 66273.36
	H319	FAILURE TO DISPOSE OF ELECTRONICS PROPERLY	22 CCR 23 66273.3
	H320	FAILURE TO MEET OFFSITE SHIPMENT REQUIREMENTS	22 CCR 23 66273.38; 49 CFR 1 172.201(e)
	H321	FAILURE TO MEET PROPER LABELING REQUIREMENTS	22 CCR 23 66273.34
	H322	IMPROPER MANAGEMENT OF MERCURY CONTAINING PRODUCTS	22 CCR 23 66273.4
	H323	FAILURE TO PROPERLY MANAGE MERCURY CONTAINING LAMP BULBS	22 CCR 23 66273.5
	H324	FAILURE TO PROPERLY MANAGE CRT TUBES AND GLASS	22 CCR 23 66273.6, 66273.7
	H325	IMPROPER HANDLING OF AEROSOL CANS	HSC 6.5 25201.16(e)
	H326	FAILURE TO MANAGE UNIVERSAL WASTE TO PREVENT RELEASE TO THE ENVIRONMENT	22 CCR 23 66273.33.5
	H328	FAILURE TO MEET ACCUMULATION STANDARDS FOR AEROSOL CANS	HSC 6.5 25201.16(f)
	H329	ILLEGAL DISPOSAL OF UNIVERSAL WASTE	22 CCR 23 66273.31(a)
	H330	UNIVERSAL WASTE ACCUMULATION TIME LIMIT EXCEEDED	22 CCR 23 66273.35

Inspector: KEVIN BEAHMInspection Date: 03/04/2015

Waste Lead Acid Battery Generator - Violations

V	VIOL #	Summary	Code
	H250	FAILURE TO MAINTAIN LEAD BATTERY DISPOSAL DOCUMENTATION	22 CCR 16 66266.81(a)(4)(B)
	H261	IMPROPER MANAGEMENT OF 11 OR MORE SPENT VEHICLE LEAD-ACID BATTERIES	22 CCR 16 66266.81(a)(3)
	H290	IMPROPER MANAGEMENT OF 10 OR LESS SPENT VEHICLE LEAD-ACID BATTERIES	22 CCR 16 66266.81(a)(1)
	H293	IMPROPER HANDLING OF DAMAGED LEAD BATTERY	22 CCR 16 66266.81(b)
	H316	FAILURE TO PROPERLY MANAGE NON-AUTOMOTIVE LEAD BATTERIES	22 CCR 23 66273.2(b)(1)

SUMMARY OF OBSERVATIONS/VIOLATIONS

☒ No violations of hazardous waste laws/regulations were discovered. KERN CUPA greatly appreciates your efforts to comply with all the laws and regulations applicable to your facility.

☐ Violations were observed/discovered as listed below. All violations must be corrected by implementing the corrective action listed by each violation. If you disagree with any of the violations or corrective actions required, please inform the CUPA in writing.

ALL VIOLATIONS MUST BE CORRECTED WITHIN 30 DAYS OR AS SPECIFIED. CUPA must be informed in writing with a certification that compliance has been achieved. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be reinspected any time during normal business hours. If a second reinspection becomes necessary due to non compliance, a reinspection charge of \$100.00 per hour may be charged to the facility.

You may request a meeting with the Program Manager to discuss the inspection findings and/or the proposed corrective actions. The issuance of this Summary of Violations does not preclude the CUPA from taking administrative, civil, or criminal action.

INSPECTION COMMENTS:

Properly label the used oil container following the requirements in 22 CCR 66279.21

COMMENTS: Go to <http://www.co.kern.ca.us/eh/> (Hazardous Materials) for forms and information.



Inspector: KEVIN BEAHM
Inspection Date: 03/04/2015

Signature of Facility Representative:



MATTHEW CONSTANTINE, DIRECTOR
PUBLIC HEALTH SERVICES

ENVIRONMENTAL HEALTH DIVISION

2700 M STREET, SUITE 300, BAKERSFIELD, CA 93301-2370

VOICE: (661) 862-8740 FAX: (661) 862-8701

Web: www.co.kern.ca.us/eh E-mail: eh@co.kern.ca.us

"ONE VOICE"



CLAUDIA JONAH, MD
PUBLIC HEALTH OFFICER

CERTIFIED UNIFIED PROGRAM AGENCY (CUPA) HAZARDOUS MATERIAL INSPECTION FORM

Report Date: 03/15/2013

Facility ID: FA0004335

File #: 000895

Facility Name: ELK HILLS POWER, LLC				Inspection Type ☒ Routine ☐ Reinspection ☐ Complaint	
Site Address: 4026 SKYLINE RD TUPMAN, CA 93276					
Phone: (661)763-2730					
PROGRAMS INSPECTED:	☒ Business Plan	☐ HW Generator	☐ UST	☐ APSA	
REINSPECTION REQUIRED:	☐ Business Plan	☐ HW Generator	☐ UST	☐ APSA	

VIOLATION	VIOLATION NUMBER	BUSINESS PLAN REQUIREMENTS
	BP01	Inventory of hazardous materials is accurate, up to date, and complete [HSC 6.95, 25504, Title 19 CCR 2729].
	BP02	Site layout/facility maps are accurate [HSC 6.95,25504; Title 19 CCR 2729].
	BP03	Hazardous materials are stored in properly labeled and non-deteriorated containers [HSC 25124(b)(3)(A & B)].
	BP04	The hazardous materials inventory shall be submitted annually on or before March 1 [Title 19 CCR 2729.4(b)].
	ER01	Contingency Plan is complete, updated, and maintained on site [HSC 6.95, 25504; Title 19 CCR 2731 Title 22 CCR 66265.53-54].
	ER02	Facility is operated and maintained to prevent/mitigate fire, explosion, or release of hazardous material or waste which could threaten human health or the environment [Title 22 CCR 66265.31; Title 19 CCR 2731].
	ER03	Business has equipment required to, or appropriate for, safe handling of hazardous materials [Title 22 CCR 66265.32 & .34].
	TR01	Facility has a training program appropriate for the size and complexity of business and nature of hazardous materials handled [Title 19 CCR 2732; Title 22 CCR 66265.16].
	TR02	Training documentation is maintained on site for current personnel [Title 19 CCR 2732; Title 22 CCR 66265.16].

INSPECTOR: DAN R STARKEY

INSPECTION DATE: 03/13/2013

SUMMARY OF OBSERVATIONS/VIOLATIONS

☒ No violations of underground storage tank, hazardous materials, or hazardous waste laws/regulations were discovered. KERN CUPA greatly appreciates your efforts to comply with all the laws and regulations applicable to your facility.

☐ Violations were observed/discovered as listed below. All violations must be corrected by implementing the corrective action listed by each violation. If you disagree with any of the violations or corrective actions required, please inform the CUPA in writing.

ALL VIOLATIONS MUST BE CORRECTED WITHIN 30 DAYS OR AS SPECIFIED. CUPA must be informed in writing with a certification that compliance has been achieved. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be reinspected any time during normal business hours. If a second reinspection becomes necessary due to non compliance, a reinspection charge of \$100.00 per hour may be charged to the facility.

You may request a meeting with the Program Manager to discuss the inspection findings and/or the proposed corrective actions. The issuance of this Summary of Violations does not preclude the CUPA from taking administrative, civil, or criminal action.

VIOLATIONS

VIOLATION #	DEGREE OF VIOLATION	CORRECTIVE ACTION REQUIRED
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INSPECTION COMMENTS:

COMMENTS: Go to <http://www.co.kern.ca.us/eh/cupaprogram.asp> for forms and information.

INSPECTOR: DAN R STARKEY
INSPECTION DATE: 03/13/2013

SIGNATURE OF FACILITY REP:

FA ID: FA0004335

FACILITY NAME: ELK HILLS POWER, LLC

FILE ID: 000895

Certification: I certify under penalty of perjury that this facility has complied with the corrective actions listed on this inspection form.

Printed Name of Owner/Operator

Title

Signature of Owner/Operator

Date



MATTHEW CONSTANTINE, DIRECTOR
PUBLIC HEALTH SERVICES

ENVIRONMENTAL HEALTH

DIVISION

2700 M STREET, SUITE 300, BAKERSFIELD, CA 93301-2370

VOICE: (661) 862-8740 FAX: (661) 862-8701

Web: www.co.kern.ca.us/eh E-mail: eh@co.kern.ca.us

"ONE VOICE"



CLAUDIA JONAH, MD
PUBLIC HEALTH OFFICER

CERTIFIED UNIFIED PROGRAM AGENCY (CUPA) HAZARDOUS MATERIAL INSPECTION FORM

Report Date: 04/13/2012

Facility ID: FA0004335

File #: 000895

Facility Name: ELK HILLS POWER, LLC				Inspection Type ☒ Routine ☐ Reinspection ☐ Complaint	
Site Address: 4026 SKYLINE RD TUPMAN, CA 93276					
Phone: (661)763-2730					
PROGRAMS INSPECTED:	☒ Business Plan	☒ HW Generator	☐ UST	☐ APSA	
REINSPECTION REQUIRED:	☐ Business Plan	☐ HW Generator	☐ UST	☐ APSA	

VIOLATION	VIOLATION NUMBER	BUSINESS PLAN REQUIREMENTS
✓	BP01	Inventory of hazardous materials is accurate, up to date, and complete [HSC 6.95, 25504, Title 19 CCR 2729].
	BP02	Site layout/facility maps are accurate [HSC 6.95,25504; Title 19 CCR 2729].
✓	BP03	Hazardous materials are stored in properly labeled and non-deteriorated containers [HSC 25124(b)(3)(A & B)].
	BP04	The hazardous materials inventory shall be submitted annually on or before March 1 [Title 19 CCR 2729.4(b)].
	ER01	Contingency Plan is complete, updated, and maintained on site [HSC 6.95, 25504; Title 19 CCR 2731 Title 22 CCR 66265.53-54].
	ER02	Facility is operated and maintained to prevent/mitigate fire, explosion, or release of hazardous material or waste which could threaten human health or the environment [Title 22 CCR 66265.31; Title 19 CCR 2731].
	ER03	Business has equipment required to, or appropriate for, safe handling of hazardous materials [Title 22 CCR 66265.32 & .34].
	TR01	Facility has a training program appropriate for the size and complexity of business and nature of hazardous materials handled [Title 19 CCR 2732; Title 22 CCR 66265.16].
	TR02	Training documentation is maintained on site for current personnel [Title 19 CCR 2732; Title 22 CCR 66265.16].

INSPECTOR: JOE CANAS

INSPECTION DATE: 03/27/2012

VIOLATION	VIOLATION NUMBER	HAZARDOUS WASTE GENERATOR REQUIREMENTS
		EPA ID NUMBER: <u>CAR000108498</u>
	GA01	Hazardous waste has not accumulated for more than 90/180/270 days (depending upon volume/circumstances) without having a hazardous waste storage permit [Title 22, CCR, 66262.34 HSC, 25123.3(c)].
	GA02	Empty containers or inner liners greater than 5 gallons have dates when emptied and are properly managed within one year of date emptied [Title 22, CCR, 66261.7(f)].
	GA03	Universal waste is not accumulated at facility for more than one year [Title 22 CCR, 66273.35(a)].
	GA04	The facility disposes of used oil filters within one year of generation, or 180 days if greater than 1 ton are accumulated [Title 22, CCR, 66266.130(c)(4)].
	GC01	Hazardous waste storage containers are in good condition [Title 22, CCR, 66165.171].
	GC02	A container holding hazardous waste shall always be closed during transfer and storage, except when it is necessary to add or remove waste [Title 22 CCR, 66265.173(a)].
	GC03	The owner or operator shall inspect areas used for container storage at least weekly, looking for leaking containers and for deterioration of containers or containment systems [Title 22 CCR, 66265.174].
	GC05	The facility has adequate secondary containment for hazardous waste tank systems [Title 22 CCR, 66264.193(a) & (b)].
	GC07	A generator may accumulate as much as 55 gallons of hazardous waste at the initial accumulation point which is at or near the area where the waste is generated and which is under the control of the operator of the process generating the waste. The generator cannot hold the waste on-site for more than one year from the initial date of accumulation [Title 22 CCR, 66262.34 (e)(1)(A)].
	GL01	All containers and portable tanks containing hazardous waste shall be labeled with the following information: "Hazardous Waste," composition, hazardous properties of the waste, the name and address of the person producing the waste, and accumulation start date [Title 22 CCR, 66262.34(f)].
	GL03	Universal waste handler shall label or mark universal waste containers to identify the type of universal waste: batteries, mercury-containing equipment, lamps, electronic devices, and CRTs [Title 22 CCR, 66273.34].
	GL04	Containers shall be labeled as "drained used oil filters" (not as non-hazardous waste) and show initial date of accumulation on each container of filters [Title 22 CCR, 66266.130(c)(3)].
	GL06	Containers and aboveground tanks used to store used oil and fill pipes used to transfer used oil into underground storage tanks shall be marked or clearly labeled with the words "USED OIL" [Title 22 CCR, 66279.21(b)].
	GR01	Generator has an EPA identification number to treat, store, dispose of, transport, or offer for transportation hazardous waste [Title 22, CCR, 66262.12].

FACILITY NAME: ELK HILLS POWER, LLC

ADDRESS: 4026 SKYLINE RD
TUPMAN, CA 93276FA ID: FA0004335
FILE ID: 000895

VIOLATION	VIOLATION NUMBER	HAZARDOUS WASTE GENERATOR REQUIREMENTS (Continued)
	GR02	The facility has made an appropriate hazardous waste determination for all wastes generated at the facility. The determination is based on laboratory analysis, "generator knowledge," or other prescribed means [Title 22, CCR, 66262.11].
	GR04	Manifests or receipts for the shipping of hazardous wastes are properly completed and retained by generator for 3 years [Title 22, CCR, 66262.23(a)(1); 66262.40(a); HSC 25160.2 Consolidated manifests].
	GT01	The facility is conducting on-site treatment of hazardous waste with a tiered permit [HSC 25189.5(d), HSC 25123.5(a) 25189.7(a)].
	GT02	Authorized, licensed, and certified hazardous waste haulers are used to transport hazardous waste to appropriate facilities [HSC 25163(a)(1), HSC 25189.5].
	GT03	Hazardous wastes are sent to authorized disposal facilities [HSC 25189.5, HSC 25114, HSC 25117.1].
	GT04	Hazardous waste is properly contained and not disposed to ground, water, or air [HSC 25189.5, HSC 25189.7(a), HSC 25113(a)].

INSPECTOR: JOE CANASINSPECTION DATE: 03/27/2012

SUMMARY OF OBSERVATIONS/VIOLATIONS

- ☐ No violations of underground storage tank, hazardous materials, or hazardous waste laws/regulations were discovered. KERN CUPA greatly appreciates your efforts to comply with all the laws and regulations applicable to your facility.
- ☒ Violations were observed/discovered as listed below. All violations must be corrected by implementing the corrective action listed by each violation. If you disagree with any of the violations or corrective actions required, please inform the CUPA in writing.

ALL VIOLATIONS MUST BE CORRECTED WITHIN 30 DAYS OR AS SPECIFIED. CUPA must be informed in writing with a certification that compliance has been achieved. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be reinspected any time during normal business hours. If a second reinspection becomes necessary due to non compliance, a reinspection charge of \$100.00 per hour may be charged to the facility.

You may request a meeting with the Program Manager to discuss the inspection findings and/or the proposed corrective actions. The issuance of this Summary of Violations does not preclude the CUPA from taking administrative, civil, or criminal action.

VIOLATIONS

VIOLATION #	DEGREE OF VIOLATION	CORRECTIVE ACTION REQUIRED
BP01	CLASS II VIOLATION	Update inventory of hazardous materials. Inventory may be updated online at: www.co.kern.ca.us/eh Owner ID: OW0003461 Password: bb5qtdy3 The inventory must include the phosphate tank
BP03	MINOR VIOLATION	Hazardous materials can become discarded material and potentially hazardous waste if stored in improperly labeled containers or in deteriorated containers. Improperly labeled containers are to be properly labeled within ten days. Hazardous materials in deteriorated or leaking containers are to be placed in overpack containers or appropriate non-deteriorated containers within 96 hours. Otherwise the materials may be considered a waste. Proper lableing of the diala oil must be added.

INSPECTION COMMENTS:

COMMENTS: Go to <http://www.co.kern.ca.us/eh/cupaprogram.asp> for forms and information.

INSPECTOR: JOE CANAS
INSPECTION DATE: 03/27/2012

SIGNATURE OF FACILITY REP:

Certification: I certify under penalty of perjury that this facility has complied with the corrective actions listed on this inspection form.

_____ Printed Name of Owner/Operator	_____ Title
_____ Signature of Owner/Operator	_____ Date

ENVIRONMENTAL HEALTH SERVICES DEPARTMENT**MATTHEW CONSTANTINE, R.E.H.S., Director**

2700 "M" STREET, SUITE 300
 BAKERSFIELD, CA 93301-2370
 Voice: (661) 862-8700
 Fax: (661) 862-8701
 TTY Relay: (800) 735-2929
 Web: www.co.kern.ca.us/eh
 E-mail: eh@co.kern.ca.us

**RESOURCE MANAGEMENT AGENCY****TED JAMES, AICP, INTERIM RMA DIRECTOR**

Animal Control Department
 Community and Economic Development Department
 Engineering and Survey Services Department
 Environmental Health Services Department
 Planning Department
 Roads Department

March 08, 2010

**CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)
 HAZARDOUS MATERIAL INSPECTION FORM**

Date: 03/08/2010

Facility ID: FA0004335

File #: 000895

Facility Name: ELK HILLS POWER, LLC		Inspection Type ☒ Routine ☐ Reinspection ☐ Complaint		
Site Address: 4026 SKYLINE RD TUPMAN, CA 93276				
Phone: (661)763-2730				
PROGRAMS INSPECTED:	☒ Business Plan	☒ HW Generator	☐ UST	☐ APSA
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VIOLATION	VIOLATION NUMBER	BUSINESS PLAN REQUIREMENTS
	BP01	Inventory of hazardous materials is accurate, up to date, and complete [HSC 6.95, 25504, Title 19 CCR 2729].
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INSPECTOR: DAN R STARKEY

INSPECTION DATE: 03/08/2010

FACILITY NAME: ELK HILLS POWER, LLC

ADDRESS: 4026 SKYLINE RD
TUPMAN, CA 93276

FA ID: FA0004335

FILE ID: 000895

VIOLATION	VIOLATION NUMBER	HAZARDOUS WASTE GENERATOR REQUIREMENTS
		EPA ID NUMBER:
	GA01	Hazardous waste has not accumulated for more than 90/180/270 days (depending upon volume/circumstances) without having a hazardous waste storage permit [Title 22, CCR, 66262.34 HSC, 25123.3(c)].
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INSPECTOR: DAN R STARKEY

INSPECTION DATE: 03/08/2010

FACILITY NAME: ELK HILLS POWER, LLC

ADDRESS: 4026 SKYLINE RD
TUPMAN, CA 93276FA ID: FA0004335
FILE ID: 000895

VIOLATION	VIOLATION NUMBER	HAZARDOUS WASTE GENERATOR REQUIREMENTS (Continued)
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INSPECTOR: DAN R STARKEY

INSPECTION DATE: 03/08/2010

SUMMARY OF OBSERVATIONS/VIOLATIONS

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VIOLATIONS

VIOLATION #	DEGREE OF VIOLATION	CORRECTIVE ACTION REQUIRED
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INSPECTION COMMENTS:

Once the locations are entered online place hazardous materials inventory in proper locations.

COMMENTS: Go to <http://www.co.kern.ca.us/eh/cupaprogram.asp> for forms and information.

INSPECTOR: DAN R STARKEY
INSPECTION DATE: 03/08/2010

SIGNATURE OF FACILITY REP:

Certification: I certify under penalty of perjury that this facility has complied with the corrective actions listed on this inspection form.

Printed Name of Owner/Operator

Title

Signature of Owner/Operator

Date



ENVIRONMENTAL HEALTH DIVISION
CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)
2700 "M" St Suite 300, Bakersfield CA 93301
(661) 862-8740

MATTHEW CONSTANTINE
DIRECTOR

CalARP Inspection Report

Facility ID: FA0004335	CERS No: 10235623	Report Date: 03/29/2016
Facility Name: ELK HILLS POWER, LLC	Inspection Date: 03/29/2016	
Facility Address: 4026 Skyline Rd TUPMAN, CA 93276	EPA ID No:	Program Level: 1
Facility Contact: RAYMOND RODRIGUEZ	Contact Phone: (661) 204-9236	Contact Email: raymond_rodriguez@elkhill

Reason for Inspection: This inspection is for the purpose of determining compliance with the accidental release prevention requirements of the California Code of Regulations, Title 19, Division 2, Chapter 4.5, California Accidental Release Prevention (CalARP) Program. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing chemical storage, handling, processing, and use; taking samples and photographs; and any other inspection activities necessary to determine compliance with the laws and regulations.

Inspection Findings

RMP Submittal Date: 03/01/2012		Next RMP Submittal Date: 03/01/2017				
Last Compliance Audit:		Next Compliance Audit:				
NAME	TYPE OF PROCESS/PRODUCT	QUANTITY		CONCENTRATION		PROGRAM LVL
COGEN NOX REDUCTION	STORAGE AND INJECTION AMMONIUM HYDROXIDE	90,000	lbs	19	%	1

DAN R STARKEY
Inspector Name

HAZARDOUS MATERIALS SPECIALIST III
Title

(661) 862-8757
Phone

Signature

03/29/2016
Date

	Violation #	Section 2735.6, Management System
	H106	Failure to submit an Risk Management Plan (RMP) which includes all requirements described in Section 2745.3 through 2745.5 and 2745.8 through 2745.9. 19 CCR 4.5 2735.5(b)(1), 2735.5(d), 2745.1(a)
	H127	Failure to include a registration in the Risk Management Plan that reflects all covered processes. 19 CCR 4.5 2735.5(b)(2)
	H114	Failure to submit in the Risk Management Plan the certification statement provided in Section 2735.5(d)(4) 19 CCR 4.5 2745.9(a)
	H133	Failure to complete the five-year accident history as provided in Section 2750.9. 19 CCR 4.5 2750.1
	H100	Failure to ensure that response actions have been coordinated with local emergency planning and response agencies. 19 CCR 4.5 2735.5(d)(3)
		Section 2745.5, RMP Five-Year Accident History
	H125	Failure to correct and submit the data required in the Risk Management Plan under sections 2745.5, 2745.6(j), and 2745.7(l) with respect to that accident within six months of the release or by the time the Risk Management Plan is updated under Section 2745.10, whichever is earlier. 19 CCR 4.5 2745.10.5(a)(1)
		Section 2745.10, RMP Updates
	H119	Failure to revise, update, and submit the Risk Management Plan to the United States Environmental Protection Agency and the CUPA as follows: 1. At least once every five years from the date of its initial submission or most recent update required by section 2745.10(a)(2) through (7); 2. No later than three years after a newly regulated substance is first listed by the United States Environmental Protection Agency; 3. No later than the date on which on which a new regulated substance is first present in an already covered process above a threshold quantity; 4. No later than the date on which a regulated substance is first present above a threshold quantity in a new process; 5. Within six months of a change that requires a revised process hazard analysis or hazard review. 6. Within six months of a change that requires a revised offsite consequence analysis as provided in section 2750.7; 7. Within six months of a change that alters the program level that applied to any covered process. 19 CCR 4.5 2745.10(a)
		Section 2750.2, Off-Site Consequence Analysis Parameters
	H134	Failure to conduct a hazard assessment that complies with Sections 2750.2 through 2750.9. 19 CCR 4.5 2750.1

Violation Number	Violation Text	Violation Degree	Comply by
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Violation Details &
Corrective Action Required:

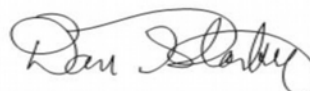
RECOMMENDATIONS/ COMMENTS:

Violations were observed/ discovered as listed above. All violations must be corrected by implementing the action listed by each violation. All minor violations must be corrected within 30 days or as specified. KCEHSD must be informed in writing, certifying that the violations have been corrected. A false statement that the violations have been corrected is a violation of the law and is punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be re-inspected at any time.

You may request a meeting with the KCEHSD Program Manager to discuss the inspection findings and/or proposed corrective actions. The issuance of this Inspection Report does not preclude KCEHSD from taking administrative, civil, or criminal action as a result of the violations that were discovered or violations that have not been corrected within the time specified.

Facility Rep. Signature

Title



Inspector Signature

03/29/2016

Date



HAZARDOUS MATERIALS BUSINESS PLAN (HMBP) INSPECTION REPORT

Facility Name: ELK HILLS POWER, LLC		Facility ID: FA0004335
Site Address: 4026 Skyline Rd TUPMAN, CA 93276		CERS ID: 10235623
Phone: (661) 765-1800	Consent Granted By:	Inspection Date: 03/29/2016
Inspection Type: ☒ Routine ☐ Reinspection		Reinspection required: ☐ Yes ☒ No
Inspection Element: BUS PLAN LARGE HIGH RISK >5 UNITS		

File/CERS Review Violations

V	Viol #	Summary	Code
	H335	Failure to adequately complete and submit a HMBP into the California Environmental Reporting System (CERS)	HSC 6.95 25505, 25508(a)(1), 25508(d)
	H344	Failure to complete and submit the Business Activities Page and/or Business Owner Operator Identification Page in CERS	HSC 6.95 25508(a)(1); 19 CCR 4 2729.2(a)(1);
	H342	Failure to complete and submit hazardous material inventory information for all reportable hazardous materials on site in CERS	HSC 6.95 25505(a)(1), 25506, 25508(a)(1)
	H341	Failure to annually review and electronically certify that the business plan is complete, accurate, and up-to-date in CERS	HSC 6.95 25508(c), 25508.2
	H346	Failure to complete and submit a site map with all required content in CERS	HSC 6.95 25505(a)(2), 25508(a)(1)
	H347	Failure to submit an adequate emergency response plan and procedures in CERS	HSC 6.95 25505(a)(3), 25508(a)(1)
	H353	Failure to submit an adequate training program in CERS	HSC 6.95 25505(a)(4), 25508(a)(1)
	H340	Failure to notify property owner in writing that a HMBP is required	HSC 6.95 25505.1
	H336	Failure to provide property owner a copy of the HMBP upon request	HSC 6.95 25505.1

Onsite Inspection Violations

V	Viol #	Summary	Code
	H334	Failure to adequately establish and implement a HMBP	HSC 6.95 25507
	H343	Failure to revise HMBP in CERS within 30 days upon a substantial change in the handler's operation	HSC 6.95 25508.1(f)
	H345	Failure to update Facility Information and/or Hazardous Materials Inventory in CERS within 30 days upon a significant change	HSC 6.95 25508.1(a)-(e)
	H348	Failure to provide initial and annual safety training to all employees and/or failure to document and maintain training records for 3 years	HSC 6.95 25505(a)(4)
	H338	Failure to report a release or threatened release of a hazardous material to the CUPA and to California Office of Emergency Services	HSC 6.95 25510(a)

Inspector: DAN R STARKEY

Inspection Date: 03/29/2016

Printed: 03/29/2016

Page 1 of 2

CONDITIONAL EXEMPTIONS FROM REPORTING REQUIREMENTS

Agricultural handlers are conditionally exempt from electronically submitting Emergency Response and Employee Training Plans in CERS if the following requirements are met:

- Owner/Operator annually submits the Facility Information and Hazardous Materials Inventory electronically into CERS
- Each location/building, where hazardous materials (i.e. pesticides, petroleum products, fertilizers, etc.) are stored, is posted with warning signs that meet the following requirements:
 - Shall be conspicuous and visible from any direction of probable approach
 - Shall be of such size that it is readable from 25 feet and shall be labeled as follows:

DANGER HAZARDOUS MATERIAL STORAGE AREA
 (the hazardous materials stored within shall be noted by category
 [i.e. pesticides, petroleum products, fertilizers, etc.])
 ALL UNAUTHORIZED PERSONS-KEEP OUT - IN AN EMERGENCY, CONTACT:
 (list the name and phone number of an emergency contact person(s))

- Shall be repeated in an appropriate language other than English when persons who do not understand the English language may enter the posted location/building
- Owner/Operator provides training for all new employees and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material, including, but not limited to, familiarity with the emergency plans and procedures

Exempt Facility Violations

V	Viol #	Summary	Code
	H760	Failure to submit Emergency Response/Contingency Plan in CERS when not meeting agricultural handler exemption requirements	HSC 6.95 25507.1, 25508(a)(1); 19 CCR 4 2733, 2734
	H758	Failure to submit Employee Training Plan in CERS when not meeting agricultural handler exemption requirements	HSC 6.95 25507.1, 25508(a)(1); 19 CCR 4 2733, 2734
	H759	Failure to establish and submit a HMBP in CERS when not meeting remote unstaffed facility exemption requirements	HSC 6.95 25505, 25506, 25507, 25507.2, 25508(a)(1)

SUMMARY OF OBSERVATIONS/VIOLATIONS

No violations of hazardous materials business plan laws/regulations were discovered. KERN CUPA greatly appreciates your efforts to comply with all the laws and regulations applicable to your facility.



Violations were observed/discovered as listed below. **ALL VIOLATIONS MUST BE CORRECTED WITHIN 30 DAYS OR AS SPECIFIED.** CUPA must be informed in writing with a certification that compliance has been achieved. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be reinspected any time during normal business hours. If a second reinspection becomes necessary due to non compliance, a reinspection charge of \$100.00 per hour may be charged to the facility.

You may request a meeting with the Program Manager to discuss the inspection findings and/or the proposed corrective actions. The issuance of this Summary of Violations does not preclude the CUPA from taking administrative, civil, or criminal action.

INSPECTION COMMENTS:

COMMENTS: Go to <http://www.co.kern.ca.us/eh/> (Hazardous Materials) for forms and information.



Inspector: DAN R STARKEY

Inspection Date: 03/29/2016

Signature of Facility Representative:

KERN COUNTY ENVIRONMENTAL HEALTH SERVICES DEPARTMENT

HAZARDOUS MATERIALS MANAGEMENT PROGRAM

CALIFORNIA ACCIDENTAL RELEASE PREVENTION PROGRAM

2700 M Street, Suite 300, Bakersfield, CA 93301 • (661) 862-8700, Fax (661) 862-8701

CALARP INSPECTION REPORT

Facility ID: FA0004335	File No.: CR00895	Report Date: 4/13/2012
Facility Name: Elk Hills Power	Inspection Date: 3/27/2012	
Facility Address: 4026 Skyline Rd	EPA ID No.:	
City: Tupman	Zip Code: 93276	Program Level: 1
Facility Contact: Mike Glavin	Contact Phone:	Contact email: Mike_Glavin@oxy.com

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the accidental release prevention requirements of the California Code of Regulations, Title 19, Division 2, Chapter 4.5, California Accidental Release Prevention (CalARP) Program. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing chemical storage, handling, processing, and use; taking samples and photographs; and any other inspection activities necessary to determine compliance with the laws and regulations.

INSPECTION FINDINGS

Is facility subject to RMP regulation (Title 19 CCR, Chapter 4.5)?		☒ Yes	☐ No
Did facility submit RMP? ☒ Yes ☐ No		Date of last RMP update: _____	
1) Process/NAICS code: 221112	Program Level 1 ☒ 2 ☐ 3 ☐		
Regulated Substance: Ammonia Hydroxide	Max. quantity in process: 36,000lbs		
2) Process/NAICS code: _____	Program Level 1 ☐ 2 ☐ 3 ☐		
Regulated Substance: _____	Max. quantity in process: _____lbs		
3) Process/NAICS code: _____	Program Level 1 ☐ 2 ☐ 3 ☐		
Regulated Substance: _____	Max. quantity in process: _____lbs		
4) Process/NAICS code: _____	Program Level 1 ☐ 2 ☐ 3 ☐		
Regulated Substance: _____	Max. quantity in process: _____lbs		
5) Process/NAICS code: _____	Program Level 1 ☐ 2 ☐ 3 ☐		
Regulated Substance: _____	Max. quantity in process: _____lbs		
6) Process/NAICS code: _____	Program Level 1 ☐ 2 ☐ 3 ☐		
Regulated Substance: _____	Max. quantity in process: _____lbs		
Did facility correctly assign program levels to processes?		☐ Yes	☐ No

Joe Canas

HMS Program Mgr

(661) 862-8756

Inspector Name

Title

Phone

Signature

Date

CALARP INSPECTION REPORT

Program Level 1

VIOLATIONS

Article 1, General		
Yes	Viol.#	Section 2735.5, General Requirements
☐	1001	The owner or operator of a stationary source that is subject to this chapter, pursuant to Section 2735.4, shall submit an RMP which includes all requirements described in Section 2745.3 through Section 2745.9. [Section 2735.5(b)(1)]
☐	1002	The RMP shall include a registration that reflects all covered processes. [Section 2735.5(b)(2)]
☐	1003	Analyze the worst-case release scenario for the process(es); document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint; and submit in the RMP the worst-case release scenario, as provided in Section 2745.4. [Section 2735.5(d)(1)]
☐	1004	Complete the five-year accident history for the process and submit it in the RMP, as provided in Section 2745.5. [Section 2735.5(d)(2)]
☐	1005	Ensure that response actions have been coordinated with local emergency planning and response agencies. [Section 2735.5(d)(3)]
☐	1006	Certify in the RMP the following: "Based on the criteria in Section 2735.4 of Title 19 of CCR, the distance to the specified endpoint for the worst-case accidental release scenario for the following process(es) is less than the distance to the nearest public receptor: [list process(es)]. Within the past five years, the process(es) has (have) had no accidental release that caused off-site impacts provided in the Risk Management Program Section 2735.4(c)(1). No additional measures are necessary to prevent off-site impacts from accidental releases. In the event of fire, explosion, or a release of a regulated substance from the process(es), entry within the distance to the specified endpoints may pose a danger to public emergency responders. Therefore, public emergency responders should not enter this area except as arranged with the emergency contact indicated in the RMP. The undersigned certifies that, to the best of my knowledge, information, and belief, formed after reasonable inquiry, the information submitted is true, accurate, and complete."
Article 3, Risk Management Plan Components and Submission Requirements		
Yes	Viol.#	Section 2745.4, RMP Off-Site Consequence Analysis Component
☐	1401	The owner or operator shall submit in the RMP one worst-case release scenario for each Program 1 process. [Section 2745.4(a)(1)]
Yes	Viol.#	Section 2745.5, RMP Five-Year Accident History
☐	1500	The owner or operator shall submit as part of the RMP information on each accident. [Section 2745.5]
Yes	Viol.#	Section 2745.10, RMP Updates
☐	1601	The owner or operator of a stationary source shall revise and update the RMP submitted at least once every five years from the date of its initial submission or most recent update. [Section 2745.10(a)(1)]
Article 4, Hazard Assessment		
Yes	Viol.#	Section 2750.2, Off-Site Consequence Analysis Parameters
☐	1201	The following endpoints shall be used for analyses of off-site consequences: use the toxic endpoints in Appendix A for regulated substances listed on both Table 1 and Table 3. [Section 2750.2(a)(2)]
☐	1202	The following endpoints shall be used for analyses of off-site consequences: flammable. For Table 2, regulated flammable substances, flammable endpoints vary according to the scenarios studied, based upon the following: explosion. An overpressure of 1 PSI. [Section 2750.2(a)(4)(A)]
☐	1203	The following endpoints shall be used for analyses of off-site consequences: flammable. For Table 2, regulated flammable substances, flammable endpoints vary according to the scenarios studied, based upon the following: radiant heat/exposure time. A radiant heat of 5 KW/M2 for 40 seconds. [Section 2750.2(a)(4)(B)]
☐	1204	The following endpoints shall be used for analyses of off-site consequences: flammable. For Table 2 regulated flammable substances, flammable endpoints vary according to the scenarios studied, based upon the following: lower flammability limit. A lower flammability limit as provided in NFPA documents or other generally recognized sources. [Section 2750.2(a)(4)(C)]
☐	1205	The following endpoints shall be used for analyses of off-site consequences: use the toxic endpoints in Appendix A for regulated substances listed on both Table 1 and Table 3. [Section 2750.2(a)(2)]

☐	1206	The following endpoints shall be used for analyses of off-site consequences: flammable. For Table 2, regulated flammable substances, flammable endpoints vary according to the scenarios studied, based upon the following: explosion. An overpressure of 1 PSI. [Section 2750.2(a)(4)(A)]
☐	1207	The following endpoints shall be used for analyses of off-site consequences: flammable. For Table 2, regulated flammable substances, flammable endpoints vary according to the scenarios studied, based upon the following: radiant heat/exposure time. A radiant heat of 5 KW/M2 for 40 seconds. [Section 2750.2(a)(4)(B)]
☐	1208	The following endpoints shall be used for analyses of off-site consequences: flammable. For Table 2 regulated flammable substances, flammable endpoints vary according to the scenarios studied, based upon the following: lower flammability limit. A lower flammability limit as provided in NFPA documents or other generally recognized sources. [Section 2750.2(a)(4)(C)]
☐	1209	For the worst-case release analysis, the owner or operator shall use a wind speed of 1.5 meters per second and F atmospheric stability class. For the analysis of alternative scenarios, the owner or operator may use typical temperature/humidity data gathered at the stationary source or at a local meteorological station. [Section 2750.2(b)]
☐	1210	For the worst-case release analysis of a regulated toxic substance, the owner or operator shall use the highest daily maximum temperature in the previous three years and average humidity for the site, based on temperature/humidity data gathered at the stationary source or at a local meteorological station. For analysis of alternative scenarios, the owner or operator may use typical temperature/humidity data gathered at the stationary source or at a local meteorological station. [Section 2750.2(c)]
☐	1211	Height of release. The worst-case release of a regulated toxic substance shall be analyzed assuming a ground level (0 feet) release. For an alternative scenario analysis of a regulated toxic substance, release height may be determined by the scenario. [Section 2750.2(d)]
☐	1212	Surface roughness. The owner or operator shall use either urban or rural topography, as appropriate. Urban means that there are many obstacles in the immediate area; obstacles include buildings or trees. Rural means there are no buildings in the immediate area and the terrain is generally flat and unobstructed. [Section 2750.2(e)]
☐	1213	Dense or neutrally buoyant gases. The owner or operator shall ensure that tables or models used for dispersion analysis of regulated toxic substances appropriately account for gas density. [Section 2750.2(f)]
☐	1214	Temperature of released substance for worst case, liquids other than gases liquefied by refrigeration only shall be considered to be released at the highest daily maximum temperature, based on data for the previous three years appropriate for the stationary source, or at process temperature, whichever is higher. For alternative scenarios, substances may be considered to be released at a process or ambient temperature that is appropriate for the scenario. [Section 2750.2(g)]
Yes	Viol.#	Section 2750.3, Worst Case Release Scenario Analysis
☐	1101	The RMP includes one worst-case scenario, including an off-site consequence analysis for each Program 1 process, as provided in 2750.2. [Section 2750.3(a)(1)]
☐	1102	The owner or operator determined the worst-case release quantity if released from a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity. [Section 2750.3(b)(1)]
☐	1103	The owner or operator determined the worst-case release quantity if released from a pipe, the greatest amount held in a pipe, taking into account administrative controls that limit the maximum quantity. [Section 2750.3(b)(2)]
☐	1104	The owner or operator for toxic substances that are normally gases at ambient temperature and handled as a gas or a liquid under pressure shall assume the whole quantity in the vessel or pipe would be released as a gas over 10 minutes. [Section 2750.3(c)]
☐	1105	For regulated toxic substances that are normally gases at ambient temperature and handled as a gas or a liquid under pressure, the release rate shall be assumed to be the total quantity divided by 10 unless passive mitigation systems are in place. [Section 2750.3(c)(1)]
☐	1106	For regulated toxic gases handled as refrigerated liquids at ambient pressure, if the released substance is not contained by passive mitigation systems or if the contained pool would have a depth of 1 centimeter or less, the owner or operator shall assume that the substance is released as a gas in 10 minutes. [Section 2750.3(c)(2)(A)]
☐	1107	For regulated toxic gases handled as refrigerated liquids at ambient pressure, if the released substance is contained by passive mitigation systems in a pool in a depth greater than 1 centimeter, the owner or operator may assume that the quantity in the vessel or pipe is spilled instantaneously to form a liquid pool. [Section 2750.3(c)(2)(B)]

☐	1108	For regulated toxic gases handled as refrigerated liquids at ambient pressure, if the released substance is contained by passive mitigation systems in a pool in a depth greater than 1 centimeter, the volatilization rate shall be calculated at the boiling point of the substance. [Section 2750.3(c)(2)(B)]
☐	1109	For regulated toxic substances that are normally liquids at ambient temperature, the owner or operator shall assume that the quantity in the vessel or pipe is spilled instantaneously to form a liquid pool. [Section 2750.3(d)(1)]
☐	1110	The surface area of the pool shall be determined by assuming that the liquid spreads to 1 centimeter deep unless passive mitigation systems are in place that serve to contain the spill and limit the surface area. Where passive mitigation is in place, the surface area of the contained liquid shall be used to calculate the volatilization rate. [Section 2750.3(d)(1)(A)]
☐	1111	For regulated toxic substances that are normally liquids at ambient temperature, the owner or operator shall assume that quantity in the vessel or pipe is spilled instantaneously to form a liquid pool. If the release would occur onto a surface that is not paved or smooth, the owner or operator may take into account the actual surface characteristics. [Section 2750.3(d)(1)(B)]
☐	1112	The volatilization rate shall account for the highest daily maximum temperature occurring in the past three years, the temperature of the substance in the vessel, and the concentration of the substance if the liquid spilled is a mixture or solution. [Section 2750.3(d)(2)]
☐	1113	The rate of release to air shall be determined from the volatilization rate of the liquid pool. [Section 2750.3(d)(3)]
☐	1114	The rate of release to air may be determined by using the methodology in the RMP off-site consequence analysis guidance or any publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices. Proprietary models that account for the modeling conditions may be used provided the implementing agency is allowed access to the model describing its features and differences. [Section 2750.3(d)(3)]
☐	1115	The owner or operator shall assume that the quantity of the substance vaporizes resulting in a vapor cloud explosion. A yield rate factor of 10% of the available energy released in the explosion shall be used to determine the distance to the explosion endpoint if the model used is based on TNT-equivalent methods. [Section 2750.3(e)]
☐	1116	For flammable gases, a yield rate factor of 10% of the available energy released in the explosion shall be used to determine the distance to the explosion endpoint if the model used is based on TNT-equivalent methods. [Section 2750.3(e)]
☐	1117	For regulated flammable substances that are normally gases at ambient temperature and handled as a gas or as a liquid under pressure, the owner or operator shall assume that the quantity in the vessel or pipe, as determined under Section (b), is released as a gas over 10 minutes. [2750.3(e)(1)]
☐	1118	For flammable gases handled as refrigerated liquids at ambient pressure, the volatilization rate (release rate) shall be calculated at the boiling point of the substance and at the conditions specified in Section (d). [Section 2750.3(e)(2)(B)]
☐	1119	For flammable liquids at ambient temperature, the owner or operator shall assume that the quantity in the vessel or pipe is spilled instantaneously to form a liquid pool. [Section 2750.3(f)(1)]
☐	1120	The owner or operator shall use the parameters defined in Sections 2750.2 to determine distance to the endpoints. [Section 2750.3(g)]
☐	1121	The owner or operator may use either the methodology provided in the RMP OCA guidance or any commercially or publicly available air dispersion modeling techniques, provided the techniques account for the specified modeling conditions and are recognized by industry as applicable as part of current practices. [Section 2750.3(g)]
☐	1122	Passive mitigation systems may be considered for the analysis of worst case provided that the mitigation system is capable of withstanding the release event triggering the scenario and would still function as intended. [Section 2750.3(h)]
☐	1123	The owner or operator shall select as the worst case for regulated flammable substances or the worst case for regulated toxic substances, a scenario based on the following factor if such a scenario would result in a greater distance to an endpoint defined in Section 2750.2(a) beyond the stationary source boundary than the scenario provided under Section (b): smaller quantities handled at higher process temperature or pressure. [Section 2750.3(i)(1)]
☐	1124	The owner or operator shall select as the worst case for regulated flammable substances or the worst case for regulated toxic substances, a scenario based on the following factor if such a scenario would result in a greater distance to an endpoint defined in Section 2750.2(a) beyond the stationary source boundary than the scenario provided under Section (b): proximity to the boundary of the stationary source. [Section 2750.3(i)(2)]

CALARP INSPECTION REPORT
COMMENTS PAGE

Page #	Violation Code #	VIOLATIONS
		[Tab_to_Insert_rows_as_needed]

RECOMMENDATIONS
No violations

COMMENTS

Violations were observed/ discovered as listed above. All violations must be corrected by implementing the action listed by each violation. All minor violations must be corrected within 30 days or as specified. KCEHSD must be informed in writing, certifying that the violations have been corrected. A false statement that the violations have been corrected is a violation of the law and is punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be re-inspected at any time.

You may request a meeting with the KCEHSD Program Manager to discuss the inspection findings and/or proposed corrective actions. The issuance of this Inspection Report does not preclude KCEHSD from taking administrative, civil, or criminal action as a result of the violations that were discovered or violations that have not been corrected within the time specified.

[Signature] RICARDO MEDINA 04-20-12 Plant Manager
Facility Rep. Signature Title

Inspector Signature Date

10-10-19 10-10-19 10-10-19

KERN COUNTY ENVIRONMENTAL HEALTH SERVICES DEPARTMENT

HAZARDOUS MATERIALS MANAGEMENT PROGRAM

CALIFORNIA ACCIDENTAL RELEASE PREVENTION PROGRAM

2700 M Street, Suite 300, Bakersfield, CA 93301 • (661) 862-8700, Fax (661) 862-8701

CALARP INSPECTION REPORT

Facility ID: FA0004335	File No.: 00895	Report Date: 03/10/2010
Facility Name: ELK HILLS POWER LLC	Inspection Date: 03/08/2010	
Facility Address: 4026 SKYLINE RD	EPA ID No.:	
City: TUPMAN	Zip Code: 93276	Program Level: 2
Facility Contact: RAY CRUZ	Contact Phone: 661-763-2730 EXT 240	Contact email: rcruz@elkhills.com

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the accidental release prevention requirements of the California Code of Regulations, Title 19, Division 2, Chapter 4.5, California Accidental Release Prevention (CalARP) Program. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing chemical storage, handling, processing, and use; taking samples and photographs; and any other inspection activities necessary to determine compliance with the laws and regulations.

INSPECTION FINDINGS

Is facility subject to RMP regulation (Title 19 CCR, Chapter 4.5)?		☒ Yes	☐ No
Did facility submit RMP? ☒ Yes ☐ No		Date of last RMP update: 11-03-08	
1) Process/NAICS code: 221112		Program Level 1 ☐ 2 ☒ 3 ☐	
Regulated Substance: AMMONIUM HYDROXIDE 19%		Max. quantity in process: 36,000lbs	
2) Process/NAICS code: _____		Program Level 1 ☐ 2 ☐ 3 ☐	
Regulated Substance: _____		Max. quantity in process: _____lbs	
3) Process/NAICS code: _____		Program Level 1 ☐ 2 ☐ 3 ☐	
Regulated Substance: _____		Max. quantity in process: _____lbs	
4) Process/NAICS code: _____		Program Level 1 ☐ 2 ☐ 3 ☐	
Regulated Substance: _____		Max. quantity in process: _____lbs	
5) Process/NAICS code: _____		Program Level 1 ☐ 2 ☐ 3 ☐	
Regulated Substance: _____		Max. quantity in process: _____lbs	
Did facility correctly assign program levels to processes?		☒ Yes	☐ No

DAN STARKEY
Inspector Name

HMS III
Title

661-345-0979
Phone

Signature

Date

CALARP INSPECTION REPORT

Program Level 2

VIOLATION

			Article 1, Program Level 2, CalARP Program Management System
Yes	No/NA	Viol.#	Section 2735.6, Management System
☒	☐	2001	The owner or operator of a stationary source shall develop a management system to oversee the implementation of the Risk Management Program elements. [Section 2735.6(a)]
☐	☒	2002	The owner or operator shall assign a qualified person or position that has the overall responsibility for the development, implementation, and integration of the Risk Management Program elements. [Section 2735.6(b)]
☐	☒	2003	When responsibility for implementing individual requirements of this chapter is assigned to persons other than the person identified under Section (b), the names or positions of these people shall be documented and the lines of authority defined through an organization chart or similar document. [Section 2735.6(c)]
			Article 5, Prevention Program
Yes	No/NA	Viol. #	Section 2755.1, Safety Information
☐	☒	3101	Safety information. The owner or operator shall compile and maintain the following up-to-date safety information related to the regulated substances, processes, and equipment: Material safety data sheets that meet the requirements of Section 5189 of Title 8 of CCR. [Section 2755.1(a)1]
☐	☒	3102	Safety information. The owner or operator shall compile and maintain the following up-to-date safety information related to the regulated substances, processes, and equipment: maximum intended inventory of equipment in which the regulated substances are stored or processed. [Section 2755.1(a)(2)]
☐	☒	3103	Safety information. The owner or operator shall compile and maintain the following up-to-date safety information related to the regulated substances, processes, and equipment: safe upper and lower temperature, pressures, flows, and compositions [Section 2755.1(a)(3)]
☐	☒	3104	Safety information. The owner or operator shall compile and maintain the following up-to-date safety information related to the regulated substances, processes, and equipment: Equipment specifications. [Section 2755.1(a)(4)]
☐	☒	3105	Safety information. The owner or operator shall compile and maintain the following up-to-date safety information related to the regulated substances, processes, and equipment: Codes and standards used to design, build, and operate the process. [Section 2755.1(a)(5)]
☐	☒	3106	Safety information. The owner or operator shall ensure that the process is designed in compliance with recognized and generally accepted good engineering practices. Compliance with federal or state regulations that address industry-specific safe design or with industry-specific design codes and standards may be used to demonstrate compliance with this section. [Section 2755.1(b)]
☐	☒	3107	Safety information. The owner or operator shall update the safety information if a major change occurs that makes the information inaccurate. [Section 2755.1(c)]
Yes	No/NA	Viol. #	Section 2755.2, Hazard Review
☐	☒	3201	Hazard review. The owner or operator shall conduct a review of the hazards associated with the regulated substances, processes, and procedures. [Section 2755.2(a)]
☐	☒	3202	Hazard review. The owner or operator shall conduct a review of the hazards associated with the regulated substances, processes, and procedures. The review shall identify the following: the hazards associated with the process and regulated substances. [Section 2755.2(a)(1)]

☐	☒	3203	Hazard review. The owner or operator shall conduct a review of the hazards associated with the regulated substances, processes, and procedures. The review shall identify the following: opportunities for equipment malfunctions or human errors that could cause an accidental release. [Section 2755.2(a)(2)]
☐	☒	3204	Hazard review. The owner or operator shall conduct a review of the hazards associated with the regulated substances, processes, and procedures. The review shall identify the following: the safeguards used or needed to control the hazards or prevent equipment malfunction or human error. [Section 2755.2(a)(3)]
☐	☒	3205	Hazard review. The owner or operator shall conduct a review of the hazards associated with the regulated substances, processes, and procedures. The review shall identify the following: any steps used or needed to detect or monitor releases. [Section 2755.2(a)(4)]
☐	☒	3206	Hazard review. The owner or operator of a stationary source shall consult with the AA to decide which hazard review methodology is best suited to determine and evaluate the hazards of the process being analyzed. [Section 2755.2(b)]
☐	☒	3207	Hazard review. The owner or operator may use checklists, if acceptable to the AA, developed by persons or organizations knowledgeable about the process and equipment as a guide to conducting the review. For processes designed to meet industry standards or federal or state design rules, the hazard review shall, by inspecting all equipment, determine whether the process is designed, fabricated, and operated in accordance with the applicable standards or rules. [Section 2755.2(c)]
☐	☒	3208	Hazard review. The hazard review shall include the consideration of applicable external events, including seismic events. [Section 2755.2(d)]
☐	☒	3209	Hazard review. The owner or operator shall document the results of the hazard review and ensure that problems identified are resolved in a timely manner. [Section 2755.2(e)]
☐	☒	3210	Hazard review. The hazard review shall be updated at least once every five years. The owner or operator shall also conduct reviews whenever a major change in the process occurs. All issues identified in the hazard review shall be resolved before startup of the changed process. [Section 2755.2(f)]
Yes	No/NA	Viol. #	Section 2755.3, Operating Procedures
☒	☐	3301	The owner or operator shall prepare written operating procedures that provide clear instructions or steps for safely conducting activities associated with each covered process consistent with the safety information for that process. Operating procedures or instructions provided by equipment manufacturers or developed by persons or organizations knowledgeable about the process and equipment may be used as a basis for a stationary source's operating procedures. [Section 2755.3(a)]
☐	☒	3302	Operating procedures. The procedures shall address the following: Initial start up. [Section 2755.3(b)(1)]
☐	☒	3303	Operating procedures. The procedures shall address the following: Normal operation. [Section 2755.3(b)(2)]
☒	☐	3304	Operating procedures. The procedures shall address the following: Temporary operation. [Section 2755.3(b)(3)]
☒	☐	3305	Operating procedures. The procedures shall address the following: Emergency shutdown and operations. [Section 2755.3(b)(4)]
☐	☒	3306	Operating procedures. The procedures shall address the following: Normal shutdown. [Section 2755.3(b)(5)]
☒	☐	3307	Operating procedures. The procedures shall address the following: Startup following a normal or emergency shutdown or a major change that requires a hazard review. [Section 2755.3(b)(6)]
☒	☐	3308	Operating procedures. The procedures shall address the following: Consequences of deviations and steps required to correct or avoid deviations. [Section 2755.3(b)(7)]
☒	☐	3309	Operating procedures. The procedures shall address the following: Equipment inspections. [Section 2755.3(b)(8)]

☐	☒	3310	The owner or operator shall ensure that the operating procedures are updated, if necessary, whenever a major change occurs and prior to startup of the changed process. [Section 2755.3(c)]
Yes	No/NA	Viol. #	Section 2755.4, Training
☐	☒	3401	The owner or operator shall ensure that each employee presently operating a process, and each employee newly assigned to a covered process, has been trained or tested competent in the operating procedures provided in Section 2755.3 that pertain to their duties. For those employees already operating a process on June 21, 1999, the owner or operator may certify in writing that the employee has the knowledge, skills, and abilities to safely carry out the duties and responsibilities as provided in the operating procedures. [Section 2755.4(a)]
☐	☒	3402	Refresher training. Refresher training shall be provided at least every three years, and more often if necessary, to each employee operating a process to ensure that the employee understands and adheres to the current operating procedures of the process. [Section 2755.4(b)]
☐	☒	3403	Refresher training. The owner or operator, in consultation with the employee operating the process, shall determine the appropriate frequency of the refresher training. [Section 2755.4(b)]
☐	☒	3404	The owner or operator shall ensure that operators are trained in any updated or new procedures prior to startup of a process after a major change. [Section 2755.4(d)]
Yes	No/NA	Viol. #	Section 2755.5, Maintenance
☐	☒	3501	The owner or operator shall prepare and implement procedures to maintain the ongoing mechanical integrity of the process equipment. The owner or operator may use procedures or instructions provided by covered process equipment vendors or procedures in federal or state regulations or industry codes as the basis for stationary source maintenance procedures. [Section 2755.5(a)]
☐	☒	3502	The owner or operator shall train or cause to be trained each employee involved in maintaining the ongoing mechanical integrity of the process. To ensure that the employee can perform the job tasks in a safe manner, each employee shall be trained in the hazards of the process, in how to avoid or correct unsafe conditions, and in the procedures applicable to the employee's job tasks. [Section 2755.5(b)]
☐	☒	3503	Any maintenance contractor shall ensure that each contract maintenance employee is trained to perform the maintenance procedures developed under Section (a). [Section 2755.5(c)]
☐	☒	3504	The owner or operator shall perform or cause to be performed inspections and tests on process equipment. Inspection and testing procedures shall follow recognized and generally accepted good engineering practices. The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations, industry standards or codes, good engineering practices, and prior operating experiences. [Section 2755.5(d)]
Yes	No/NA	Viol. #	Section 2755.6, Compliance Audits
☐	☒	3601	The owner or operator shall certify that they have evaluated compliance with the provisions of this article at least every three years to verify that the procedures and practices developed under this chapter are adequate and are being followed. [Section 2755.6(a)]
☐	☒	3602	The compliance audit shall be conducted by at least one person knowledgeable in the process. [Section 2755.6(b)]
☐	☒	3603	The owner or operator shall develop a report of the audit findings. [Section 2755.6(c)]
☐	☒	3604	The owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit and document that deficiencies have been corrected. [Section 2755.6(d)]

☐	☒	3605	The owner or operator shall retain the two most recent compliance audits. This requirement does not apply to any compliance audit report that is more than five years old. [Section 2755.6(e)]
Yes	No/NA	Viol. #	Section 2755.7, Incident Investigation
☐	☒	3701	The owner or operator shall investigate each incident which resulted in, or could reasonably have resulted in, a catastrophic release. [Section 2755.7(a)]
☐	☒	3702	An incident investigation shall be initiated as promptly as possible, but not later than 48 hours following the incident. [Section 2755.7(b)]
☐	☒	3703	A summary shall be prepared at the conclusion of the investigation. [Section 2755.7(c)]
☐	☒	3704	A summary shall be prepared at the conclusion of the investigation which includes at a minimum: date of incident. [Section 2755.7(c)(1)]
☐	☒	3705	A summary shall be prepared at the conclusion of the investigation which includes at a minimum: date investigation began. [Section 2755.7(c)(2)]
☐	☒	3706	A summary shall be prepared at the conclusion of the investigation which includes at a minimum: a description of the incident. [Section 2755.7(c)(3)]
☐	☒	3707	A summary shall be prepared at the conclusion of the investigation which includes at a minimum: the factors that contributed to the incident. [Section 2755.7(c)(4)]
☐	☒	3708	A summary shall be prepared at the conclusion of the investigation which includes at a minimum: any recommendations resulting from the investigation. [Section 2755.7(c)(5)]
☐	☒	3709	The owner or operator shall promptly address and resolve the investigation findings and recommendations. Resolutions and corrective actions shall be documented. [Section 2755.7(d)]
☐	☒	3710	The findings shall be reviewed with all affected personnel whose job tasks are affected by the findings. [Section 2755.7(e)]
☐	☒	3711	Investigation summaries shall be retained for five years. [Section 2755.7(f)]
			Article 7, Emergency Response Program
Yes	No/NA	Viol. #	Section 2765.1, Emergency Response Applicability
☐	☒	3801	The owner or operator of a stationary source whose employees will not respond to accidental releases of regulated substances need not comply with Section 2765.2, provided that they meet the following: For stationary sources with any regulated toxic substance held in a process above the threshold quantity, the stationary source is included in the community emergency response plan developed under Section 11003 of Title 42 of the United States Code. [Section 2765.1(b)(1)]
☐	☒	3802	The owner or operator of a stationary source whose employees will not respond to accidental releases of regulated substances need not comply with Section 2765.2, provided that they meet the following: For stationary sources with only regulated flammable substances held in a process above the threshold quantity, the owner or operator has coordinated response actions with the local fire department. [Section 2765.1(b)(2)]
☐	☒	3803	The owner or operator of a stationary source whose employees will not respond to accidental releases of regulated substances need not comply with Section 2765.2, provided that they meet the following: appropriate mechanisms are in place to notify emergency responders when there is a need for a response. [Section 2765.1(b)(3)]
Yes	No/NA	Viol. #	Section 2765.2, Emergency Response Program
☐	☒	3901	The emergency response program shall include the following elements: An emergency response plan, which shall be maintained at the stationary source and contain at least the following elements: procedures for informing and interfacing with the public and local emergency response agencies about accidental releases, emergency planning, and emergency response. [Section 2765.2(a)(1)(A)]

☐	☒	3902	The emergency response program shall include the following elements: An emergency response plan, which shall be maintained at the stationary source and contain at least the following elements: documentation of proper first aid and emergency medical treatment necessary to treat accidental human exposures. [Section 2765.2(a)(1)(B)]
☐	☒	3903	The emergency response program shall include the following elements: An emergency response plan, which shall be maintained at the stationary source and contain at least the following elements: Procedures and measures for emergency response after an accidental release of a regulated substance. [Section 2765.2(a)(1)(C)]
☐	☒	3904	The emergency response program shall include the following elements: Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance. [Section 2765.2(a)(2)]
☐	☒	3905	The emergency response program shall include the following elements: Training for all employees in relevant procedures and relevant aspects of the incident command system [Section 2765.2(a)(3)]
☐	☒	3906	The emergency response program shall include the following elements: Procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that employees are informed of changes. [Section 2765.2(a)(4)]
☐	☒	3907	A written plan that complies with the contingency plan format developed pursuant to Section 25503.4 of HSC and that, among other matters, includes the elements provided in Section (a) shall satisfy the requirements of this section if the owner or operator also complies with Section (c). [Section 2765.2(b)]
☐	☒	3908	The emergency response plan developed under Section (a)(1) shall be coordinated with the community emergency response plan developed under Section 11003 of Title 42 of United States Code. Upon request of the local emergency planning committee or emergency response officials, the owner or operator shall promptly provide to the local emergency response officials information necessary for developing and implementing the community emergency response plan. [Section 2765.2(c)]

**CALARP INSPECTION REPORT
COMMENTS PAGE**

Page #	Violation Code #	VIOLATIONS
3	3301	Section 2755.3(a) Failure to have the overall required operating procedures for this process
3	3304	Section 2755.3(b)(3) Failure to have written operating procedures for temporary operation
3	3305	Section 2755.3(b)(4) Failure to have written operating procedures for emergency shutdown operation
3	3307	Section 2755.3(b)(6) Failure to have written operating procedures for startup following normal or emergency shutdown or major change requiring a hazard review
3	3308	Section 2755.3(b)(7) Failure to have written operating procedures for consequences of deviations and steps required to correct or avoid deviations
3	3309	Section 2755.3(b)(8) Failure to have written operating procedures for equipment inspections
1	2003	Section 2735.6(c) Failure to have written organization chart showing responsible person for portion of the RMP plans.

RECOMMENDATIONS

Complete the required operating procedures and submit electronically within 60 days
Complete an organization chart showing responsible person for portion of the RMP plans within 30 days.

COMMENTS

Violations were observed/ discovered as listed above. All violations must be corrected by implementing the action listed by each violation. All minor violations must be corrected within 30 days or as specified. KCEHSD must be informed in writing, certifying that the violations have been corrected. A false statement that the violations have been corrected is a violation of the law and is punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be re-inspected at any time.

You may request a meeting with the KCEHSD Program Manager to discuss the inspection findings and/or proposed corrective actions. The issuance of this Inspection Report does not preclude KCEHSD from taking administrative, civil, or criminal action as a result of the violations that were discovered or violations that have not been corrected within the time specified.

E-mailed Ray Cruz
Facility Rep. Signature

Title

Dan Starkey
Inspector Signature

3-10-2010
Date

ENVIRONMENTAL HEALTH SERVICES DEPARTMENT**MATTHEW CONSTANTINE, R.E.H.S., Director**

2700 "M" STREET, SUITE 300
BAKERSFIELD, CA 93301-2370
Voice: (661) 862-8700
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TTY Relay: (800) 735-2929
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January 16, 2007

RESOURCE MANAGEMENT AGENCY**DAVID PRICE III, RMA DIRECTOR**

Community and Economic Development Department
Engineering & Survey Services Department
Environmental Health Services Department
Planning Department
Roads Department

**CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)
HAZARDOUS MATERIAL INSPECTION FORM**

Date: 01/11/2007

Facility ID: FA0004335

File #: 000895

Facility Name: ELK HILLS POWER			Inspection Type ☒ Routine ☐ Reinspection ☐ Complaint		
Site Address: 4026 SKYLINE RD TUPMAN, CA 93276					
Phone: (661)763-2731					
PROGRAMS INSPECTED:	☒ Business Plan	☒ HW Generator	☐ UST	☐ AGT	☒ CalARP
REINSPECTION REQUIRED:	☐ Business Plan	☐ HW Generator	☐ UST	☐ AGT	☐ CalARP

VIOLATION

YES	NO/NA	VIOL. #	BUSINESS PLAN REQUIREMENTS
☐	☒	BP01	Inventory of hazardous materials is accurate, up to date, and complete [HSC 6.95, 25504, Title 19 CCR 2729].
☐	☒	BP02	Site layout/facility maps are accurate [HSC 6.95,25504; Title 19 CCR 2729].
☐	☒	BP03	Hazardous materials are stored in properly labeled and non-deteriorated containers [HSC 25124(b)(3)(A & B)].
☐	☒	ER01	Contingency Plan is complete, updated, and maintained on site [HSC 6.95, 25504; Title 19 CCR 2731 Title 22 CCR 66265.53-54].
☐	☒	ER02	Facility is operated and maintained to prevent/mitigate fire, explosion, or releases of hazardous material or waste which could threaten human health or the environment [Title 22 CCR 66265.31; Title 19 CCR 2731].
☐	☒	ER03	Business has equipment required to, or appropriate for, safely handling hazardous materials [Title 22 CCR 66265.32 & .34].
☐	☒	TR01	Facility has a training program appropriate for the size and complexity of business and nature of hazardous materials handled [Title 19 CCR 2732; Title 22 CCR 66265.16].
☐	☒	TR02	Training documentation is maintained on site for current personnel. [Title 19 CCR 2732;22 CCR 66265.16].

COMMENTS: Go to <http://www.co.kern.ca.us/eh/cupaprogram.asp> for forms and information.**GPS Coordinates: Latitude:****Longitude:****INSPECTOR:** DAN R STARKEY**DATE:** 01/11/2007

HAZARDOUS WASTE GENERATOR

EPA ID NUMBER:

VIOLATIONS

YES	NO/NA	VIOL. #	GENERATOR REQUIREMENTS
☐	☒	GR01	Generator has an EPA Identification number to treat, store, dispose, transport, or transfer hazardous waste [Title 22, CCR 66262.12].
☐	☒	GR02	The facility has made an appropriate waste determination for hazardous based on own knowledge or analysis or other [Title 22, CCR 66262.11]
☐	☒	GR03	Facility Personnel demonstrate awareness of proper(legal) hazardous-waste handling procedures. [Title 22, CCR, 66262.34(d)(2)].
☐	☒	GA01	Hazardous waste has not accumulated for more than 90/180/270 days(depending upon volume/circumstances) without the facility having a hazardous waste storage permit [Title 22,CCR, 66262.34(a).]
☐	☒	GA02	Empty containers or inner liners greater than 5 gallons have dates when emptied and are managed properly within one year of date emptied [Title 22, CCR, 66261.7(f)].
☐	☒	GA03	Universal waste is not accumulated at facility for more than one year [Title 22, CCR, 66273.15(a);66273.35(a)].
☐	☒	GA04	The facility disposes used oil filters within 180 days of generation (or one year if less than 1 ton are accumulated) [Title 22, CCR, 66266.130(c)(4)].
☐	☒	GA05	The facility disposes lead-acid batteries within 180 days of generation (or one year if less than 1 ton are accumulated) [Title 22, CCR, 66268.81(a)(6)]
☐	☒	GC01	Hazardous waste storage containers are in good condition [Title 22, CCR, 66262.34(a)(1)(A)].
☐	☒	GC02	Containers holding hazardous waste are closed/sealed except when adding/removing waste [Title 22, CCR, 66262.34(a)(1)(A)].
☐	☒	GC03	The facility documents weekly inspections of hazardous waste storage area/containers [Title 22, CCR, 66265.15(d) and 66262.34(a)(1)(A)].
☐	☒	GC04	The facility documents daily inspections of tanks where hazardous waste is stored [Title 22, CCR 66262.34(a)(1)(A)].
☐	☒	GC05	The facility has adequate secondary containment for hazardous waste tank systems [Title 22, CCR 66262.34(a)(1)(A)].
☐	☒	GC06	Containers utilizing satellite accumulation rules are at or near the point of generation [Title 22, CCR 66262.34(e)(1)(A)].
☐	☒	GC07	Satellite wastes are managed according to the regulations (complete labeling, accumulation times, 55-gallon or 1 quart volume limits, etc.). [Title 22, CCR, 66262.34(e)].
☐	☒	GR04	Manifests or LDRs are properly completed and/or retained by generator for 3 years [Title 22, CCR 66262.23(a)(1); 66263.42;66263.24;66262.34(a)(4)].
☐	☒	GR05	The facility filed an exception report to DTSC after not receiving the signed TSDF copy of a manifest within 35 days [Title 22, CCR, 66262.42].
☐	☒	GR06	The facility has copies of bills of lading or receipts for removal of hazardous wastes [HSC 25160.2-Consolidated manifests/ 66266.81(a)(6)(B)-lead acid batteries/66266.130- oil filters]. The facility shall maintain copies of receipts for at least three years.
☐	☒	GR07	The facility submitted a hazardous waste recycling report [HSC 25143.10]
☐	☒	GT01	The facility is conducting on-site treatment of hazardous waste with a tiered permit [HSC 25189.5(d)]
☐	☒	GT02	Authorized, licensed, and certified hazardous waste haulers are used to transport hazardous waste to appropriate facilities [H&S Code Chapter 6.5 Section 25163].
☐	☒	GT03	Hazardous wastes are sent to authorized disposal facilities [HSC 25189.5].
☐	☒	GT04	Hazardous waste is not disposed to ground, water, or air [HSC 25189.5].

INSPECTOR: DAN R STARKEY

DATE: 01/11/2007

VIOLATIONS

<u>YES</u>	<u>NO/NA</u>	<u>VIOL. #</u>	<u>GENERATOR REQUIREMENTS</u>
☐	☒	GL01	Containers of hazardous waste are properly labeled (includes appropriate accumulation date, the words "HAZARDOUS WASTE," the waste composition/physical state, the hazardous properties, and name/address of generator) [Title 22, CCR, 66262.34(f)].
☐	☒	GL02	Containers of excluded recyclable materials are properly labeled [HSC 25143.9(a)].
☐	☒	GL03	Containers of universal waste are properly labeled. [Title 22, CCR, 66273.14 for SQH or 66273.34 for LQH].
☐	☒	GL04	Containers of drained used oil filters are labeled with the words "DRAINED USED OIL FILTERS" [Title 22, CCR, 66266.130(c)(3)].
☐	☒	GL05	Accumulation dates are marked on spent lead-acid batteries [22CCR 66266.81]
☐	☒	GL06	Tanks/containers of used oil destined for recycling are clearly marked with the words "USED OIL" [HSC 25143.9(a)].
☐	☒	GL07	Empty contaminated containers are clearly marked with the date they were emptied [Title 22, CCR, 66261.7(f)].

FACILITY NAME: ELK HILLS POWER

ADDRESS: 4026 SKYLINE RD
TUPMAN, CA 93276

FA ID: FA0004335
FILE ID: 000895

SUMMARY OF OBSERVATIONS/VIOLATIONS

- ☒ No violations of underground storage tank, hazardous materials, or hazardous waste laws/regulations were discovered. KERN CUPA greatly appreciates your efforts to comply with all the laws and regulations
- ☐ Violations were observed/discovered as listed below. All violations must be corrected by implementing the corrective action listed by each violation. If you disagree with any of the violations or corrective actions required, please inform the CUPA in writing.

ALL VIOLATIONS MUST BE CORRECTED WITHIN 30 DAYS OR AS SPECIFIED. CUPA must be informed in writing with a certification that compliance has been achieved. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. Your facility may be reinspected any time during normal business hours. If a second reinspection becomes necessary due to non compliance, a reinspection charge of \$85.00 per hour may be charged to the facility.

You may request a meeting with the Program Manager to discuss the inspection findings and/or the proposed corrective actions. The issuance of this Summary of Violations does not preclude the CUPA from taking administrative, civil, or criminal action.

FACILITY NAME: ELK HILLS POWER

ADDRESS: 4026 SKYLINE RD
TUPMAN, CA 93276

FA ID: FA0004335
FILE ID: 000895

VIOLATIONS

VIOL. NO	VIOL. TYPE	CORRECTIVE ACTION REQUIRED
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INSPECTION COMMENTS:

INSPECTOR: DAN R STARKEY
DATE: 01/11/2007

SIGNATURE OF FACILITY REP:

Certification: I certify under penalty of perjury that this facility has complied with the corrective actions listed on this inspection form.

Signature of Owner/Operator: _____ Title: _____ Date: _____