4 December 2002

Leonard Anderson, Esq.
West Newport Oil Company
P.O. Box 1547
Newport Beach, CA 92663

Subject: Remedial Action Progress
Cement Returns Area, Newport Banning Ranch
Orange County, California

Dear Mr. Anderson:

The purpose of this letter is to provide a summary of the laboratory testing data collected to date as part of the remedial action plan (RAP) for the cement returns area at the Newport Banning Ranch (NBR) site in Orange County, California. The cement returns area RAP was submitted to the Santa Ana Regional Water Quality Control Board (RWQCB) on 1 July 2002. The RWQCB approved the cement returns area RAP in their letter to you dated 16 September 2002.

Following RWQCB approval of the RAP, the cement returns were excavated by WNOC personnel. Mr. Thiesen of the RWQCB observed the excavation and the proposed confirmatory sampling locations on 5 November 2002. Soil samples were subsequently collected from the completed excavation and from the proposed backfill source area. At a meeting at the site on 2 December 2002, Mr. Thiesen requested copies of the soil sample chemical laboratory data. By copy of this letter, the requested sampling information is being forwarded to the RWQCB.

To evaluate the soil quality in the completed excavation in the former cement returns area, a total of 16 grab soil samples were collected from the sidewalls and the floor of the excavation. Soil samples were sent to a chemical laboratory for the following analyses:

- total recoverable petroleum hydrocarbons (TRPH) (EPA Method 418.1),
- benzene, toluene, ethylbenzene, and xylenes (BTEX) (EPA Method 8021),
- total petroleum hydrocarbons as gasoline (TPHg) (EPA Method 8015M), and
- hydrocarbon carbon chain analysis (C12-C23 inclusive).

A summary of the chemical laboratory data is provided in Table 1, attached to this letter. The laboratory chemical data sheets are provided in Attachment 2, where excavation confirmation samples are labeled CRA-01 through CRA-16. In summary, these samples did not contain detectable concentrations of BTEX or gasoline range hydrocarbons. A few soil samples contained low concentrations of TRPH (ranging from non-detect to 160 mg/kg). It should be noted that sample CRA-17 was a sample of the excavated cement returns material. This sample was analyzed for purposes of material handling and remediation decision-making.

As discussed in the 2 December 2002 meeting with RWQCB, it is proposed to backfill the excavation with soils that have been previously bio-remediated in the site bioremediation cell. A stockpile of these soils currently exists east of the lined storage area in the site Upland. To evaluate the chemical quality of these soils prior to use as backfill, a total of seven grab soil samples were collected at varying distances along the stockpile perimeter. These stockpile samples were tested according to the analytical protocol described above. Data is summarized in Table 1 and the laboratory chemical data sheets are provided in Attachment 2, where stockpile samples are labeled SP-01 through SP-07. The soil samples did not contain detectable concentrations of BTEX or gasoline range hydrocarbons. A few soil samples contained low concentrations of TRPH (ranging from 43 to 920 mg/kg). Each sample meets the criteria established for open space at the site.

As discussed with Ken Thiesen on 2 December 2002, upon review of the laboratory data, the RWQCB will issue an approval letter for the backfill soils and therefore completion of the cement returns area remedial action. If you have questions, please contact either of the undersigned at (714) 969-0800.

Sincerely,

Michael Reardon, P.E.
Project Engineer

Eric Smalstig, P.E.
Senior Project Engineer

Attachments: 1 - Table 1 – Summary of Soil Sample Chemical Data
2 - Laboratory Chemical Data

Copy to: Ken Thiesen, Regional Water Quality Control Board, Santa Ana
Mr. George Basye, Aera Energy, Brea
Mr. Michael Klancher, Aera Energy, Bakersfield

ATTACHMENT 1

TABLE 1
SUMMARY OF LABORATORY DATA

TABLE 1
SUMMARY OF LABORATORY RESULTS
CEMENT RETURNS AREA
NEWPORT BANNING RANCH
(November 2002)

PARAMETER	METHOD	RESULTS – (Sample ID) [1]
CONFIRMATION SAMPLES – CEMENT RETURNS EXCAVATION		
TPHg	EPA 8015M	ND – All Samples
BTEX	EPA 8021B	ND – All Samples
TRPH	EPA 418.1	ND – (CRA-09, CRA-14, CRA-15) 13 – (CRA-05, CRA-06, CRA-12) 15 – (CRA-11) 16 – (CRA-07) 17 – (CRA-10, CRA-13) 19 – (CRA-04, CRA-08) 22 – (CRA-02) 23 – (CRA-03) 40 – (CRA-16) 160 – (CRA-01)
STOCKPILE - SOIL SAMPLES		
TPHg	EPA 8015M	ND – All Samples
BTEX	EPA 8021B	ND – All Samples
TRPH	EPA 418.1	43 – (SP-02) 72 – (SP-03) 160 – (SP-06) 320 – (SP-05) 460 – (SP-04) 760 – (SP-01) 920 – (SP-07)

Note:
1) Units are reported in milligram per kilogram (mg/kg)

ATTACHMENT 2

LABORATORY DATA