

BALDWIN HILLS COMMUNITY STANDARDS DISTRICT

Summary

The purpose of the Baldwin Hills Community Standards District (CSD) is to establish additional regulations, safeguards and controls for activities related to drilling for and production of oil in the unincorporated portion of the Inglewood Oil Field. The mitigation measures identified in the Environmental Impact Report were incorporated into the CSD to provide the necessary development standards and regulations to minimize potential adverse impacts of oil field operations. The following provides a summary of the CSD:

PROHIBITED USES

The CSD prohibits the following:

- Refining (22.44.142.E.27.b)
- Drilling in the Holy Cross Cemetery properties and the small non-contiguous parcel located east of La Brea Avenue (22.44.142.D.1)

USES SUBJECT TO A DIRECTOR'S REVIEW (22.44.142.H.1)

The CSD allows oil production operations through a director's review procedure provided operations comply with the development standards, operating procedures and requirements of the CSD. Oil production operations include: drilling new wells; re-drilling existing wells, re-working or maintenance of existing wells; oil extraction (pumping); processing operations related to the initial separation of oil, gas and water, and; processing operations related to water injection.

The CSD requires that the operator submit a director's review application pursuant to Part 12 of Chapter 22.56 of the County Code for proposed drilling of new wells and re-drilling of existing wells, the installation of ancillary equipment and structures, and construction work associated with facility maintenance.

Director's review applications for drilling and re-drilling may only be approved if the subject wells were first approved as part of an annual drilling plan. The number of drilling and re-drilling applications that can be approved through a director's review procedure is subject to the following limits:

- A maximum of 24 wells (includes newly drilled and re-drilling of existing wells) for the first year following the effective date of the CSD
- A maximum of 53 wells per year (includes newly drilled and re-drilling of existing wells)
 - A maximum of 45 of those wells may be newly drilled wells
- A maximum of 600 wells may be approved through a director's review procedure over a 20 year period following the effective date of the CSD

USES SUBJECT TO A CONDITIONAL USE PERMIT (22.44.142.H.2)

The CSD allows the following subject to a conditional use permit pursuant to Part 1 of Chapter 22.56 of the County Code:

- Drilling or re-drilling that exceeds the maximum number allowed with a director's review
- Steam drive plant
- New tanks with a capacity of greater than 5,000 barrels

APPLICATIONS WHERE VIOLATIONS EXISTS (22.44.142.H.4)

The CSD provides that no application will be accepted for processing or approved if there are any existing uses in violation of the provisions of the CSD.

DISTRICT-WIDE STANDARDS (22.44.142.E)

Fire Protection and Emergency Response (22.44.142.E.1)

The Fire Protection and Emergency Response subsection includes measures for ensuring that the existing facility has the necessary emergency response capabilities and that surrounding communities are notified in the event of an emergency. Measures include:

- Require that the operator implement a **Community Alert Notification System** capable of notifying area residents in the event of an emergency.
- Require that the operator develop and implement **spill containment training** for oil field personnel.
- Require that the operator maintain and implement an **Emergency Response Plan** per Environmental Protection Agency regulations.

Air Quality and Public Health (22.44.142.E.2)

The Air Quality and Public Health subsection includes provisions to minimize emissions that could impact the public health of surrounding communities. Measures include:

- Require that the operator obtain **emission offsets** for new or modified emission sources (applies to stationary sources)
- Prohibits the installation of a new gas plant or flare as part of a steam drive plant (note: a steam drive plant requires a conditional use permit)
- Require the use of **Tier 2 engines** or better and use of **second generation heavy duty diesel catalysts** on all drill rig engines
- Require use of **Tier 3 engines** and use of **level 3 diesel catalyst** on all off-road diesel construction equipment engines
- Require air quality monitoring of **total hydrocarbon vapors and hydrogen sulfide** at each **well drill site**, at each **workover or reworking site** and monitoring of total hydrocarbon vapors at the **gas plant**; monitors to digitally record levels of hydrogen sulfide and total hydrocarbon vapors and provide automatic alarms; subsection specifies actions to be taken tied to threshold levels in alarm events
- Require the use of a gas buster and portable flare for drilling in the nodular shale and require that a gas buster and portable flare be available for all other drilling.

- Require that crude oil storage tanks contain a pressure monitoring system in the vapor space of each tank; subsection establishes an alarm threshold and requires breakdown event reporting and corrective action in coordination with the Los Angeles County Fire Department and SCAQMD
- Require that the operator use **odor suppressants** when loading material into the **biofarms** and on the **mud shaker tables** for all drilling operations; odor suppressants are defined as “an organic emulsifier, or other compound, that is used to eliminate hydrocarbon odors by reducing the organic composition of hydrocarbon materials”
- Require the use of **closed systems** for all produced water and crude oil associated with production, processing and storage
- Require the following **setbacks** for new wells:
 - 400 feet from the property boundary of any residential, commercial, or office/professional building and the property boundary from any public park or recreation area
 - 20 feet from the public roadways
- Limit construction of a new steam drive plant and water treatment plant(s) to different schedules in order to minimize construction related dust (note: steam drive plant requires a conditional use permit)
- Require maintenance of a **meteorological station** at the oil field in coordination with Cal Tech
- Require that the meteorological data be assessed every 5 years to determine if a **new health risk assessment** is needed
- Comply with approved **Fugitive Dust Control Plan**
- Comply with approved **Odor Minimization Plan**
- Comply with approved **Air Monitoring Plan**

Safety and Risk of Upset (22.44.142.E.3)

The Safety and Risk of Upset subsection includes measures to minimize the risk of accidental explosions, fires and spills. Measures include:

- Require **blending of natural gas liquids** (NGLs) from the gas plant with crude oil and limit the amount of NGLs that can be stored on-site to that allowed in the Risk Management Plan
- Require that the propane and natural gas liquid bullets be **fire-proofed with a minimum two-hour fire rating insulation and automatic deluge system**
- Require that any future steam plant be located at least 1,000 feet from the closest residential, commercial, institutional, or recreational areas (note: steam plant requires a conditional use permit)
- Require that all oil storage tank areas contain **secondary containment** capable of holding 110% of largest tank volume
- Require that all **retention basins be adequately sized** to handle [inflows and outflows] a 100-year storm event plus potential spill of the largest tank
- Require that all above ground piping that contain or could contain oil be protected by basins or secondary containment

Geotechnical (22.44.142.E.4)

The Geotechnical subsection includes measures for minimizing slope instability due to grading, drilling and production activity, and for monitoring ground movement at the oil field and its vicinity. Measures include:

- All proposed grading subject to review by the Department of Public Works
- Prohibit cut and slope fills greater than 2:1
- Require a **site-specific geotechnical investigation** in conjunction with an application for a grading permit for grading in excess of 5,000 cubic yards (grading in excess of 5,000 cubic yards also requires a conditional use permit)
- Require a **site-specific geotechnical investigation** for all proposed permanent structures
- Require that the operator use erosion control devices and comply with the approved **Erosion Control Plan**
- Require that slopes be restored to original grades once use is discontinued, provided restoration does not affect existing drainage patterns or slope stability
- Require annual ground movement surveys (subsidence and uplift)
- If annual ground movement survey report indicates ground movement is occurring at the oil field and/or vicinity the operator is required to review property damage complaints from the previous year; the Department of Public Works to review the complaint analysis in consultation with DOGGR; DOGGR may require adjustments to fluid injection and withdrawal rates
- Require a **Fault Study** for permanent structures in the Alquist-Priolo Fault Zone; following the fault study **prohibit permanent structures within 50 feet of an active fault**
- Require that the operator maintain an **accelerometer** (to measure seismic activity) at the oil field in coordination with Caltech and that operations cease following a seismic event measuring 13 percent of gravity until the structural integrity of oil field infrastructure is verified
- Require that a County-approved paleontologist monitor all rough grading through sensitive sediments
- Maintain and implement an approved **Pipeline Management Plan**

Noise Attenuation (22.44.142.E.5)

The Noise Attenuation subsection includes measures for minimizing noise impacts from drilling and production operations. Measures include:

- Elevation of noise levels limited to 5dBA from the existing baseline levels at the property line of neighboring uses as established in the Final Environmental Impact Report
- Prohibit pure tones when measured from developed areas
- Require that the operator regularly service existing and future gas plant equipment to minimize tonal noise from worn parts
- Require that the operator disable backup alarms between the hours of 8:00pm and 8:00am
- Require that the operator comply with an approved **Drilling Quiet Mode Plan** from 6:00pm to 8:00am
- Prohibit deliveries to the oil field between the hours of 8:00pm to 7:00am, except in case of emergency
- Prohibit deliveries to areas within 500 feet of any residential property between 5:00pm and 7:00am Monday through Saturday, and 5:00pm to 9:00am on Sundays and legal holidays
- Prohibit construction activity from 7:00pm to 7:00am from Monday through Friday

- Prohibit construction activity on Saturdays, Sundays and legal holidays
- Prohibit unnecessary idling of construction equipment
- Require that all construction equipment be powered by internal combustion engines and that equipment be properly muffled and maintained
- Require that the operator brief employees and subcontractors on noise policies prior to commencement of work and that operator post quiet mode policies at every drill/construction site

Vibration Reduction (22.44.142.E.6)

The Vibration Reduction subsection includes measures for minimizing vibration associated with drilling and production operations. Measures include:

- Require that oil operations be conducted in a manner that minimizes vibration
- Require that vibration levels not exceed a velocity of .25 mm/s over the frequency range of 1 to 100 Hz at the outer boundary

Biological Resources (22.44.142.E.7)

The Biological Resources subsection includes provisions to protect areas of high quality habitat by minimizing or avoiding the disturbance of sensitive natural communities. Measures include:

- Comply with provisions of an **Emergency Response Plan** which outlines response measures in the event of an accidental spill
- Comply with the approved **Special Status Species Plan**, which identifies sensitive habitat areas and priority restoration areas
- In the event that proposed drilling and production operations would disturb areas identified as sensitive habitat in the Special Status Species Plan, the operator is required to submit a **Native Habitat Protection Plan** to the Director for review and approval prior to issuance of any permits for oil field development. This subsection also contains minimum requirements for the Native Habitat Protection Plan including the retention of a County-approved biologist to direct all habitat restoration and revegetation efforts.
- Require **pre-construction surveys** for proposed work in designated sensitive habitat areas; if surveys find federal or state listed plant or wildlife species then operator required to comply with all applicable US Fish and Wildlife and California Department of Fish and Game regulations
- Require **construction monitoring and relocation of sensitive wildlife**, if needed, for work in designated sensitive habitat areas
- Require that any removal of trees and riparian scrub be scheduled for outside the nesting season
- Require that **restoration** per the approved Habitat Protection Plan begin within 60 days after the completion of drilling or construction work

Cultural/Historic Resources (22.44.142.E.8)

The Cultural and Historic Resources subsection includes measures for avoiding disturbances from future oil field development to the Cone Trust House and to unknown subsurface cultural resources. Measures include:

- Require that new oil field development be located to avoid disturbance to the Cone Trust House.

- Require that the operator retain a qualified archeologist to facilitate a workshop for oil field construction personnel. Minimum training requirements include: a review of archaeological artifacts, examples of common artifacts, and notification procedures in case artifacts and/or human remains are discovered.
- Comply with the approved **Construction Treatment Plan**, which details how to properly record and evaluate new discoveries.

Lighting (22.44.142.E.9)

The Lighting subsection includes provisions to minimize impacts associated with off-site spill over of lighting used during drilling operations which typically occur 24 hours a day. Measures include:

- Require that lighting sources be screened and directed to prevent off-site spillover.
- Require that the operator prepare a **Lighting Plan** for all new permanent structures to be reviewed and approved by the Director of Planning prior to issuance of any permits.

Landscaping, Visual Screening and Irrigation (22.44.142.E.10)

The Landscaping, Visual Screening and Irrigation subsection includes measures for improving the visual character of the oil field. Measures include:

- Comply with the conceptual landscape plan prepared by landscape architect Mia Lehrer, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas and adjacent public streets or highways; landscaping pursuant to the conceptual landscape plan shall be completed in phases over a two to five year period.
- Require that all landscaping be routinely inspected and maintained in a neat, clean, and healthful condition.

Other Requirements (22.44.142.E.11 to 22.44.E.36)

In addition to general oil field development standards, the BHCSO requires a number of plans and programs that address recycling, protection of water resources, and additional oversight of oil field activities. These plans and programs include:

- Require that all drilling, re-drilling and reworking waste be collected in portable steel bins and removed from the oil field within 30 days following completion of work unless waste is intended for reinjection as permitted by DOGGR.
- Require that the director of public works review and approve a private road construction plan prior to the construction of any new private roads
- Require that the operator maintain and implement a **Construction Storm Water Pollution Prevention Plan** and a **Spill Prevention, Control and Countermeasure Plan**
- Require that the operator prepare a **site-specific hydrologic analysis** that addresses anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in loss of vegetation
- Require that the operator install and maintain **groundwater quality monitoring wells** in the vicinity of each surface water retention basin
- Prohibit the storage of non-essential equipment on-site
- Require that all non-essential equipment be removed within 30 days following completion of work

- Require that equipment/facilities be removed once they reach the end of their useful economic life; require that areas be revegetated within 90 days of equipment/facility removal
- Require that the operator maintain the oil field free from debris, vegetation overgrowth, and accumulations of garbage, refuse and other wastes
- Comply with the approved **Hazardous Materials Business Plan**; store hazardous materials in an orderly manner and label
- Limit the number of drill rigs to **no more than three drill rigs** present within the oil field at any one time
- Require that the operator prepare and submit an **Annual Drilling, Well Abandonment and Well Pad Restoration Plan** to the Director for approval. The Plan must be reviewed by the community (through the Community Advisory Panel) and approved by the Director prior to commencement of any drilling for that year.
- Require that all drilling and re-drilling equipment be removed within 90 days following completion of drilling or re-drilling activity
- Prohibit refining
- Limit the number of reworking rigs to **no more than eight reworking rigs** present within the oil field at any one time
- Prohibit new oil storage tanks within 500 feet of developed areas
- Require annual production reports
- Require annual testing for hydrocarbon vapor of areas that contain abandoned wells
- Requires that the Director conduct a public hearing to assess the status of the oil field when production levels fall below designated threshold level.
- Require that the operator submit an **Abandonment Plan** to DOGGR within 180 days of permanent facility shutdown; the operator to provide quarterly updates of abandonment and site remediation in compliance with the CSD and approved Abandonment Plan.

MONITORING AND COMPLIANCE (22.44.142.F)

The Monitoring and Compliance subsection includes measures for ensuring compliance with BHCSD development standards and program requirements, as well as monitoring of on-going operations. Measures include:

- Require that the operator prepare and submit an **Environmental Quality Assurance Program**, which would include the steps the operator would take to ensure compliance with standards; the EQAP would also be reviewed by the community (through the community advisory panel or CAP)
- Require that the operator submit annual reports to the Director of Planning describing: project status; development standards compliance; results and analysis required by the CSD. These reports would also be reviewed by the CAP and the MACC.
- Require that the operator fund on-site **Environmental Compliance Coordinator(s)** to monitor drilling construction and day to day operations. The ECC would report to the Department of Regional Planning.
- Require compliance with an approved Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP)
- Require that the operator perform **Annual Emergency Response Drills** with the Los Angeles County and Culver City Fire Departments.

- Require that the Department of Public Health **monitor ambient noise levels and vibration** in sensitive receptive areas on a quarterly basis; suspends drilling approvals until noise and vibration violations are resolved.
- Require that the operator report all complaints to the Department of Regional Planning on the same business day and that the operator maintain a complaint log and that said log be submitted to the director, MACC and CAP on a quarterly basis.

ADMINISTRATIVE ITEMS (22.44.142.G)

The Administrative Items subsection includes a number of provisions to ensure fee recovery for enforcement, indemnification, adequate insurance and performance security, periodic review of CSD provisions, and establishment of a Multiple Agency Coordination Committee (MACC). These provisions include:

- Requires that the operator deposit the sum of \$500,000 with the Department of Regional Planning to establish a draw-down account to **cover reasonable expenses** incurred by the County or County contractors for permitting, permit condition implementation, and condition monitoring; the operator to replenish account when it reaches a certain level
- Require that the operator provide **evidence of insurance** coverage that meets county requirements as determined by the Chief Executive Office.
- Require that the operator establish to the satisfaction of the Los Angeles County Chief Executive Officer **financial responsibility** for cleanup of any spills or other disaster associated with new and existing wells prior to issuance of new drilling or re-drilling permits
- Require that the **County review the provisions in the adopted BHCS every five years**, or sooner if determined by the Director, to assess the adequacy of developments standards.
- Require that the County establish a Multiple Agency Coordination Committee (MACC) comprised of representative from the various public agencies that regulate oil field development.

ENFORCEMENT (22.44.142.I)

The Enforcement subsection established additional enforcement provisions, including:

- Civil penalties for violations ranging from \$1,000 to \$10,000 per day per violation
- Access to records and facilities for enforcement and inspection
- Draw-down account established to cover fines

PUBLIC OUTREACH (22.44.142.J)

The Public Outreach subsection includes measures to ensure community awareness and outreach. Measures include:

- Establishment of a Community Advisory Panel (CAP)
- Designation of an Ombudsperson to respond to questions and concerns regarding oil field operations
- Annual information newsletter
- Maintenance of an Oil Field Website
- Annual community meetings to provide updates on oil operations

MODIFICATION OF DEVELOPMENT STANDARDS (22.44.142.K)

The modification subsection provides a mechanism for the operator to apply for a modification of development standards. The procedure requires an application pursuant to the director’s review requirements with the following additional requirements:

- **Notice of pending application** - notices mailed to property owners within 1,000 foot radius of the exterior boundaries of the field 30 days prior to action;
- **Public hearing** – if a written protest is received , the matter will be set for public hearing before the hearing officer
- **Notification of decision** – the director shall notify the operator and all property owners within a 1,000 foot radius of oil field boundary of both approvals and denials;
- **Right of appeal** - any person may appeal the director’s decision within 15 calendar days of the mailing date of the notice of decision.

IMPLEMENTATION PROVISIONS (22.44.142.L)

The Implementation subsection requires various plans and programs needed for initial compliance with the BHCS D requirements, due within a specified time frame. The plans and programs address a number of issue areas. The following table provides a summary of the various required plans and programs:

Implementation Subsection L Summary and Schedule:

Plan/Program	Issue Area	Due Date	Subject/Purpose	Lead Agency
Copy of current Emergency Response Action Plan	Fire Protection and Emergency Response	12/27/08	Provide DRP and Fire Department copy of current Plan	DRP; Fire Department
Oil Field Entrance Sign	Signs	12/27/08	Post oil field entrance sign	DRP
Hazardous Material Business plan	Storage of Material	12/27/08	Submit copy of Hazardous Material Business Plan to DRP; Hazardous Material Business Plan is monitored by the Fire Department	Fire

Plan/Program	Issue Area	Due Date	Subject/Purpose	Lead Agency
Multiple Agency Coordination Committee (MACC)	Administrative	1/26/09	DRP to establish a MACC comprised of representatives from the following agencies: County Fire; County DPW; County DPH; SCAQMD; RWQCB; DOGGR; Culver City Fire. MACC to review and comment on all monitoring and compliance reports, plans and other required documents	DRP
Drilling, Redrilling, Well Abandonment and Well Pad Restoration Plan	Drilling, Redrilling and Reworking Operations	1/26/09	Indicate drilling plan for the year; indicate wells that will be abandoned for the year; and indicate well pad restoration activities; drilling and/or redrilling permits will not be approved until the Plan has been approved	DRP
Citizens Advisory Panel (CAP)	Public Outreach	1/26/09	DRP to establish a CAP comprised of representatives from the major HOAs surrounding the Oil Field; lessor and landowners; operator; the County and neighboring cities and institutions.	
Perimeter Identification Signs	Signs	1/26/09	Post perimeter identification signs	DRP
Other Required Signs	Signs	1/26/09	Post all other required signs	DRP
Odor Minimization Plan	Air Quality and Public Health	2/25/09	Specify measures to be taken to minimize odor impacts from operations	DRP
Air Quality Monitoring Plan	Air Quality and Public Health	2/25/09	Specify number and location of monitors that will be used to monitor workover, reworking and gas plant operations hydrogen sulfide and hydrocarbon vapors	DRP
Develop spill containment training program	Fire Protection and Emergency Response	2/25/09	Develop a spill containment response program and ensure adequate equipment on-site	DRP
Accumulated Ground Movement Study	Geotechnical	2/25/09	Implementation plan for measuring accumulated subsidence and/or uplift at the oil field and vicinity; implement within 90 days after implementation plan is approved	DPW

Plan/Program	Issue Area	Due Date	Subject/Purpose	Lead Agency
Environmental Quality Assurance Program (EQAP)	Monitoring and Compliance	2/25/09	Program for assuring compliance with the CSD; include provision for an on-site Environmental Coordinator(s); EQAP must be approved prior to commencement of drilling; reviewed by MACC and CAP	DRP
Drilling Quiet Mode Plan	Noise Attenuation	2/25/09	Detail measures to be taken by the operator to minimize evening and nighttime noise; no drilling approvals until Plan has been approved by the Director in consultation with DPH	DRP
Oil Field Website	Public Outreach	2/25/09	Provide up-to-date information on oil field development activities	DRP
Propane and Natural Gas Liquids Bullet Fireproofing	Safety and Risk of Upset	2/25/09	Install fire proofing on existing propane and natural gas liquid bullets within the oil field	Fire
Fugitive Dust Control Plan	Air Quality and Public Health	3/27/09	Plan for minimizing dust impacts; follow SCAQMD guidelines for fugitive dust mitigation	DRP
Meteorological Station	Air Quality and Public Health	3/27/09	Submit to SCAQMD a design for the installation of a meteorological station at the oil field; the meteorological station to record meteorological conditions to better evaluate and respond to odor complaints	SCAQMD
Well Amortization Report	Air Quality and Public Health	3/27/09	Inventory of existing wells that are located within the setback area. The report to include an amortization and abandonment schedule for the Wells located within the setback, based on useful economic life.	DRP
Worker Training Material	Cultural/Historic Resources	3/27/09	Training material prepared by a qualified archeologist to train construction/drilling personnel on how to identify and treat potential artifacts	DRP
Community Alert Notification System	Fire Protection and Emergency Response	3/27/09	Automatic notification of area residents in the event of an emergency	Fire

Plan/Program	Issue Area	Due Date	Subject/Purpose	Lead Agency
Fire Protection Audit	Fire Protection and Emergency Response	3/27/09	Review of fire fighting capabilities per applicable regulations; identify corrective actions; set a time frame for implementing corrective actions	Fire
New Gas Plant Flare	Noise Attenuation	3/27/09	Submit an application for a new gas plant to SCAQMD; the new gas plant to minimize/eliminate vibration incidents due to operation of the flare	SCAQMD
Gas Plant Audit	Safety and Risk of Upset	3/27/09	3rd party audit of the existing gas plant for compliance with fire code and seismic assessment; audit to identify corrective actions and include a corrective action plan with estimated completion time for correction measures	Fire
Retention Basins	Safety and Risk of Upset	3/27/09	Demonstrate that existing retention basins are adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank	DPW
No Littering Signs	Signs	3/27/09	Post no littering signs	DRP
Install oil tank pressure monitors on existing tanks	Air Quality and Public Health	5/26/09	Install tank pressure monitoring system on existing tanks to monitor and digitally record the pressure in tank vapor space; require corrective action in an alarm event	DRP
Special Status Species and Habitat Protection Plan	Biological Resources	5/26/09	Identify special status habitat areas within the Inglewood Oil field	DRP
Revise the Emergency Response Plan (ERP)	Biological Resources	5/26/09	Revise ERP to address protection of sensitive biological resources and revegetation of any areas disturbed during an accidental oil spill or cleanup activities	DRP
Construction Treatment Plan	Cultural/Historic Resources	5/26/09	Establish protocol for treatment of new archeological discoveries	DRP
Annual ground movement monitoring plan	Geotechnical	5/26/09	Implementation plan for taking annual measurements of subsidence and/or uplift at the oil field and vicinity	DPW

Plan/Program	Issue Area	Due Date	Subject/Purpose	Lead Agency
Erosion control plan	Geotechnical	5/26/09	Detail best management practices to control erosion at the oil field	DPW
Accelerometer	Geotechnical	5/26/09	Install an accelerometer at the Oil Field in coordination with the Caltech Seismological Laboratory; the accelerometer to measure site-specific ground accelerations; subsection E.4.g requires that the operator cease operations and inspect oil field infrastructure following a seismic event that exceeds 13 percent of gravity; operations may not be reinstated until it is determined that infrastructure is structurally sound	DPW
Tank Seismic Assessment	Geotechnical	5/26/09	Assess existing oil tank's with capacity greater than 5,000 barrels ability to withstand an earthquake; include corrective measures and timeline for implementing corrective measures	DPW
Landscape Plan	Landscaping, Visual Screening and Irrigation	5/26/09	Address screening, irrigation and planting protocol for perimeter of oil field consistent with the conceptual landscape plan; landscaping to be in place within 2 years of Plan approval	DRP
Unused/Abandoned Equipment Removal Plan	Oil Field Cleanup and Maintenance Plan	5/26/09	Identify all unused equipment and identify a schedule for removal; all unused equipment to be removed within 1 year after plan is approved by the Director	DRP
Recycling Plan	Oil Field Waste Removal	5/26/09	Address construction, demolition debris and landscape waste	DPW
Pipelines	Processing Operations	5/26/09	All existing pipelines not enclosed within a fence shall be placed underground or covered with appropriate material approved by the Fire Department	Fire
Water Management Plan	Water Management	5/26/09	Address best management practices, water conservation, drainage, drip irrigation and use of reclaim water	DPW

Plan/Program	Issue Area	Due Date	Subject/Purpose	Lead Agency
Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP)	Monitoring and Compliance	5/26/09	Program detailing inspection procedures, maintenance routines, safety audits, corrosion monitoring, etc.; SIMQAP to be updated every 5 years to incorporate changes in procedures and new safety and maintenance technologies	DRP
Program for detecting Tank bottom leaks	Tanks	5/26/09	Program for detecting and dealing with tank bottom leaks; submit to Fire Department for review and approval	Fire
Community Meeting	Public Outreach	5/26/09	Operator hold first of annual community meeting to update community on operations	DRP
Well Identification Signs	Signs	5/26/09	Post well identification signs	DRP
Ground Water Monitoring Program	Ground Water Monitoring	11/27/09	Install groundwater quality monitors	DRP
Active Pipeline Plot Plan	Process Operation	11/27/09	Show location of all active pipelines (including waste water lines) located outside of the CSD boundary	Fire
Oil Tank Secondary Containment	Safety and Risk of Upset	11/27/09	Demonstrate that all existing oil tank areas contain sufficient secondary containment (berms and walls) to contain at least 110 percent of the largest Oil Tank volume.	Fire
Above Ground Piping Containment	Safety and Risk of Upset	11/27/09	Demonstrate that existing above ground piping in the Oil Field that contain or could contain oil are properly protected by basins or secondary containment (berms or walls).	DPW
Paint structures	Painting	11/27/10	Paint all existing visible structures with a compatible color; provide semi-annual report on status	DRP