



State Water Resources Control Board

Division of Drinking Water

February 6, 2023

Governor's Office of Planning & Research

FEB 6 2023

Colleen Doan
Community Development Director
City of Signal Hill
2175 Cherry Ave
Signal Hill, CA 90755

STATE CLEARING HOUSE

Dear Ms. Doan:

DDW COMMENTS ON SIGNAL HILL PETROLEUM CONDITIONAL USE PERMIT 97-03 EXTENSION PROJECT

The State Water Board, acting by and through its **Division of Drinking Water** (Division) has reviewed the **City of Signal Hill's** (City) Environmental Impact Report (EIR) for the proposed 20-year extension of Signal Hill Petroleum's (SHP) Conditional Use Permit (CUP) 97-03.

In accordance with the California Code of Regulations (CCR), Title 14, Section 15082(b), each responsible agency shall provide the lead agency with specific detail about the scope and content of the environmental information, related to the responsible agency's area of statutory responsibility, that must be included in the draft EIR. The State review period started on January 13, 2023, and will be open until February 13, 2023. The Division has reviewed the City's complete project description and Initial Study attached to the Notice of Preparation package. At this time, the Division has identified the following comments and questions during the review process:

1. Please notify the Division if any of the existing and proposed oil and gas facilities are located **within 1,000 feet** from any existing potable water production wells.
2. The Division recommends the following additional agencies to be included in the State Clearinghouse distribution for reviewal of the project: SWRCB Division of Water Quality, SWRCB Division of Drinking Water, Los Angeles Regional Water Quality Control Board, Los Angeles County Department of Regional Planning, California Public Utilities Commission, and Office of the State Fire Marshal.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

3. The City must comply with the California Government Code (CGC), Title 5, Section 51017.1, Locating Hazardous Pipelines Near Drinking Water Wells and of CGC, Title 5, Section 51017.2, Wellhead Protection. As a reference, these regulations could be found in the weblink below:
<https://casetext.com/statute/california-codes/california-government-code/title-5-local-agencies/division-1-cities-and-counties/part-1-powers-and-duties-common-to-cities-and-counties/chapter-55-the-elder-california-pipeline-safety-act-of-1981>
4. The City must comply with cross-connection control requirements per CCR, Title 17, Section 7584, Responsibility and Scope of Program. Specifically, the City must ensure that cross-connection control is established when potable water is utilized in oil and gas facilities.
5. In Section 3.7.2.3 and 3.10.2.2 of the Initial Study, it is mentioned that the first step in protecting drinking water aquifers is with CalGEM and SWRCB concurring that an aquifer meets certain criteria set forth in PRC §3131 and § 146.4 of Title 40 of the Code of Federal Regulations, including documentation that the aquifer is not currently and would not in the future become a source of drinking water. During our review of the Notice of Completion & Environmental Document Transmittal, we noticed that SWRCB was not selected as a reviewing agency, and it was not clear if the SWRCB has been contacted to review the aquifer. If the SWRCB has not been contacted, please work closely with a SWRCB representative. The list of SWRCB contacts regarding water quality in areas of oil and gas production can be seen in the weblink below:
https://www.waterboards.ca.gov/water_issues/programs/groundwater/sb4/contacts.html
6. In Section 3.7.2.3 of the Initial Study, it states that the two groundwater production wells make-up about 90% of the City's water supply. This statement is inaccurate. Please correct the groundwater production percentage. This value could be corrected by obtaining the City's most recent production data from the City's Water Department.
7. In Section 3.10.1.4 of the Initial Study, under the Groundwater Quality subsection, it is mentioned that minimal water treatment occurs prior to entering the potable water system. This statement is inaccurate. In fact, the City has an oxidation and filtration treatment for removal of manganese and iron from one of its production wells. Additionally, the City operates a treatment system consisting of nanofiltration and granular activated carbon to remove color and benzene from its other production well.
8. In Section 3.10.3 of the Initial Study, it is mentioned that there will be little impact on water quality within drinking water aquifers from a 2014 study. Is there an updated study on current conditions? If not, the Division recommends the City to update the Impacts of Oil Field Operations on Groundwater Quality in Signal Hill-Long Beach Area study.

9. In Section 3.19.1 of the Initial Study, it is stated the City only has one groundwater treatment facility. This statement is inaccurate. Please refer to above comment #7 and revise the Initial Study accordingly.

10. On page 4-3 of the Initial Study, the City's annual water quality report is discussed stating that none of the monitored chemicals were detected at or above the reporting limit in groundwater sources. This statement is inaccurate. In fact, benzene, toluene, color, odor, iron, and manganese were detected in 2021 in the City's production wells.

If you have questions regarding this letter, please contact Stephanie Osorio, P.E. at (818) 551-2009 or me at (818) 551-2022.

Sincerely,



Dmitriy Ginzburg, P.E.
District Engineer
Hollywood District

Cc: California State Clearinghouse
Office of Planning and Research

Cecil Looney, Deputy Director
City of Signal Hill

Thomas Bekele, Public Works Director
City of Signal Hill