

Notice of Exemption

To: Office of Planning and Research
PO Box 3044, 1400 Tenth Street, Room 222
Sacramento, CA 95812-3044
County Clerk of Santa Barbara

From: UC Santa Barbara
Office of Campus Planning and Design
University of California, Santa Barbara
Santa Barbara, CA 93106-2032

Project Title: Ellwood Marine Terminal Tank Degas and De-sludge Project

Project Location – Specific: Venoco Road, North Campus, University of California, Santa Barbara

Project Location – City: Santa Barbara **Project Location – County:** Santa Barbara

Project Description: The University of California, Santa Barbara campus is proposing to degas and remove sludge and liquids from the decommission oil tanks at the Ellwood Marine Terminal on the North Campus. See attached detailed project description.

Name of Public or Agency Approving Project: University of California, Santa Barbara,

Name of Person or Agency Carrying Out Project: University of California, Santa Barbara, Environmental Health and Safety Department

Exempt Status: (check one)

- ☐ Ministerial (Sec. 21080 (b)(1); 15268);
☐ Declared Emergency (Sec. 21080(b)(3); 15269(a);
☐ Emergency Project (Se. 21080(b)(4); 15269 (b) (c));
☒ Categorical Exemption. Sec. 15330, Class 30, Minor Actions to Prevent, Minimize, Stabilize, Mitigate, or Eliminate the Release of Hazardous Substances.

Reason why project is exempt: A portable thermal oxidizer will be used for the project. The Class 30 exemption is not valid if an onsite thermal treatment unit is used except for small scale treatment systems that are permitted by the local Air Pollution Control District (APCD). The portable thermal oxidizer will be permitted and regulated by the Santa Barbara County APCD, will be small scale, and will be used on a short term basis. The entire project will be one month and the portable thermal oxidizer will be used for 3 to 5 days. The project is consistent with the Class 30 exemption. The decommissioned tanks will be cleaned therefore preventing any potential future releases of hazardous materials.

Lead Agency-University of California, Santa Barbara, Office of Campus Planning and Design

Contact Person: Shari Hammond **Area Code/Telephone/Extension:** (805) 893 3796

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? ☒ Yes ☐ No

Signature: Shari Hammond

Date: 2.20.2020

Title: Principal Planner

Dept Name: Campus Planning
and Design

CC: Ali Aghayan, UCSB Environmental Health and Safety Department **Governor's Office of Planning & Research**
 Nicolas Bruce, UCSB Environmental Health and Safety Department
 Alissa Hummer, UCSB, Office of Campus Planning & Design
 Barton Lounsbury, UCOP Office of General Council
 Daniel Sweeney, UCSB Office of Budget and Planning, Real Estate

FEB 25 2020
STATE CLEARINGHOUSE

**UNIVERSITY OF CALIFORNIA, SANTA BARBARA
ELLWOOD MARINE TERMINAL DEGAS AND TANK CLEANING PROJECT**

PRELIMINARY ENVIRONMENTAL ASSESSMENT

The University of California, Santa Barbara campus proposes to degas and remove sludge from the decommissioned oil tanks at the Ellwood Marine Terminal (EMT) site on the North Campus.

Project Objectives

Respond to Santa Barbara County Certified Unified Program Agency (CUPA) request to degas the tanks and clean residual liquids and sludge in tanks.

Project Background

The Ellwood Marine Terminal project site was used for storage and transport of crude oil from 1929 to 2012. Platform Holly, which is located off of Isla Vista, produced oil and shipped it through an offshore pipeline to the Ellwood Onshore Facility (EOF), located approximately one mile west of the EMT. Prior to 2012, the Line 96 pipeline, transported crude oil from the EOF to EMT's storage tanks. From the storage tanks, oil was delivered offshore to the former barge mooring station via a loading line that runs 2,665 feet off shore from the EMT. In January of 2012, Line 96 was connected to the Plains All American Pipeline (Line 901) at Las Flores Canyon and as a result of this new route, crude oil was redirected and transported from the EOF to Line 901, thereby eliminating the need for storing crude oil at the EMT and, ultimately, eliminating marine barging offshore the EMT facility. Since that time, operations at the EMT have been idled and have not resumed.

The EMT site was owned and operated by Venoco, Inc. and is on University owned land. In May 2017 Venoco, Inc. filed for bankruptcy and discontinued all decommissioning efforts at the EMT. The Santa Barbara County CUPA has requested the University degas and remove liquids and any sludge from two decommissioned oil tanks at EMT. The tanks are filled with a mixture of seawater, from cleaning the loading line, and residual product.

The University had the contents of the tanks sampled in July 2019. The eastern tank is dry and empty and the western tank has approximately 6-inches of liquid at the bottom and a nearly undetectable amount of sludge (Catalyst 2019).

Existing Setting

Slope/Topography: The project site is on a knoll perched above tidal wetlands and floodplains of the Devereux Slough. The land falls gently to the west to a small unnamed drainage less than 1000 feet from the ocean. Another, possibly spring-fed drainage abruptly cuts across the knoll at the south lease boundary and continues its way eastward to the coastal dunes behind the sandy beach. The project site and adjoining lands are transitional to several distinct habitats. The isolated knoll is its own watershed, that is, vegetation on the knoll depends only on rainfall and fog for water.

Flora: The site is dominated by annual grasslands, with coastal scrub, ruderal, and ornamental plant species. A dense eucalyptus windrow exists along the northern and eastern perimeter of the project site that was planted in order to screen the facility from public view. There are also sensitive plant species on site. Southern tarplant are present within the two storage tank containment areas, parking area, infrequently used roads on site, and along the loading line. A single mature coast live oak tree grows among the eucalyptus at the entrance to the project site. Creeping wild-rye, saltgrass, blue wild-

rye, and native perennial grasses, occur in the storage tank containment area, adjacent to the fence and ballast water tank, and on the western portion of the project site. The fenced portion of the project site has been affected by oil- and gas-related activities, including annual mowing or weed-whipping to reduce fire hazard. The unfenced portions of the site are open to the public, and were not mowed, and as a result continue to support elements of native habitats, consisting primarily of coastal scrub.

Fauna: Large numbers of common animals are expected to forage, breed or cross through the project site, including raccoon, coyote, Botta's gopher, California ground squirrel, western fence lizards, and a number of bird species. A number of sensitive wildlife species are known or likely to occur in the vicinity of the project site, including the sandy foredune area and ballast water pond. These include sensitive or listed species: globose dune beetle, Monarch butterfly, California red-legged frog, California legless lizard, Southern western pond turtle, western snowy plover, and California least tern. In addition, raptors, nesting native birds, and bats are all or known to be present at the project site.

Wetlands: Recent surveys have delineated variously sized areas of Palustrine Emergent (PE) Wetlands (KMA, 2014) on site. Five PE Wetlands are located within the two oil storage tank bermed containment areas, and one PE Wetland is located in the fire water tank containment area. The ballast water pond is considered Open Water and is surrounded by another PE Wetland. These are artificially derived features that have captured and sustained water, but meet the California Coastal Commission/County criteria as wetlands. Two PE Wetlands are located along the loading line corridor.

Existing Onsite Structures: Facilities in the fenced portion of the project site consist of storage tanks situated within earthen containment berms, a pump station and control building, a ballast water pond, and associated pipelines and roadways. Areas outside the fence include paved roadways, the aboveground Loading Line extending to the southwest across the Coal Oil Point Reserve (COPR) to the beach, and a portion of the buried pipeline (Line 96).

Archaeological Sites: The project site contains two known archaeological sites (CA-SBA-1327 and CA-SBA-2341).

Soils: Soils on the majority of the site are mapped as Concepcion fine sandy loam, 0-2% slopes, with small areas of Concepcion fine sandy loam, 2-9% slopes, eroded, present at the northeast and southeast corners of the fenced area, and Concepcion fine sandy loam, 15-30% slopes, eroded, present in the southwest portion.

Surrounding Land Uses: The approximately 18-acre site is located in the western portion of the UCSB North Campus, and is bounded by the UCSB North Campus Open Space (NCOS) Restoration area to the north, the COPR to the south, and by undeveloped property in the City of Goleta's jurisdiction to the west. The adjacent Sperling Reserve on the Ellwood Mesa is designated as open space by the City of Goleta. UCSB's Cheadle Center for Biodiversity and Ecological Restoration (CCBER) and COPR are currently restoring native habitats on the NCOS and COPR lands adjacent to the project site, including reclamation of estuarine wetlands, creation and restoration of vernal wetlands and perennial grassland, and re-introduction of coastal sage scrub and oak woodland habitats.

PROJECT DESCRIPTION

There are two 120' diameter crude oil tanks at the Ellwood Marine Terminal with internal floating pan roofs, and external geodesic dome roofs. Each tank is surrounded by an earthen containment berm. The University proposes to empty and clean the western tank at the EMT. The eastern tank is dry. Prior

to opening the tanks for cleaning each tank will be degassed. Once degassed, the crude oil tanks will be pressure washed with liquids removed by vacuum truck. Potable water is available onsite. Containment measures will be implemented to capture any residual fluids that may be present after cleaning and flushing operations. Collected fluids will be removed and disposed through a designated and permitted disposal/recycling facility. The tanks will be cleaned to the maximum extent so they will be cleared of all potentially hazardous waste for future removal of the tanks.

Degassing

The project would utilize a portable thermal oxidizer to destroy hydrocarbon vapors (VOCs) from the tanks. A thermal oxidizer is a unit for air pollution control that oxidizes VOCs and converts them into carbon-dioxide and water. The portable thermal oxidizer will be permitted/pre-approved by the Santa Barbara County Air Pollution Control District (APCD). The portable thermal oxidizer would be hooked up to each tank to convert any VOCs in the tank into water and CO₂. The contractor is required to take samples of the influent and effluent every 60 minutes in accordance with the permit from the APCD.

The portable thermal oxidizer will be compliant with the Santa Barbara County APCD rules and emission limits. Emission limits are in Table 1.

Table 1. Thermal Oxidizer Emission Limits

Mobile Vapor Combustor	lb/hr	lb/day	TPY
NO _x (as NO ₂)	0.36	8.64	1.58
ROC	0.90	21.58	1.12
CO	1.24	29.66	5.41
SO _x (as SO ₂)	2.01	54.45	9.94
PM _{2.5}	0.11	2.70	0.49
PM ₁₀	0.11	2.70	0.49
PM	0.11	2.70	0.49

Residual product removal

Residual product (a mix of seawater and oil residue) would be pumped from the tanks, then disposed of appropriately offsite. There is a chance that the tanks will have to be cleaned with pressurized water or manual cleaning methods.

The two tanks at EMT were sampled (east and west). The eastern tank was dry and the western tank had approximately 6-inches of liquid at the bottom (42,300 gallons or 1,007 barrels). The amount of sludge identified was low.

Liquid within the western tank was sampled for constituents related to oil and gas operations. The waste will either be disposed of as Hazardous Waste or Exempt Recyclable Material. This will be determined when the work starts (Bruce, 2019).

Approximately 8,500 gallons of wash water would be generated to help liquefy and /or perform final cleaning of the tank. Sludge would be liquefied and disposed of in liquid form. There would be approximately 50,800 gallons of material/liquid disposed.

OR the material would be solidified and transported as solid waste. This option involves adding sawdust or other stabilizing material onsite to prepare for transportation.

Liquids would be pumped into onsite mixing tanks where the solidifying material would be added and the solids then loaded into trucks for disposal.

Site Access:

The EMT site will be accessed from Storke Road in Goleta west on Elkus Way and to the Venoco Road access to the EMT. Venoco Road is a paved road between the Coal Oil Point Reserve and the North Campus Open Space area that was constructed to access the EMT when it was in full operation. The EMT site has dirt access roads within the site which vehicles and equipment will use to access the tanks.

Spill Prevention, Control, and Countermeasure Plan

A Spill Prevention, Control, and Countermeasure Plan (SPCC) for the Ellwood Marine Terminal is attached (Rincon, 2019). This SPCC was prepared in August 2019 to meet the US Environmental Protection Agency's SPCC Rule (Part 112, "Oil Pollution Prevention," of Title 40 of the Code of Federal Regulations. The EMT is not currently operating and oil handling or transfer operations are not conducted at the facility however the SPCC is required. The attached SPCC is not specifically for the degas and de-sludge/dewatering project however contains all of the necessary requirements for an accidental release during these operations.

A project specific SPCC will be prepared by the contractor when they are hired for the project and is forthcoming.

Equipment:

The following equipment would be used for the project. This list is not a complete, exhaustive list of equipment that may be used at the site.

Vacuum trucks
Air pumps, air hoses, tank ventilators, tank cleaning gear, hot pressure washer
Spill containment loading berms
Sludge pump
Hoses of varying sizes
Personnel trucks
Forklift
Holding tanks

Disposal Location: The waste product would either be hauled to a recycling facility for recycling or disposed at an approved disposal location for this material. The exact final destination of the waste material will be determined upon removal and final testing.

Schedule: The project is scheduled to begin in the summer of 2020 and be complete within one month.

Consistency with the LRDP:

The Ellwood Marine Terminal is within an *Open Space* land use designation. The EMT was constructed in 1929 by Mobil Oil and has operated as oil storage tanks up to 2012. The last owner/operator of the EMT, Venoco, Inc., leased the land from the University after the University purchased the "North Campus" in 1994. The site is decommissioned and will be demolished and restored to Open Space in the future.

ENVIRONMENTAL ISSUES:

Pursuant to State law and in accordance with the California Environmental Quality Act (CEQA), a The project would be exempt from CEQA under Class 30, Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances. The Class 30 exemption is not valid if an onsite thermal treatment unit is used except for small scale treatment systems that are permitted by the local APCD. The portable thermal oxidizer will be permitted and regulated by the Santa Barbara County APCD, will be small scale, and will be used on a short term basis. The entire project will be one month and the portable thermal oxidizer will be used for 3 to 5 days. The project is consistent with the Class 30 exemption.

Aesthetics: The proposed project is to degas and de-sludge the two existing tanks on the project site. The visual character of the site will not change from the existing condition and there would be no impact to scenic vista.

The staging and operation of the degas and de-sludge equipment at the facility may be temporarily visible from surrounding neighborhoods, trails and the beach; however, this equipment would not obstruct a scenic vista. The visual impacts during the work would be temporary (one month).

The project would not affect neighboring areas with glare or night lighting. There would be no work conducted after sunset; therefore, there is no need for night lighting. There would be no impacts to visual resources from the project.

Agricultural Resources: There are no agricultural resources at the University.

Air Quality: The project does not include any grading or ground disturbance that would result in dust generation. Equipment would use existing paved and/or dirt roads within the site area to access the tanks for degassing and sludge removal. The access road to and from the project site is paved. There would be little to no dust generation.

There would be approximately 27 truckloads of waste material leaving the site. The use of the transport vehicles have the potential to generate minimal air emissions. Equipment used to degas and de-sludge the tanks would not result in air emissions from vehicular use.

Extremely minor odor events could occur during the degas and de-sludge process. Odor thresholds are defined as the point at which a person can detect an odor-generating substance. Below the odor threshold, a person would not detect the odor by smell. According to the American Industrial Hygiene Association, the odor detection threshold is the lowest concentration of odorant that will elicit a sensory response in the olfactory receptors of a specified percentage of a given population (AIHA 1989). The annoyance level would be a higher concentration. As the loading line and tanks have been previously flushed with seawater and the facility has not been used for a long period, any remaining hydrocarbons would most likely be heavily weathered, and the lighter hydrocarbons, which could cause odors, would have evaporated. However, with containment measures, releases of hydrocarbons would be minimal; the extent of any odors would be localized.

Releases of toxic vapors could occur from tank cleaning or releases of residual fluids in the tanks. Toxic materials within the fluids could include benzene, toluene, or hydrogen sulfide. However, releases of vapors would be localized and would not generate acute or chronic impacts off site. The project would utilize a portable thermal oxidizer to destroy hydrocarbon vapors (VOCs) from the tanks. A thermal oxidizer is a unit for air pollution control that oxidizes VOCs and converts them into carbon-dioxide and water. The portable thermal oxidizer would be operating for 3 to 5 days and will be compliant with the Santa Barbara County APCD rules and emission limits. Emission

limits are in Table 1. There would be no impacts to air quality from the use of a portable thermal oxidizer.

Cancer risks from exposure to carcinogens are a long-term issue. Long-term exposure to carcinogens is not anticipated as a result of the project as piping, tanks and contaminated soils would be removed from the site.

Biological Resources: The EMT site contains ESHAs such as small wetland areas and sensitive plant species (southern tarplant, native grassland). There are mature eucalyptus trees on the north and east sides of the EMT which are known raptor nesting sites. There would be no grading, excavation, or ground disturbance to degas and remove sludge from the tank. Vehicles and equipment would be on designated roads and access ways and would not impact any sensitive resources identified at the EMT site. Raptor nesting surveys would be conducted prior to operations to avoid any potential impacts from noise.

Cultural Resources: Archeological resources have been previously identified at the site however there would be no ground disturbance from degassing and removing sludge from the tank. Vehicles and machinery would be on developed roads and areas within the EMT site and would not impact archeological resources.

Geology: There would be no ground disturbance from degassing and removing sludge from the tank. Vehicles and machinery would be on developed roads and areas within the EMT site and would not impact geologic resources.

Hazards and Hazardous Materials. The University had the contents of the tanks sampled in July 2019. The two tanks at EMT were sampled (east and west). The eastern tank was dry and the western tank had approximately 6-inches of liquid at the bottom (42,300 gallons or 1,007 barrels). The amount of sludge identified was low.

Liquid within the western tank was sampled for constituents related to oil and gas operations. Only the benzene TCLP result exceeds the maximum concentration of contaminants for toxicity characteristic as specified by RCRA. The remaining liquid in the tank did not exhibit any other characteristics of hazardous waste and therefore could be transported and disposed as a non-hazardous waste according to both federal and state criteria (Catalyst 2019). The waste will either be disposed of as Hazardous Waste or Exempt Recyclable Material. This will be determined when the work starts (Bruce, 2019).

Approximately 8,500 gallons of wash water would be generated to help liquefy and /or perform final cleaning of the tank. Sludge would be liquefied and disposed of in liquid form. There would be approximately 50,800 gallons of material/liquid disposed.

Residual product (a mix of seawater and oil residue) would be pumped from the tanks, then disposed of appropriately offsite. There is a chance that the tanks will have to be cleaned with pressurized water or manual cleaning methods.

Hydrology/Water Quality: The project does not involve new development, land disturbance, site grading, or excavation. There would be no change in site drainage or an increase in impervious surface from the project.

Land Use: The Ellwood Marine Terminal is within an *Open Space* land use designation. The EMT was constructed in 1929 by Mobil Oil and has operated as oil storage tanks up to 2012. The last owner/operator of the EMT, Venoco, Inc., leased the land from the University after the University purchased the "North Campus" in 1994. The site will be decommissioned and restored to Open Space in the future.

Mineral Resources: There are no mineral resources at the University or at the project site. There would be no impact to mineral resources as a result of the proposed project.

Noise: There would be minimal noise generated from degas and de-sludge project. Noise would be generated by vacuum trucks and the transport of potentially hazardous materials offsite. There are no sensitive receptors within proximity of the project site and the project would take about a month to complete. There would be no long term noise generated.

Population and Housing: There would be no impact to population and housing from the proposed project.

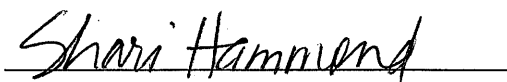
Public Services: The proposed project would not increase the need for public services at the University. All necessary utility connections are available in proximity at the project site such as potable water to use for tank cleaning. There would be no impact to public services as a result of the proposed project.

Recreation: The project to degas and remove liquids and sludge from the tanks at the EMT would not impact recreational resources.

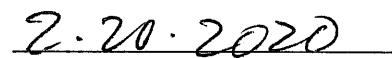
Traffic: There would be temporary vehicular traffic to mobilize, transport hazardous materials, and demobilize. There would be approximately 27 truck trips to remove potentially hazardous materials from the EMT site. The entire project would take about one month.

Utilities: All necessary utilities are available within vicinity of the project site. The EMT site is decommissioned and not in use. There is a potable water source at the EMT used for fire suppression if ever necessary. The potable water connection on site would be used for the tank wash down process.

DETERMINATION: Based on the above project assessment, the proposed project is classified as exempt from the provisions of CEQA under Section 15330, Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances (Class 30) None of the exceptions cited in Section 15300.2 apply to this project.



Shari Hammond
Principal Planner



Date

V. REFERENCES

Aghayan, Ali

2019 Personal communication with Ali Aghayan, Environmental Health Program Manager. Environmental Health and Safety Department, University of California, Santa Barbara.

Bruce, Nicholas

2019 Personal communication with Nicholas Bruce, Environmental Compliance Specialist, Environmental Health and Safety Department, University of California, Santa Barbara.

Catalyst

2019 *Summary of Aboveground Storage Tank Sampling and Analysis Activities and Disposal Options*. Report from Catalyst Environmental Solutions to Nicholas Bruce, Environmental Health and Safety Department, University of California, Santa Barbara. September 5, 2019.

County of Santa Barbara

2017 *Administrative Draft Initial Study Ellwood Marine Terminal Demolition and Reclamation Plan*. 13DRP-00000-00001/16CDP-00000-00102. Prepared by Kathy Pfeifer, County of Santa Barbara Planning and Development Department, Energy Division. April 18, 2017.

KMA-Kevin Merk Associates, LLC

2014 *Venoco Ellwood Marine Terminal Abandonment Project. Delineation of Waters of the US and State of California*. Prepared for Venoco Inc. Prepared by KMA/Kevin Merk Associates, LLC July 2014.

Interact/Katherine Rindlaub Biological Consulting/VJS Biological Consulting

2014 *Biological Assessment Ellwood Marine Terminal Decommissioning*. County of Santa Barbara Case NO. 13DRP-00000-00001. August 2014. Prepared for Venoco Inc. Prepared by InterAct with Katherine Rindlaub Biological Consulting and VJS Biological Consulting.

UCSB

2010 Vision 2025 Long Range Development Plan. University of California, Santa Barbara.



Ellwood Marine Terminal Location Map – University of California, Santa Barbara North Campus



Note: Pipeline data depicted on this map is for reference purposes only and should never be used as a substitute for contacting a one-call center prior to excavation activities. Please call 811 before any digging occurs.

Facility Diagram

Source: NAIP 2018



Figure 2

Rincon Consultant, Inc.



OFFICE OF CAMPUS PLANNING AND DESIGN
BUDGET AND PLANNING
1325 CHEADLE HALL
SANTA BARBARA, CALIFORNIA 93106-2032
Tel: (805) 893-3796

February 20, 2020

Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, CA 95812-3044

Re: Notice of Exemption for the University of California, Santa Barbara, Ellwood Marine Terminal
Degas and De-sludge Project

A Notice of Exemption, and an Environmental Assessment are attached for the University of California, Santa Barbara, Ellwood Marine Terminal Degas and De-sludge Project. Two copies of the NOE and a self addressed, stamped envelope are enclosed to return the SCH stamped NOE to the University. If there are any questions or comments please do not hesitate to telephone me at (805) 893-3796 or send e-mail to shari.hammond@ucsb.edu.

Sincerely,

A handwritten signature in black ink that reads "Shari Hammond".

Shari Hammond
Principal Planner

Attachment/Enclosure: As stated.