

Fire Department

HEADQUARTERS

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Notice to Comply

Inspection Report 10/07/2007

Greka Oil and Gas, Inc. Bell Lease – Bell Injection Facility 6605 Palmer Road

A "Stop Work Order" was issued on December 7, 2007, for the Bell injection facility. The following corrections are needed in order for the "Stop Work Order" to be lifted:

Fire Protection Equipment

- 1. Extinguishers shall be properly mounted and identified. *California Fire Code Section 1002.1*
- 2. Ensure fire hydrants are visible and in good operating condition. *California Fire Code Section 1001.5.1*
- 3. Install a national standard male fitting to the temporary fire suppression water tank located at the tank battery. *California Fire Code Section 1001.5.1*

Hazardous Materials

- 1. Obtain a "Flammable or Combustible liquids (f.3.1)" permit prior to performing any repairs on the failed injection water pipeline. *California Fire Code Section* 7901.3.1 and 105
- 2. Install a manual control valve at the tank battery, on the injection water pipeline. *California Fire Code Section 7901.11.4*
- 3. Repair or replace the injection water pipeline in accordance with industry standards. *California Fire Code Section 8001.5.2.4*
- 4. After repairs have been made test and inspect the injection water pipeline. Hydrostatically test the injection water pipeline to 150% of the maximum anticipated pressure and inspect entire section of pipeline (from tank battery to the injection water tank). Test for a minimum of ten minutes. *California Fire Code Section 7901.11.10*
- 5. Repair and test the overflow alarms on the injection water tank. Provide third party documentation verifying repairs have been made and alarm is working properly. *California Fire Code Section 7902.6.5.3*

- 6. Ensure drainage around the injection water tank will provide proper flow to secondary containment. Provide third party documentation verifying grading to ensure proper flow. *California Fire Code Section 8003.1.3.3*
- 7. Construct and maintain a dike on the southeast side of the facility to prevent accidental discharge of crude and injection water into the nearby creeks. *California Fire Code Section 7902.2.8.1*
- 8. Construct and maintain secondary containment around above ground tanks used for temporary storage of clean-up products. *California Fire Code Section* 8003.1.3.3
- 9. Install and identify fire extinguishers (minimum of 20BC) at temporary storage tanks used for clean-up products. *California Fire Code Section 7901.5.3*
- 10. Repair holes and cracks in the injection water tank. *California Fire Code Section* 8001.5.2.4
- 11. Remove all accumulations of oil within and outside secondary containment at the Bell lease tank battery and injection facility. *Title 40, Code of Federal Regulations Part 112 et al.; California Health and Safety Code Section 25404(c)(2); California Fire Code Section 8001.5.2.5*
- 12. Submit a work plan for verification that cleanup of contamination at this facility is complete, and for assessment of soils and groundwater where contamination may remain. Following receipt and approval of this workplan by this office, implement the workplan, and provide the results of the verification and assessment to this office. Based on the results of the assessment, submit to this office a workplan for remediation of the contamination. Following approval of this workplan by Fire Prevention Division (FPD), implement the remediation and provide the results of remediation to FPD. *California Fire Code Sections 104.2, 105.2.3, 7901.7.4, and 8001.5.2.5; California Health and Safety Section 25404 et al.*
- 13. Containerize all contaminated materials on site in covered, impermeable bins. *Title 22, California Code of Regulations, Section 66262.34.*
- 14. Characterize all contaminated materials and dispose of them within 90 days. *Title 22, California Code of Regulations, Sections 66260.200, 66262.11, and 66262.34.*
- 15. Submit an updated Spill Prevention, Control, and Countermeasures (SPCC) Plan to FPD. *Title 40, Code of Federal Regulations Part 112 et al.; California Health and Safety Code Section 25404(c)(2)*
- 16. Comply with all assessment and cleanup requirements from the Santa Barbara County Fire Department, Fire Prevention Division, Site Mitigation Unit. *California Health and Safety Code Section 25404 et al.; California Fire Code Sections* 104.2, 105.2.3, 7901.7.4, and 8001.5.2.5

General Requirements

- 1. Clear debris and brush from around electrical panel. *California Fire Code* Section 8509.2, National Electrical Code
- 2. Clear a firebreak around all power poles requiring clearance in accordance with PRC 4291. All power poles meeting this requirement must have a minimum 10-foot firebreak. *Public Resources Code 4292*
- 3. Install and maintain "No Smoking" signs at the facility. *California Fire Code Section 7902.1.3.1*

Training and Documentation

- 1. Train all employees on the proper procedures of reporting an emergency. *California Fire Code Section 1303.3.4.2.1*
- 2. Provide a copy of the new Fire Protection Plan for the tank battery.
- 3. Provide an updated copy of the facility plan and maps.
- 4. Pay appropriate fees and obtain proper permits to operate.

A thorough inspection was not completed due to areas of the facility being surrounded in crude oil. Once an acceptable clean up of the facility has been completed we will reinspect the facility and make further recommendations and conditions.

J. Snodgrass Santa Barbara County Fire Department Fire Prevention Division Engineer/Inspector

J. Neipp Santa Barbara County Fire Department Fire Prevention Division Site Mitigation Unit