



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

Mr. Mark Little  
Beta Offshore  
111 West Ocean Blvd., Suite 1240  
Long Beach, CA 90802

VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
No. 7009 2820 0001 6537 9560

**WATER QUALITY CERTIFICATION FOR PROPOSED BETA OFFSHORE PIPELINE  
RETROFIT (PLATFORM ELLY) PROJECT (Corps' Project No. SPL-2013-00856-JWM),  
PACIFIC OCEAN, CITY OF LONG BEACH, LOS ANGELES COUNTY  
(FILE No. 13-150)**

Dear Mr. Little:

Board staff has reviewed your request on behalf of BETA Offshore (Applicant) for a Clean Water Act Section 401 Water Quality Certification for the above-referenced project. Your application was deemed complete April 3, 2014.

I hereby issue an order certifying that any discharge from the referenced project will comply with the applicable provisions of sections 301 (Effluent Limitations), 302 (Water Quality Related Effluent Limitations), 303 (Water Quality Standards and Implementation Plans), 306 (National Standards of Performance), and 307 (Toxic and Pretreatment Effluent Standards) of the Clean Water Act, and with other applicable requirements of State law. This discharge is also regulated under State Water Resources Control Board Order No. 2003 - 0017 - DWQ, "General Waste Discharge Requirements for Dredge and Fill Discharges that have received State Water Quality Certification" which requires compliance with all conditions of this Water Quality Certification.

**Please read this entire document carefully.** The Applicant shall be liable civilly for any violations of this Certification in accordance with the California Water Code. This Certification does not eliminate the Applicant's responsibility to comply with any other applicable laws, requirements and/or permits.

Should you have questions concerning this Certification action, please contact Dana Cole, Section 401 Program, at (213) 576-5733.

Samuel Unger  
Samuel Unger, P.E.  
Executive Officer

4-9-14  
Date

## DISTRIBUTION LIST

Simon Poulter  
Padre Associates  
5290 Overpass Road, Suite 217  
Goleta, CA 93111

Bill Orme (via electronic copy)  
State Water Resources Control Board  
Division of Water Quality  
P.O. Box 944213  
Sacramento, CA 94244-2130

John Markham  
U.S. Army Corps of Engineers  
Regulatory Branch, Ventura Field Office  
2151 Alessandro Drive, Suite 110  
Ventura, CA 93001

Paul Amato  
(via electronic copy)  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Jim Bartel  
U.S. Fish and Wildlife Service  
6010 Hidden Valley Road  
Carlsbad, CA 92011

Alison Dettmer  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, California 94105

Jon Victoria  
California Department of Fish and Wildlife  
Office of Spill Prevention  
Los Alamitos, CA 90720

**ATTACHMENT A**

**Project Information**  
**File No. 13-150**

1. Applicant: Mr. Mark Little  
Beta Offshore  
111 West Ocean Blvd., Suite 1240  
Long Beach, CA 90802  
Phone: (562) 685-8183 Fax: (562) 628-1536
2. Applicant's Agent: Simon Poulter  
Padre Associates  
5290 Overpass Road, Suite 217  
Goleta, CA 93111  
Phone: (805) 683-1233 Fax: (805) 683-3944
3. Project Name: 13-150 Beta Offshore Pipeline Retrofit (Platform Elly)
4. Project Location: Long Beach, Los Angeles County

<u>Latitude</u>	<u>Longitude</u>
33.370922756	118.073315414
33.374131160	118.071758403
33.381449444	118.070147640
33.384676955	118.064580514
33.435644104	118.081059328

5. Type of Project: Improve and retrofit offshore pipeline
6. Project Purpose: The proposed project (Project) will retrofit and improve pipeline corrosion detection on Beta Offshore's (Beta) existing 16-inch oil pipeline from Platform Elly to shore, which has been in service since 1984. The existing cathodic protection system is approaching the end of its 30 year design life.
7. Project Description: Beta proposes to retrofit the cathode protection (CP) system on the 16-inch, 15.2 mile long San Pedro Bay Oil Pipeline. The pipeline extends from Platform Elly, an oil and gas platform located in

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federal waters, 13 miles south of the City of Long Beach, to onshore facilities in Long Beach Harbor. The overall project involves installing new equipment at five locations along the pipeline in order to improve pipeline corrosion detection and extend the operating life of the existing CP system which functions to prevent corrosion of the metal walls of the pipeline. Of the five project sites, only one, TP-5, occurs within State Waters (~0.75 miles offshore and 35-foot water depth) on deeded tidelands held by the City of Long Beach.

#### Equipment Requirements

TP-5 will require pipe clamps, a SubMar™ mat and a RetroMat™. The equipment installed at TP-5 will allow Beta to monitor the pipeline potential in the nearshore area and assess the effectiveness of its onshore current CP system.

RetroMat™ is a flexible concrete stabilization mattress with an integrated cathodic protection system comprising many interconnected small aluminum anodes cast directly into the concrete. The system is designed to provide cathodic protection for pipelines at crossings or in other unstable conditions.

A 16 inch RetroClamp™ with a stab plate will be used to attach monitoring equipment to verify cathodic-protection system performance. For future potential surveys these stab plates provide continuity with the pipeline, allowing accurate measurements to be made.

A SubMar mat is an articulating concrete mat and will be used for pipeline protection. A SubMar™ mat will be installed atop of the RetroClamp™ for protection of the equipment and pipeline.

#### Construction Vessels and Anchoring

The CP Installation Project will require two construction vessels. The Marine Vessel Danny C (Danny C) will support all ROV and diving operations. The Danny C is a 76-foot long dive support vessel with a 3-point mooring system. The So Cal Ship Services vessel will assist the Danny C in deploying and recovering of anchors and positioning the Danny C in the anchor spread if necessary. Where feasible and when conditions permit, live boating will be conducted in order to minimize the number of anchor points required during installation activities.

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#### Test Point Clamp, SubMar™ Mat, and RetroMat Installation by Divers

Once onsite near TP-5 (depth of water about 35 feet); the anchor assist vessel will moor the Danny C using predefined survey points of the pipeline. A diver will then excavate (jet and airlift) around the pipeline and under the area as required (approximately a nine-foot by three-foot area) in order to position the clamp. The diver will then clean the clamp installation area as required to ensure a proper connection. The Danny C will lower the clamp and anode mat within 20 feet adjacent to the pipeline where the diver will direct the crane into final position. The diver will then install the clamps over the pipeline and secure the clamp using clamp hardware and hand tools per the manufacturer's installation instructions and test the continuity. After verification of the continuity, the diver will re-bury the pipeline and CP components in this location to ensure protection.

The proposed installation point is not near any other pipe crossing locations and anchoring would not occur within the vicinity of any existing pipelines or power cables (each mooring location has been selected in order to be greater than 500 feet away from the pipeline).

Work activities at this location have been estimated to take one construction day.

Weather forecasts will be monitored before mobilizing personnel and equipment. Based on a good forecast and approvals, mobilization will begin.

8. Federal Agency/Permit: U.S. Army Corps of Engineers  
NWP No. 12 and 18 (Permit No. SPL-2013-00856-JWM)
9. Other Required Regulatory Approvals: Bureau of Safety and Environmental Enforcement  
South Coast Air Quality Management District  
City of Long Beach

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10. California Environmental Quality Act Compliance: The proposed project is Categorical Exempt from CEQA pursuant to the CEQA Guidelines, Section 15301(b) Existing Facilities
11. Receiving Water: Pacific Ocean
12. Impacted Waters of the United States: Ocean/Estuary/Bay: 0.034 temporary acres (84 linear feet) and 0.003 permanent acres (21 linear feet)
13. Dredge Volume: One cubic yard
14. Related Projects Implemented/to be Implemented by the Applicant: The Applicant has not identified any related projects carried out in the last 5 years or planned for implementation in the next 5 years.
15. Avoidance/ Minimization Activities: The Applicant has proposed to implement several Best Management Practices, including, but not limited to, the following:
- Where feasible and when conditions permit, "live boating" will be conducted in order to minimize the number of anchor points required during installation activities.
  - Anchoring will be performed in accordance with the Project Mooring Operations Plan which states that anchors will be positioned at least 500 feet from any active pipelines to avoid damage and fluid releases.
  - Aqueos (contractor) will meet all requirements by Beta and the agencies involved to install and remove anchors.
  - Aqueos will utilize the data supplied to perform design calculations for Marine Terminal, Structure and vessel anchoring systems for the Locations of facilities, subsea equipment, and seafloor features including pipelines, power and communications cables, completed and exploratory wells, debris, and hard bottom features.
  - Water depth relative to Mean Lower Low Water (MLLW) at the

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anchor, dip section at rest, and vessel positions to will be within plus or minus two feet of sea water accuracy.

- Aqueos will monitor the local prevailing weather patterns.
- Aqueos will provide vessels for stand-off and watch circle, which will include the Vessel length overall gross tonnage and draft.
- Activities will be conducted in accordance with the Beta Unit's approved Oil Spill Prevention and Response Plan - Beta Unit Complex (2013).
- An emergency incident or a substantial threat of an incident from Beta Complex Facilities will trigger a set of prioritized internal and external notifications.
- Initial notifications shall not be delayed by the collection of information for reporting.
- Report forms will be used to provide accurate incident information for the initial and follow-up notifications to federal, state and local agencies.
- During installation, the Project components would not be lowered directly over the pipeline. Components will be lowered within 20 feet adjacent to the pipeline and laterally positioned into place.
- Absorbent spill clean-up materials and spill kits shall be available on all Project vessels and near equipment refueling areas.
- Drip Pans or sorbent pads shall be used as necessary for all temporary or mobile equipment on deck.
- Small spills will not be hosed down.
- Used absorbent materials will be removed and stored properly until they can be taken to a legal point of disposal.
- Employees will be trained on proper offshore fueling and cleanup procedures.
- Marine spills will be subject to the requirements of the *Oil Spill*

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*Prevention and Response Plan - Beta Unit Complex (2013):*

16. Proposed  
Compensatory Mitiga-  
tion:

None

17. Required Compensato-  
ry Mitigation:

Disturbances are expected to be temporary or minor, therefore, no compensatory mitigation will be required by this Regional Board. See *Attachment B, Conditions of Certifications, Additional Conditions* for modifications and additions.



## ATTACHMENT B

### Conditions of Certification File No. 13-150

#### STANDARD CONDITIONS

Pursuant to §3860 of Title 23 of the California Code of Regulations (23 CCR), the following three standard conditions shall apply to this project:

1. This Certification action is subject to modification or revocation upon administrative or judicial review, including review and amendment pursuant to §13330 of the California Water Code and Article 6 (commencing with 23 CCR §3867).
2. This Certification action is not intended and shall not be construed to apply to any activity involving a hydroelectric facility and requiring a Federal Energy Regulatory Commission (FERC) license or an amendment to a FERC license unless the pertinent Certification application was filed pursuant to 23 CCR Subsection 3855(b) and the application specifically identified that a FERC license or amendment to a FERC license for a hydroelectric facility was being sought.
3. Certification is conditioned upon total payment of any fee required pursuant to 23 CCR Chapter 28 and owed by the Applicant.

#### ADDITIONAL CONDITIONS

Pursuant to 23 CCR §3859(a), the Applicant shall comply with the following additional conditions:

1. The Applicant shall submit to this Regional Board copies of any other final permits and agreements required for this project, including, but not limited to, the U.S. Army Corps of Engineers' (ACOE) Section 404 Permit. **These documents shall be submitted prior to any discharge to waters of the State.**
2. The Applicant shall adhere to the most stringent conditions indicated with either this Certification, or the ACOE Section 404 Permit.
3. The Applicant shall comply with all water quality objectives, prohibitions, and policies set forth in the *Water Quality Control Plan, Los Angeles Region (1994)*, as amended.
4. The Avoidance/Minimization activities proposed by the Applicant as described in Attachment A, No. 15, are incorporated as additional conditions herein.
5. The Applicant and all contractors employed by the Applicant shall have copies of this Certification, and all other regulatory approvals for this project on site at all times and shall be familiar with all conditions set forth.

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### Conditions of Certification

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6. Fueling, lubrication, maintenance, operation, and storage of vehicles and equipment shall not result in a discharge or a threatened discharge to waters of the State. At no time shall the Applicant use any vehicle or equipment which leaks any substance that may impact water quality. Staging and storage areas for vehicles and equipment shall be located outside of waters of the State.
7. All excavation, construction, or maintenance activities shall follow best management practices to minimize impacts to water quality and beneficial uses.
8. No construction material, spoils, debris, or any other substances associated with this project that may adversely impact water quality standards, shall be located in a manner which may result in a discharge or a threatened discharge to waters of the State. Designated spoil and waste areas shall be visually marked prior to any excavation and/or construction activity, and storage of the materials shall be confined to these areas.
9. All waste or dredged material removed shall be relocated to a legal point of disposal if applicable. A legal point of disposal is defined as one for which Waste Discharge Requirements have been established by a California Regional Water Quality Control Board, and is in full compliance therewith.
10. The Applicant shall implement all necessary control measures to prevent the degradation of water quality from the proposed project in order to maintain compliance with the Basin Plan. The discharge shall meet all effluent limitations and toxic and effluent standards established to comply with the applicable water quality standards and other appropriate requirements, including the provisions of Sections 301, 302, 303, 306, and 307 of the Clean Water Act. This Certification does not authorize the discharge by the applicant for any other activity than specifically described in the 404 Permit.
11. The discharge shall not: a) degrade surface water communities and populations including vertebrate, invertebrate, and plant species; b) promote the breeding of mosquitoes, gnats, black flies, midges, or other pests; c) alter the color, create visual contrast with the natural appearance, nor cause aesthetically undesirable discoloration of the receiving waters; d) cause formation of sludge deposits; or e) adversely affect any designated beneficial uses.
12. The Applicant shall allow the Regional Board and its authorized representative entry to the premises to inspect and undertake any activity to determine compliance with this Certification, or as otherwise authorized by the California Water Code.
13. The Applicant shall restore all areas of TEMPORARY IMPACTS to waters of the United States and all other areas of temporary disturbance which could result in a discharge or a threatened discharge to waters of the State.

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### Conditions of Certification File No. 13-150

14. The Applicant shall submit to this Regional Board **Annual Monitoring Reports** (Annual Reports) by **January 1<sup>st</sup>** of each year for a minimum period of **five (5) years** following this issuance of 401 Certification or until project completion has been achieved and documented. The Annual Reports shall describe in detail all of the project and construction activities performed during the previous year. At a minimum the Annual Reports shall include the following documentation:
  - (a) Geographical Positioning System (GPS) coordinates in decimal-degrees format outlining the boundary of the project areas;
  - (b) The overall status of project including a detailed schedule;
  - (c) Copies of all permits revised as required in Additional Condition 1;
  - (d) Water quality monitoring results for each reach (as required) compiled in an easy to interpret format;
  - (e) A certified Statement of “no net loss” of wetlands associated with this project;
  - (f) Discussion of any monitoring activities; and
  - (g) A certified Statement from the permittee or their representative that all conditions of this Certification have been met.
15. All applications, reports, or information submitted to the Regional Board shall be signed:
  - (a) For corporations, by a principal executive officer at least of the level of vice president or his duly authorized representative, if such representative is responsible for the overall operation of the facility from which discharge originates.
  - (b) For a partnership, by a general partner.
  - (c) For a sole proprietorship, by the proprietor.
  - (d) For a municipal, State, or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.
16. Each and any report submitted in accordance with this Certification shall contain the following completed declaration:

“I declare under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the



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### Conditions of Certification

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necessary to assure compliance with the water quality standards and other pertinent requirements incorporated into this Certification.

- (b) In response to a suspected violation of any condition of this Certification, the State Water Resources Control Board (SWRCB) or Regional Water Quality Control Board (RWQCB) may require the holder of any permit or license subject to this Certification to furnish, under penalty of perjury, any technical or monitoring reports the SWRCB deems appropriate, provided that the burden, including costs, of the reports shall be a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.
  - (c) In response to any violation of the conditions of this Certification, the SWRCB or RWQCB may add to or modify the conditions of this Certification as appropriate to ensure compliance.
22. This Certification shall expire **five (5) years** from date of this Certification. The Applicant shall submit a complete application at least 90 days prior to termination of this Certification if renewal is requested.

