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January 29, 2010

Via E-Mail (ghu@waterboards.ca.gov) and U.S. Mail

Mr. G. Jeffrey Hu
Water Resources Control Engineer
Site Cleanup Unit IV
Los Angeles Regional Water Quality Control Board
320 West Fourth Street
Suite 200
Los Angeles, CA 90013

**Re: Holifield Park and Second Semiannual Groundwater Monitoring Report for 2009 (submitted by Parsons on behalf of Defense Energy Support Center)—
(SCP No. 0286A, Site No. 16638)**

Dear Mr. Hu:

On behalf of the City of Norwalk ("City"), this will provide comments on the Second Semiannual 2009 Groundwater Monitoring Report ("Report") submitted on behalf of the Defense Energy Support Center ("DESC") by Parsons Group, Inc. and dated January 21, 2010. The City is very concerned that this Report confirms an expansion of the plume of hydrocarbon contaminants into Holifield Park. This expansion has now been documented for over the last eighteen months. It is now time to take firm action, specifically:

(1) Order an immediate submittal of a supplemental workplan by Kinder Morgan Energy Partners, L.P. addressing the need to contain and *remediate* the plume (evidently from the 24-inch block valve area) that is impacting Holifield Park; and (2) order the prompt (within 30 days) installation of a further groundwater monitoring well located north and easterly of the current well GW-0-18.

1. Review of Recent History Of Hydrocarbon Plume Expansion in Southern Corner of Holifield Park

A series of recent reports by Parsons and AMEC demonstrate a steady expansion of the plume of hydrocarbon contaminants in the southern portion of Holifield Park. Table 1 below summarizes the data:

Table 1: Summary of Recent Groundwater Sampling for Southern Portion of Park

<i>Date</i>	<i>Report Title</i>	<i>PZ-5 Results</i>	<i>GW0-18 Results</i>
4/7/2008 (sample date 2/20/08)	Summary of 1st Quarter 2008 Sentry Event (AMEC)	940 (TPHg)/ 1000 (TPHg-duplicate) <1 (Benzene)	Not reported
4/1/2009 (sample date 2/24/09)	Summary of 1st Quarter 2009 Sentry Event (AMEC)	1000 (TPHg)/ 1000 (TPHg)(duplicate) 61 (Benzene)	Not reported
7/27/09 (sample date 4/23/09)	First Semi-Annual 2009 Monitoring Report (AMEC)	1200 (TPHg)/ 1200 (TPHg)(duplicate) 250(Benzene) 270 Benzene (duplicate)	<50 ug/L (TPHg) <0.5 (benzene)
10/23/09 (sample date 7/22/09)	Summary of 3rd Quarter Sentry Event (AMEC)	3800 (TPHg) 3500 (TPHg)(duplicate) 2000 (Benzene) 1900 (Benzene)(duplicate)	Not reported
1/21/10 (sample date 10/21/09)	Second Semi-Annual 2009 Monitoring Report (Parsons)	2900 (TPHg)/ 3000 (TPHg)(duplicate) 1100 (Benzene) 1100 (Benzene)(duplicate)	2400 TPHg 170 (benzene)

As demonstrated in Table 1, in the last eighteen months (April 2008 through October 2009) there has been a steady, albeit not linear, increase in total TPH at Pizeometer 5 from an average of 1000-1200 ug/L to the current levels of approximately 3000 ug/L. That's an increase of 200%. Table 1 shows a similar steady increase in benzene levels at Pizeometer 5 to a level of 1,100 ug/L, which is more than two orders of magnitude higher than the federal MCL for benzene (5 ug/L).

More significantly, in less than six months (from April '09 to October '09) the plume has expanded to a substantial hydrocarbon (2,400 ug/L) presence in well GWO-18, where it was previously a "non-detect" with a detection limit of 50 ug/L. Benzene levels during the same period also went from a "non-detect" level to 170 ug/L, well above the federal MCL of 5 ug/L.

The City is unaware of any recent change in sampling firms (Blaine Tech is the most recent firm) or analytical detection methods that might otherwise account for such a dramatic increase in TPH and related benzene levels. AMEC and Parsons separately report the data, and it appears to meet all normal quality control and assurance requirements.

2. A Call for Remedial Board Action

The recent historical pattern is clear: an increasing plume of hydrocarbon contaminants, presumably originating from the Block Valve area owned by Kinder Morgan, is expanding into the City's Park and impacting groundwater. Although the City is aware that Kinder Morgan has an existing remedial scheme in place, it is clearly failing to do the job. Kinder Morgan suggests that it is "working on increasing the pumping rates [of its current extraction system]" in order to address the plume of contaminants. (Second Semi-annual 2009 Monitoring Report at p. 6-1) This suggestion is but more of the same, and certainly does not appear to address the rapid and troublesome spread of the hydrocarbon contaminants. Thus, it is time for the Regional Board to act, and act decisively.

The City requests that the Regional Board immediately order that:

- (1) Kinder Morgan submit a specific and supplemental Corrective Action Plan to contain the hydrocarbon plume already in Holifield Park;
- (2) Kinder Morgan submit a specific work plan to remediate the existing plume in Holifield Park; and
- (3) That any such Corrective Action Plan be open for public comment for a period of 30 days to allow the City adequate time to review and comment upon the proposed plan.

Sincerely,



Thomas E. Lynd
Assistant City Manager

cc: Mr. Kwang-il Lee (SLIC Cleanup Unit IV)
Mr. Arthur Health (Remediation)
Mr. Sam Unger (Principal Engineer for Regional Board)
Mr. Craig Stewart (AMEC-Geomatrix)
Ms. Shioh-Whei Chou (AMEC-Geomatrix)
Mr. Steve Defibaugh, KMEP
Congresswoman F. Grace Napolitano
Lt. Col. Jon Ramer (DESC)
Mr. Redwan Hassan (Parsons)
Mr. Kola Olowu (DESC)