



September 16, 2016

Mr. Paul Cho, P.G.
Water Resources Control Engineer
California Regional Water Quality Control Board, Site Cleanup Unit IV
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Request for Authorization
Monitoring Well Abandonment- Holifield Park
Defense Fuel Support Point Norwalk
15306 Norwalk Boulevard, Norwalk, California
(SCP NO. 0286A, Site ID NO. 16638)

Dear Mr. Cho:

The Source Group, Inc. (SGI) on behalf of the Defense Logistics Agency – Energy (DLA – Energy) is submitting this request for authorization to abandon one groundwater monitoring well located in the Holifield Park adjacent to the former Defense Fuel Support Point (DFSP) Norwalk facility (Site) located at 15306 Norwalk Boulevard, Norwalk, California. Abandonment of this well was discussed with the RWQCB during an on-site meeting held August 16, 2016.

The set of groundwater monitoring wells at the Site includes wells on the DFSP facility and wells in the adjacent Holifield Park to the east. Seven monitoring wells currently exist in the northern part of Holifield Park (Figure 1). These wells were installed to provide lateral delineation of hydrocarbons extending east of the DFSP facility. Recently, City of Norwalk personnel informed SGI that they are concerned that the wellhead surface completion of GMW-67 poses a risk to ball field users and thus this well is being proposed for abandonment.

Well GMW-67 was installed on July 13, 2015 following RWQCB approval of SGI's work plan entitled *Revised Work Plan for Further Evaluation of GMW-62 LNAPL Plume*, dated December 15, 2014 and approved by RWQCB in a letter dated March 16, 2015. The well installation and findings from sampling were reported on September 28, 2015, in a report titled *Further Evaluation of Petroleum Hydrocarbons in Soil and Groundwater Vicinity of GMW-62*. Well GMW-67 was also incorporated in the Site-wide groundwater monitoring program.

To evaluate the environmental significance of current monitoring data from that well, SGI reviewed the historical results of sampling and monitoring from that well. Well GMW-67 was installed as a lateral delineation point for LNAPL contamination found in GMW-62. GMW67 is located between well GMW-62, approximately 100 feet to the southwest and well GMW-65, approximately 100 feet to the northeast. As expected for an intermediate delineation point in the relative proximity to a well containing LNAPL, well GMW-67 groundwater samples were found to contain detectable concentrations of petroleum hydrocarbons, including benzene concentrations of 22 to 71 ug/L. These benzene values are two orders of magnitude lower than in GMW-62 (up to 3,900 ug/L), and therefore provide an indication that the lateral extent of contamination found as LNAPL in GMW-62 is laterally limited to the east where GMW-67 is located. The benzene concentrations

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in samples from the farther northeastern delineation, upgradient, well GMW-65, have consistently been reported at <0.5 ug/L, indicating that the GWM-65 well provides a consistent lateral delineation point.

Therefore, it is SGI's opinion that well GWM-67 is not crucial to the monitoring of chemical concentrations in groundwater, due to (1) the proximity of other groundwater monitoring wells (GMW-60 to the west; GMW-68 to the southwest; GMW-64 to the southeast; and GMW-65 and GMW-63 to the northeast) and (2) the westward direction of groundwater flow in the shallow aquifer is away from GMW-67. As this well presents potential tripping hazard to park visitors, SGI recommends abandonment of that well.

A permit to abandon the well will be sought from Los Angeles County Department of Environmental Health, and if the permit allows in-place grouting, that method of well destruction will be implemented, with the upper 5 feet of well removed, the borehole backfilled with cement to two feet below grade, and the surface area brought to surrounding grade with clean gardening soil. If in-place abandonment is not permitted, the existing well will be over drilled from ground surface to total depth of 47 feet below ground surface (bgs) and all well-construction materials will be removed and placed in UN-rated 55-gallon drums. The drums will be sealed, labeled, and transported off site under manifest for disposal. The borehole will be backfilled with bentonite/cement grout from total depth to approximately two feet below ground surface, gardening soil from approximately two feet below grade to ground surface, and the surface will be restored to match surrounding surface.

The remaining surrounding Holifield Park wells will continue to be monitored as part of the site-wide monitoring program. As part of that program, the groundwater monitoring data in the Park will be evaluated for potential data gaps resulting from the GMW-67 abandonment. The RWQCB will be notified of any proposed modifications to the network of monitoring wells, including Holifield Park.

The abandonment is scheduled for October 2016, pending permitting from Los Angeles County. If you have any questions regarding this proposed abandonment, please call me at (562) 597-1055.

Sincerely,



Paul Parmentier
Principal Hydrogeologist
The Source Group, Inc

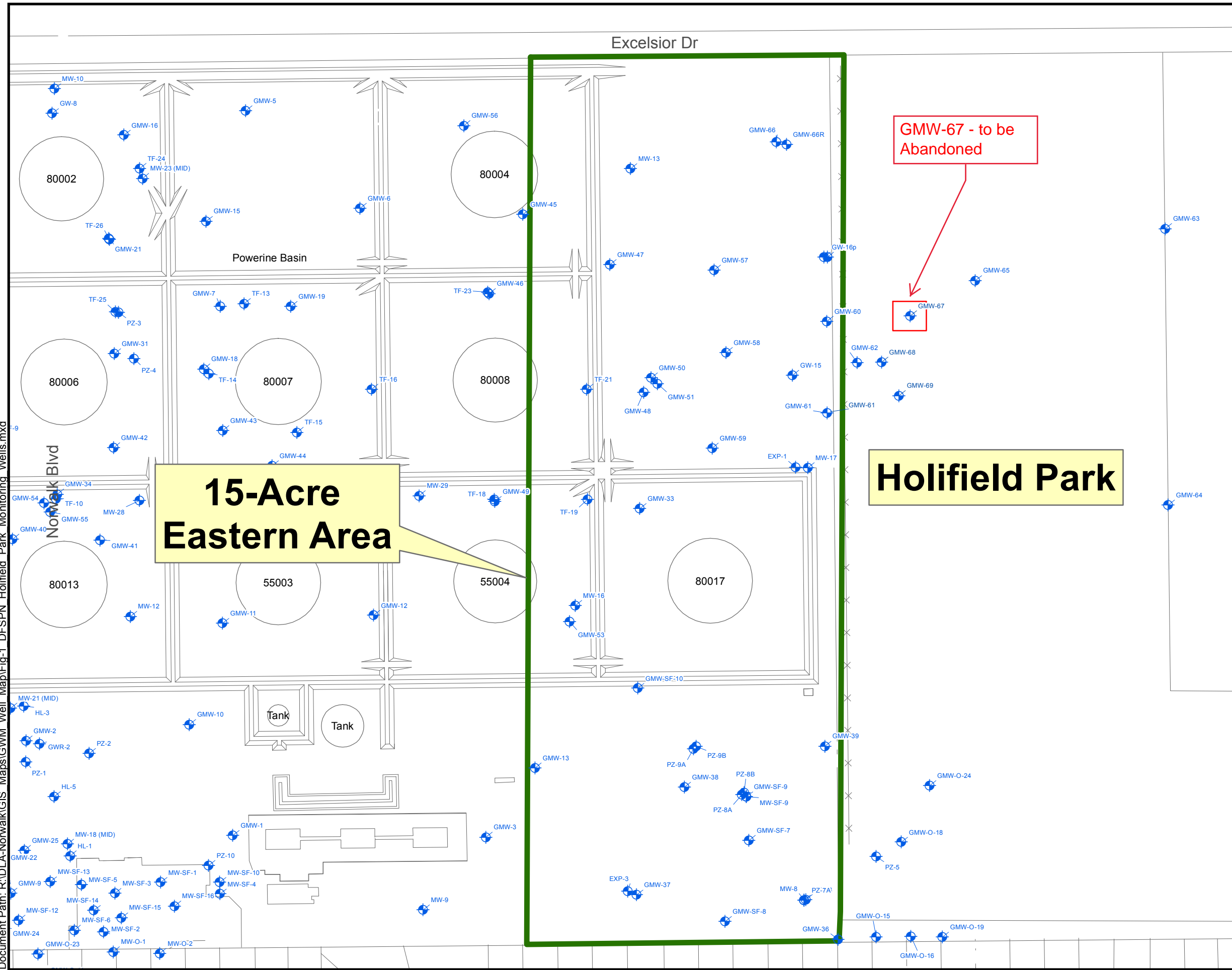
Ec: Ms. Carol Devier-Heeney, DLA Energy
Mr. Neil F. Irish, SGI
Ms. Adriana Figueroa, City of Norwalk

File: DFSP Norwalk – 04-NDLA-007



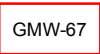

Enclosure:

Figure 1

Document Path: R:\DLA-Norwalk\GIS_Maps\GMM_Well_Map\Fig-1_DFSPN_Holifield_Park_Monitoring_Wells.mxd



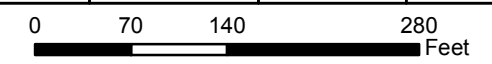
Legend

-  Former Above Ground Storage Tanks
-  Existing Groundwater Monitoring Wells
-  GMW-67 Well Proposed to be Abandoned
-  15 Acre Expanded Holifield Park Area



DFSP Norwalk
15306 Norwalk Boulevard
Norwalk, California

Project Number:	Date:	Drawn By:	Approved By:
04-NDLA-007	09/19/2016	PW	PP



Holifield Park Monitoring Well Locations



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Figure 1