



SFPP, L.P.
Operating Partnership

File No: 29.39
April 19, 2010

Mr. Paul Cho, P.G.
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Ste. 200
Los Angeles, CA 90013

Subject: Response to Comments Dated March 30, 2010 Regarding “Groundwater Investigation, Monitoring and Remediation in the Southern Plume Area, Defense Fuel Support Point Norwalk, 15306 Norwalk Boulevard, Norwalk, California (SCP No. 0286, Site No. 204DM00)”

Dear Mr. Cho:

SFPP, L.P. (SFPP), an operating partnership of Kinder Morgan Energy Partners, L.P. (KMEP), is submitting this letter to respond to comments received from the California Regional Water Quality Control Board, Los Angeles Region (RWQCB) in a letter dated March 30, 2010. Our responses to the comments and requirements in that letter are described below.

The RWQCB has requested that SFPP collect soil gas samples at depths of 5 feet and 15 feet in the vicinity of well GMW-O-14 and submit the results of the soil gas sampling by April 30, 2010 (RWQCB Comment 1). In addition, the RWQCB has requested that SFPP submit a work plan for installing a soil vapor monitoring network by June 1, 2010 (RWQCB Comment 3). Soil gas sampling near well GMW-O-14 will first require obtaining access to the off-site private property where the sampling will be performed. Based on our past experience in working on private properties neighboring the site, obtaining access to this property likely will require more time than accounted for in the due date of April 30, 2010 for RWQCB Comment 1 prescribed in the RWQCB’s March 30, 2010 letter. In addition, the work involved in installing a vapor monitoring point network to address RWQCB Comment 3 also will involve obtaining access to off-site property(ies) and field sampling activities. Therefore, to perform the overall work in a manner that is efficient and minimizes disruption to the landowners and residents, we propose to prepare a work plan to install the vapor monitoring network while we negotiate access to the necessary offsite property(ies). The proposed soil vapor monitoring point network will include one or more monitoring points in the vicinity of well GWM-O-14 to address RWQCB Comment 1. As requested, the work plan will be submitted to the RWQCB for review by June 1, 2010.

After receiving RWQCB approval of the work plan and obtaining access to the necessary off-site property(ies), SFPP will install and sample the vapor monitoring network. Soil gas sampling will be performed in accordance with the *Advisory for Active Soil Gas Investigations*, published by the Department of Toxic Substances Control (DTSC) and the RWQCB.¹ Results from the soil gas sampling will be compared to results from the soil gas sampling conducted in 2006 and the California Human Health Screening Levels (CHHSLs) as requested by the RWQCB in RWQCB Comment 1.

¹ DTSC, 2003, *Advisory for Active Soil Gas Investigations*, January 28.

To address RWQCB Comment 2, the human health risk assessment (HHRA) will be updated if new soil gas data exceed CHHSLs. As described in the 2006 HHRA, groundwater exposure pathways are not considered complete because shallow groundwater in the immediate vicinity of the DFSP Norwalk facility is not used as a drinking water source and the depth to groundwater (approximately 19 feet or greater) precludes contact during typical construction and underground utility work (typically within 10 feet below ground surface [bgs]). Also, the 2006 HHRA used soil data collected in the early 1990s (prior to remediation) to conservatively represent chemical concentrations in soil and indicated that risks from exposure to soil were not significant. No carcinogens were detected in soil (e.g., benzene or ethylbenzene). Therefore, if the new soil gas data indicate that the HHRA needs to be updated, the HHRA will be updated using the new soil gas data and the results of the HHRA will be submitted to the RWQCB within two months after receiving the soil gas data, consistent with the timeframe prescribed in the RWQCB's March 30, 2010 letter (e.g., the deadline for RWQCB Comment 2 is two months after the deadline for RWQCB Comment 1).

To address RWQCB Comment 4, SFPP will evaluate the effectiveness of the current remedial measures and submit the results of this evaluation to the RWQCB by April 30, 2010. In addition, a brief discussion of the benzene concentrations observed at GMW-O-14 is presented here. As reported in the Second Semiannual 2009 Groundwater Monitoring Report², benzene was detected in the groundwater sample collected from GMW-O-14 at a concentration of 14,000 micrograms per liter ($\mu\text{g/L}$) in October 2009. While this concentration represents an increase compared to that observed in the same well during the previous monitoring event, it appears to reflect a concentration similar to several values detected in 2004 (13,000, 11,000, and 13,000 $\mu\text{g/L}$), prior to a significant rise in groundwater level that occurred during late 2004 and 2005, rather than a new release. The increased benzene concentration observed at GMW-O-14 in October 2009 may be attributed to the continued decline of groundwater level since 2005. As shown on Figure 1 (attached), the benzene concentration and groundwater level in GMW-O-14 have shown a generally inverse relationship and the higher concentration detected in October 2009 may be a result of the lower groundwater level at that time.

In response to RWQCB Comment 5, SFPP has reviewed data collected from monitoring of the hydrocarbon leak detection system installed at the block valves of SFPP's pipelines in November 2007. The leak detection system was installed to provide an effective alternative to pipeline tracer tests, which significantly interfere with SFPP's operations and take away from resources reserved for site remediation. Based on the data reviewed, no leaks have been detected at the block valves during the time this system has been in place. Therefore, a pipeline tracer test is not considered to be necessary at this time and SFPP requests that the requirement for a new tracer test be put on hold. SFPP will continue to monitor the leak detection system and notify the RWQCB and other agencies as required if a pipeline leak is suspected.

Please let me know if the proposed approach and schedule described above for addressing the RWQCB's requests to evaluate soil gas concentrations in the southern off-site areas are acceptable to the RWQCB.

² Parsons, 2010, Second Semiannual 2009 Groundwater Monitoring Report, January 21.

If you have any questions regarding this letter or wish to discuss other issues concerning the site, please contact me at (714) 560-4802.

Sincerely,



Stephen T. Defibaugh, PG, CHG
Project Manager - Remediation

Attachment: Figure 1 – Benzene Concentrations and Groundwater Elevations for GMW-O-14

cc:

Lt. Col. Jon Ramer, DESC
Mr. Kola Olowu, DESC
Mr. Redwan Hassan, Parsons
Ms. Mary Lucas, Parsons
Ms. Mary Jane McIntosh, RAB
Dr. Eugene Garcia, RAB
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Mr. Alex Padilla, AMEC

Ms. Nancy Matsumoto, WRD
Mr. Steven Hariri, DTSC
Ms. Minxia Dong, Norwalk Regional Library
Mr. Edward Garcia, City of Norwalk
Ms. Adriana Figueroa, City of Norwalk
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Figure 1

