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June 3, 2011

420070.B1.01

Mr. Paul Cho, PG
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Subject: Work Plan Addendum for Soil Vapor Monitoring, South-Central and Southeastern Off-Site Areas, Defense Fuel Support Point Norwalk, 15306 Norwalk Boulevard, Norwalk, California (SCP No. 0286B, Site No. 204DM00)

Dear Mr. Cho:

Pursuant to your request made in a letter dated May 17, 2011, CH2M HILL is submitting this letter on behalf of SFPP, L.P. (SFPP), an operating partnership of Kinder Morgan Energy Partners, L.P. (KMEP), to provide a work plan addendum for conducting a soil vapor monitoring investigation at the Defense Fuel Support Point - Norwalk located at 15306 Norwalk Boulevard in Norwalk, California (DFSP; the site). The soil vapor monitoring program was requested by the California Regional Water Quality Control Board, Los Angeles Region (RWQCB) in its letter dated March 30, 2010. A work plan for installing a soil vapor monitoring network (the work plan) was submitted by AMEC on behalf of SFPP to the RWQCB on May 27, 2010 and approved on August 11, 2010.

Work Plan

As described in the work plan (AMEC, 2010), the proposed soil vapor monitoring network will consist of up to 10 soil vapor monitoring points in the south-central and southeastern residential areas. Each monitoring point will consist of a soil vapor probe nest with probes installed at depths of 5 and 15 feet below ground surface (bgs) in a single borehole. Soil vapor samples will be analyzed by an on-site mobile laboratory for fuel constituents consisting of benzene, toluene, ethylbenzene, total xylenes (collectively, BTEX), methyl tertiary butyl alcohol (MTBE), tertiary butyl alcohol (TBA), 1,2-dichloroethane, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, n-butylbenzene, sec-butylbenzene, isopropylbenzene, and n-propylbenzene using Environmental Protection Agency (EPA) Method 8260B. In addition, a confirmation soil vapor sample will be collected in a 1-liter Summa® canister during each sampling event and analyzed for the same list of fuel constituents. The confirmation soil vapor samples will be submitted to a fixed laboratory certified by the California Environmental Laboratory Accreditation Program (ELAP) and

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analyzed for EPA Method TO-15. Tracer compound(s) will be included in both method analyte lists.

Work Plan Addendum

As requested by the RWQCB, this addendum adds the analysis for methane. SFPP will sample and analyze for methane in the mobile and fixed laboratory samples using American Society for Testing and Materials (ASTM) Method D1946. The RWQCB suggested using the guidance document entitled, "Advisory on Methane Assessment and Common Remedies at School Sites", prepared by the Department of Toxic Substances Control (DTSC) in 2005, to prepare a response program if methane is detected in soil gas samples. Only some portions of DTSC's guidance are relevant as the document was intended for the evaluation of methane at school sites. If methane is present in soil gas samples, the data will be evaluated and the appropriate response program will be implemented after consultation with the RWQCB and SFPP's health and safety division. The City and the local fire department may be contacted by SFPP if warranted.

Property Access Update

SFPP has finalized a property access agreement with the City of Norwalk to allow SFPP to install and monitor a soil vapor monitoring probe in the southwest corner of Holifield Park (southeastern off-site area). The access agreement was finalized in late December 2010. In addition, property access agreements have been secured with four of six private property owners in the south-central off-site area. The RWQCB submitted follow-up access request letters to private property owners on April 22 and May 4, 2011; however, SFPP has yet to receive a response from two property owners (12241 and 12247 Cheshire Street). Additional correspondence from the RWQCB will be required to facilitate execution of the remaining site access agreements.

If you have any questions regarding this project, please contact Stephen Defibaugh of KMEP at 714-560-4802 or myself at 213-228-8271.

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Sincerely,

CH2M HILL



Dan Jablonski, REA
Project Scientist

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