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September 20, 2011

424272.C1.01

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 LNAPL Characterization in Uppermost Groundwater Zone and Top of Bellflower Aquitard, Defense Fuel Support Point Norwalk, 15306 Norwalk Boulevard, Norwalk, California (SCP No. 0286B, Site No. 204DM00)

Dear Mr. Cho:

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 characterization of liquid-phase hydrocarbons (light non-aqueous phase liquid [LNAPL], or free product) at the Defense Fuel Support Point - Norwalk located at 15306 Norwalk Boulevard in Norwalk, California (DFSP; the site). The work plan describes the methods used to verify, and quantify where present, the vertical distribution of LNAPL in areas of current or historical occurrence of LNAPL and has been prepared pursuant to the request made by the California Regional Water Quality Control Board, Los Angeles Region (RWQCB) during the Norwalk Technical Meeting held on May 27, 2010. A work plan for the LNAPL investigation was submitted by AMEC on behalf of SFPP to the RWQCB on July 21, 2010 and approved on September 28, 2010.

Work Plan

As described in the work plan (AMEC, 2010), the proposed work includes: collection of free product samples from wells; characterization of LNAPL presence and distribution in soil using laser induced fluorescence cone penetrometer testing (CPT/LIF) technology; and the collection, observation, field screening, lithologic logging, and laboratory testing of soil core samples from assessment borings. The CPT/LIF assessment will be conducted at four locations (CPT/LIF-1 through CPT/LIF-4) in the south-central area and one location (CPT/LIF-5) in the southeastern area. Proposed boring locations CPT/LIF-1 through CPT/LIF-5 are based on the historical and recent presence of free product in wells in the south-central and southeastern areas and are expected to provide data from areas in which substantial thickness of residual LNAPL, if present, would be relatively likely.

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Work Plan Addendum

This work plan addendum addresses a change in the proposed location of boring CPT/LIF-3. CPT/LIF-3 was initially proposed in the southern offsite area at 12247 Cheshire Street; however, this boring was relocated due to site access delays with the current property owner. CPT-LIF-3 has been relocated to an onsite location in the south-central area near extraction well MW-SF-10 (Figure 1). This is an area with a historical and recent presence of residual free product. Relocating CPT/LIF-3 will allow SFPP to initiate the field work for this investigation without further delay, as all other offsite site access agreements have been completed.

SFPP intends to initiate the pre-field activities associated with the LNAPL investigation in the next several days. If you have any questions regarding this project, please contact Stephen Defibaugh of KMEP at 714-560-4802 or myself at 213-228-8271.

Sincerely,

CH2M HILL

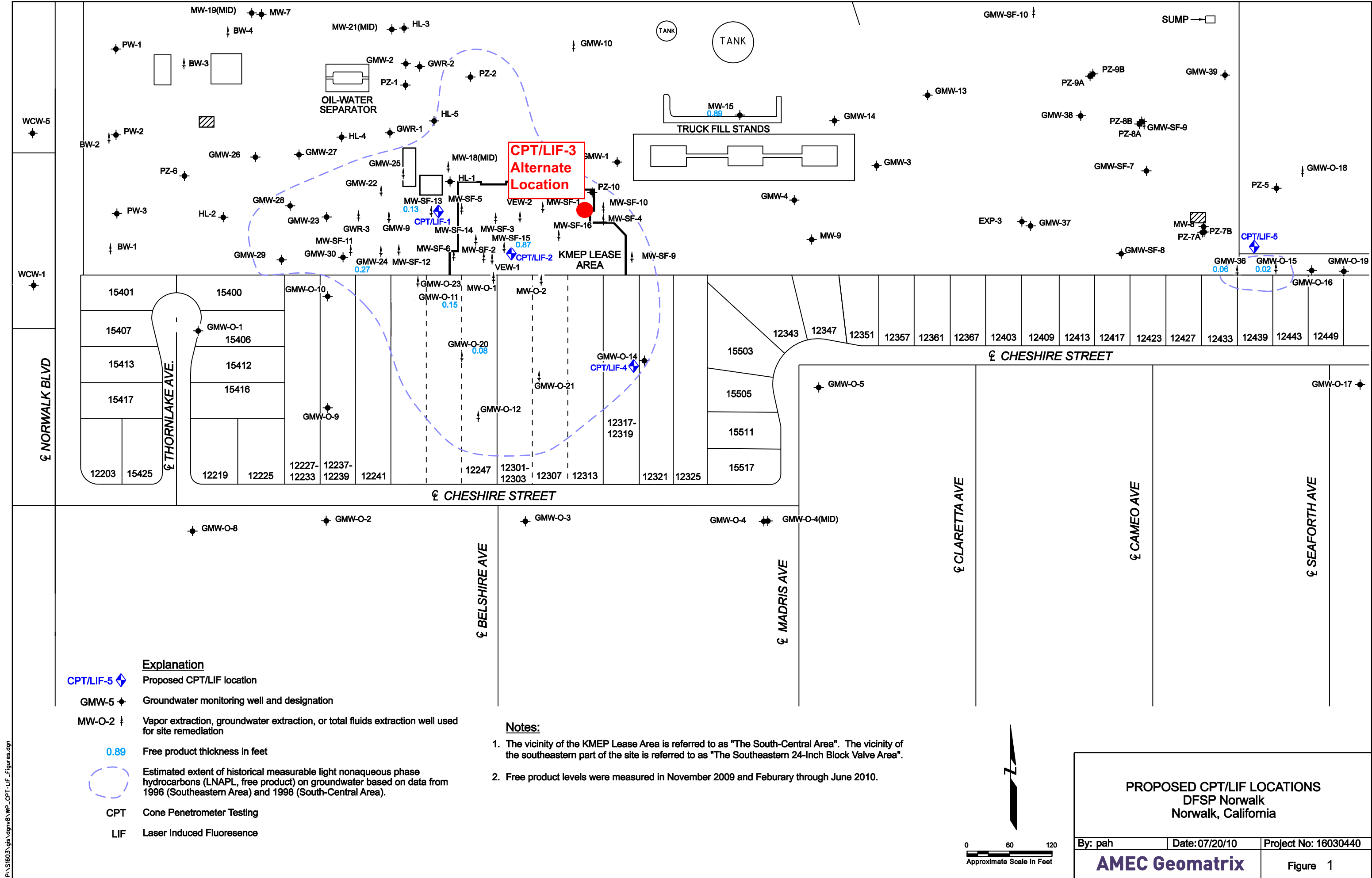


Dan Jablonski, REA
Project Scientist

Distribution List

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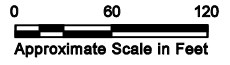
**CPT/LIF-3
Alternate
Location**

Explanation

- ◆ CPT/LIF-5 Proposed CPT/LIF location
- ◆ GMW-5 Groundwater monitoring well and designation
- † MW-O-2 Vapor extraction, groundwater extraction, or total fluids extraction well used for site remediation
- 0.89 Free product thickness in feet
- Estimated extent of historical measurable light nonaqueous phase hydrocarbons (LNAPL, free product) on groundwater based on data from 1996 (Southeastern Area) and 1998 (South-Central Area).
- CPT Cone Penetrometer Testing
- LIF Laser Induced Fluorescence

Notes:

1. The vicinity of the KMEP Lease Area is referred to as "The South-Central Area". The vicinity of the southeastern part of the site is referred to as "The Southeastern 24-Inch Block Valve Area".
2. Free product levels were measured in November 2009 and February through June 2010.



PROPOSED CPT/LIF LOCATIONS DFSP Norwalk Norwalk, California		
By: pah	Date: 07/20/10	Project No: 16030440
AMEC Geomatrix		Figure 1

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