



CH2M
6 Hutton Centre Drive
Suite 700
Santa Ana, CA 92707
O +1 714 429 2000
F +1 714 429 2050
www.ch2m.com

Ching-Yin To
Industrial Permitting Unit
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013

September 22, 2017

Subject: Toxicity Test Species Selection, National Pollutant Discharge Elimination System Permit Number CA0063509 (Order No. R4-2016-0309) for the SFPP Norwalk Pump Station, 15306 Norwalk Boulevard, Norwalk, California

Dear Ms. To,

On behalf of SFPP, L.P. (SFPP), an operating partnership of Kinder Morgan, Inc. (Kinder Morgan), this letter provides an update on the selection of fish for toxicity testing at the SFPP Norwalk Pump Station, based on the results from species-sensitivity screening.

In a letter from Mr. Samuel Unger to Stephen Defibaugh/Kinder Morgan dated April 14, 2017, the California Regional Water Quality Control Board (Water Board) approved the use of *Menidia beryllina* (inland silverside) as an alternative test species at the SFPP Norwalk Pump Station. The use of this alternative species was conditional based on the general lack of supply for topsmelt in this region; and, to be consistent with Mr. Unger's letter, toxicity testing with topsmelt will resume once a consistently healthy and reliable supply of this organism is available.

In May 2017, whole effluent toxicity test species sensitivity screenings were conducted with giant kelp (*Macrocystis pyrifera*), purple urchin (*Strongylocentrotus purpuratus*), and the inland silverside. The effluent samples used for these tests were collected on May 8, 10, and 12, 2017. These data were provided to the Water Board in the second quarter Self-Monitoring Report.

The Norwalk permit states that "*The species that exhibits the highest "Percent Effect" at the discharge IWC [in-stream waste concentration] during species sensitivity screening shall be used for routine monitoring during the permit cycle.*" While the species selection is to be based on a percent effect, these test data are also to be evaluated for compliance based on the Test of Significant Toxicity (TST) to determine a "pass" or "fail" result. No toxicity to any species' endpoint was found (TST = "pass"). A percent reduction from the control (2.5 percent) was only observed for inland silverside survival. This difference was not statistically significant and growth (a more sensitive endpoint) was not reduced in fish exposed to effluent; however, the permit requires that, based on this difference, inland silverside shall be used for routine toxicity monitoring. Regardless of the relevance of this percent difference, Kinder Morgan supports this outcome because, in the absence of other indicators, it would be logical to use a fish for toxicity testing at the SFPP Norwalk Pump Station based on their historical use at the site and 2015 toxicity to fish that resulted in a Toxicity Reduction Evaluation.

Please note that there are challenges with the use of all species for Whole Effluent Toxicity testing, and the 7-day test duration for the inland silverside can make it particularly difficult to conduct a total of three tests in a calendar month, as required by the permit, if the first test results in a "fail." Fish growth results from the first test would, at the earliest, be received 9 to 10 days after the first sample collection (that is, results would be received on the 11th or 12th when sample collection begins on the 1st day of the month). Immediately beginning sample collection for two additional tests would only end sampling for the final test a few days before the end of the month. It may not be possible to comply with the required testing within the same calendar month if organism availability, sample shipment delays, unplanned operations downtime, or other unexpected delays occur. However, Kinder Morgan and our contract laboratory will exercise every effort to complete these tests in the required time, if needed.

If you have any questions or would like additional information, please contact Eric Davis of CH2M at 213.228.8262.

Regards,
CH2M HILL Engineers, Inc.



Eric Davis
Project Manager



Cameron Irvine, R.P. Biol.
Ecotoxicologist

Cc: Cassandra D. Owens, Water Board
Stephen Defibaugh, Kinder Morgan