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April 30, 2021

Attention: Mr. Paul Cho
Los Angeles Regional Water Quality Control Board
320 W 4th St., Suite 200
Los Angeles, California 90013

**Subject: Deadline Extension Request for a Natural Source Zone Depletion
Interim Remedial Action Plan, SFPP, L.P. Norwalk Pump Station, Norwalk, California**

Dear Mr. Cho,

On behalf of SFPP, L.P. (SFPP), an indirect subsidiary of Kinder Morgan, Inc. (Kinder Morgan), Jacobs has prepared this letter to request a deadline extension for the Natural Source Zone Depletion (NSZD) Interim Remedial Action Plan (IRAP), currently due on April 30, 2021. Kinder Morgan is requesting a new deadline of September 30, 2021, to provide more time to evaluate data being generated from the ongoing NSZD pilot study and associated temporary suspension of groundwater treatment system (GWTS), the completion of biosparge activities in the south-central area of the site, and the initiation of horizontal biosparge activities in the southeastern and offsite/south-central areas of the site.

In the Los Angeles Regional Water Quality Control Board's (Regional Board) comments¹ on the *Biosparging Effectiveness Evaluation and Recommendations, South-Central Area* report (Jacobs, 2019), the Regional Board acknowledged that the horizontal biosparge remedy (well BS-01) in the south-central area appeared to have reached a technical endpoint after approximately 2.5 years of continuous operation and concurred with the implementation of a NSZD rate evaluation pilot study in the south-central area, which would serve as the basis for a broader remedy transition plan to progress from active remediation to an NSZD remedy across the site. To initiate this transition, in their comments letter, the Regional Board requested that Kinder Morgan prepare an IRAP by April 30, 2021, to implement the NSZD remedy.

Subsequently, in accordance with the approved *NSZD Work Plan*² and the *Southeastern Area Horizontal Biosparge System Construction Work Plan*³, in May 2020 Kinder Morgan suspended horizontal biosparge (BS-01) and GWTS (i.e, hydraulic control) activities in the south-central area, initiated NSZD monitoring in the south-central area, and initiated horizontal biosparge activities (well BS-02) in the southeastern area of the site. At that time, GWTS activities remained active in the

¹ California Regional Water Quality Control Board, Los Angeles Region (Water Board). 2020. Letter to Mr. Ryan Koch, Kinder Morgan; *Review of Biosparging Effectiveness Evaluation Report and Requirement for Quarterly Groundwater Monitoring in the South-Central Area*. April 8.

² Jacobs Engineering Group Inc. (Jacobs). 2019b. *Natural Source Zone Depletion Work Plan, SFPP Norwalk Pump Station, 15306 Norwalk Boulevard, Norwalk, California*. July 2.

³ Jacobs Engineering Group Inc. (Jacobs). 2017. *Horizontal Biosparge System Construction Work Plan, SFPP Norwalk Pump Station, 15306 Norwalk Boulevard, Norwalk, California*. October 30.

southeastern and offsite/south-central areas of the site. Subsequently, two NSZD monitoring events were performed in May (baseline) and November (6-month post-shutdown of the south-central area horizontal biosparge well) 2020; the NSZD rates observed confirm that NSZD can be measured at this site and that significant cumulative rates (up to approximately 1,400 gal/year or 10,000 lb/year) of biodegradation are occurring in the subsurface. NSZD performance data was documented in the Third and Fourth Quarter 2020 Remediation Progress Reports and the First Quarter 2021 Remediation Progress Report (Jacobs, 2020; Jacobs, 2020 and Jacobs 2021, respectively). These quarterly remediation progress reports also documented that the southeastern horizontal biosparge well (BS-02) is functioning as designed and is successfully treating dissolved phase and source mass contamination in groundwater, with an operational timeframe (that is, expected time to reach a technical endpoint) consistent with horizontal biosparge well BS-01.

To further the overall site management strategy, Kinder Morgan installed a vertically staggered horizontal biosparge (well BS-03) and horizontal SVE (well HSVE-01) system in the offsite/south-central area of the site in 2020⁴, with the intention of using the same proven treatment approach employed in the south-central and southeastern areas of the site. Construction of the “stacked well” offsite treatment system was completed at the end of 2020, and in preparation for activating that system, on January 20, 2021, Kinder Morgan submitted a request to the Regional Board for approval to temporarily suspend hydraulic control in the southeastern and offsite/south-central areas⁵. Acknowledging that this request was simply an expansion of the same site management approach previously approved for the south-central area, the Regional Board granted approval to temporarily suspend all remaining hydraulic control activities in an email on January 20, 2021⁶. Henceforth, hydraulic control in the southeastern and offsite/south-central areas was suspended on February 23, 2021. Shortly thereafter, Kinder Morgan notified the Regional Board via email on March 26, 2021, that the offsite horizontal treatment wells would be activated in April 2021.

At this time, all active remedies in the south-central area are inoperative, horizontal biosparging and vertical SVE systems are active in the southeastern area, the horizontal SVE well is active in the offsite/south-central area (as of April 6, 2021), and the NSZD pilot study has been expanded to the southeastern and offsite/south-central areas. With the requested deadline extension for the IRAP, Kinder Morgan will continue monitoring and collecting NSZD data in all areas of the site to further demonstrate that it is a viable alternative remedy, which is practically defined as the NSZD degradation rate being greater than or equal to source mass removal using vertical and horizontal SVE and the GWTS. In the meantime, Kinder Morgan will continue to document progress in forthcoming quarterly remediation progress reports.

Please let me know if you have any questions or concerns based on the information provided in this letter.

Regards



Eric Davis, P.G.
Senior Project Manager

⁴ Jacobs Engineering Group Inc. (Jacobs). 2019. *Drilling and Installation of a Stacked Horizontal Biosparge and Soil Vapor Extraction Remediation Well System in the Offsite South-Central Area, SFPP Norwalk Pump Station, 15306 Norwalk Boulevard, Norwalk, California*. November 4.

⁵ Jacobs Engineering Group Inc. (Jacobs). 2021. Request for Approval to Temporarily Suspend Hydraulic Control in the Southeastern and Offsite/South-Central Areas (Letter), SFPP Norwalk Pump Station, 15306 Norwalk Boulevard, Norwalk, California. January 8.

⁶ California Regional Water Quality Control Board, Los Angeles Region (Water Board). 2021. Approval of Request to Temporarily Suspend Hydraulic Control in the Southeastern and Offsite/South-Central Areas (email from Paul Cho to Eric Davis), SFPP Norwalk Pump Station, 15306 Norwalk Boulevard, Norwalk, California. January 20.