



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

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Steve Defibaugh, P.G., C.HG.  
Remediation Project Manager  
Kinder Morgan Energy Partners  
1100 Town and Country Road  
Orange, California 92868  
[Steve\\_Defibaugh@kindermorgan.com](mailto:Steve_Defibaugh@kindermorgan.com)

### GROUNDWATER INVESTIGATION, MONITORING AND REMEDIATION IN OFF-SITE 24-INCH BLOCK VALVE AREA, DEFENSE FUEL SUPPORT POINT NORWALK, 15306 NORWALK BOULEVARD, NORWALK, CALIFORNIA (SCP NO. 0286B, SITE NO. 204DM00)

Dear Mr. Defibaugh:

Defense Fuel Support Point (DFSP) Norwalk facility, operated by Defense Energy Support Center (DESC), is a 50-acre facility consisting of 12 aboveground storage tanks that previously stored and distributed jet propellant (JP)-1 and JP-8. Kinder Morgan Energy Partners, L.P. (KMEP) leases a 2-acre easement along the southern and eastern boundaries of Defense Fuel Support Point (DFSP) Norwalk facility for operation of its pipelines that convey gasoline, diesel, and jet fuel. Under the oversight of Los Angeles Regional Water Quality Control Board (Regional Board), both DESC and KMEP have been conducting environmental investigations, monitoring, and cleanup at the subject site.

As a part of ongoing efforts in monitoring the impact of released petroleum product in the subsurface, Parsons and AMEC Geomatrix (AMEC), on the behalves of DESC and KMEP respectively, jointly conducted the second semiannual groundwater sampling in October, 2009 at the subject facility located at 15306 Norwalk Boulevard, Norwalk, California. The results of the groundwater sampling event were reported in the January 21, 2009 "Second Semiannual 2009 Groundwater Monitoring Report" (Report). During the Restoration Advisory Board (RAB) meeting held on January 28, 2010 at the City of Norwalk Sports Complex, AMEC presented the findings of the Report. During the RAB meeting, Regional Board staff discussed with you and RAB members concerns regarding the increased concentrations of total petroleum hydrocarbons in some monitoring wells (PZ-5 and GWO-18), the interruption of groundwater extraction/discharge operations and the corrective measures. On January 29, 2010, the City of Norwalk (the City) expressed their concerns similar to the issues discussed during the RAB meeting.

Based on our review of the submitted results, we have the following requirements:

1. Reporting of elevated concentrations of fuel components and oxygenates in groundwater:

Contaminant concentrations have increased in some monitoring wells compared to previous sampling events. Among these monitoring wells with increased contaminant concentrations are PZ-5 and GMW-O-18 which are located in the vicinity of 24-inch block valve area; the 24-inch block valve area is at the southeast corner of DFSP Norwalk facility. The detected contaminants with significant increase in concentrations include total petroleum hydrocarbons (TPH) both as fuel product and as gasoline, benzene, toluene, ethylbenzene, xylenes (BTEX), methyl tert-butyl ether (MTBE), tert-butyl alcohol (TBA). KMEP and their consultant, AMEC, have attributed the observed increase in contaminant concentrations in PZ-5 and GMW-O-18 to the interrupted

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groundwater extraction from the area due to issues associated with pumping maintenance problems and selenium discharge limit in the National Pollutant Discharge Elimination System (NPDES) permit No. CA0063509. The onsite groundwater treatment system was forced to shut-down to stay in compliance with the NPDES permit. It is presumed that selenium in the extracted groundwater exceeding the NPDES discharge limit could be a naturally occurring site condition.

The observed increase in contaminant levels in the vicinity of the 24-inch block valve area due to the pumping interruption has raised the concern that the contaminant groundwater plume may potentially spread further near well GMW-O-18. Regional Board staff shares the concern with the City and members of the local communities. We acknowledge that you have taken corrective measure to address these issues; you have resumed groundwater pumping in wells GMW-O-15, GMW-36, MW-SF-12, MW-SF-13, and MW-SF-16 through pumping maintenance and selenium concentration screening in the extraction wells. While your efforts continue in searching for a viable solution for selenium compliance with the NPDES permit and full operation of your onsite groundwater treatment system, you shall implement the following measures:

- a. Increase the monitoring frequency from quarterly to monthly at the following wells: GMW-O-15, GMW-O-16, GMW-O-18, GMW-O-19, PZ-5, and GMW-36.

Monthly groundwater sampling at the above-mentioned wells shall continue until a modification to the monthly sampling requirements is warranted by future monitoring data and approved by this Regional Board. The monthly sampling report is due for our review on the 15<sup>th</sup> of each following month. Your next monthly sampling report is due on **April 15, 2010**.

- b. Start groundwater extraction from well GMW-O-18 and connect it to the existing groundwater treatment system. Groundwater extraction from GMW-O-18 shall start by **April 15, 2010**. A summary of the field activity shall be included in the subsequent Quarterly Remediation Progress Report.

2. Selenium Discharge Compliance:

We understand that KMEP and AMEC have been working on solutions to resolve the selenium excursion issues. You shall submit a summary report to present your proposed solutions for our review by **April 1, 2010**.

3. Capture Zone Analysis and Field Validation:

AMEC submitted a "Summary of Capture Zone Analysis for Southern Area, SFPP, L.P. Norwalk, 15306 Norwalk Boulevard, Norwalk, California" (Summary), dated December 21, 2009. This Summary presents scenario of pumping from well GMW-36 and GMW-O-15. The Summary states that the simulated results will be checked by measuring and contouring drawdown in wells and piezometers in the field after at least six months of pumping. You shall also simulate scenario of adding pumping from GMW-O-18. The validation of the modeling with field data shall be included in your semiannual groundwater monitoring report jointly with DESC's simulation results and validation, in a separate section.

4. Step-Out Investigation

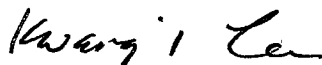
The recent detected TPH, BTEX, MTBE, and TBA in GMW-O-18 call for additional step-out investigation to further delineate the impact. You shall submit a work plan for a complete delineation of the subsurface contamination in the vicinity for our review by **April 19, 2010**.

5. Pumping Operation and Maintenance Status

Your future groundwater monitoring report shall include a separate table to summarize the status of each pump during the reporting period, including operational status during each site visit, and reasons for and duration of any interruption.

If you have any questions concerning this letter, please contact Jeffrey Hu via telephone at (213) 576-6736 or via electronic mail at [ghu@waterboards.ca.gov](mailto:ghu@waterboards.ca.gov).

Sincerely,



Kwangil Lee, Ph.D., P.E.  
DOD Program Manager  
Chief, Site Cleanup IV Unit

- cc. Congresswoman Grace Napolitano, 1609 Longworth Building, Washington, D.C. 20515  
Ms. Shiow Whei Chou, Geomatrix, [SWChou@geomatrix.com](mailto:SWChou@geomatrix.com)  
Mr. Edward Garcia, City Manager, City of Norwalk, 12700 Norwalk Blvd., Norwalk CA 90651  
Mr. Steve Harari, Department of Toxic Substances Control [shariri@dtsc.ca.gov](mailto:shariri@dtsc.ca.gov)  
Mr. Redwan Hassan, Parsons, [Redwan.hassan@parsons.com](mailto:Redwan.hassan@parsons.com)  
Ms. Conesa Lee, Air Force Real Property, Northrop Grumman, 1700 N Moore, Suite 2300, Arlington, VA 22209-2809  
Ms. Mary Jane McIntosh [MARYJANEMC13@aol.com](mailto:MARYJANEMC13@aol.com)  
Mr. Steve Osborn, Kinder Morgan, [OsbornS@kindermorgan.com](mailto:OsbornS@kindermorgan.com)