



SFPP, L.P.
Operating Partnership

September 15, 2011

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

Subject: Update on Property Access and Request for RWQCB Assistance, Southern and Eastern Offsite Areas, Defense Fuel Support Point Norwalk, 15306 Norwalk Boulevard, Norwalk, CA

Dear Mr. Cho:

Pursuant to your request made in a letter dated August 30, 2011, SFPP, L.P. (SFPP), an operating partnership of Kinder Morgan Energy Partners, L.P. (KMPEP), is submitting this letter to provide an update on the progress made to obtain property access for a soil vapor monitoring program and light non-aqueous phase liquid (LNAPL) characterization study in offsite areas south and east of the Defense Fuel Support Point–Norwalk located at 15306 Norwalk Boulevard in Norwalk, California (DFSP; the site). In addition, this letter requests that the California Regional Water Quality Control Board, Los Angeles Region (RWQCB) assist with obtaining access to one property south of site that is critical to completing the soil vapor monitoring program.

The soil vapor monitoring program was requested by the RWQCB in its letter dated March 30, 2010. A work plan for installing a soil vapor monitoring network was submitted to the RWQCB on May 27, 2010 and approved on August 11, 2010. The LNAPL investigation was requested pursuant to a request made by the RWQCB during the Norwalk Technical Meeting held on May 27, 2010. A work plan for implementing the LNAPL characterization was submitted to the RWQCB on July 21, 2010 and approved on September 28, 2010.

As described in the work plans and SFPP's previous correspondence with the RWQCB, SFPP has obtained written authorization (i.e., access agreements) to access the necessary properties, except for two properties south of the site. SFPP mailed copies of site access agreements to seven private property owners in the southern offsite area and to the City of Norwalk for boring locations in the eastern offsite area in Holifield Park. Provided below is an update on status of these access agreements and the request for the RWQCB to assist with obtaining access to one property south of site.

Southern Offsite Access

As discussed during the last Restoration Advisory Board (RAB) meeting, conducted on August 11, 2011, SFPP has yet to receive site access agreements from two property owners

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in the southern offsite areas. SFPP's inability to gain site access at these properties has caused a significant delay in conducting both the soil vapor monitoring and LNAPL investigations. SFPP has not received site access agreements from the following property owners:

Soil Vapor Monitoring Investigation

- **12247 Cheshire Street Property**—location of proposed soil vapor probes SVM-6, SVM-7, and SVM-10. Property owner is Ms. Sheepa Seekaroudy of 16215 Wayfarer Lane, Huntington Beach, CA 92649.
Contact phone number is 714.595.2248
Contact email is psheepa@hotmail.com
- **12241 Cheshire Street Property**—location of proposed soil vapor probe SVM-2. Property owner is Sushina Jandial of PO BOX #270 Artesia, CA 90702
Contact phone number is 714.300.8880

LNAPL Investigation

- **12247 Cheshire Street Property** – location of boring CPT/LIF-3. Property owner is Ms. Sheepa Seekaroudy of 16215 Wayfarer Lane, Huntington Beach, CA 92649.
Contact phone number is 714.595.2248
Contact email is psheepa@hotmail.com

SFPP has made several attempts to contact and/or secure site access with these owners but all attempts have been unsuccessful. The RWQCB also submitted follow-up site access request letters to the property owners on April 22 and May 4, 2011, but SFPP has yet to receive signed access agreements. In order to facilitate the LNAPL investigation, SFPP proposes to relocate CPT/LIF-3 from the 12247 Cheshire Street property to an onsite location in the south-central area of the site (see attached Figure 1), near remediation extraction well MW-SF-10. This new location is positioned in an area with a historical presence of residual free product. SFPP will prepare a Work Plan Addendum letter documenting this change. It is anticipated that this work will proceed in October 2011.

Of the 10 soil vapor probe monitoring points proposed for the soil vapor investigation, there are three vapor probes located at 12247 Cheshire Street and one vapor probe located at 12241 Cheshire Street. It may be possible to relocate probe SVM-2 from 12241 to the adjacent property to the west (12237-12239 Cheshire Street) (see attached Figure 2). However, there are no alternate locations for the three vapor probes proposed at the 12247 Cheshire Street property. These locations are critical for the investigation since this residential property is located offsite in an area overlying the current extent of dissolved chemicals of potential concern (COPCs) in groundwater.

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Eastern Offsite Access

In December 2010, SFPP 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 (eastern offsite area). The agreement also allows for the installation of temporary borings to facilitate completion of the LNAPL investigation. No further assistance from the RWQCB is needed to complete the investigations for this area.

Recommendations and Request for RWQCB Assistant to Obtain Property Access

SFPP is proposing to initiate the LNAPL investigation using the alternate CPT/LIF-3 location described above. The investigation will be conducted according to the RWQCB-approved work plan dated, July 21, 2010.

SFPP also requests that the RWQCB contact the 12247 Cheshire Street property owner directly for additional negotiations and/or enforcement actions to facilitate the implementation of the soil vapor investigation.

Please feel free to contact me at (714) 560-4802 or Dan Jablonski at (213) 228-8271 if you have any questions regarding this issue.

We look forward to your response.

Sincerely,



Stephen T. Defibaugh, PG, CHG
Project Manager-Remediation

Attachments

Figure 1-Proposed CPT/LIF Locations

Figure 2-Proposed Soil Vapor Monitoring Point Locations

Distribution List

LTC Tam Gaffney, Commander, DLA Energy-Americas West

Mr. Kola Olowu, DLA Energy

Mr. Redwan Hassan, Parsons

Ms. Mary Lucas, Parsons

Ms. Mary Jane McIntosh, RAB

Dr. Eugene Garcia, RAB

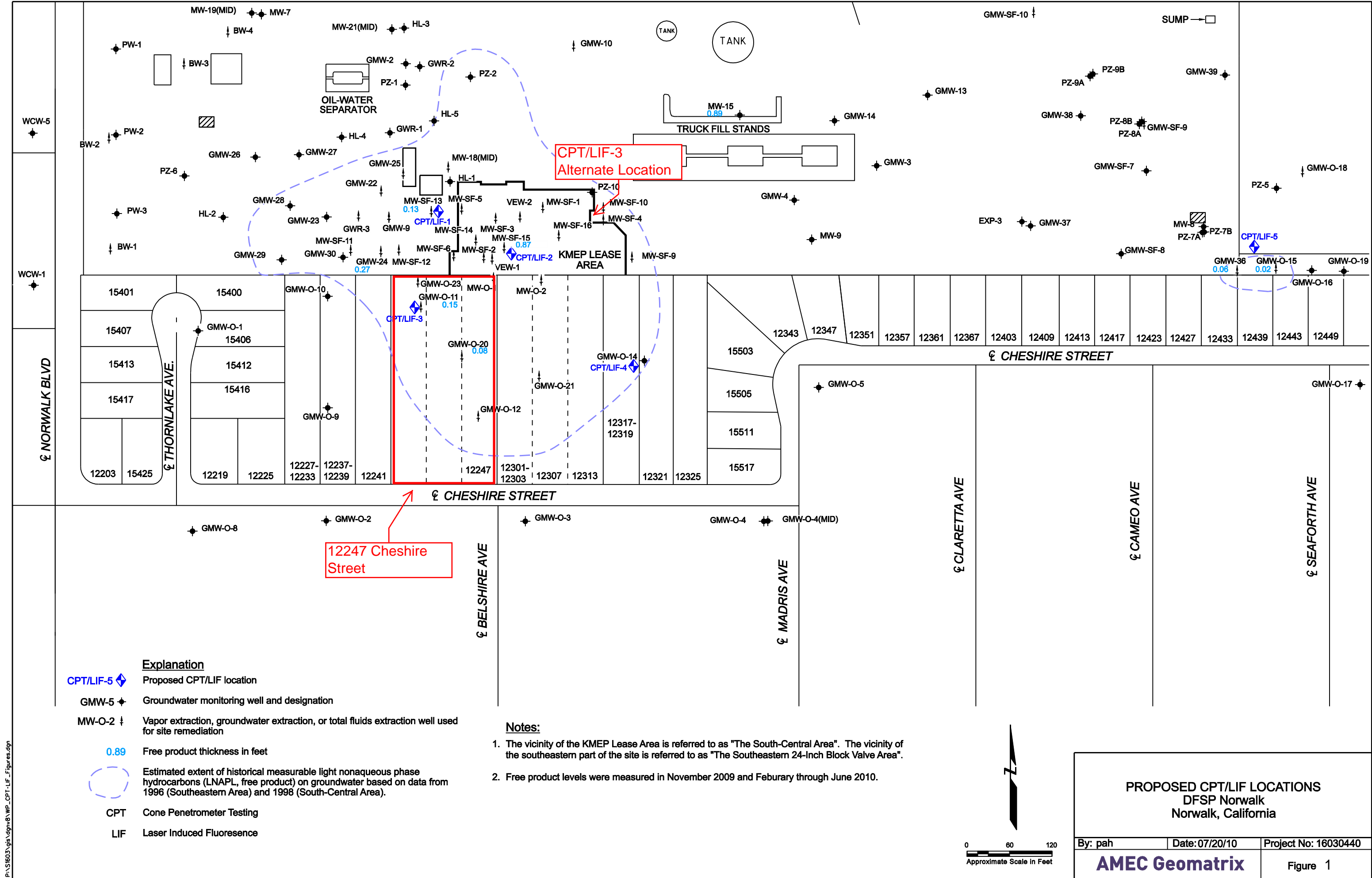
Mr. Bob Hoskins, RAB

Ms. Tracy Winkler, RAB

Ms. Minxia Dong, Norwalk Regional Library

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Ms. Adriana Figueroa, City of Norwalk
Mr. Norman Dupont, Richards/Watson/Gershon
Mr. Charles Emig, City of Cerritos
Mr. Gary Lynch, Park Water Company
Office of Congresswoman Grace F. Napolitano
Mr. Tim Whyte, URS
Mr. Mark Wuttig/CH2M HILL
Mr. Dan Jablonski/CH2M HILL



CPT/LIF-3
Alternate Location

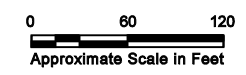
12247 Cheshire Street

Explanation

- Proposed CPT/LIF location
- Groundwater monitoring well and designation
- 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

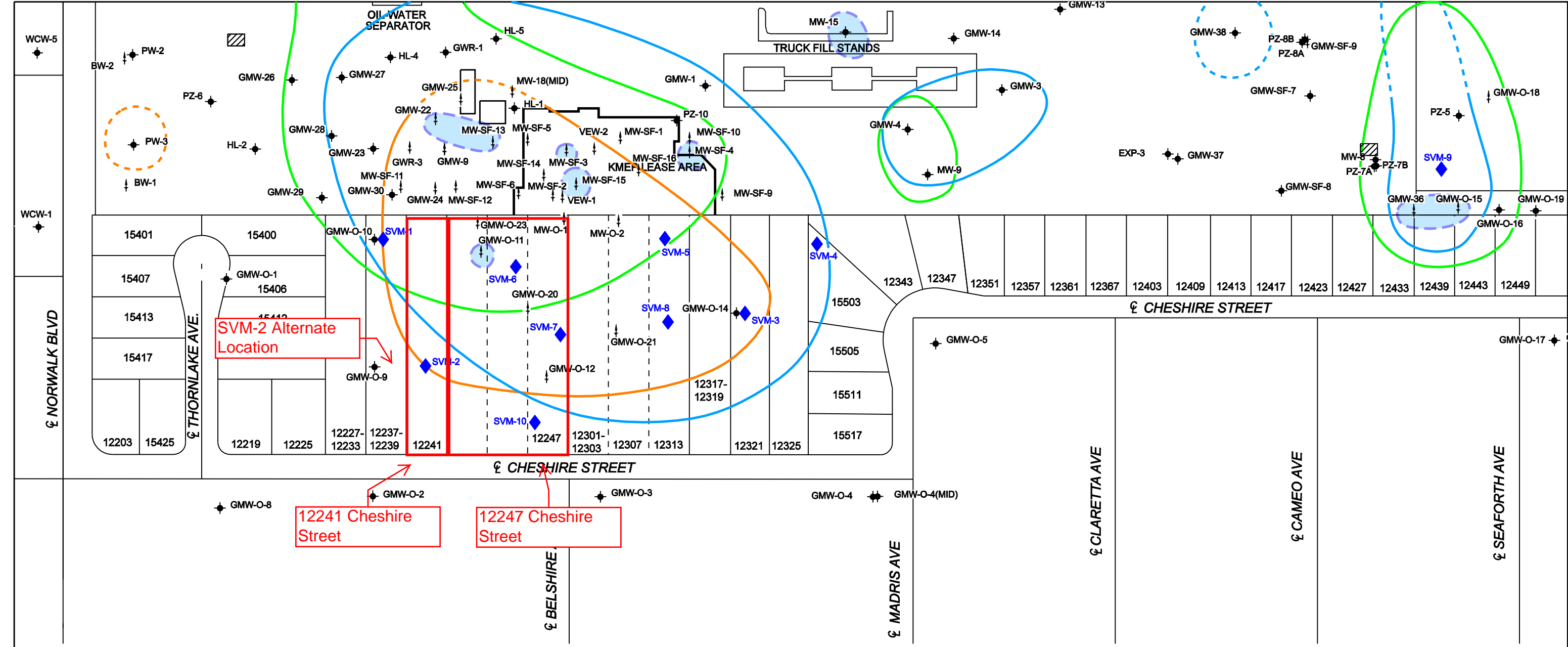
Notes:

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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SVM-2 Alternate Location

12241 Cheshire Street

12247 Cheshire Street

Explanation

- SVM-10 ◆ Proposed soil vapor monitoring point and designation
- GMW-5 ◆ Groundwater monitoring well and designation
- MW-O-2 † Vapor extraction, groundwater extraction, or total fluids extraction well used for site remediation
- Estimated extent of detected dissolved benzene in groundwater based on data from April 2009; dashed where inferred
- - - Estimated extent of detected dissolved 1,2-dichloroethane in groundwater based on data from April 2009; dashed where inferred
- Estimated extent of detected dissolved methyl tert-butyl ether in groundwater based on data from April 2009; dashed where inferred
- Estimated extent of measurable light nonaqueous phase hydrocarbons (LNAPL, free product) on groundwater based on data from April 2009; dashed where inferred.

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. Estimated extents of petroleum hydrocarbon constituents are from Figures 5, 6, and 7 of the First Semi-Annual 2009 Groundwater Monitoring Report, AMEC, July 27, 2009.



0 60 120
Approximate Scale in Feet

PROPOSED SOIL VAPOR MONITORING POINT LOCATIONS DFSP Norwalk Norwalk, California		
By: pah	Date: 05/27/10	Project No: 16030440
AMEC Geomatrix		Figure 2

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