



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

March 30, 2010

Steve Defibaugh
Kinder Morgan Energy Partners
1100 Town and Country Road
Orange, California 92868

GROUNDWATER INVESTIGATION, MONITORING AND REMEDIATION IN THE SOUTHERN PLUME AREA, DEFENSE FUEL SUPPORT POINT NORWALK, 15306 NORWALK BOULEVARD, NORWALK, CALIFORNIA (SCP NO. 0286B, SITE NO. 204DM00)

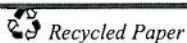
Dear Mr. Defibaugh:

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.

Regional Board staff has been monitoring the data trend of subsurface groundwater quality beneath the subject facility and vicinity. The persisting increasing of petroleum constituents, especially benzene, has been observed in well GMW-O-14, located in the southern plume. Since the observed increase in contaminant concentration is beneath a residential area, you must take the following actions:

1. Collect soil vapor samples according to the State of California Department of Toxic Substances Control guidelines at 5 feet and 15 feet depth at and around the monitoring well GMW-O-14 and submit data by **April 31, 2010**. The data should be compared to the previously collected soil vapor results and any screening levels such as California Human Health Screening Levels (CHHSL).
2. Re-conduct your a human health risk assessment completed previously for the site using the updated collection of site data, including soil, soil vapor, and groundwater quality, geological and hydrogeological setting, to re-evaluate the human health risk for the receptors on and near the facility, including the local residents. You shall submit the findings of your human risk assessment for our review by **July 1, 2010**.
3. Install a vapor monitoring network in the residential areas to monitor the soil vapor at soil depths of 5 feet and 15 feet below ground surface. You shall submit a work plan for vapor monitoring network for our review by **June 1, 2010**.
4. Evaluate the effectiveness of the current remedial measures and discuss the increase of benzene concentration from the monitoring well GMW-O-14 by **April 31, 2010**. If the current system is not effective, a revised remedial action plan (RAP) is required. The revised RAP must include cleanup goals for all the detected contaminant of concerns in soil, soil vapor, and groundwater released from KMEP's pipeline, valves, or other facilities. The revised RAP must also include proposed treatment technologies to cleanup and abate the effect of your contaminant release, as well as mitigation

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

measures for plume containment, vapor intrusion control, etc. You must submit your revised RAP for our review by **June 1, 2010**.

5. Investigate any potential new leaking from the pipelines operated by KMEP that might have contributed to the recently observed increase in contaminant level in the groundwater. You shall submit a tracer testing report for our review by **July 1, 2010**.

If you have any questions concerning this letter, please contact Mr. Paul Cho at (213) 576-6721 or me at (213) 576-6734.

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
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