DEPARTMENT OF NATURAL RESOURCES

GOVERNOR KIM REYNOLDS
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February 6, 2018

Heather V. Tittjung, CHMM
Sr. Environmental Remediation Specialist
Magellan Midstream Partners, LP
One Williams Center, OTC-8
Tulsa, OK 74172

SUBJECT: Proposed Changes to Free Product Monitoring and Recovery
Magellan Midstream Partners, LP, Des Moines Terminal at 2503 SE 43rd Street in Pleasant Hill, Iowa
Spill Number: 030210-AHB-0849

Dear Ms. Tittjung:

On January 25, 2018 we received the Fourth Quarter 2017 Groundwater Monitoring and Free Product Recovery Report from WSP (consultant for Magellan) for the above referenced site and Spill Number. In the Proposed Path Forward section of the report WSP requested piezometers (recovery wells) PZ-2, PZ-6, PZ-10 and PZ-11, Monitoring Wells MW08-1 through MW08-8, MW11-9 and MW11-10 be removed from the monthly gauging (free product monitoring and recovery) program. Furthermore fluid level gauging would be conducted in Monitoring Wells MW08-1 through MW08-8, MW11-9 and MW11-10 during February, May, August and November of each year instead of monthly.

In the report the request to cease free product monitoring and recovery for piezometers (recovery wells) PZ-2, PZ-6, PZ-10 and PZ-11, Monitoring Wells MW08-1 through MW08-8, MW11-9 and MW11-10 stated this was based on the wells exhibiting less than 0.2 foot of free product for 12 consecutive months, satisfying the product recovery criteria established in 567 IAC 135.7(5)"f" which is as follows: ***Termination of free product recovery activities. Owners and operators may propose to the department to terminate free product recovery activities when significant amounts of hydrocarbons are not being recovered. The department will consider proposals to terminate free product recovery when the amount of product collected from a monitoring well is equal to or less than 0.1 gallon each month for a year unless another plan is approved by the department. When free product activities have been terminated, owners and operators must inspect the monitoring wells monthly for at least a year. The department must be notified and free product recovery activities reinitiated if during the monthly well inspections it is determined the product thickness in a monitoring well exceeds 0.02 foot. The monthly well inspection records must be kept available for review by the department.***

Examination of the free product recovery reports for piezometers (recovery wells) PZ-2, PZ-6, PZ-10 and PZ-11, Monitoring Wells MW08-1 through MW08-8, MW11-9 and MW11-10 showed for the last year (12 months) there was no free product recovered or measured. In fact there was no free product recovered or measured in any of these wells for the last two years (24 months).

We accept your request to cease (terminate) free product monitoring and recovery for piezometers (recovery wells) PZ-2, PZ-6, PZ-10 and PZ-11, Monitoring Wells MW08-1 through MW08-8, MW11-9 and MW11-10. Since there has been no free product recovered or measured in these wells for the last

two years (24 months) monthly checking of the wells for at least one year after free product monitoring and recovery activities has been terminated will not be required.

We also accept your request to conduct fluid level gauging in Monitoring Wells MW08-1 through MW08-8, MW11-9 and MW11-10 during February, May, August and November of each year instead of monthly.

You may contact Bill Gibbons at (515) 725-0335; bill.gibbons@dnr.iowa.gov or this office with any questions or comments.

Sincerely,

Ted Petersen
Supervisor, Field Office #5

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