Fields of Opportunities

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DEPARTMENT OF NATURAL RESOURCES
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April 12, 2017

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

SUBJECT: Proposed Changes to Monitoring to Semi Annual Sample Collection
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 27, 2017 we received a report from WSP – Parsons Brinckerhoff (consultant for Magellan) for the above referenced site and Spill Number which included free product recovery data and monitoring results for the fourth quarter of 2016. There was also a letter titled "Proposed Path Forward" which included details for proposed changes to the monitoring plan.

The proposed changes to the monitoring plan are as follows:

1. Reducing the groundwater sampling frequency to a semi-annual basis in February and August (each year) as outlined in the proposed sampling schedule (Table 4 in the 2016, 4th quarter monitoring report).
2. Removing up-gradient monitoring wells MW08-2, MW08-4, MW08-6 and MW08-7 from the sampling schedule because BTEX (benzene, toluene, ethylbenzene, and xylenes) and TEH (Total Extractable Hydrocarbons) – Diesel was only detected once in MW08-4 in November 2010.
3. Wells would be sampled for both BTEX and TEH – Diesel in February, but only for TEH – Diesel in August.
4. Free product recovery reports would continue to be submitted quarterly and would incorporate the semi-annual groundwater sampling results in the first and fourth quarter reports.

Justification for reduced monitoring was stated as follows. "All wells that have been sampled since the March 2010 release have shown a decreasing trend in TEH-Diesel or it has never been detected. Only one well (MW11-09) exhibited a TEH-Diesel concentration above its action level during the fourth quarter of 2016".

Based on monitoring results that have showed a stable or decreasing trend in contaminant concentrations, and justification given in the letter titled "Proposed Path Forward" we find the proposed changes in the monitoring plan to be acceptable. Starting with the first quarter of 2017 the proposed changes as stated above will be implemented. For clarification samples collected the first quarter (February) each year must be

analyzed for benzene, toluene, ethylbenzene and xylenes (BTEX) using Iowa method OA-1, and total extractable hydrocarbons (TEH) using Iowa method OA-2. For samples collected the third quarter (August) each year must be analyzed for TEH (using Iowa method OA-2) only. Submit the semi-annual monitoring reports with the first and third quarter free product recovery reports.

If monitoring results (laboratory analytical data) show a significant increase in contaminant levels or if it appears the plume of contamination is moving (seeing higher levels of contamination in down-gradient monitoring wells or contamination in wells for the first time) there may need to be an increase in the frequency of monitoring, wells added to the monitoring plan or other remedial actions to prevent the spread of contamination.

Free product monitoring and recovery will continue to be done monthly and includes the following wells: Recovery Wells RW-1 through RW-9, Recovery wells PZ-1, PZ-2 & PZ-5 through PZ-12, Monitoring Wells MW08-1 through MW08-8, and Monitoring Wells MW11-9 & MW11-10 (all of the wells currently in the free product recovery plan). You are required to submit quarterly free product recovery reports that show the amount of free product recovered in total for the month, and well data showing the static water level and free product thickness in all of the wells listed above. Free product recovery reports will be due by the 30th day of the following month ***(following the end of the quarter)***.

Monthly hand-bailing of wells is the current method of free product recovery, however if site conditions change such that product recharge in the wells increases significantly, or if the free product plume migrates beyond its current defined extent other methods of free product recovery may need to be employed.

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

Sincerely,

Ted Petersen
Supervisor, Field Office #5

c: Judy Andrews, PG, Senior Consultant Environment, WSP – Parsons Brinckerhoff, 123 North Third Street, Suite 507, Minneapolis, NM 55401 (via E-mail – judy.andrews@wspgroup.com)
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