



Ms. Maura O'Brien
Washington State Department of Ecology
Northwest Regional Office
3190 – 160th Avenue SE
Bellevue, WA 98008-5452

Subject:

Revised Site Groundwater Monitoring Plan

Kinder Morgan Harbor Island Terminal
KMLT File No. 29.79.02 (81171)
2720 13th Avenue Southwest
Seattle, Washington 98134

Dear Ms. O'Brien:

On behalf of Kinder Morgan Liquids Terminal, LLC (KMLT), ARCADIS US, Inc (ARCADIS) is pleased to submit this Revised Site Groundwater Monitoring Plan (Plan) for the KMLT Harbor Island Terminal located at 2720 13th Avenue Southwest in Seattle, Washington (site). The purpose of this Plan is to request and provide justification to support the reduction of groundwater sampling frequency at the site for the compliance and performance monitoring programs.

Reduced frequency of groundwater monitoring at the site is warranted due to:

- Quarterly groundwater quality data has been collected at the site since 2002
- Current groundwater conditions onsite are stable and not migrating offsite
- There have been no product releases reported at the site since 2010
- SPH has only been observed in one monitoring well (A-6) in the last 9 quarterly monitoring events.

Cleanup activities at the site are being conducted under a Consent Decree (CD) number 00-2-07760-2SEA between Washington State Department of Ecology (Ecology) and GATX Terminals Corporation (GATX) executed on April 4, 2000. KMLT assumed the obligations of the CD with the purchase of GATX Harbor Island Terminal in 2001. Compliance groundwater monitoring and sampling is currently

ARCADIS U.S., Inc.
1100 Olive Way
Suite 800
Seattle
Washington 98101
Tel 206.325.5254
Fax 206.325.8218
www.arcadis-us.com

ENVIRONMENT

Date:
May 20, 2014

Contact:
Matt Annis

Phone:
206.726.4716

Email:
matt.annis@arcadis-us.com

Our ref:
WA000804.2014

performed in accordance with the *Proposed Reduced Monitoring-Site-Wide Groundwater Compliance Monitoring Plan* (Reduced Monitoring Plan [Delta Consultants Inc. (Delta) 2007]). Additionally, low-flow groundwater sampling techniques are used in accordance with the Technical Revision Request (Delta 2008).

In addition, performance monitoring groundwater samples are collected in accordance with the letter Response to Comments - *B and D Yards Groundwater Remediation Engineering Design Report* dated December 12, 2012 (ARCADIS 2012) to evaluate the overall effectiveness of the sulfate land application.

Contaminants of Concern and Cleanup Levels

The approved Reduced Monitoring Plan (Delta 2007) outlines site-specific contaminants of concern (COCs) and applicable cleanup levels for groundwater. These site-specific COCs and their cleanup levels are as follows:

- Total Petroleum Hydrocarbons as Gasoline Range Organics at 1.0 milligrams per liter (mg/L)
- Total Petroleum Hydrocarbons as Diesel Range Organics at 10 mg/L
- Total Petroleum Hydrocarbons as Heavy Oil at 10 mg/L
- Benzene at 0.071 mg/L
- Toluene at 200 mg/L
- Ethylbenzene at 29 mg/L
- Total Lead at 0.0058 mg/L
- No Product Sheen

Current Groundwater Monitoring Plan

Compliance Monitoring

In accordance with the Reduced Monitoring Plan (Delta 2007) and Technical Revision Request (Delta 2008), the current groundwater compliance plan schedule is presented in Table 1 and Figure 2.

Performance Monitoring

In accordance with the Response to Comments - *B and D Yards Groundwater Remediation Engineering Design Report* dated December 12, 2012 (ARCADIS 2012), the current groundwater performance plan schedule is presented in Table 1.

Proposed Groundwater Monitoring Plan

The section below summarizes the proposed changes to the current groundwater monitoring plan. Groundwater gauging and sample collection protocols and procedures will continue to be implemented in accordance with the Ecology-approved plans mentioned above.

Compliance Monitoring

This proposed groundwater monitoring plan was prepared with consideration for the requirements of the Model Toxics Control Act (MTCA) regulations and requirements from Exhibit F of the CD. The achievement of cleanup levels in groundwater is measured at points of performance and compliance located within the hydrocarbon plume area and at the edges of the site in accordance with section 1.2 in Exhibit F of the CD. Points of compliance will not be altered for this plan and consist of the 44 wells presented in Table 2. Hydrograph and COC trend graphs for monitoring wells MW-7, MW-9, MW-14, and MW-19 are presented in Attachment A. The graphs are representative of the compliance points and indicate stable or decreasing groundwater conditions.

Future compliance groundwater monitoring events are proposed to be conducted on a semi-annual basis until the site has achieved compliance with the applicable cleanup levels. The proposed compliance groundwater monitoring plan is summarized in Table 2 and presented in Figure 3.

Proposed Performance Groundwater Monitoring Plan

In accordance with the Response to Comments letter dated December 20, 2012 and the KMLT *Remedial Action Report – B and D Yards* (RAP) [ARCADIS 2013]), the current groundwater performance monitoring plan will be conducted quarterly through third quarter 2014.

After the completion of the third quarter 2014 monitoring event KMLT proposes to alter the performance monitoring schedule to semi-annual monitoring which will be conducted concurrently with compliance monitoring activities. The proposed performance groundwater monitoring plan is summarized in Table 2 and presented in Figure 4.

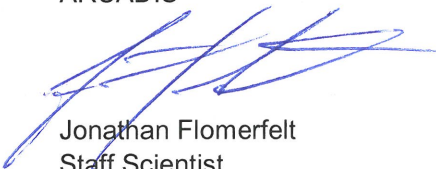
Schedule

The proposed Plan would be initiated during the third quarter 2014 sampling event upon Ecology approval; annual sampling will be conducted in the third quarter of each year.

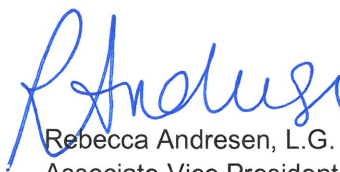
If you have any questions or comments, please contact Matt Annis at 206.726.4716 or by email at matt.annis@arcadis-us.com.

Sincerely,

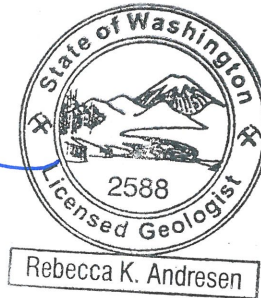
ARCADIS



Jonathan Flomerfelt
Staff Scientist



Rebecca Andresen, L.G.
Associate Vice President



Copies:

- Mr. Dave Rowland, KMLT, Seattle (CD Copy)
- Mr. Robert Truedinger, c/o Stephanie Randall, KMLT, Orange, CA (CD copy)
- Stephanie Randall, KMLT, Orange, CA (File Copy)

Tables

Table 1	Current Groundwater Monitoring
Table 2	Proposed Groundwater Monitoring Plan

Figures

Figure 1	Site Location
Figure 2	Current Groundwater Monitoring Plan
Figure 3	Proposed Groundwater Monitoring Plan
Figure 4	Proposed Performance Monitoring Plan

Attachments

Attachment A	Hydrographs and Trend Graphs
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Tables

Table 2
Proposed Monitoring Schedule
2014 Revised Groundwater Monitoring Plan
Kinder Morgan Liquids Terminals, LLC, Harbor Island Terminal
Seattle, Washington

Well	Sampling Schedule	GRO by NWTPH-GX	DRO by NWTPH-DX	HO by NWTPH-DX	BTEX by EPA 8260B	Total and Dissolved Lead by EPA 200.8	MNA Geochemical Parameters ¹	Depth to Water/SPH by downhole meter
A-4	1Q							X
	3Q							X
A-5	1Q	X			X			X
	3Q	X			X			X
A-6	1Q							X
	3Q							X
A-8	1Q							X
	3Q	X	X	X	X			X
A-10	1Q							X
	3Q	X	X	X	X			X
A-11	1Q							X
	3Q							X
A-12	1Q							X
	3Q							X
A-14R	1Q							X
	3Q	X	X	X	X	X		X
A-16	1Q							X
	3Q							X
A-18	1Q							X
	3Q							X
A-19	1Q							X
	3Q							X
A-20	1Q							X
	3Q							X

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A-21	1Q	X			X		X	X
	3Q	X			X	X	X	X
A-22R	1Q							X
	3Q							X
A-23R	1Q							X
	3Q	X			X		X	X
A-25	1Q							X
	3Q							X
A-26R	1Q							X
	3Q							X
A-27	1Q	X			X		X	X
	3Q	X			X		X	X
A-28R	1Q	X			X		X	X
	3Q	X			X	X	X	X
11 ²	1Q	X			X		X	X
	3Q	X			X		X	X
12 ²	1Q	X			X		X	X
	3Q	X	X	X	X	X	X	X
MW-1	1Q							X
	3Q	X	X	X	X	X		X
MW-2	1Q							X
	3Q	X	X	X	X	X	X	X
MW-3	1Q							X
	3Q	X	X	X	X	X		X

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MW-4	1Q							X
	3Q	X	X	X	X			X
MW-5	1Q							X
	3Q	X	X	X	X	X		X
MW-6	1Q							X
	3Q	X			X	X	X	X
MW-7 ²	1Q	X			X		X	X
	3Q	X			X	X	X	X
MW-8	1Q							X
	3Q	X	X	X	X	X		X
MW-9 ²	1Q	X			X		X	X
	3Q	X			X	X	X	X
MW-12R	1Q							X
	3Q	X	X	X	X	X	X	X
MW-14	1Q							X
	3Q	X			X		X	X
MW-16	1Q							X
	3Q	X	X	X	X			X
MW-18	1Q	X			X			X
	3Q	X			X			X
MW-19 ²	1Q	X			X		X	X
	3Q	X			X		X	X
MW-20	1Q							X
	3Q	X	X	X	X			X

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Seattle, Washington

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MW-21	1Q	X	X	X	X		X	X
	3Q	X	X	X	X		X	X
MW-22	1Q							X
	3Q	X	X	X	X			X
MW-23	1Q	X			X		X	X
	3Q	X			X	X	X	X
MW-24	1Q	X			X		X	X
	3Q	X			X	X	X	X
MW-25	1Q							X
	3Q	X	X	X	X	X		X
MW-07R	1Q							X
	3Q	X	X	X	X	X	X	X
SH-02R	1Q							X
	3Q	X	X	X	X	X	X	X
SH-05R	1Q							X
	3Q	X	X	X	X	X		X
TMW-B1	1Q							X
	3Q	X			X			

Table 2
Proposed Monitoring Schedule
2014 Revised Groundwater Monitoring Plan
Kinder Morgan Liquids Terminals, LLC, Harbor Island Terminal
Seattle, Washington

Well	Sampling Schedule	GRO by NWTPH-GX	DRO by NWTPH-DX	HO by NWTPH-DX	BTEX by EPA 8260B	Total and Dissolved Lead by EPA 200.8	MNA Geochemical Parameters ¹	Depth to Water/SPH by downhole meter
TMW-1 ²	1Q	X			X		X	X
	3Q	X			X		X	X
TMW-2 ²	1Q	X			X		X	X
	3Q	X			X		X	X
TMW-3 ²	1Q	X			X		X	X
	3Q	X			X		X	X
TMW-4 ²	1Q	X			X		X	X
	3Q	X			X		X	X
TMW-5 ²	1Q	X			X		X	X
	3Q	X			X		X	X
TMW-6 ²	1Q	X			X		X	X
	3Q	X			X		X	X

Notes

1 Monitored Natural Attenuation (MNA) Geochemical Parameters include dissolved oxygen, methane, ferrous iron, nitrate, sulfate, and sulfide
2 Performance monitoring locations
GRO = Total Petroleum Hydrocarbons - Gasoline Range Organics by Northwest Method NWTPH-Gx
BTEX = Benzene, Toluene, Ethylbenzene, and Xylenes by Environmental Protection Agency (EPA) Method 8260B.
1Q, 2Q, 3Q, 4Q = Denotes the quarter for each sampling event
-- Not Applicable

Table 1
Current Monitoring Schedule
2014 Revised Groundwater Monitoring Plan
Kinder Morgan Liquids Terminals, LLC, Harbor Island Terminal
Seattle, Washington

Well	Sampling Schedule	GRO by NWTPH-GX	DRO by NWTPH-DX	HO by NWTPH-DX	BTEX by EPA 8260B	Total and Dissolved Lead by EPA 200.8	MNA Geochemical Parameters ¹	Depth to Water/SPH by downhole meter
A-4	1Q, 3Q, 4Q							X
	2Q							X
A-5	1Q, 3Q, 4Q	X			X			X
	2Q	X			X			X
A-6	1Q, 3Q, 4Q							X
	2Q							X
A-8	1Q, 3Q, 4Q							X
	2Q	X	X	X	X			X
A-10	1Q, 3Q, 4Q							X
	2Q	X	X	X	X			X
A-11	1Q, 3Q, 4Q							X
	2Q							X
A-12	1Q, 3Q, 4Q							X
	2Q							X
A-14R	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X		X
A-16	1Q, 3Q, 4Q							X
	2Q							X
A-18	1Q, 3Q, 4Q							X
	2Q							X
A-19	1Q, 3Q, 4Q							X
	2Q							X
A-20	1Q, 3Q, 4Q							X
	2Q							X

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Seattle, Washington

Well	Sampling Schedule	GRO by NWTPH-GX	DRO by NWTPH-DX	HO by NWTPH-DX	BTEX by EPA 8260B	Total and Dissolved Lead by EPA 200.8	MNA Geochemical Parameters ¹	Depth to Water/SPH by downhole meter
A-21	1Q, 3Q, 4Q	X			X		X	X
	2Q	X			X	X	X	X
A-22R	1Q, 3Q, 4Q							X
	2Q							X
A-23R	1Q, 3Q, 4Q	X			X			X
	2Q	X			X		X	X
A-25	1Q, 3Q, 4Q							X
	2Q							X
A-26R	1Q, 3Q, 4Q							X
	2Q							X
A-27	1Q, 3Q, 4Q	X			X		X	X
	2Q	X			X		X	X
A-28R	1Q, 3Q, 4Q	X			X		X	X
	2Q	X			X	X	X	X
12	1Q, 3Q, 4Q							X
	2Q							X
MW-1	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X		X
MW-2	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X	X	X
MW-3	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X		X
MW-4	1Q, 3Q, 4Q							X
	2Q	X	X	X	X			X

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2014 Revised Groundwater Monitoring Plan
Kinder Morgan Liquids Terminals, LLC, Harbor Island Terminal
Seattle, Washington

Well	Sampling Schedule	GRO by NWTPH-GX	DRO by NWTPH-DX	HO by NWTPH-DX	BTEX by EPA 8260B	Total and Dissolved Lead by EPA 200.8	MNA Geochemical Parameters ¹	Depth to Water/SPH by downhole meter
MW-5	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X		X
MW-6	1Q, 3Q, 4Q	X			X			X
	2Q	X			X	X	X	X
MW-7	1Q, 3Q, 4Q	X			X		X	X
	2Q	X			X	X	X	X
MW-8	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X		X
MW-9	1Q, 3Q, 4Q	X			X		X	X
	2Q	X			X	X	X	X
MW-12R	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X	X	X
MW-14	1Q, 3Q, 4Q	X			X		X	X
	2Q	X			X		X	X
MW-16	1Q, 3Q, 4Q							X
	2Q	X	X	X	X			X
MW-18	1Q, 3Q, 4Q	X			X			X
	2Q	X			X			X
MW-19	1Q, 3Q, 4Q	X			X		X	X
	2Q	X			X		X	X
MW-20	1Q, 3Q, 4Q							X
	2Q	X	X	X	X			X
MW-21	1Q, 3Q, 4Q	X	X	X	X		X	X
	2Q	X	X	X	X		X	X

Table 1
Current Monitoring Schedule
2014 Revised Groundwater Monitoring Plan
Kinder Morgan Liquids Terminals, LLC, Harbor Island Terminal
Seattle, Washington

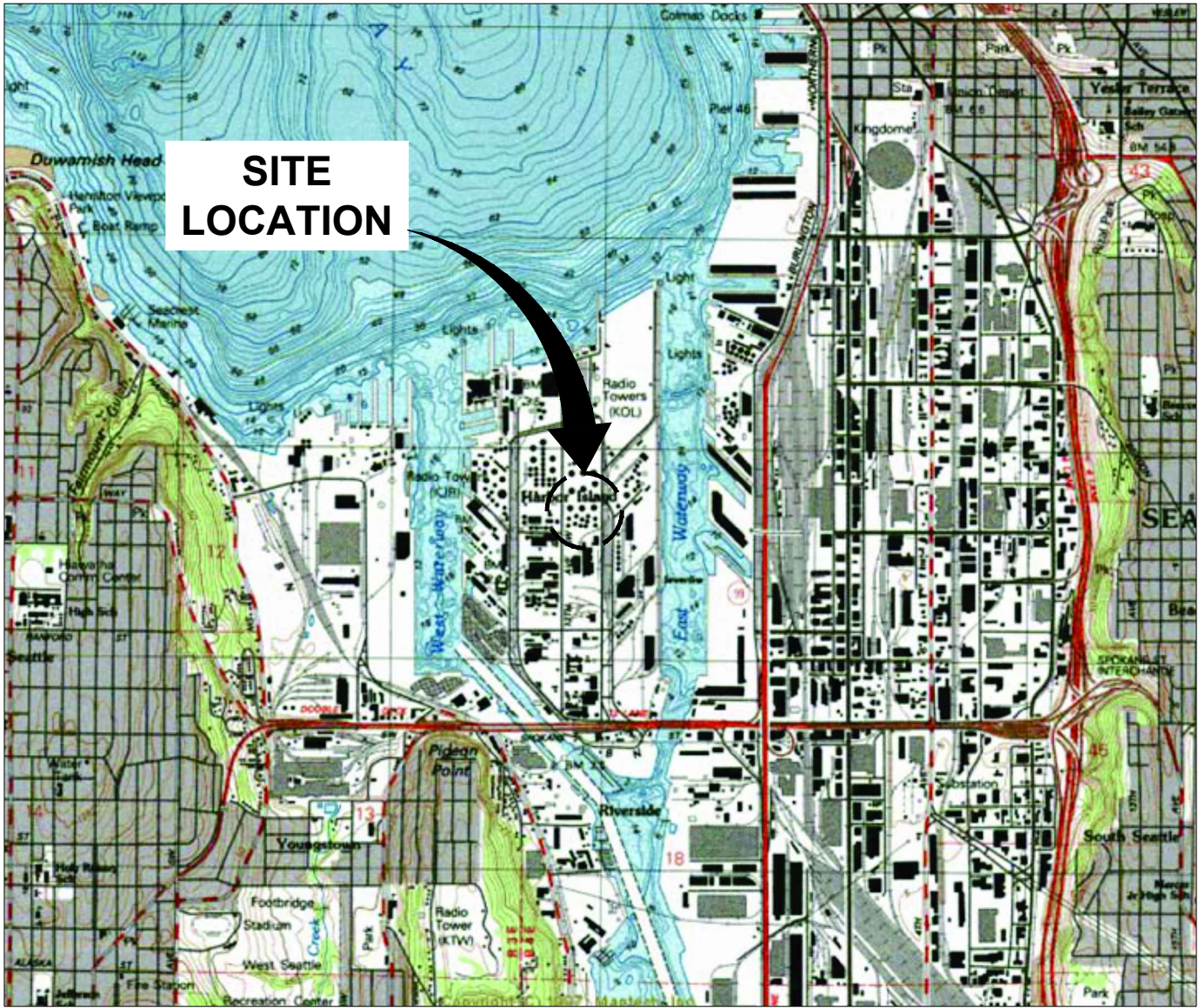
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MW-22	1Q, 3Q, 4Q							X
	2Q	X	X	X	X			X
MW-23	1Q, 3Q, 4Q	X			X		X	X
	2Q	X			X	X	X	X
MW-24	1Q, 3Q, 4Q	X			X		X	X
	2Q	X			X	X	X	X
MW-25	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X		X
MW-07R	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X	X	X
SH-02R	1Q, 3Q, 4Q							X
	2Q	X	X	X	X	X	X	X
SH-05R	1Q, 3Q, 4Q							X
	2Q							X
TMW-B1	1Q, 3Q, 4Q							X
	2Q	X			X			

Notes

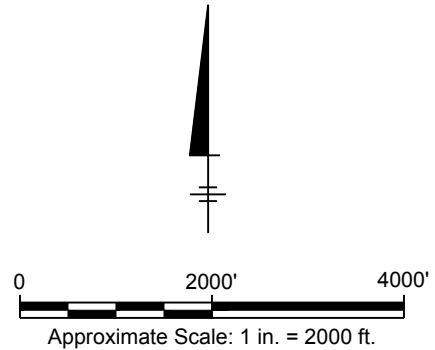
1 Monitored Natural Attenuation (MNA) Geochemical Parameters include dissolved oxygen, methane, ferrous iron, nitrate, sulfate, and sulfide
GRO = Total Petroleum Hydrocarbons - Gasoline Range Organics by Northwest Method NWTPH-Gx
BTEX = Benzene, Toluene, Ethylbenzene, and Xylenes by Environmental Protection Agency (EPA) Method 8260B.
1Q, 2Q, 3Q, 4Q = Denotes the quarter for each sampling event
-- Not Applicable


Figures

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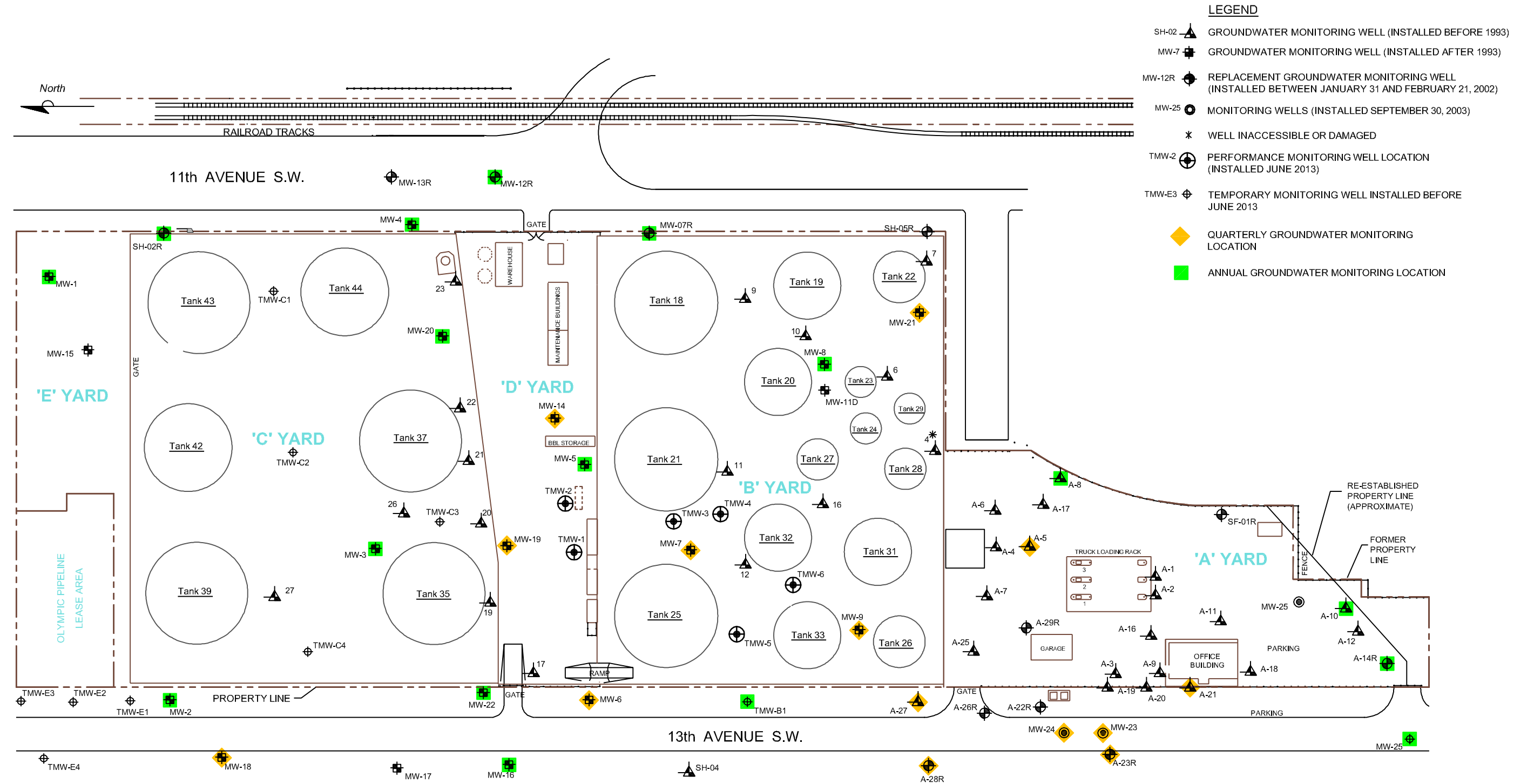


REFERENCE: BASE MAP USGS 7.5. MINUTE TOPOGRAPHIC MAP SEATTLE SOUTH, WASHINGTON 1083




KINDER MORGAN LIQUID TERMINALS, LLC HARBOR ISLAND TERMINAL 2720 13TH AVENUE SOUTHWEST, SEATTLE, WASHINGTON 2014 REVISED GROUNDWATER MONITORING PLAN	
SITE LOCATION MAP	
	FIGURE 1

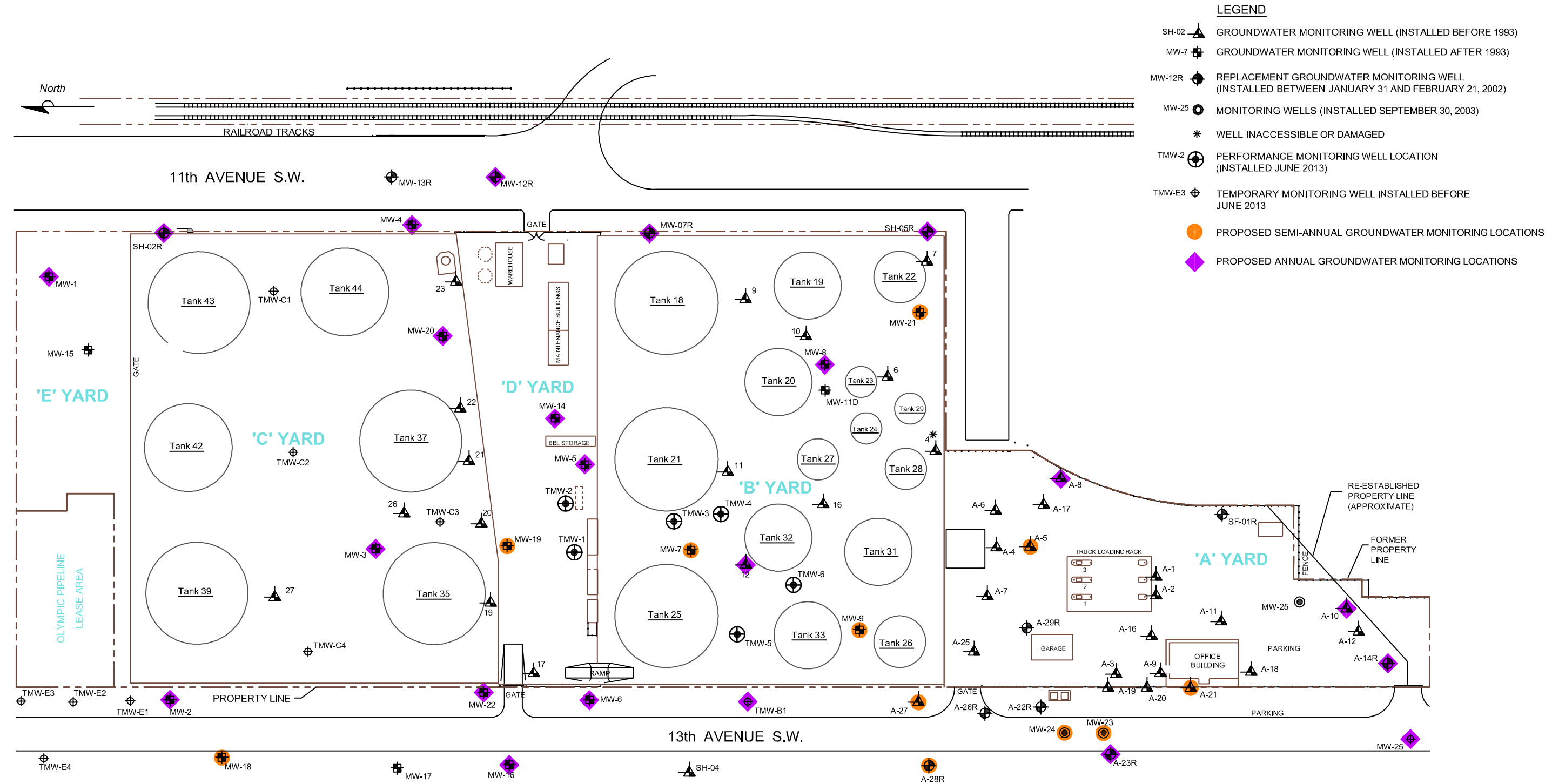
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KINDER MORGAN LIQUID TERMINALS, LLC
 HARBOR ISLAND TERMINAL
 2720 13TH AVENUE SOUTHWEST, SEATTLE, WASHINGTON
2014 REVISED GROUNDWATER MONITORING PLAN
CURRENT QUARTERLY AND ANNUAL GROUNDWATER MONITORING LOCATIONS


FIGURE
2

CITY:\Read\ DIV\GROUP\F\Read\ DB\Read\ LD\Op\ PIC\Op\ PM\Read\ TM\Op\ LYR\Option\OFF\REF*
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- LEGEND**
- SH-02 ▲ GROUNDWATER MONITORING WELL (INSTALLED BEFORE 1993)
 - MW-7 ⊕ GROUNDWATER MONITORING WELL (INSTALLED AFTER 1993)
 - MW-12R ⊕ REPLACEMENT GROUNDWATER MONITORING WELL (INSTALLED BETWEEN JANUARY 31 AND FEBRUARY 21, 2002)
 - MW-25 ● MONITORING WELLS (INSTALLED SEPTEMBER 30, 2003)
 - * WELL INACCESSIBLE OR DAMAGED
 - TMW-2 ⊕ PERFORMANCE MONITORING WELL LOCATION (INSTALLED JUNE 2013)
 - TMW-E3 ⊕ TEMPORARY MONITORING WELL INSTALLED BEFORE JUNE 2013
 - PROPOSED SEMI-ANNUAL GROUNDWATER MONITORING LOCATIONS
 - ◆ PROPOSED ANNUAL GROUNDWATER MONITORING LOCATIONS

KINDER MORGAN LIQUID TERMINALS, LLC
 HARBOR ISLAND TERMINAL
 2720 13TH AVENUE SOUTHWEST, SEATTLE, WASHINGTON
2014 REVISED GROUNDWATER MONITORING PLAN
PROPOSED SEMI-ANNUAL AND ANNUAL GROUNDWATER MONITORING LOCATIONS


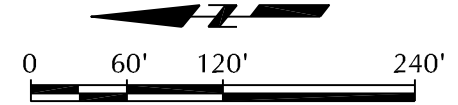
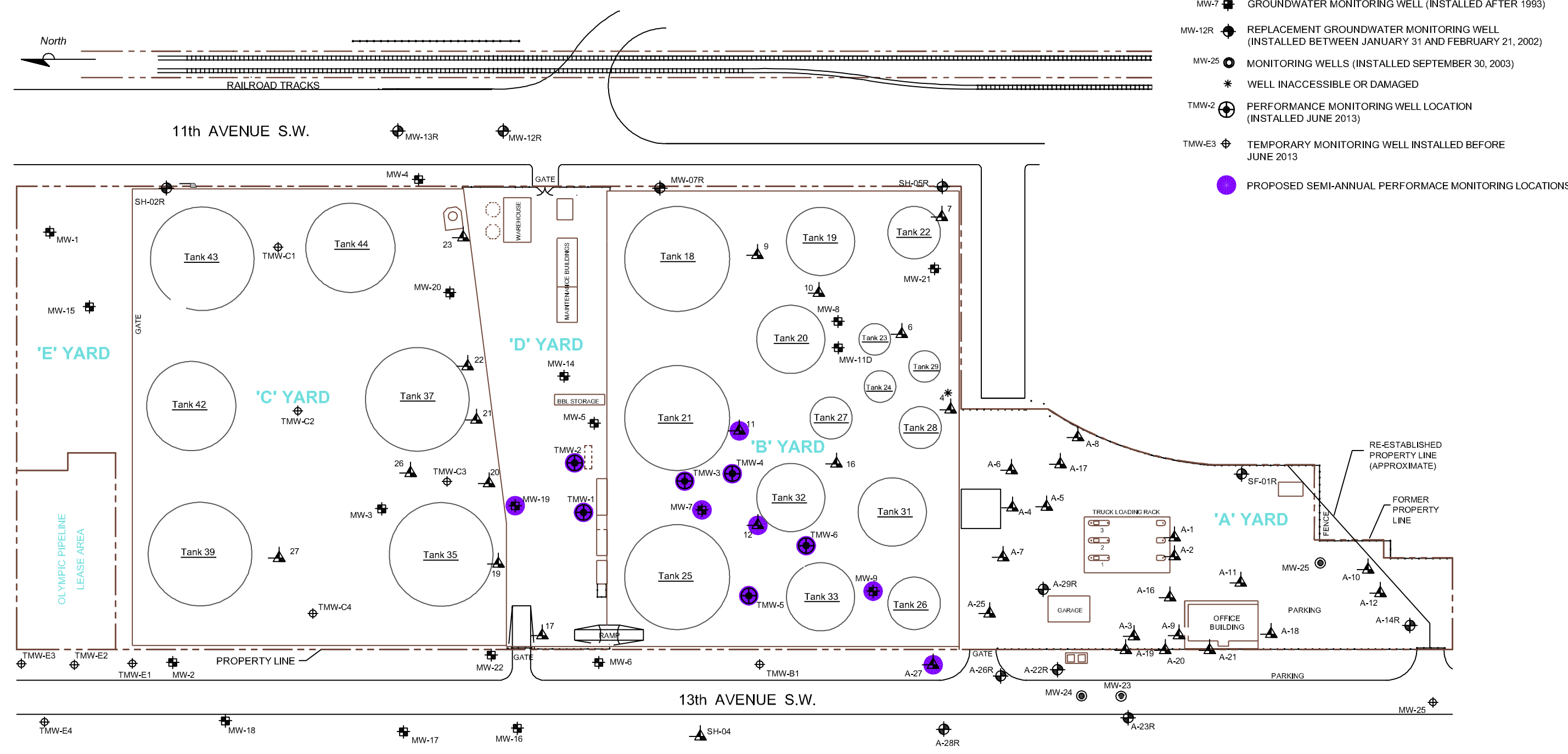


FIGURE
3

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 XREFS: IMAGES: PROJECTNAME:

LEGEND

- SH-02 GROUNDWATER MONITORING WELL (INSTALLED BEFORE 1993)
- MW-7 GROUNDWATER MONITORING WELL (INSTALLED AFTER 1993)
- MW-12R REPLACEMENT GROUNDWATER MONITORING WELL (INSTALLED BETWEEN JANUARY 31 AND FEBRUARY 21, 2002)
- MW-25 MONITORING WELLS (INSTALLED SEPTEMBER 30, 2003)
- * WELL INACCESSIBLE OR DAMAGED
- TMW-2 PERFORMANCE MONITORING WELL LOCATION (INSTALLED JUNE 2013)
- TMW-E3 TEMPORARY MONITORING WELL INSTALLED BEFORE JUNE 2013
- PROPOSED SEMI-ANNUAL PERFORMANCE MONITORING LOCATIONS



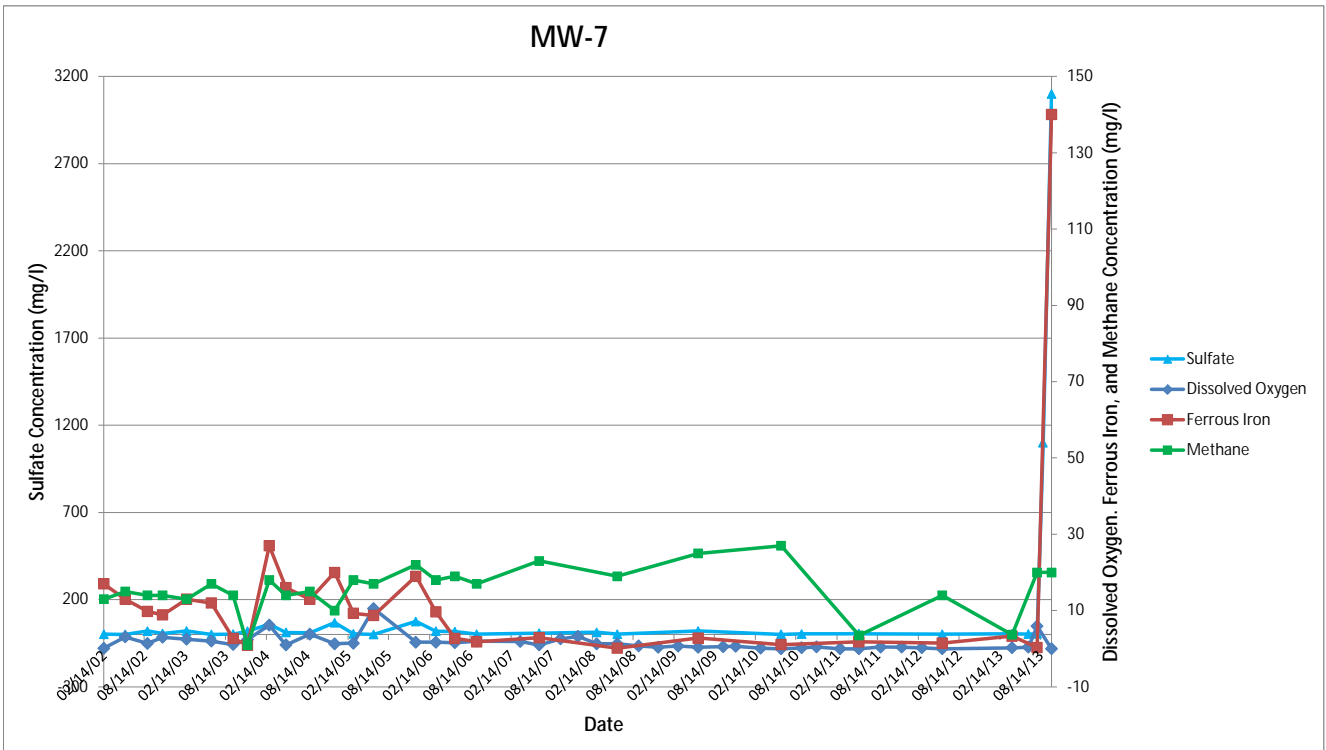
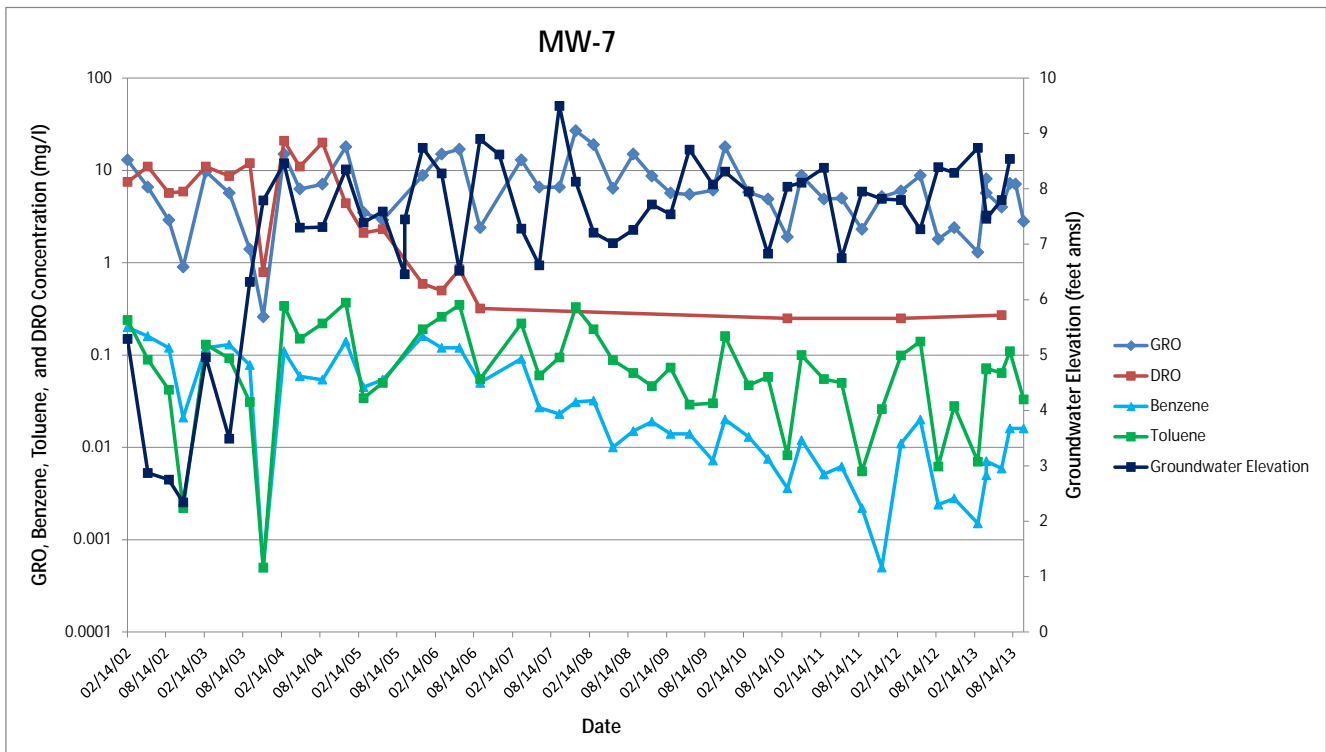
KINDER MORGAN LIQUID TERMINALS, LLC
 HARBOR ISLAND TERMINAL
 2720 13TH AVENUE SOUTHWEST, SEATTLE, WASHINGTON
2014 REVISED GROUNDWATER MONITORING PLAN

PROPOSED PERFORMANCE MONITORING LOCATIONS




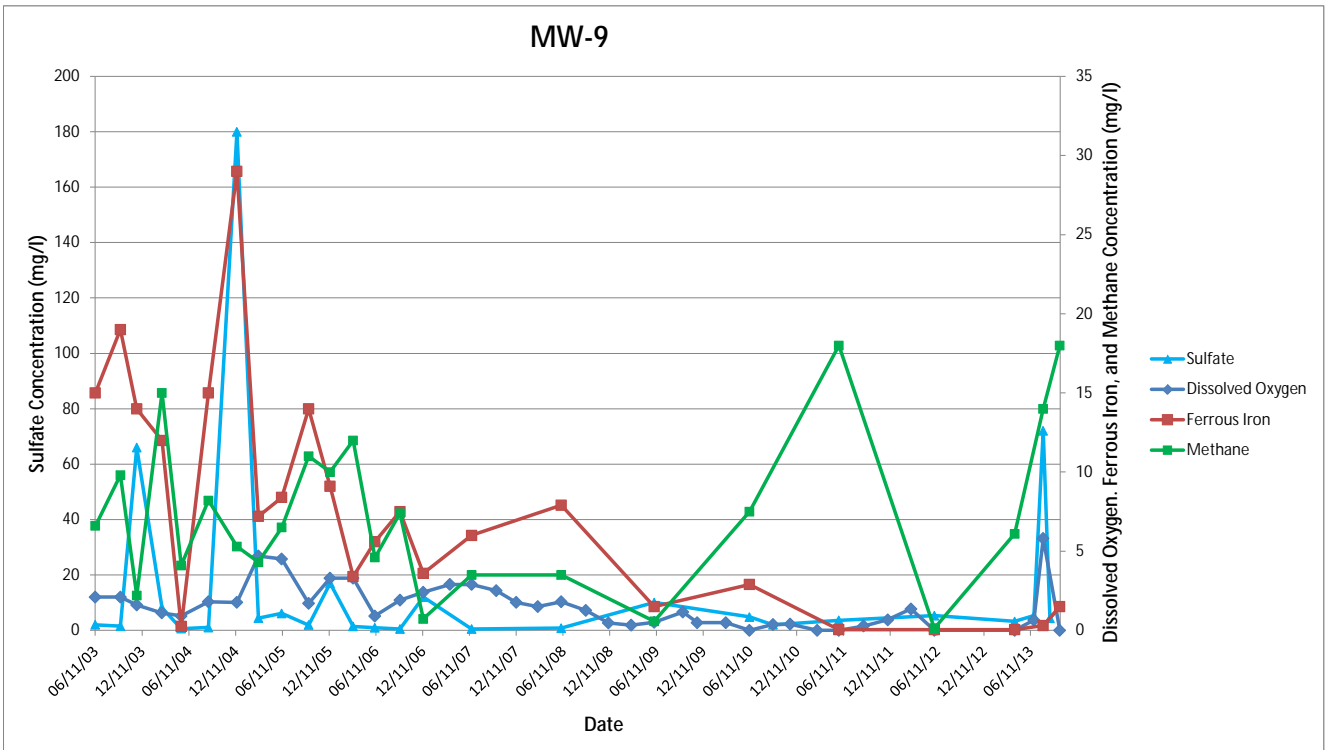
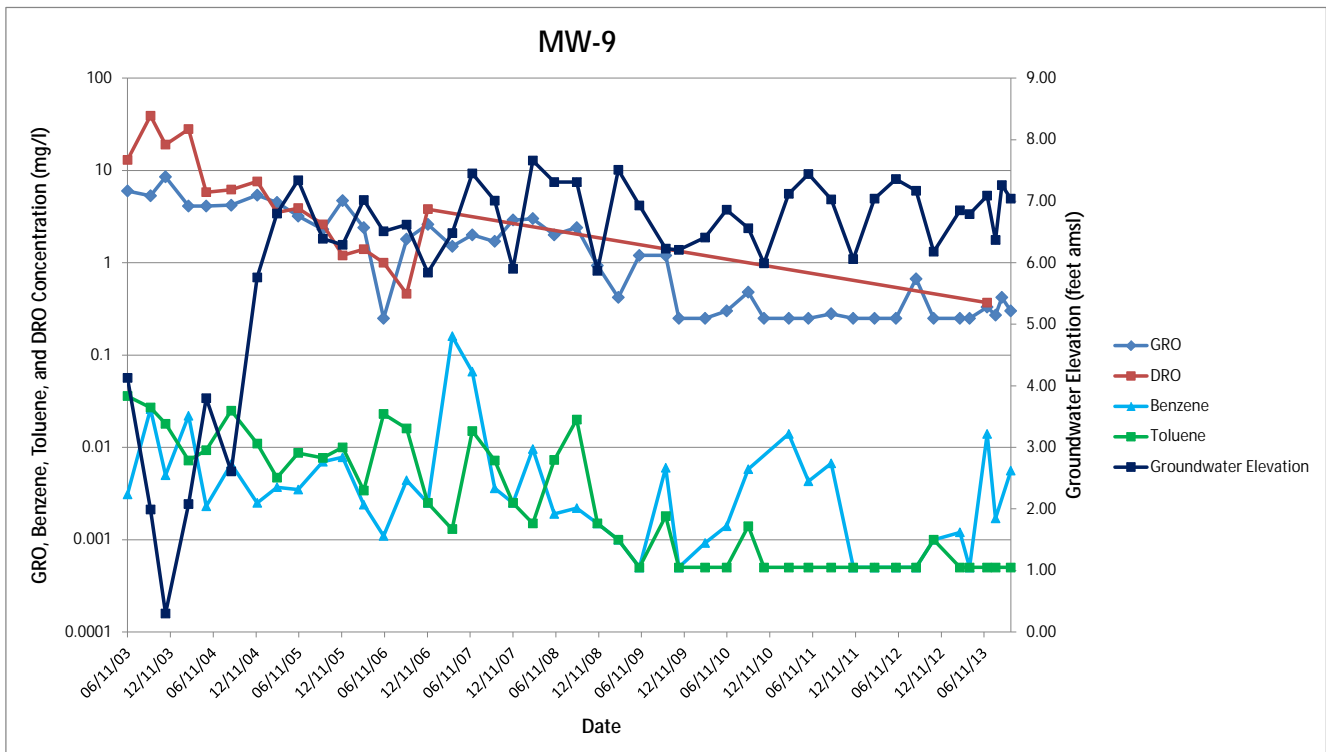


Attachment A

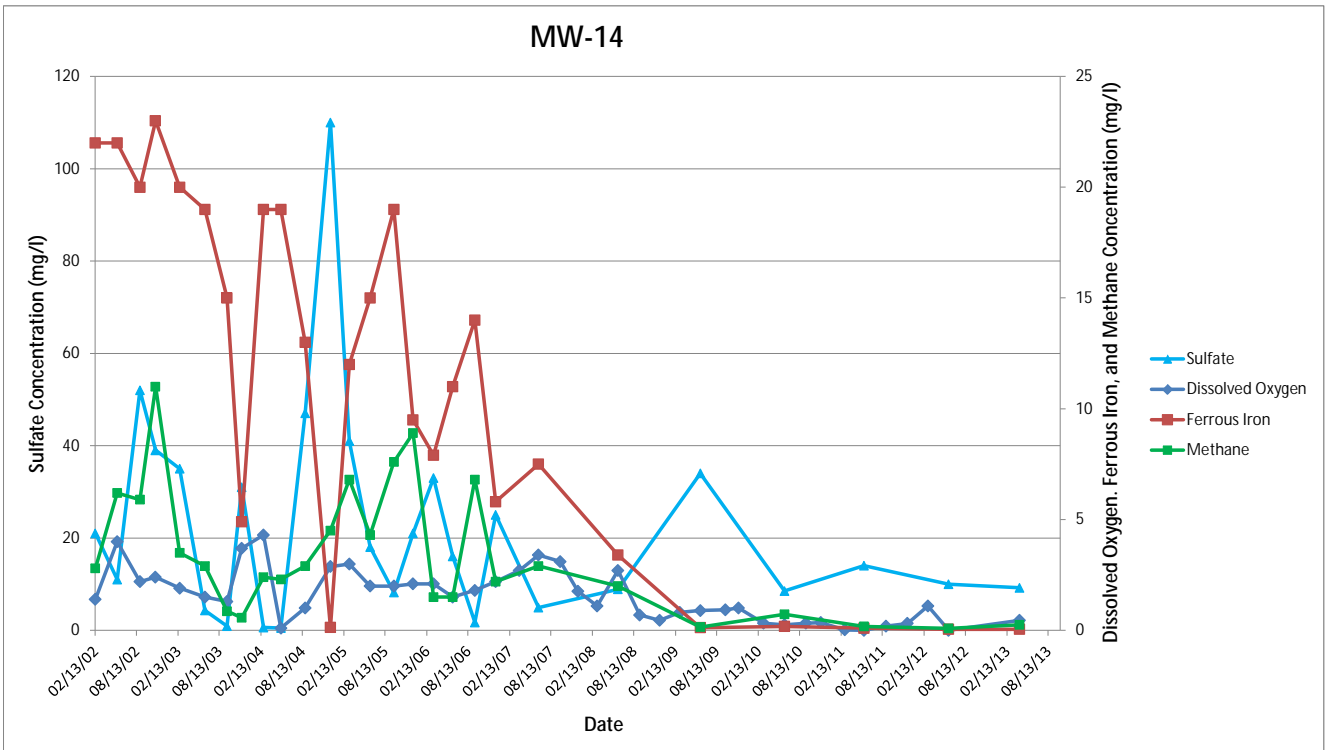
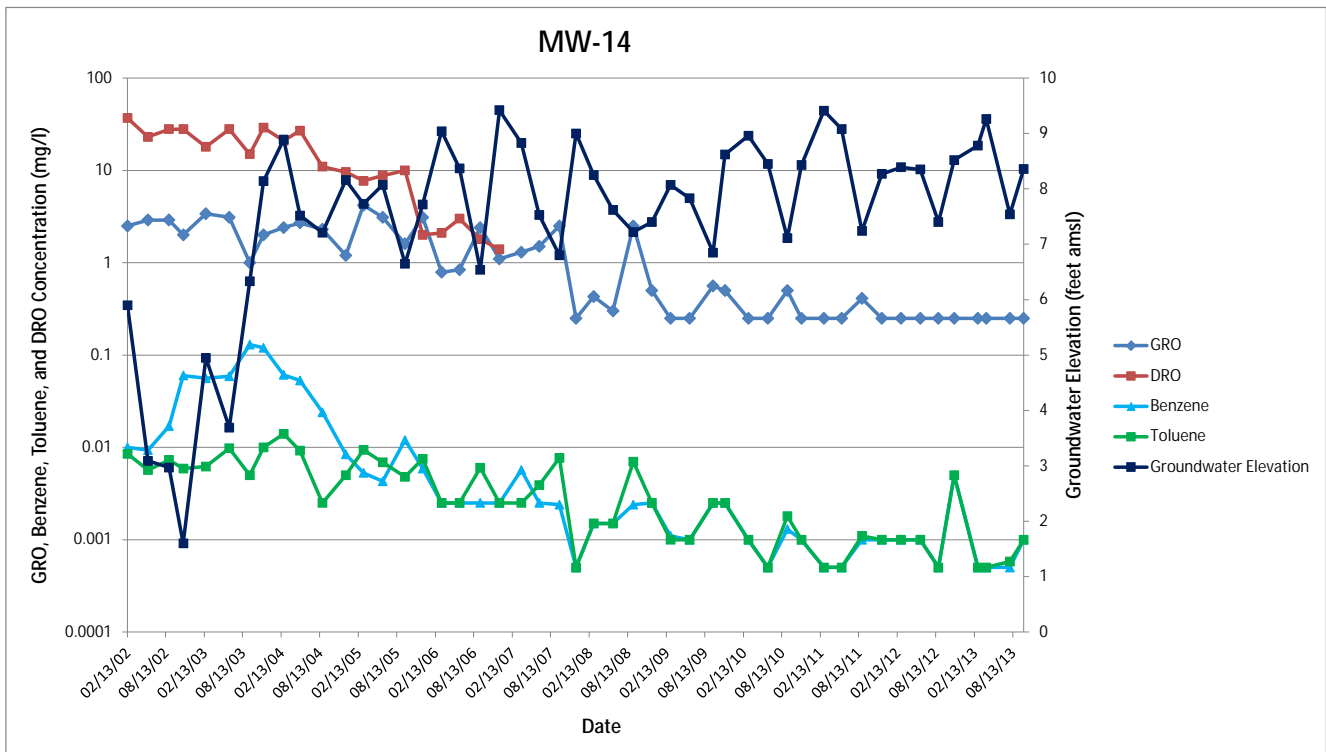


KINDER MORGAN LIQUID TERMINALS, LLC
 HARBOR ISLAND TERMINAL
 2720 13TH AVENUE SOUTHWEST, SEATTLE, WASHINGTON
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ATTACHMENT A
HYDROGRAPH AND CONSTITUENT TREND GRAPHS



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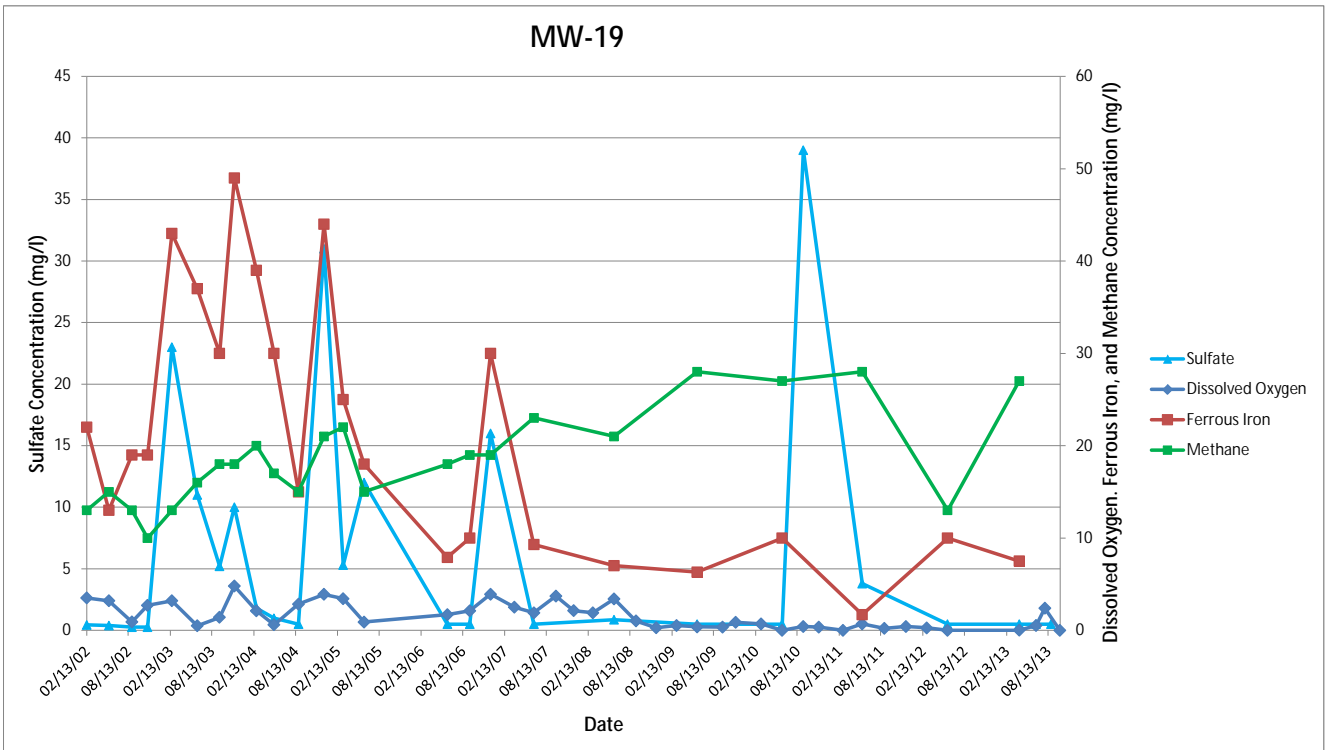
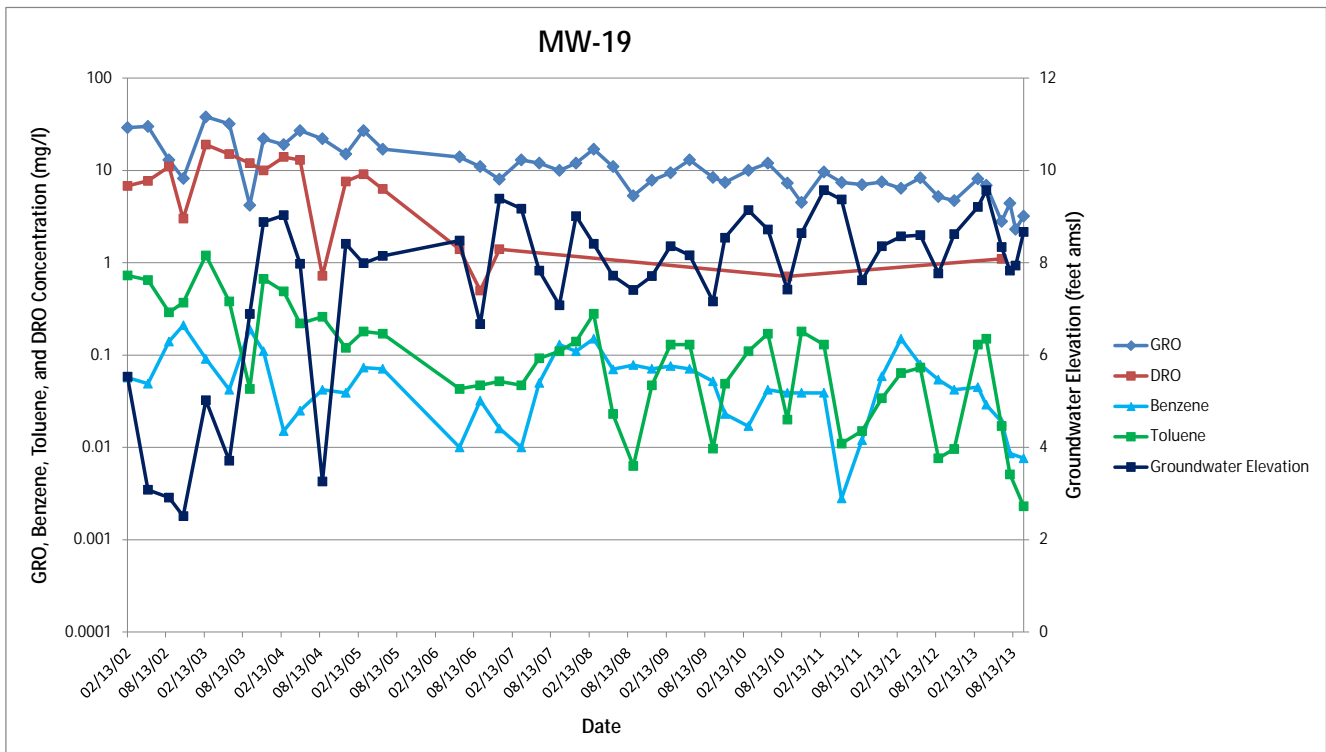


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