



Los Angeles Regional Water Quality Control Board

April 5, 2019

Mr. James L'Esperance
Northrop Grumman Corporation
101 Continental Boulevard
El Segundo, California 90245

Certified Mail
Return Receipt Requested
Claim No. 7018 1830 0001 5952 8095

REVISED MONITORING AND REPORTING PROGRAM NO. CI-10201 – FORMER TRW BENCHMARK FACILITY, 200 SOUTH TURNBULL CANYON ROAD, INDUSTRY, CALIFORNIA (FILE NO. 15-141, ORDER NO. R4-2014-0187, SERIES NO. 053, CI-10201, GLOBAL ID. WDR100026609)

Dear Mr. L'Esperance:

On April 4, 2016, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) enrolled Northrop Grumman Corporation under General Waste Discharge Requirements (WDRs Order No. R4-2014-0187) with a Monitoring and Reporting Program (MRP) No. CI-10201 for pilot tests to inject sodium persulfate, activator, and pH buffer for groundwater remediation of volatile organic compounds and 1,4-dioxane at the subject site.

The Discharger submitted the *WDR Modification Request* (Request) dated February 15, 2019 to propose reducing WDR monitoring frequency from quarterly to semiannually. On February 15, 2019, United States Environmental Protection Agency, Region IX concurred with the proposed modification indicated in the Request.

Based on the review of the monitoring reports from the Second Quarter 2016 to the Fourth Quarter 2018, the sampling results indicated that concentrations of constituents of concern exhibited a decreasing trend since completion of the injection and groundwater quality data have been relatively stable from pre-injection through post-injection groundwater sampling events. Therefore, WDR monitoring frequency can be reduced from quarterly to semiannually.

The revised MRP, which incorporates reduction of monitoring and reporting frequency, is enclosed. The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the revised MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100026609. Please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

IRMA MUÑOZ, CHAIR | DEBORAH SMITH, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

For all parties who upload electronic documents to State Database GeoTracker, it is no longer necessary to email a copy of these documents to losangeles@waterboards.ca.gov or submit hard copies to our office. The Regional Board will no longer accept documents (submitted by either hard copy or email) already uploaded to GeoTracker. Please see Electronic Submittal to the Los Angeles Regional Board for GeoTracker Users dated December 12, 2011 for further details at: <http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20OGT%20Users.pdf>

To avoid paying future annual fees, please submit a written request for termination of your enrollment under the general WDR in a separate letter when the project is completed and the WDR is no longer needed. Be aware that the annual fee covers the fiscal year billing period beginning July 1 and ending June 30, the following year. You will pay the full annual fee if your request for termination is made after the beginning of the new fiscal year beginning July 1.

If you have any questions, please contact the Project Manager, Dr. Ann Chang at (213) 620-6122 (ann.chang@waterboards.ca.gov), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 (eric.wu@waterboards.ca.gov).

Sincerely,



Deborah J. Smith
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-10201 dated April 5, 2019

cc: Mr. Raymond Chavira, United States Environmental Protection Agency
Mr. Klaus Rohwer, Equipoise Corporation
Ms. Jennifer Nyman, Geosyntec Consultants, Inc.

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

REVISED MONITORING AND REPORTING PROGRAM NO. CI-10201
FOR
FORMER TRW BENCHMARK FACILITY
200 SOUTH TURNBULL CANYON ROAD, INDUSTRY, CALIFORNIA

ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2014-0187 (SERIES NO. 053)
FILE NO. 15-141

I. MONITORING AND REPORTING REQUIREMENTS

- A. Northrop Grumman Corporation (hereinafter Discharger) shall implement this Monitoring and Reporting Program (MRP) on the effective date (April 5, 2019) under Regional Board Order No. R4-2014-0187. The next monitoring report shall be received at the Regional Board by **July 30, 2019**. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – June	July 30
July – December	January 30

- B. If there is no discharge or injection, during any reporting period, the report shall so state. By March 1 of each year, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall discuss the compliance record and the corrective actions taken or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements.
- C. The Discharger shall comply with requirements contained in Section G of Regional Board Order No. R4-2014-0187 "*Monitoring and Reporting Requirements*".

II. GROUNDWATER MONITORING PROGRAM

A groundwater monitoring program shall be implemented to evaluate impacts associated with the injection activity. Groundwater samples shall be collected from monitoring wells PT-MW-1 through PT-MW-9 and W30 (Figure 1). The injection activities were completed in December 2017. The Discharger shall continue to conduct semiannual sampling events after the injection from all 10 monitoring wells for the following groundwater parameters:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Semiannually
Oxidation-Reduction Potential	millivolts	grab	Semiannually
pH	pH units	grab	Semiannually
Specific Conductivity	mS/cm	grab	Semiannually
Temperature	°C	grab	Semiannually
Turbidity	NTU	grab	Semiannually
Total Organic Carbon	mg/L	grab	Semiannually
Total Dissolved Solids	mg/L	grab	Semiannually
Sulfate	mg/L	grab	Semiannually
Chloride	mg/L	grab	Semiannually
Boron	mg/L	grab	Semiannually
Nitrate and Nitrite	mg/L	grab	Semiannually
Volatile Organic Compounds	µg/L	grab	Semiannually
1,4-Dioxane	µg/L	grab	Semiannually

All groundwater monitoring reports must include, at a minimum, the following:

- a. Well identification, date and time of sampling;
- b. Sampler identification, and laboratory identification;
- c. Observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.

III. MONITORING FREQUENCIES

Specifications in this monitoring program are subject to periodic revisions. Monitoring requirements may be modified or revised by the Executive Officer based on review of monitoring data submitted pursuant to this Order. Monitoring frequencies may be adjusted to a less frequent basis or parameters and locations dropped by the Executive Officer if the Discharger makes a request and the request is backed by statistical trends of monitoring data submitted.

VI. CERTIFICATION STATEMENT

Each report shall contain the following completed declaration:

"I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

Executed on the ____ day of _____ at _____

(Signature)

(Title)"

Former TRW Benchmark Facility
WDR Order No. R4-2014-0187
Revised Monitoring and Reporting Program No. CI-10201

V. PUBLIC DOCUMENTS

All records and reports submitted in compliance with Regional Board Order No. R4-2014-0187 and Monitoring and Reporting Program No. CI-10201 are public documents and will be made available for inspection during business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region, upon request by interested parties. Only proprietary information, and only at the request of the Discharger will be treated as confidential.

VI. ELECTRONIC SUBMITTAL OF INFORMATION

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data in Electronic Deliverable Format, discharge location data, and searchable Portable Document Format of monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100026609.

Ordered by:



Deborah J. Smith
Executive Officer

Date: April 5, 2019

