



California Regional Water Quality Control Board Los Angeles Region



Matthew Rodriguez
Secretary for
Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • FAX (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown Jr.
Governor

January 27, 2012

Mr. Suleman Mohammed
On-Bandini LLC
515 South Figueroa Street, Suite 1600
Los Angeles, CA 90071

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9436 – FORMER TRW PSI FACILITY, 6033 EAST BANDINI BOULEVARD, COMMERCE, CALIFORNIA (ORDER NO. R4-2007-0019, SERIES NO. 069, CI-9436, GLOBAL ID. WDR100000398)

Dear Mr. Mohammed:

On October 1, 2008, Los Angeles Region Regional Water Quality Control Board (Regional Board) issued you general Waste Discharge Requirements (WDR) Order No. R4-2007-0019 and Monitoring and Reporting Program (MRP) No. CI-9436 for a pilot test to inject sodium permanganate for groundwater remediation of chlorinated volatile organic compounds (VOCs) including trichloroethene (TCE).

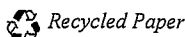
Based on the favorable results of the pilot test conducted in 2008, the *Groundwater Remedial Action Plan* (GRAP), dated May 12, 2011, was prepared and submitted for conducting full scale in-situ chemical oxidation injection to treat TCE in groundwater. The GRAP proposes to inject approximately 104,000 gallons of 3.5% potassium permanganate solution into the target zone approximately between 95 and 110 feet below ground surface (bgs) through 78 injection points. On September 13, 2011, the Regional Board approved the GRAP.

The revised MRP, which reflects the full scale application of potassium permanganate injection, is enclosed. When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to "Compliance File CI No. 9436" which assure that the reports are directed to the appropriate file and staff. Also, please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100000398. ESI training video is available at:

<https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>

California Environmental Protection Agency




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 the attached announcement (Electronic Submittal to the Los Angeles Regional Board for GeoTracker User dated December 12, 2011) for further details.

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 (achang@waterboards.ca.gov), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 (ewu@waterboards.ca.gov).

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosures:

Revised Monitoring and Reporting Program No. CI-9436 dated January 27, 2012.
Electronic Submittal to the Los Angeles Regional Board for GeoTracker User
dated December 12, 2011

cc: Mr. Mark Cousineau, Hazard Management Consulting, Inc.
Mr. Hsien Chen, AECOM

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9436
FOR
FORMER TRW PSI FACILITY
6033 EAST BANDINI BOULEVARD, COMMERCE, CALIFORNIA

ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2007-0019 (SERIES NO. 069)

I. MONITORING AND REPORTING REQUIREMENTS

- A. On-Bandini LLC (hereinafter Discharger) shall implement this revised Monitoring and Reporting Program (MRP) on the effective date (January 27, 2012) under Regional Board Order No. R4-2007-0019. The next monitoring report under this program shall be received at the Regional Board by **April 15, 2012**. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15

- 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 Order No. R4-2007-0019 "*Monitoring and Reporting Requirements*" in addition to the aforementioned requirements.

II. DISCHARGE MONITORING PROGRAM

The monitoring reports shall contain the following information regarding the injection activities:

1. Location map showing injection points used for the potassium permanganate solution.
2. Written and tabular summary defining depth of injection points, quantity of the potassium permanganate solution injected at each injection point, and total amount of the potassium permanganate solution injected at the Site.
3. Visual inspection at each injection point shall be conducted and recorded during the injection.

III. 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 W-1, W-2, W-3, W-4, W-5, and W-7 (Figure 2). The Discharger shall conduct a baseline sampling prior to the proposed injection, followed by months 1, 3, and quarterly sampling events after the injections from all six monitoring wells for the following groundwater parameters:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Baseline, months 1, 3 after injection, and quarterly thereafter
Oxidation-Reduction Potential	millivolts	grab	Same as specified above
pH	pH units	grab	Same as specified above
Specific Conductivity	mS/cm	grab	Same as specified above
Temperature	°C	grab	Same as specified above
Turbidity	NTU	grab	Same as specified above
Total Organic Carbon	mg/L	grab	Same as specified above

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total Dissolved Solids	mg/L	grab	Same as specified above
Sulfate	mg/L	grab	Same as specified above
Chloride	mg/L	grab	Same as specified above
Boron	mg/L	grab	Same as specified above
Nitrate and Nitrite	mg/L	grab	Same as specified above
Permanganate	mg/L	grab	Same as specified above
Volatile Organic Compounds	µg/L	grab	Same as specified above
Color	color unit	grab	Same as specified above

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

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

IV. 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.

V. 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)"

VI. PUBLIC DOCUMENTS

All records and reports submitted in compliance with Order No.R4-2007-0019 and Monitoring and Reporting Program No. CI-9436 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.

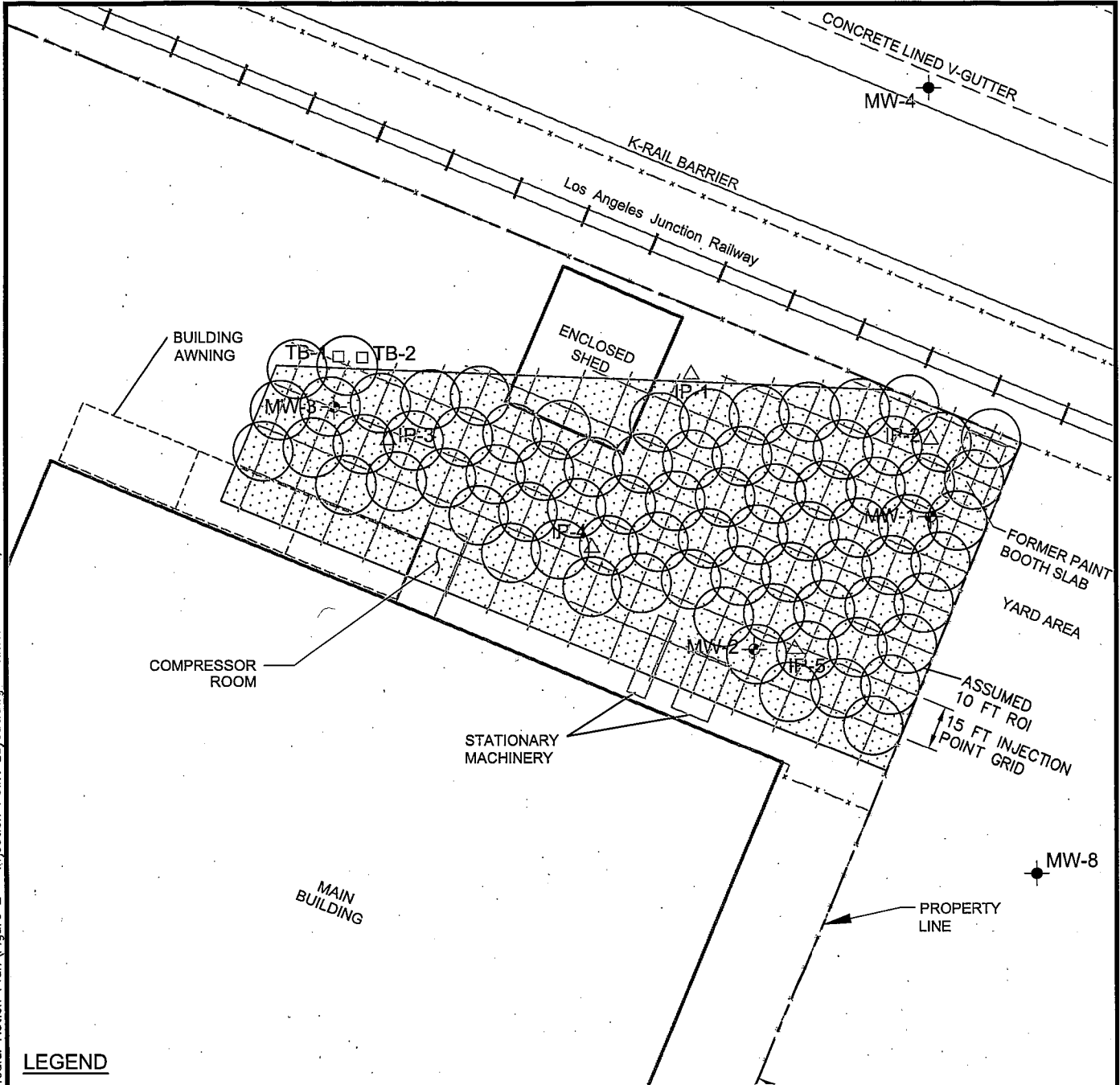
VII. ELECTRONIC SUBMITTAL OF INFORMATION

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100000398.

Ordered by: Samuel Unger
Samuel Unger, P.E.
Executive Officer

Date: January 27, 2012

File: P:\ET\DATA\work\36983\cad\On Bandini LLC\Remedial Action Plan\Figure 2 - Injection Point Layout.dwg Time: Oct 04, 2011 - 9:37am

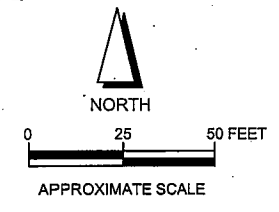


LEGEND

- ◆ Onsite Groundwater Monitoring Well
- Offsite Groundwater Monitoring Well
- △ Oxidant Injection Point from ISCO Pilot Test (2008)
(Abandoned After Oxidant Injection)
- Halogenated VOCs vertical delineation HydroPunch Location (2008)
- Proposed Injection Point on 15-foot grid with a conservative 10-foot Radius of Influence assumed
- - - - - Approximate Property Line Boundary
- x - x - Approximate Fence Location
- ▨ Planned Active Remediation Area

NOTES

1. Source: Imagery from TerraServer On-Line USGS Database, from March 29, 2004.
2. Groundwater Monitoring Well Locations Surveyed by DMc Engineering, conducted February 14, 2005 and March 9, 2006.



ISCO PROCESS AND CHEMICAL SECURITY PLAN		
ISCO Grid and Injection Point Locations		
FORMER TRW/PSI FACILITY		6033 BANDINI BLVD, COMMERCE, CA
Date: 9-11	On Bandini, LLC	
Project No. 60135235	AECOM	Figure 2



California Regional Water Quality Control Board Los Angeles Region



Matthew Rodriguez
Secretary for
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<http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown Jr.
Governor

December 12, 2011

Electronic Submittal to the Los Angeles Regional Board for GeoTracker Users

To Interested Parties:

Effective November 1, 2011, the Los Angeles Regional Water Quality Control Board (Regional Board) implemented a Paperless Office system. Interested parties were notified of this intent in a letter dated October 20, 2011 (the announcement can be seen at <http://www.waterboards.ca.gov/losangeles/resources/Paperless/>).

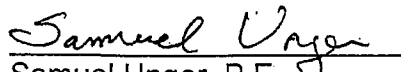
This letter is intended to clarify the electronic submittal process for all **GeoTracker** users in accordance with the October 20, 2011 Paperless Office announcement.

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. In special circumstances where GeoTracker may not be the best place to submit correspondence, such as oversized or confidential documents, please contact case staff directly to arrange a submittal method.

If you have questions regarding this matter, please contact the appropriate staff assigned to your program or project. You may refer to the Regional Boards' Departmental Listing for contact information.

Sincerely,


Samuel Unger, P.E.
Executive Officer

California Environmental Protection Agency

