



California Regional Water Quality Control Board Los Angeles Region



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Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

September 23, 2011

Ms. Jennifer L. Wiley
The Boeing Company
2201 Seal Beach Blvd., M/C 110-SE17
Seal Beach, CA 90740-5603

REVISED MONITORING AND REPORTING PROGRAM CI-9625 – THE BOEING COMPANY, FORMER COMPTON SITE, 233 EAST MANVILLE STREET, 200 EAST STANLEY STREET, AND 157 EAST STANLEY STREET, COMPTON, CALIFORNIA (FILE NO. 96-056; SCP NOS. 0462, 0559A, AND 0559B; SITE ID NO. 2045B00)

Dear Ms. Wiley:

We have received the "Request for Modifications to the General Waste Discharge Requirements Fact Sheet and Monitoring and Reporting Program, The Boeing Former Compton Site, Compton, California", (Letter) dated September 1, 2011, prepared by Leighton Consulting, Incorporated. The Letter proposes to modify the existing monitoring and reporting program (MRP) CI-9625 for the groundwater extraction and treatment (GET) System by excluding one of three Bellflower Aquitard (BFA) extraction wells from the remediation system and monitoring network. In June 2009 this Regional Board approved the Remediation Measure Work Plan for the installation of a hydraulic containment barrier consisting of an on-site and off-site GET system, which included three BFA extraction wells, one A-sand extraction well and three A-Sand injection wells. These wells were subsequently installed in 2010 as an initial implementation of the Remediation Measure Work Plan. The system is currently under construction and is anticipated to startup in the 4th Quarter 2011. On September 9, 2010, General Waste Discharge Requirements Order No. R4-2007-0019 (with MRP No. CI-9625) was issued to the Boeing Company (Boeing) to begin the GET system at the site.

Extraction well EW0130 was completed as a 6-inch diameter well and is screened between the depths of 65 and 105 feet below ground surface (bgs). Groundwater was first encountered in EW0103 at a depth of 68 feet bgs. Data collected from the pilot testing activities indicate that EW0103 was never able to yield the volume of water produced by the surrounding extraction wells. EW0103 was repeatedly dewatered by bailing, whereas EW0102 and EW0104 sustained pumping rates of up to 8 gallons per minute (gpm) for prolonged periods with only 5 to 9 feet of drawdown. Based on the data collected, Boeing request that this extraction well (EW0103) be removed from the GET system and MRP CI-9625. The need for a replacement well, or additional extraction wells, will be evaluated based on capture zone analysis after system startup and stabilization.

Regional Board staff Ms. Ana Townsend in the Site Cleanup Program has reviewed the proposed modifications to the GET system and MRP CI-9625 and approve the changes on September 22, 2011. The revised MRP, which incorporates the requested modifications, is enclosed. All monitoring reports shall be sent to the Regional Board, ATTN: Information Technology Unit. When submitting monitoring and technical reports to the Regional Board per these requirements, please include a reference to

California Environmental Protection Agency

Ms. Jennifer Wiley
The Boeing Company
SCP No. 0462, 0559A and 0559B

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September 23, 2011

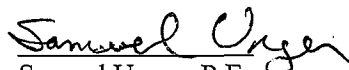
"Compliance File No. CI-9625", which will assure that the reports are directed to the appropriate file and staff. Also, please do not combine other reports with your WDR monitoring and reports. Submit each type of report as a separate document.

To avoid paying future annual fees, please submit a written request for termination of your enrollment under the general permit in a separate letter, when your project has been completed and the permit 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.

In addition, you are required to comply with Electronic Submittal of Information (ESI) as specified in the June 20, 2011, letter (attached) for WDR report submittal under Geotracker Global ID WDR100000709.

If you have any additional questions, please contact the Project Manager, Mr. David Koo at (213) 620-6155 or the Unit Chief of Groundwater Permitting, Dr. Eric Wu at (213) 576-6683 regarding this matter.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosures:

1. Monitoring and Reporting Program CI No. 9625 revised on September 23, 2011
2. June 20, 2011 ESI letter

cc: Cheryl Ross, West Basin Municipal Water District
Chris Nagler, Watermaster - California Department of Water Resources
Nancy Matsumoto, Water Replenishment District of Southern California
Robert Scott, Boeing Environmental, Health and Safety
Richard Williams, Leighton Consulting, Inc.

California Environmental Protection Agency

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

MONITORING AND REPORTING PROGRAM NO. CI-9625

FOR

THE BOEING COMPANY
BOEING FORMER COMPTON FACILITY
COMPTON, CALIFORNIA
(TREATED GROUNDWATER RE-INJECTION)
(FILE NO. 96-056; SCP NO. 0462, 0559A and 0559B)
(ORDER NO. R4-2007-0019, SERIES NO. 137)

I. REPORTING REQUIREMENTS

- A. The Boeing Company (hereinafter Discharger) shall implement this monitoring and reporting program (MRP) on the effective date of this enrollment (September 9, 2010) under Regional Board Order No. R4-2007-0019 (Series No. 137). The first monitoring report (Post-Construction & Startup Report) under this program, for January – March 2011, shall be received at the Regional Board by April 30, 2011. 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 30
April – June	July 30
July – September	October 30
October – December	January 30
Annual Summary Report	March 15 of each year beginning in 2012

- B. If there is no discharge or injection during any reporting period, the report shall so state. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.
- C. By March 15 of each year, starting in 2012, 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.
- D. Whenever wastes associated with the discharge under this Order are transported to a different disposal site, the following shall be reported in the monitoring report: type and

quantity of wastes; name and address of the hauler (or method of transport if other than by hauling); and location of the final point(s) of disposal.

- E. Laboratory analyses - all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.
- F. The method limits (MLs) employed for effluent analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can demonstrate that a particular ML is not attainable and obtains approval for a higher ML from the Regional Board Executive Officer (Executive Officer). The Discharger shall submit a list of the analytical methods employed for each test and the associated laboratory quality assurance/quality control (QA/QC) procedures upon request by the Regional Board.
- G. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136. All QA/QC samples must be run on the same dates when samples were actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Regional Board staff.
- H. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services, and in accordance with current United States Environmental Protection Agency (USEPA) guideline procedures or as specified in this Monitoring Program." Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- I. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with WDRs. This section shall be located at the front of the report and shall clearly list all non-compliance with WDRs, as well as all excursions of effluent limitations.
- J. The Discharger shall maintain all sampling and analytical results: date, exact place, and time of sampling; dates analyses were performed; analyst's name; analytical techniques used; and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Regional Board.
- K. If the Discharger performs analyses on any groundwater samples more frequently than required by this Order using approved analytical methods, the results of those analyses shall be included in the report.

- L. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.
- M. The Discharger should not implement any changes to the Monitoring and Reporting Program prior to receiving Executive Officer's written approval.

II. TREATED GROUNDWATER RE-INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding re-injection activities:

1. Location map showing re-injection points used for the treated groundwater. Groundwater monitoring wells shall not be used as re-injection points to avoid reduction of groundwater monitoring network and data bias. Treated groundwater must only be injected into the five wells proposed and approved in the workplan(s).
2. Written and tabular summary defining the quantity of treated groundwater injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

III. GROUNDWATER MONITORING PROGRAM

Monitoring of groundwater to be re-injected into the subsurface shall consist of sampling and analysis for specific water quality attributes and potential residual contaminants in accordance with the Los Angeles Region Basin Plan and shall be performed in addition to the on-going groundwater monitoring conducted under the Key Well Monitoring Plan for the Boeing Company Former Compton Site. The following groundwater extraction and treatment (GET) System components or sample points will be monitored under the MRP sampling program:

- Existing On-Site Extraction wells: EW-0101, EW-0102, and EW-0104
- Future Off-Site Extraction Well: EW-0105
- Influent Process Stream Samples: Total on-Site Influent and Total off-Site Influent
- Effluent Process Stream Samples: Total on-Site Effluent and Total off-Site Effluent
- Existing groundwater monitoring wells MWD020, MWD030 and MWD035
- Future downgradient groundwater monitoring well at a location to be approved by this Regional Board, prior to start-up of the off-Site GET System, if implemented.

Figure 1 shows the location of the Site. Figure 2 shows the groundwater monitoring wells, on-Site groundwater extraction and injection wells, and the proposed locations of the off-Site groundwater extraction and injection wells. Also depicted are the locations of the on-Site and off-Site GET System compounds. The precise configuration of the off-Site GET System components may change as they are subject to on-going negotiations with the off-Site property owners.

Baseline groundwater samples from the extraction and injection wells and a flow-weighted sample simulating the influent process stream have previously been analyzed. The required MRP constituents to be analyzed, and the monitoring schedule for each sample group are shown below.

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total Groundwater Extraction	Gallons	Flow Meter Measurement	Daily
Total Groundwater Re-injection	Gallons	Flow Meter Measurement	Daily
Groundwater Elevations	feet above mean sea level	In situ	Daily
pH	pH units	Grab	Monthly for the first year, Semi-annual thereafter
Temperature	°F/°C	Grab	Monthly for the first year, Semi-annual thereafter
Total Dissolved Solids (TDS), Boron, Chloride, Sulfate	milligrams per liter (mg/L)	Grab	Monthly for the first year, Semi-annual thereafter
Metals (arsenic, chromium, iron, lead, aluminum and nickel)	micrograms per liter (µg/L)	Grab	Monthly for the first year, Semi-annual thereafter
VOC s	micrograms per liter (µg/L)	Grab	Monthly for the first year, Semi-annual thereafter

1 The sampling frequency during the initial 30-day system startup and shakedown period will consist of a minimum of weekly sampling for the constituents and parameters shown above. Thereafter, the sampling and analysis will be conducted on a monthly basis as indicated.

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

- a. Summary of reporting period activities
- b. Summary of planned activities for upcoming reporting period
- c. Identification of well or GET System component sample point, date and time of sampling, and name of individual performing the sampling and the laboratory conducting the analysis.
- d. Daily groundwater elevation levels, recorded to 0.01 feet mean sea level (ft msl)
- e. Daily, monthly, and cumulative groundwater extraction rates in gallons by individual extraction well and total influent,
- f. Daily, monthly, and cumulative groundwater injection rates in gallons by individual injection wells and total effluent; and
- g. VOC concentrations ending each reporting period for TCE, PCE, cis- 1, 2-DCE, Freon 11, Freon 113, toluene, and vinyl chloride for each groundwater extraction well and influent and effluent process stream sampling points.

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 this Order are public documents and shall be made available for inspection during normal 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 (ESI) TO GEOTRACKER

The Discharger shall submit all reports required under this Monitoring and Reporting Program, including groundwater monitoring data associated with the Waste Discharge Requirements, to the State Water Resources Control Board GeoTracker database, in addition to submitting hard copies to the Regional Board office. Once the Discharger demonstrates mastery of electronic submittal of reports to GeoTracker for the Site, it may request that the Regional Board waive the requirement of submitting hard copies of reports.

Ordered by: Samuel Unger
Samuel Unger
Executive Officer

Date: September 23, 2011



California Regional Water Quality Control Board Los Angeles Region



Linda S. Adams
Acting Secretary for
Environmental Protection

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(213) 576-6600 • Fax (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown Jr.
Governor

June 20, 2011

To Dischargers and Interested Parties

ELECTRONIC SUBMITTAL OF INFORMATION TO GEOTRACKER FOR WASTE DISCHARGE REQUIREMENTS (WDR) UNDER GROUNDWATER PERMITTING PROGRAM (NON-CHAPTER 15 WDR)

For several years, parties responsible for cleanup of leaks from underground storage tanks and other groundwater cleanup and land disposal sites have been required to electronically submit over the internet their groundwater analytical data, the surveyed locations of monitoring wells, the PDF copies of reports and certain other data to the State Water Resources Control Board's (SWRCB) Geotracker database. The Geotracker system currently has information submitted by responsible parties for over 10,000 groundwater cleanup sites statewide.

In addition to submitting hard copies of reports to the Los Angeles Regional Water Quality Control Board (Regional Board) office, dischargers are directed to submit all reports required under the waste discharger requirements (WDR) adopted by the Regional Board, including groundwater monitoring data in Electronic Data Format, well and discharge location data, and searchable pdf reports and correspondence, to the SWRCB's Geotracker database. The electronic copy is intended to eventually replace the need for a paper copy and is expected to be relied upon for all public information requests, regulatory review, and compliance/enforcement activities. Once dischargers demonstrate mastery of electronic submittal of reports to Geotracker, dischargers may request that the Regional Board waive the requirement of submitting hard copies of reports for the Site.

For submitting data and reports, dischargers or their representatives will need to set up a Geotracker user account. Instruction to set up a Geotracker account is found at our Electronic Submittal of Information (ESI) website:

http://www.waterboards.ca.gov/ust/electronic_submittal/index.shtml

Our ESI website also contains information that will aid your transition to electronic data and reporting submittal, such as guidelines on claiming and getting access to a facility, uploading of analytical data in specified Electronic Data Format (EDF), PDF of reports, and well survey templates. For general assistance in searching or utilizing Geotracker, please contact Geotracker Help Desk at (866) 480-1028 or Geotracker@waterboards.ca.gov. For questions about using Geotracker, please contact Mr. Hamid Foolad at (916) 341-5791 or hfoolad@waterboards.ca.gov. For regulatory requirement questions, please contact the WDR project manager assigned to each WDR. A site-specific amendment to each WDR Monitoring and Reporting Program will be sent to each discharger for ESI requirements and will include project manager contact information.

California Environmental Protection Agency

ESI Implementation Schedule

The Regional Board will implement electronic submittal of information (ESI) in phases:

Phase 1: Effective July 1, 2011, all groundwater cleanup WDR dischargers are required to comply with ESI. The facilities that were issued WDRs for Underground Storage Tanks Program have been required to submit electronic formatted data since 2002. Facilities within the Site Cleanup Program and Land Disposal Program were added in 2005.

Phase 2: Effective October 1, 2011, industrial, commercial and municipal WDR dischargers, excluding 26 National Pollutant Discharge Elimination System/Water Recycling Requirements (NPDES/WRR) major dischargers (See attached Table 1) are required to comply with ESI.

Major NPDES/WRR Dischargers

Twenty-six major NPDES/WRR dischargers previously began an effort to submit electronic data in to the State Water Board's California Integrated Water Quality System (CIWQS) database. An evaluation of the facility data in CIWQS will be conducted, and at a future date NPDES/WRR dischargers may also be required to submit their groundwater data into CIWQS or Geotracker.

Training and Outreach

Two identical training and outreach sessions will be held for dischargers, consultants and the public to introduce them to the ESI requirements and its application:

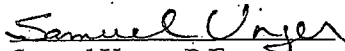
Date: Wednesday, July 13, 2011 and Monday, September 26, 2011
Time: 1pm - 3pm
Location: Regional Water Quality Control Board – Los Angeles Region
320 W. 4th Street, 1st Floor Carmel Room
Los Angeles, CA 90013

Please RSVP for the training if you plan to attend by e-mailing Ms. Rosie Villar at rvillar@waterboards.ca.gov.

In addition, once available we will post a recording of the training on our internet site at http://www.waterboards.ca.gov/losangeles/water_issues/programs/ground_water_permitting.shtml

If you have any questions or need additional information, please contact Groundwater Permitting Unit Chief, Dr. Eric Wu, at (213)576-6683 or ewu@waterboards.ca.gov or Groundwater Permitting and Land Disposal Section Chief, Dr. Rebecca Chou, at 213-576-6618 or rhou@waterboards.ca.gov.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosure: Table 1 – 26 Major NPDES/WRR Dischargers List

Table 1 - 26 Major NPDES/WRR Dischargers List

Primary_Discharger	Facility_Name	Order_Number	CI_Number
Burbank City Department of Public Work (DPW)	Burbank Waste Water Reclamation Plant (WWRP)	91-101	6753
Camarillo Sanitary District	Camarillo Water Reclamation Plant (WRP)	87-132	6187
Camrosa Water District	Camrosa WWRP	95-059	0821
City of San Buenaventura	Ventura WWRP	87-045	6190
County of Ventura Special Districts	Moorpark Waste Water Treatment Plant (WWTP)	R4-2002-0028	8371
District of Southern California	Alamitos Barrier Recycled Water Project	R4-2005-0061	8956
Las Virgenes Municipal Water District (MWD)	Rancho Las Virgenes Farm	79-107	6438
Las Virgenes MWD	Tapia WRF	97-072	6189
Los Angeles City Bureau of Sanitation, Water Reclamation Division	Tillman WWRP	R4-2007-0008	6185
Los Angeles City DWP	Harbor Water Recycling Project	R4-2003-0025	8537
Los Angeles City DWP	HWRP Barrier Project	R4-2003-0134	8654
Los Angeles County DPW	Malibu Mesa WWRP	00-167	5689
Los Angeles County Sanitation Districts (LACSD)	Long Beach WWRP	97-072	6184
LACSD	Los Coyotes WWRP	97-072	6182
LACSD	Montebello Forebay Groundwater Recharge	91-100	5728
LACSD	Pomona WRP	97-072	6241
LACSD	San Jose Creek WRP	97-072	6372
LACSD	Saugus WRP	97-072	6188
LACSD	Valencia Water Reclamation Plant	97-072	6186
LACSD	Whittier Narrows Water Reclamation Plant, El Monte	97-072	6844
Oxnard City	Oxnard WWTP	R4-2008-0083	9456
Simi Valley City	Simi Valley WWRP	87-046	6408
US Navy Southwest Division	San Clemente Island WWTP	R4-2004-0057	8734
Ventura City	Ventura WRF	87-045	6190
West Basin MWD	Edward C. Little Water Recycling Facility	01-043	7453
West Basin MWD	Edward C. Little Water Recycling Facility	R4-2006-0069	7485