



EDMUND G. BROWN JR. GOVERNOR

MATTHEW RODRIQUEZ SECRETARY FOR ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

April 27, 2016

Mr. John E. Williams The Boeing Company 2201 Seal Beach Blvd Seal Beach, CA 90740-5603

REVISED MONITORING AND REPORTING PROGRAM – THE BOEING COMPANY, FOMRER COMPTON SITE, 233 EAST MANVILLE STREET, 200 EAST STANLEY STREET, AND 157 EAST STANLEY STREET, COMPTON, CALIFORNIA (FILE NO. 96-056, CI-9625, ORDER NO. R4-2007-0019, SERIES NO. 137, SITE ID NO. 2045BOO; GLOBAL ID WDR100000709)

Dear Mr. Williams:

On September 9, 2010, the Boeing Company (Boeing) (hereinafter Discharger) was enrolled under the *"Revised General Waste Discharge Requirements for Groundwater Remediation at Petroleum Hydrocarbon Fuel, Volatile Organic Compound and/or Hexavalent Chromium Impacted Sites"* adopted by the Los Angeles Regional Water Quality Control Board (Regional Board) on March 1, 2007 for the groundwater extraction and treatment (GET) system. Upon enrollment of the Waste Discharge Requirements (WDRs), the Discharger was required to implement Monitoring and Reporting Program (MRP) No. CI-9625.

On April 21, 2015, the Discharger submitted a letter to the Regional Board requesting to modify the monitoring frequency for groundwater elevations and volumes of groundwater extraction and injection from daily to monthly.

On September 15, 2015, the Discharger submitted a work plan for the installation of two additional injection wells (IW0104 and IW0105) to inject treated groundwater. The two additional injection wells are needed because the three existing injection wells have reoccurring problems with biofouling which decreases their capacity for injection. However, the total volume of groundwater injection will remain the same. On December 21, 2015, Regional Board staff of the Site Cleanup Program approved the work plan. On January 5, 2016, the Discharger informed the Regional Board that these two injection wells have been installed according to the approved work plan.

Based on the review of groundwater data collected from December 2011 to December 2014, groundwater elevations and its flow direction have been stable. In addition, the volumes of groundwater extracted and injected were routinely documented by the GET system data recorders on a daily basis, and have demonstrated to be persistent. Therefore, the monitoring frequency for groundwater elevations and the reporting of the average groundwater extraction and injection volumes are reduced from daily to monthly.

IRMA MUÑOZ, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

Enclosed please find the revised MRP No. CI-9625 with following modifications:

- 1. Authorize the use of two additional injection wells IW0104 and IW0105 for injecting treated groundwater.
- 2. Monitoring frequency of groundwater elevations and reporting of average groundwater extraction and injection volumes are reduced from daily to monthly.

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 WDR100000709.

Please see Electronic Submittal for GeoTracker Users, dated December 12, 2011 at: <u>http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20GT%20Users.pdf</u>

If you have any additional questions, please contact the Project Manager, Mr. David Koo, at (213) 620-6155 (<u>David.Koo@waterboards.ca.gov</u>) or the Groundwater Permitting Unit Chief, Dr. Eric Wu, at (213) 576-6683 (<u>Eric.Wu@waterboards.ca.gov</u>).

Sincerely,

Samuel Unger DE

Samuel Unger, P.E Executive Officer

Enclosure: Monitoring and Reporting Program No. CI-9625 revised on April 25, 2016

cc: Cheryl Ross, West Basin Municipal Water District Chris Nagler, California Department of Water Resources Nancy Matsumoto, Water Replenishment District of Southern California Robert Scott, Boeing Environmental, Health and Safety Rodney Crother, Stantec Consulting Services, Inc.

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

# REVISED MONITORING AND REPORTING PROGRAM NO. CI-9625 FOR THE BOEING COMPANY BOEING FORMER COMPTON FACILITY COMPTON, CALIFORNIA

# ENROLLMENT UNDER REGIONAL BOARD ORDER NO. R4-2007-0019 (SERIES NO. 134) FILE NO. 96-056

#### I. <u>REPORTING REQUIREMENTS</u>

A. The Boeing Company (hereinafter Discharger) shall implement this revised Monitoring and Reporting Program (MRP) at the Boeing Former Compton Facility, located at 233 East Manville Street, 200 East Stanley Street, And 157 East Stanley Street, Compton, California, the location of which is shown on Figure 1, under Regional Board Order No. R4-2007-0019. The first monitoring report under this revised monitoring program is due by July 30, 2016. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

Monitoring Period	Report Due	
January – March	April 30	
April – June	July 30	
July – September	October 30	
October – December	January 30	

- B. If there is no discharge or injection during any reporting period, the report shall so state.
- C. By March 15<sup>th</sup> of each year, beginning March 15, 2017, 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/or toxicity analyses shall be conducted at a laboratory certified for such analyses by the State Water Resources Control Board, Division of Drinking Water (SWRCB-DDW) Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certifications shall be provided each time a new analysis is used and/or renewal is obtained from ELAP.
- F. The method limits (MLs) employed for 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 Executive Officer. At least once a year, 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.
- G. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 CPR 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 SWRCB-DDW ELAP, 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. For every item where the requirements are not met, the Discharger shall submit a statement of the cause(s), and actions undertaken or proposed which will bring the discharge into full compliance with waste discharge requirements at the earliest possible time, including a timetable for implementation of those actions.
- J. The Discharger shall maintain all sampling and analytical results, including strip charts, 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. 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.

- L. Any mitigation/remedial activity including any pre- or post-treatment conducted at the Site must be reported in the semi-annual monitoring report.
- M. 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 Waste Discharge Requirements (WDRs). This section shall be located at the front of the report and shall clearly list all non-compliance with discharge requirements, as well as all excursions of effluent limitations.
- N. 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.
- O. 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:

- 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 (IW0101, IW0102, IW0103, IW0104 and IW0105) approved in the work plan dated September 15, 2015 (Figure 2).
- 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 provides the location of the site. The groundwater monitoring wells and the on-site groundwater extraction and injection wells are shown on Figure 2.

Baseline groundwater samples from the extraction and injection wells and a flowweighted 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 in Table 1 below:

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

## Table 1

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. Groundwater elevations, recorded to 0.01 feet mean sea level (ft msl)
- e. Monthly and cumulative groundwater extraction volumes in gallons for each and all extraction wells and total influent,
- f. Monthly and cumulative groundwater injection volumes in gallons for each and all injection wells and total effluent; and
- g. VOC concentrations ending each reporting period for trichloroethene (TCE), tetrachloroethene (PCE), cis-1,2-dichloroethene (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. <u>CERTIFICATION STATEMENT</u>

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 \_\_\_\_\_

File No. 96-056 Order No. R4-2007-0019

\_\_\_\_\_ (Signature)

(Title)"

#### VI. ELECTRONIC SUBMITTAL OF INFORMATION (ESI) TO GEOTRACKER

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 WDR100000709.

All records and reports submitted in compliance with this Order 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.

Ordered by: <u>Samuel Unger</u>, P.E.

Date: April 27, 2016

Executive Officer

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BOEING FORMER COMPTON FACILITY Compton, California

Figure No.

SITE LOCATION MAP

9179 Aero Drive San Diego, CA 92123 www.stantec.com

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