

California Regional Water Quality Control Board

Central Coast Region



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Environmental Protection

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Edmund G. Brown Jr.
Governor

NEGATIVE DECLARATION

This groundwater treatment project is part of Whittaker Corporation's (Whittaker) phased approach to hydraulically capture and clean up perchlorate, volatile organic compounds (VOCs), and hexavalent chromium (CrVI) resulting from a former ordnance manufacturer. The former Whittaker Ordnance Facility (Site) is a 94-acre parcel located at 2751 San Juan Road in south-western Hollister, San Benito County. For much of the Site's history, liquid waste from many of the onsite buildings drained to a large septic tank and past operators disposed of wastes in areas around the Site including: burn areas, sumps, ponds, and dry wells. Whittaker has conducted investigation and cleanup actions across the Site over the last 15 years.

Whittaker has installed over 100-monitoring wells to characterize the groundwater plumes located on and off the Site. The largest plume, the perchlorate plume, extends approximately half- to three-quarters of a mile south-west from the Site. The purpose of this project is to upgrade and expand the Groundwater and Extraction Treatment System (GETS) to effectively pump polluted groundwater at the Site boundary, source areas, and offsite, treat the water, and re-inject it into a deeper aquifer unit.

I. PROJECT DESCRIPTION

Date: September 13, 2011

Project Title: Expansion of the Groundwater Extraction and Treatment System (GETS)

Project Location: Currently, six extraction wells are constructed on the property at 2751 San Juan Road, as part of the existing GETS. This project proposes installation of additional extraction wells on the property, an injection well, and three offsite extraction wells located within 1,000 feet of the property along Old San Juan Hollister Highway (see Figure 2 of the Initial Environmental Study).

APN: 021-03-13, 021-03-17, 021-03-14, 021-03-11, 018-11-16

Project Proponent:

Whittaker Corporation
Mr. Eric G. Lardiere, Vice-President
1955 N. Surveyor Avenue
Simi Valley, CA 93063

Project Description: Pursuant to the Central Coast Regional Water Quality Control Board's (Central Coast Water Board) Cleanup and Abatement Order (CAO) No. R3-2009-0015, Whittaker is required to hydraulically capture and cleanup wastes in groundwater associated with the discharge of wastes from their Site. As described in the Initial



Environmental Study¹ (IES) dated September 2, 2011, Whittaker plans to upgrade the existing treatment system to improve operations, then integrate three offsite extraction wells, six new onsite wells, an onsite injection well, and associated conveyance piping to treat and re-inject groundwater. The existing treatment system consists of an influent tank, a de-aeration tank, a methanol feed system, a bioreactor for perchlorate treatment, a bioreactor for selenium treatment, bag filters, two liquid-phase granular activated carbon units for VOCs treatment, an ultraviolet light system for disinfection, and an aeration/discharge tank. GETS upgrades include:

- modify pump and controls in the extraction wells to better control influent flow rate;
- modify the current bioreactor system, which includes a de-aeration fixed film reactor; and two continuous stirred tank reactors (CSTRs), into a single CSTR to simplify the system and reduce the number of components that require process control;
- upgrade the electron donor dosage system to improve control of the CSTR;
- add a continuous, real-time oxidation reduction potential (ORP) monitoring device that automatically puts the GETS in recycle mode when ORP readings are outside performance limits;
- restart the extraction wells in a phased approach, and determine which wells, and if additional wells, are needed to hydraulically capture polluted groundwater; and
- discharge the effluent into the Unit 5 aquifer via a new injection well. (Whittaker will discharge to the San Benito River or temporarily to land via spray irrigation pursuant to the other permits during the phased re-start.)

Draft plans include installation of approximately 600 linear feet of pipeline for the onsite extraction wells, and 1,900 linear feet of pipeline for the offsite wells via county right-of-way. Discharge to land (groundwater reinjection) will be permitted by the Central Coast Water Board under site-specific Waste Discharge Requirements (WDR). Treated groundwater will be recharged into the Unit 5 aquifer via a new recharge well that will be installed adjacent to the GETS (see Figure 1). The well will be installed to a depth of approximately 850 feet below ground surface, and will be designed to accommodate up to 140 gallons per minute. An existing Unit 5 monitoring well (SW-1) will be used to monitor groundwater chemistry and quality. Whittaker will conduct the project in phases, and anticipate it will be completed by early to mid-2012, pending permits and Central Coast Water Board approval of cleanup plans.

II. DETERMINATION

In accordance with the California Environmental Quality Act (CEQA), Geosyntec Consultants, Inc., prepared an IES (attached) on behalf of the Central Coast Water Board (Lead Agency) to determine whether the proposed project may have a significant adverse effect on the environment. On the basis of that study, the Central Coast Water Board makes the following determination:

¹ Available under the "Whittaker Ordinance" regulated facility on the Water Board's Geotracker website: <https://geotracker.waterboards.ca.gov/>

- The proposed project will not have a significant effect on the environment, and therefore does not require mitigation measures, hence, the Lead Agency has prepared this Negative Declaration.

III. CONDITIONS (Less than Significant Impacts):

A. Air Quality

The proposed Project will be "less than significant" with respect to creating a net increase of any criteria pollutant. The construction and operation of the Project is not anticipated to exceed the Monterey Bay Unified Air Pollution Control District's Air Quality Management Plan's daily emissions thresholds. Project-related construction traffic and operation of diesel equipment will have a temporary effect on air quality in the vicinity of the proposed pipeline components and upgraded treatment system. Pavement demolition and excavation of the pipeline trench will generate fugitive dust including particulate matter with a diameter of 10 microns or less, and particulate matter with a diameter of 2.5 microns or less. Operation of diesel-engine construction equipment onsite, hauling of demolition and trenching spoils from the Site and materials to the Site, and construction crew traffic will generate emissions of reactive organic gases (ROG), nitrogen oxide (NO_x), carbon monoxide (CO), and particulate matter. These emissions will increase local concentrations temporarily, but are not expected to violate air quality standards.

B. Hazards and Hazardous Materials

A less than significant impact to the public or the environment is anticipated. The Project is included on a list of hazardous materials sites (Cortese List) compiled pursuant to Government Code Section 65962.5 (California Environmental Protection Agency, 2010) because it has a cleanup and abatement order. The Project will provide for the treatment of groundwater that is contaminated with perchlorate, volatile organic compounds, and hexavalent chromium. Project activities will not create a significant hazard to the public or the environment. Onsite source areas are characterized to the extent practicable, and should not be disturbed during construction of the extraction wells and associated conveyance systems.

C. Hydrology and Water Quality

The Project is being conducted in accordance with the requirements set forth in the Water Board's CAO No. R3-2009-0015 and a pending WDR for recharge of treated groundwater. The GETS will extract groundwater from Units 1 and 3, treat groundwater to remove perchlorate, VOCs and CrVI to levels below the limits set by the pending WDR Permit, and the treated water will be recharged to the Unit 5 aquifer. ReInjection of this treated groundwater is consistent with the policy of 'maximum benefit of the people of the state' in accordance with State Resolution No. 68-16 (Anti-Degradation Policy), and as agreed to by the Water Board. The treated groundwater will be re-injected into Unit 5, which has poor water quality (high dissolved solids and mineral content). There is potential some constituents, including selenium, will increase in concentration in a limited area; therefore, there is potential to degrade water quality. However, it is less than significant, as demonstrated by Whittaker's anti-degradation analysis and Whittaker will confirm this with monitoring.



D. Noise

The Project is located in San Benito County and will be located in a lightly developed area surrounded by low-density residential, industrial, and agricultural uses. Elevated ambient noise conditions may be associated with San Juan Hollister Road, which parallels the Project Area. Sensitive noise receptors in the vicinity of the Project Area include residents along certain sections of the pipeline corridor. Construction of the Project will generally take place Monday through Friday between 7 a.m. and 7 p.m. Per the San Benito County Code, Title 25, Chapter 25.37, Article III Noise Level Standards, "temporary construction, demolition or maintenance of structures" are exempt during this time period. Therefore, noise levels will not exceed relevant noise standards.

Construction of the Project, in particular the installation of extraction wells, pipeline and reinjection well, will temporarily increase the ambient noise levels in the area. Exposure to a periodic increase in noise levels will generally be short-term. The installation of extraction wells has an estimated total duration of approximately 25 days. Construction along pipeline routes will proceed at approximately 200 feet per day, limiting the duration of noise exposure at any single location. The entire piping project is estimated to take a total of 15 days. Construction of the reinjection well has an estimated total duration of approximately 20 days. In total, the Project has an estimated total duration of six months. Following construction, operation of the Project will be passive in nature, primarily occurring underground or within the GETS onsite. The impact to sensitive receptors will be temporary during construction, over a very short duration, and therefore, no impact.

IV. FINDING

Central Coast Water Board hereby finds that the proposed project will not have a significant effect on the environment and does not require mitigation measures.



Digitally signed by John M. Robertson
DN: cn=John M. Robertson, o=State Water Resources
Control Board, ou=Central Coast Regional Board,
email=jrobertson@waterboards.ca.gov, c=US
Date: 2011.09.12 16:14:29 -07'00'

Date: September 13, 2011

for Roger W. Briggs
Executive Officer

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Ordinance\WDR\CEQA\NegDec_Sept2011.doc

