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GOVERNOR



JARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

July 9, 2019

Mr. Benny DeHghi
Honeywell International, Inc
2525 West 190th Street
Torrance, California 90504

Certified Mail
Return Receipt Required
Claim No. 7018 2290 0001 8905 2725

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9355 – FORMER BENDIX FACILITY, 11600 SHERMAN WAY, NORTH HOLLYWOOD, CALIFORNIA (FILE NO. 15-157, ORDER NO. R4-2014-0187, SERIES NO. 050, CI-9355, GLOBAL ID. WDR100001703)

Dear Mr. DeHghi:

On January 15, 2016, the Los Angeles Regional Water Quality Control Board (Regional Water Board) enrolled Honeywell International, Inc. (Discharger) under General Waste Discharge Requirements (WDR) for In-Situ Groundwater Remediation and Groundwater Re-injection, Order No. R4-2014-0187, with Monitoring and Reporting Program (MRP) No. CI-9355 for injection of treated groundwater and calcium polysulfide for groundwater remediation of volatile organic compounds and hexavalent chromium at the subject site.

The Discharger submitted the *Request for Modification to Waste Discharge Requirements Revised Monitoring and Reporting Program* (Request), dated April 15, 2019 to propose removal of monitoring requirements for off-site groundwater monitoring wells GW-12B, GW-17 and NHE-2 as off-site injection activities at injection well IW-4 were completed in March 2018. On May 23, 2019, Regional Water Board Site Cleanup staff approved the Request.

Based on our review of the monitoring reports from the First Quarter 2017 to the First Quarter 2019, the sampling results indicated that groundwater quality data have been relatively stable from pre-injection through post-injection groundwater sampling events. Therefore, off-site monitoring of groundwater quality at the locations indicated above is no longer needed and can be removed from the MRP.

The revised MRP, which incorporates the requested modification, 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 WDR100001703. Please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

IRMA MUÑOZ, CHAIR | RENEE PURDY, 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 Water 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 Water Board for GeoTracker Users dated December 12, 2011 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,


Reree Purdy
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-9355 dated July 9, 2019

cc: Ms. Linda Tuley, Stantec Consulting Services Inc.

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9355
FOR
FORMER BENDIX FACILITY
11600 SHERMAN WAY, NORTH HOLLYWOOD, CALIFORNIA

ENROLLMENT UNDER REGIONAL WATER BOARD
ORDER NO. R4-2014-0187 (SERIES NO. 050)
FILE NO. 15-157

I. MONITORING AND REPORTING REQUIREMENTS

- A. Honeywell International, Inc. (hereinafter Discharger) shall implement this Monitoring and Reporting Program (MRP) on the effective date (July 9, 2019) under Regional Water Board Order No. R4-2014-0187. The next monitoring report shall be received at the Regional Water Board by **October 30, 2019**. Subsequent monitoring reports shall be received at the Regional Water 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

- 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 Water 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 Water Board Order No. R4-2014-0187 "*Monitoring and Reporting Requirements*".

II. ON-SITE CALCIUM POLYSULFIDE INJECTION

A. Discharge Monitoring Program

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

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

B. Groundwater Monitoring Program

The injection activities started in December 2017. A groundwater monitoring program shall be implemented to evaluate impacts associated with the injection activity. Groundwater samples shall be collected from monitoring wells GW-1, GW-3, GW-7, GW-15, GW-20, GW-22, GW-31, and GW-32 (Figure 1). The Discharger shall conduct sampling events with specified schedules from all eight monitoring wells for the following groundwater parameters:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Monthly during the injection period, and quarterly after injection
Oxidation-Reduction Potential	millivolts	grab	Monthly during the injection period, and quarterly after injection
pH	pH units	grab	Monthly during the injection period, and quarterly after injection
Specific Conductivity	mS/cm	grab	Monthly during the injection period, and quarterly after injection
Temperature	°C	grab	Monthly during the injection period, and quarterly after injection
Turbidity	NTU	grab	Monthly during the injection period, and quarterly after injection
Total Organic Carbon	mg/L	grab	Monthly during the injection period, and quarterly after injection
Total Dissolved Solids	mg/L	grab	Monthly during the injection period, and quarterly after injection
Sulfate	mg/L	grab	Monthly during the injection period, and quarterly after injection
Chloride	mg/L	grab	Monthly during the injection period, and quarterly after injection

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Boron	mg/L	grab	Monthly during the injection period, and quarterly after injection
Nitrate and Nitrite	mg/L	grab	Monthly during the injection period, and quarterly after injection
Total Chromium and Hexavalent Chromium	µg/L	grab	Monthly during the injection period, and quarterly after injection
Volatile Organic Compounds	µg/L	grab	Monthly during the injection period, and quarterly after injection
1,4-Dioxane	µg/L	grab	Monthly during the injection period, and quarterly after injection

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. RE-INJECTION OF TREATED GROUNDWATER

A. Discharge Monitoring Program

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

1. Location map showing injection points used for re-injection of treated groundwater.
2. Written and tabular summary defining depth of discharge points and quantity of treated groundwater re-injected at each injection point per day and a summary describing the days on which the system is in operations.
3. The Discharger shall conduct an effluent monitoring on the treated groundwater prior to subsurface discharge. Treated groundwater samples shall be collected for the following chemical analyses:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total Dissolved Solids	mg/L	grab	Monthly
Sulfate	mg/L	grab	Monthly
Chloride	mg/L	grab	Monthly
Boron	mg/L	grab	Monthly
Hexavalent Chromium	µg/L	grab	Weekly for 6 months and monthly thereafter
Total Chromium	µg/L	grab	Monthly
Volatile Organic Compounds	µg/L	grab	Monthly
1,4-Dioxane	µg/L	grab	Monthly

B. 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 GW-10, GW-11, GW-30, and GW-34 (Figure 1). The Discharger shall conduct quarterly sampling from all four monitoring wells for the following groundwater parameters:

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

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.

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 Regional Water Board Order No. R4-2014-0187 and Monitoring and Reporting Program No. CI-9355 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

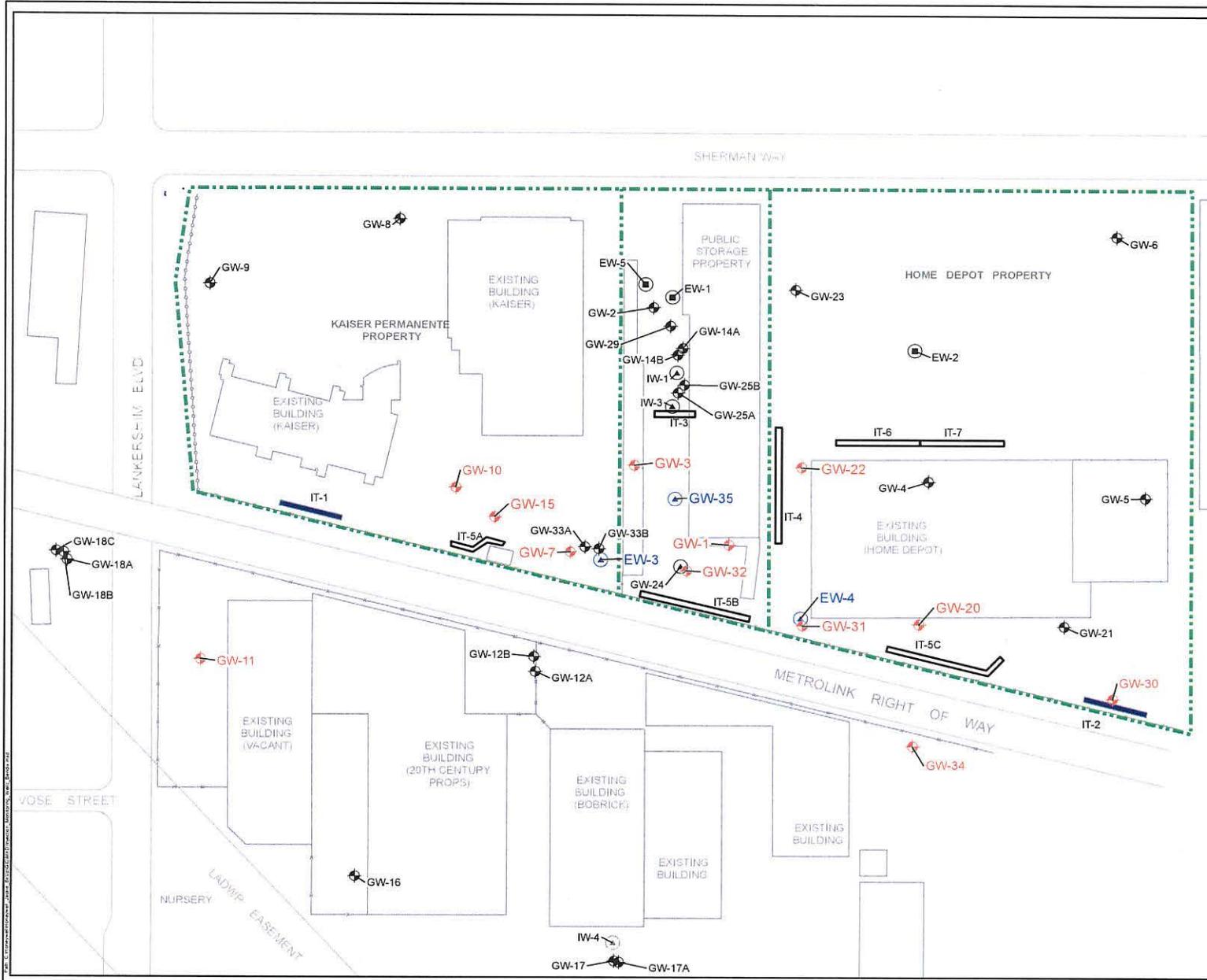
The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data in Electronic Deliverable Format, discharge location data, and searchable Portable Document Format of monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100001703.

Ordered by:



Renee Purdy
Executive Officer

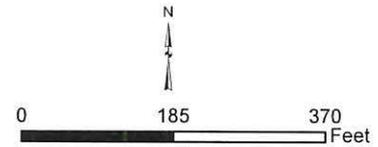
Date: July 9, 2019



Legend

- Groundwater Extraction Well
- WDR Monitoring Well for On-Site Direct Injection
- Groundwater Monitoring Well
- Injection Well for On-Site Direct Injection
- Groundwater Injection Well
- Groundwater Injection Well (inactive during reporting phase)
- North Hollywood Extraction Well
- North Hollywood Monitoring Well
- Site Boundary
- Active Injection Trench (Treated Water)
- Inactive Injection Trench
- Existing Structures

Notes:
 1. IT = Injection Trench
 2. EW = Extraction Well
 3. IW = Injection Wells



FORMER BENDIX FACILITY
 NORTH HOLLYWOOD, CALIFORNIA

**ON-SITE DIRECT INJECTION AND
 REINJECTION OF TREATED GROUNDWATER
 WDR MONITORING WELL LOCATIONS
 JUNE 2019**

FIGURE 1