



# California Regional Water Quality Control Board Los Angeles Region



Linda S. Adams  
Acting Secretary for  
Environmental Protection

320 West Fourth 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

April 4, 2011

Mr. Mark Mishler  
Chief Financial Officer  
Breeze-Eastern Corporation  
35 Melanie Lane  
Whippany, New Jersey 07981

**APPROVAL OF REQUEST FOR MODIFICATION TO WASTE DISCHARGE REQUIREMENTS FOR DISCHARGE OF TREATED GROUNDWATER AT FORMER PLACERITA CANYON FACILITY (a.k.a. SPACE ORDNANCE SYSTEMS), 25977 SAND CANYON ROAD, CANYON COUNTRY, CALIFORNIA 91351 (FILE NO. 88-02, ORDER NO. 89-16, CI-6857)**

Dear Mr. Mishler:

On February 27, 1989, the Los Angeles Regional Water Quality Control Board (Regional Board) adopted Waste Discharge Requirements (WDR) Order No. 89-16 for the disposal of treated groundwater at the former Placerita Canyon Facility in Canyon Country, California.

Quarterly groundwater monitoring has been conducted at the site for nearly 20 years. The data from groundwater samples collected from monitoring wells indicate the extent of VOCs is localized to two specific monitoring locations at the site. The groundwater data from extraction well samples collected from the main downgradient extraction well field show that VOCs have only been detected at two extraction well locations during the past five years (or before). In addition, a single extraction well located in an upgradient area of the site does not contain sufficient groundwater to be extracted or treated.

Additional studies conducted from 2002 to 2009 for the purpose of characterizing either the extent of VOC-impact groundwater or identifying potential VOC source areas did not indicate VOC-impacted groundwater to extend beyond the two localized areas or identify the presence of VOC source areas. These additional studies included a soil gas survey, a comprehensive site-wide groundwater investigation, installation of additional monitoring wells and groundwater sampling, a "hydropunch" investigation, and soil sampling.

Currently, the concentration of only one VOC at one monitoring well location exceeds its maximum contaminant level. As a result, in a letter report dated December 7, 2010, Conestoga-Rovers & Associates, on behalf of Breeze-Eastern Corporation, proposed reducing the monitoring program sampling frequency from quarterly to semi-annually and the number of sampling wells from eight to three.

The revised Monitoring and Reporting Program, which incorporates the requested modifications, is enclosed. This revised Monitoring and Report Program CI-6857 dated April 4, 2011, supersedes the monitoring and reporting program dated February 27, 1989.

Mr. Mark Mishler  
Breeze-Eastern Corporation

- 2 -

April 4, 2011

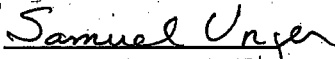
All monitoring reports should be sent to the Regional Board, ATTN: Information Technology Unit.

When submitting monitoring and technical reports to the Regional Board per these requirements, please include a reference to "Compliance File No. CI-6857", which will assure that the reports are directed to the appropriate file and staff. Also, please do not combine other reports with your monitoring report. 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.

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.

Sincerely,



Samuel Unger, P.E.  
Executive Officer

Enclosures: Revised Monitoring and Reporting Program No. CI-6857

cc: Mr. Michel Iscarous, Department of Toxic Substances Control  
Ms. Sonja Donaldson, Breeze-Eastern Corporation  
Mr. Arthur J. Zottola, Breeze-Eastern Corporation  
Mr. Craig Bloomgarden, Manatt, Phelps & Phillips, LLP  
Mr. Steven Day, Conestoga-Rovers & Associates

STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION  
MONITORING AND REPORTING PROGRAM NO. CI-6857  
FOR FORMER PLACERITA CANYON FACILITY (a.k.a. SPACE ORDNANCE SYSTEMS)  
25977 SAND CANYON ROAD, CANYON COUNTRY, CALIFORNIA 91351  
(ORDER NO. 89-16, FILE NO. 88-02)

I. REPORTING REQUIREMENTS

- A. Breeze-Eastern Corporation (hereinafter Discharger) shall implement this revised monitoring and reporting program under Regional Board Order No. 89-16. The Semi-Annual Groundwater Monitoring Report for the First Semi-Annual Monitoring Period 2011, shall be received at the Regional Board by **July 15, 2011**. Subsequent reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – June	July 15
July – December	January 15

- B. If there is no discharge or injection during the reporting period, the report shall so state. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.
- C. By March 1st of each year, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries, as applicable, of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall explain 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 (WDRs). Alternatively, the annual summary report may be incorporated into the second semi-annual monitoring report (due on January 15).
- D. 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.
- E. The method limits (MLs) employed for effluent analyses shall be at or 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 Office). 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.

April 4, 2011

- F. 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 or as specified in the approved method of analysis. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Regional Board staff.
- G. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Public Health 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.
- H. 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 the 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.
- I. 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.
- J. 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.
- 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.

## II. EFFLUENT MONITORING PROGRAM

The Discharger shall conduct effluent monitoring at the site. A representative sample shall be collected from the established Main (Area II) Treatment System effluent sampling station. The Main (Area II) Treatment System effluent shall be monitored for the duration of its operation in accordance with the following effluent monitoring program:

CONSTITUENT	ANALYTICAL METHOD	UNITS	MINIMUM FREQUENCY OF ANALYSIS
Benzene	EPA 8260B	µg/L	Semi-Annual
1,1-Dichloroethane	EPA 8260B	µg/L	Semi-Annual
1,2-Dichloroethane	EPA 8260B	µg/L	Semi-Annual
1,1-Dichloroethene	EPA 8260B	µg/L	Semi-Annual
Tetrachloroethene	EPA 8260B	µg/L	Semi-Annual
1,1,1-Trichloroethane	EPA 8260B	µg/L	Semi-Annual
Toluene	EPA 8260B	mg/L	Semi-Annual
Trichloroethene	EPA 8260B	mg/L	Semi-Annual
trans-1,2-Dichloroethene	EPA 8260B	mg/L	Semi-Annual
cis-1,2-Dichloroethene	EPA 8260B	mg/L	Semi-Annual
Xylenes	EPA 8260B	mg/L	Semi-Annual
Total Flow	In situ	gal/day	Semi-Annual <sup>1</sup>

<sup>1</sup> Total flow reported in units of gallons per day will be a calculated value derived from by dividing the total flow (in gallons) since the last monitoring event by the number of days since the last monitoring event.

### III. INFLUENT MONITORING PROGRAM

The Discharger shall conduct influent monitoring at the site. A representative sample shall be collected from the established Main (Area II) Treatment System influent sampling station. The Main (Area II) Treatment System influent shall be monitored for the duration of its operation in accordance with the following influent monitoring program:

CONSTITUENT	ANALYTICAL METHOD	UNITS	MINIMUM FREQUENCY OF ANALYSIS
Benzene	EPA 8260B	µg/L	Semi-Annual
1,1-Dichloroethane	EPA 8260B	µg/L	Semi-Annual
1,2-Dichloroethane	EPA 8260B	µg/L	Semi-Annual
1,1-Dichloroethene	EPA 8260B	µg/L	Semi-Annual
Tetrachloroethene	EPA 8260B	µg/L	Semi-Annual
1,1,1-Trichloroethane	EPA 8260B	µg/L	Semi-Annual
Toluene	EPA 8260B	mg/L	Semi-Annual
Trichloroethene	EPA 8260B	mg/L	Semi-Annual
trans-1,2-Dichloroethene	EPA 8260B	mg/L	Semi-Annual
cis-1,2-Dichloroethene	EPA 8260B	mg/L	Semi-Annual
Xylenes	EPA 8260B	mg/L	Semi-Annual
Total Flow	In situ	gal/day	Semi-Annual <sup>1</sup>

<sup>1</sup> Total flow reported in units of gallons per day will be a calculated value derived from by dividing the total flow (in gallons) since the last monitoring event by the number of days since the last monitoring event.

IV. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from groundwater monitoring wells PMW-3A, PMW-7, and PMW-15 to monitor groundwater quality at the site. Groundwater shall be monitored in accordance with the following groundwater monitoring program:

CONSTITUENT	ANALYTICAL METHOD	UNITS	MINIMUM FREQUENCY OF ANALYSIS
Benzene	EPA 8260B	µg/L	Semi-Annual
1,1-Dichloroethane	EPA 8260B	µg/L	Semi-Annual
1,2-Dichloroethane	EPA 8260B	µg/L	Semi-Annual
1,1-Dichloroethene	EPA 8260B	µg/L	Semi-Annual
Tetrachloroethene	EPA 8260B	µg/L	Semi-Annual
1,1,1-Trichloroethane	EPA 8260B	µg/L	Semi-Annual
Toluene	EPA 8260B	mg/L	Semi-Annual
Trichloroethene	EPA 8260B	mg/L	Semi-Annual
trans-1,2-Dichloroethene	EPA 8260B	mg/L	Semi-Annual
cis-1,2-Dichloroethene	EPA 8260B	mg/L	Semi-Annual
Xylenes	EPA 8260B	mg/L	Semi-Annual
Total dissolved solids (TDS)	EPA 160.1	mg/L	Semi-Annual
Sulfate	EPA 300	mg/L	Semi-Annual
Chloride	EPA 300	mg/L	Semi-Annual
Boron	EPA 6010B	mg/L	Semi-Annual
Depth to Groundwater	In situ	Feet, below top of casing	Semi-Annual <sup>2,3</sup>

<sup>2</sup> Groundwater elevation will be calculated from depth to groundwater (measured in feet below top of casing) and the reference elevation (in feet above mean sea level) at top of casing.

<sup>3</sup> In addition to PMW-3A, PMW-7, and PMW-15, water levels will be recorded at monitoring locations PMW-2, PMW-3, PMW-5BR, PMW-6, PMW-11, and PMW-14 during semi-annual monitoring events for the purpose of estimating groundwater flow direction.

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. Semi-annual observation of groundwater levels recorded to 0.01 feet above mean sea level and groundwater flow direction

V. MONITORING FREQUENCIES

Monitoring frequencies may be adjusted to a less frequent basis or parameters may be modified by the Executive Officer if the Discharger makes a request and the Executive Officer determines that the request is adequately supported by statistical trends of monitoring data submitted.

VI. CERTIFICATION STATEMENT

Each report shall contain the following declaration:

"I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on the \_\_\_\_ day of \_\_\_\_\_ at \_\_\_\_\_.

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

\_\_\_\_\_  
(Title)"

VII. PUBLIC DOCUMENTS

These records and reports 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.

VIII. Electronic Submittal of Information (ESI) to GeoTracker

The Discharger shall submit all reports required under this MRP, including groundwater monitoring data, to the State Water Resources Control Board GeoTracker database, in addition to submitting hard copies to the Regional Board office, Information Technology Unit. Once the Discharger demonstrate 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, P.E.  
Executive Officer

Date: April 4, 2011