

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

2019090369

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street,
Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Brownfields and Environmental Restoration
Program
9211 Oakdale Avenue
Chatsworth, CA 91311

Project Title: Former Northrop Grumman System Corporation East Complex Facility, West of Crenshaw Boulevard Parcel - Interim Measures Work Plan for Chemical Milling Area Ground Water

Project Location: One Northrop Avenue, Hawthorne, CA. 90250

County: Los Angeles

Project Description:

The Department of Toxic Substances Control (DTSC) pursuant is proposing the approval of the "Interim Measures Work Plan, Chem Mill Area, Former East Complex, Northrop Grumman Systems Corporation (NGSC Site), Hawthorne, California", dated May 20, 2017 (IM Workplan). This Interim measure (IM) will remediate volatile organic compounds (VOCs) present in ground water within the Bellflower B-Horizon zone ground water aquifer utilizing enhanced in situ bioremediation (EISB) with a biorecirculation system beneath Chem Mill Area. The VOCs consist of trichloroethene (TCE), tetrachloroethene (PCE), and 1, 1-dichloroethene [1, 1-DCE, which is a daughter product of 1, 1, 1-trichloroethane (TCA)]. The primary VOC of concern is PCE.

The project activities consist of the installation of (8) injection wells, (6) extraction wells, and (6) additional monitoring wells along with the construction of a conveyance system, and the modification of an existing amendment injection/treatment trailer. The modification will allow for semi-automated extraction, amendment of extracted water with electron donor (sodium lactate), and commercially available bioaugmentation cultures. The amended ground water will then be reinjected at the NGSC Site.

Background:

Overall, the former Northrop Facility encompassed approximately 110 acres which has been reduced by parcelization and redevelopment. At present it is surrounded by asphalt-paved parking area, railroad tracks, and commercial, industrial, and residential developments. The nearest residential area is approximately (150) yards away. The Chem Mill Area is located in the middle portion and is currently occupied by Triumph Aerospace Structures (Triumph). Prior to Northrop acquisition and development of the site, it was used for agriculture. The Chem Mill Area was previously used for the painting and sealing of aircraft parts and chemical milling of aircraft skin. Chemical milling is a process that includes coating, etching, dipping, and stripping of parts. It was performed in two buildings between 1963 and 1991 which have since been demolished. Chemicals used in the chemical milling process included metals (aluminum, magnesium, titanium), acids, bases, petroleum and chlorinated solvents (primarily PCE), maskants, fuel, and corrosion-inhibiting oils. When the Chem Mill Area was in operation, "process fluids" were collected in a sump at one building and routed via subsurface piping to a clarifier located adjacent to another building. A series of 1500-gallon underground storage tanks (USTs) and associated piping existed within the Area.

Corrective action is being conducted in accordance with a 2003 Resource Conservation and Recovery Act (RCRA) Corrective Action Consent Agreement between Northrop Grumman System Corporation (NGSC). Soil and groundwater investigations revealed significant contamination. Northrop has previously implemented focused interim measures at the Chem Mill Area through excavating soils and extracting soil vapor using a soil vapor extraction system. The current proposed project activities are an expansion of

the successful pilot EISB system at the Plant 1 Area to address groundwater contamination in the Bellflower Zone B mostly beneath the Chem Mill Area.

Project Activities:

- 1) Four (4) shallow injection wells will be installed as part of the in-ground portion of the EISB system;
- 2) Four (4) deep injection wells will be installed as part of the in-ground portion of the EISB system;
- 3) Six (6) extraction wells will be installed as part of the in-ground portion of the EISB system;
- 4) One (1) new shallow monitoring well will be installed to supplement select existing wells for monitoring the performance of the EISB system;
- 5) Three (3) new A-B Confining Unit monitoring wells will be installed to supplement select existing wells for monitoring the performance of the EISB system;
- 6) The above-ground portion of the EISB will include a construction of a conveyance system and modification of an existing amendment injection/treatment trailer-mounted system. Operation will consist of extraction, amendment of extracted water with electron donor (sodium lactate) and commercially available bioaugmentation cultures (i.e. KB-1™), and reinjection of the amended ground water at the Chem Mill area;
- 7) The operation of the EISB system will be accompanied by periodic performance monitoring of VOC concentrations in ground water as measured in the system influent, extraction wells, and individual groundwater monitoring wells;
- 8) When site-derived VOC concentrations in ground water beneath the Chem Mill area have decreased below system-specific EISB performance measures for treatment effectiveness, the achieved groundwater concentrations will be evaluated against Los Angeles Regional Water Quality Control Board Basin Plan goals for constituents such as PCE. If these were not achieved, additional measures will be evaluated in the final remedy selection process; and
- 9) Site Activities will be conducted in accordance with a site-specific Health and Safety Plan that complies with Title 8, California Code of regulations, Section 5192.

The operations and testing of the interim project is planned to continue for a 3-5 year duration.

Name of Public Agency Approving Project: Department of Toxic Substances Control
Brownfields and Environmental Restoration Program-
Chatsworth Office

Name of Person or Agency Carrying Out Project: Northrop Grumman Systems Corporation

Exemption Status: (check one)

- Ministerial [PRC, Sec. 21080(b) (1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
- Categorical Exemption: Class 30; Section 15330]
- Statutory Exemptions: [State code section number]

Exemption Title: Minor Actions Taken to Prevent, Minimize, Stabilize, Mitigate, or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substance.

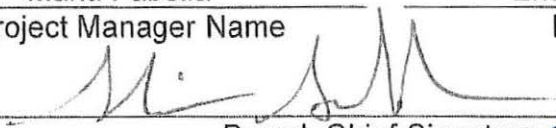
Reasons Why Project is Exempt:

1. The project is a minor action designed to prevent, minimize, stabilize, mitigate or eliminate the release or threat of release of hazardous waste or hazardous substances;
2. The project does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit or the relocation of residences or businesses, and does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 25123; and
3. The exceptions pursuant to California Code of Regulations, title. 14, § 15300.2 have been addressed as follows:
 - Cumulative Impact. The project will not result in cumulative impacts because it is designed to be a short-term, final remedy that would not lead to a succession of projects of the same type in the same place over time;
 - Significant Effect. The environmental safeguards and monitoring procedures that are enforceable and made a condition of project approval will prevent unusual circumstances from occurring so that there is no possibility that the project will have a significant effect on the environment;
 - Scenic Highways. The project will not damage scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, because it is not located within a highway officially designated as a state scenic highway;
 - Hazardous Waste Sites. The project is not located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code; and
 - Historical Resources. The project will not cause a substantial adverse change in the significance of a historical resource because there are none at the Site.

Evidence to support the above reasons is documented in the project file record, available for inspection at the File Room of the:

Department of Toxic Substances Control
 Brownfields and Environmental Restoration Program
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Maria Fabella

Maria Fabella	Environmental Scientist	(818) 717 - 6598
Project Manager Name	Project Manager Title	Phone #
		6/28/2019
Branch Chief Signature		Date
HAISSAM SALLUM	SUPERVISING HAZARDOUS SUBSTANCES ENGINEER II	(818) 717 - 6538
Branch Chief Name	Branch Chief Title	Phone #

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR:

Governor's Office of Planning & Research

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