

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

2019098023

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
Site Mitigation and Restoration Program
9211 Oakdale Avenue
Chatsworth, CA 91311

Project Title: Former Northrop Grumman Systems Corporation East Complex Facility Plant 1 Interim Measures Work Plan

Project Location: 3901 Jack Northrop Avenue, Hawthorne, CA 90250

County: Los Angeles

Project Description: The Department of Toxic Substances Control (DTSC) determined remedial actions were required to address volatile organic compounds (VOCs) present in ground water within the Bellflower B-Horizon perched zone beneath the Former Northrop Grumman System Plant 1. The remediation will consist of enhanced in situ bioremediation (EISB) with a biorecirculation system. The predominant VOCs to be remediated consist of trichloroethene (TCE), tetrachloroethene (PCE), and 1,1-dichloroethene (1,1-DCE). DTSC approved the Interim Measures Work Plan, Plant 1 Area Groundwater, Former East Complex Facility, West Parcel, Hawthorne California dated June 19, 2017 for the Northrop Grumman Systems Corporation (NGSC) pursuant to Section 25187 of the Health and Safety Code.

Background: The Former NGSC East Complex Facility is bounded by Prairie Avenue on the west, the Dominguez Channel on the east, Jack Northrop Avenue on the south, and the Hawthorne Municipal Airport on the north. It was first developed by NGSC in the 1940's on previous agricultural land and encompassed approximately 110 acres. The Plant 1 Area portion is approximately 45 acres with a single large building, surrounded by a large asphalt-paved parking area. The nearest residential area is approximately 200 yards to the south. Plant 1 was used to support manufacturing of military aircraft components including cutting, stamping, heat treating, quality testing, as well as cleaning and painting of aluminum aerospace components. Triumph Aerostructures occupies Plant 1 and continues to manufacture outer aircraft panels.

Corrective action is being conducted in accordance with a 2003 Resource Conservation and Recovery Act (RCRA) Corrective Action Consent Agreement between NGSC and DTSC. Soil and groundwater investigations have been conducted for 20 years revealing significant contamination. NGSC previously implemented focused interim measures at the Plant 1 Area through excavating soils and extracting soil vapor using a soil vapor extraction system.

Project Activities: The project activities are an expansion of the successful pilot EISB system at the Plant 1 Area. Twelve injection wells, sixteen extraction wells and eight additional monitoring wells along with construction of a conveyance system will be installed and modification to an existing amendment injection/treatment trailer, which had been used for the EISB pilot test to allow for semi-automated extraction of ground water and amendment. The amendment will be with electron donor (sodium lactate) and commercially available bioaugmentation cultures. The amended ground water will be reinjected at the Site. The following is a list of the specific project activities:

- 1) Install twelve injection wells as part of the in-ground portion of the EISB system.
- 2) Install sixteen extraction wells as part of the in-ground portion of the EISB system.
- 3) Install eight new monitoring wells to supplement select existing wells for monitoring the performance of the EISB system.

- 4) The above-ground portion of the EISB will include a construction of a conveyance system and modification of the existing amendment injection/treatment trailer-mounted system. Operation will consist of groundwater 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 Plant 1 area.
- 5) The operation of the EISB system will be accompanied by periodic monitoring of VOC concentrations in ground water as measured in the system influent, extraction wells, and individual groundwater monitoring wells.
- 6) When site-derived VOC concentrations in ground water beneath the Plant 1 area have decreased below acceptable groundwater levels to avoid threat of vapor migration from ground water to residential indoor air, the system will be temporarily shut down to evaluate the effectiveness. The interim goals will be based on system effectiveness, but the final cleanup goals will be the respective Maximum Contaminant Levels (MCLs) of the various COCs in ground water.
- (7) The EISB injections will continue for one year.
- (8) The interim measures project operation and maintenance, consisting of groundwater monitoring, will continue for three years. The results of the Interim Measure will be incorporated into the final long-term remedy for the overall former Facility.

In the event biological, cultural or historical resources are discovered during project activities, work will be suspended while a qualified biologist or cultural or historical resource specialist assesses the area and arrangements are made to protect or preserve any resources that are discovered. If human remains are discovered, no further disturbance will occur in the location where the remains are found, and the County Coroner will be notified pursuant to the Health and Safety Code, Chapter 2, Section 7050.5

Name of Public Agency Approving Project: Department of Toxic Substances Control

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: [CCR, Title 14, Chapter 3, Section 15330]
- ☐ Statutory Exemptions: [State code section number]
- ☐ Common Sense [CCR, Sec. 15061(b)(3)]

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

1. Reasons Why Project is Exempt: 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 will not exceed \$1 million in cost.
3. 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.
4. The exceptions pursuant to Cal. Code Regs., tit. 14, § 15300.2 have been addressed as follows:
 - Cumulative Impact. The final remedy will 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.
- Historical Resources. The project will not cause a substantial adverse change in the significance of a historical resource at the Site because there are none at the Site.

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

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