California Regional Water Quality Control Board

Los Angeles Region

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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April 3, 2007

Mr. Robert Scott
Boeing Realty Corporation
4501 Conant Street
Long Beach, CA 90808

WORK PLAN APPROVAL – ADDENDUM TO BUILDING 1/36 (PARCEL C) SOURCE-AREA GROUNDWATER IN-SITU REACTIVE ZONE PILOT STUDY WORK PLAN, BOEING REALITY CORPORATION (BRC), FORMER C-6 FACILITY, 19503 SOUTH NORMANDIE AVENUE, LOS ANGELES (SLIC NO. 410; SITE ID NO. 1846000)

Dear Mr. Scott:

We have received the *Addendum to Building 1/36 (Parcel C) Source-Area Groundwater In-Situ Reactive Zone Pilot Study Work Plan, Boeing Realty Corporation, Former C-6 Facility, Los Angeles, California*, (Work Plan Addendum) dated February 1, 2007, prepared by CDM. Soil and groundwater beneath the former facility have been impacted by various volatile organic compounds (VOCs). Two primary source areas have been identified at the Site, Former Buildings 2 and 1/36. In-Situ Enhanced Bioremediation (ISEB) Pilot Test Work Plans and General Waste Discharge Requirements (General WDR) permit, for the treatment of the Building 2 and 1/36 source area groundwater VOCs impacts in the Bellflower Aquitard, have been approved by this Regional Board. Remediation injections were initiated in the Building 2 area in 2004, however, technical difficulties prompted a review of the selected amendment and injection methods.

Based on the data collected to date, the bioremediation/bioaugmentation strategy for the Site is expected to be ISEB with recirculation. The original work plan, "*Building 1/36 (Parcel C) Source-Area Groundwater In-Situ Reactive Zone Pilot Study Work Plan, Boeing Realty Corporation, Former C-6 Facility, Los Angeles, California*" dated May 10, 2002, and approved by this Regional Board on October 29, 2002, involved batch injections of an electron donor amendment into a network of injection points in order to stimulate the bioremediation of impacted groundwater. This Work Plan Addendum modifies and supplements the original plan by adding groundwater extraction, converting to semi-continuous injections, and adding bioaugmentation. This new approach is referred to as Biorecirculation.

We have completed our review of the Work Plan Addendum and approve its implementation. In support of the amendment and bioaugmentation components of the pilot study, a request for an individual WDR permit has been submitted and is in the process of being developed for the subject site. As indicated in the Work Plan Addendum, this addendum is being submitted in place of a Remedial Action Plan (RAP), which will be submitted following the completion of the Pilot Study and the determination of the future Site remediation strategy. The pre-remediation activities will now be summarized in a Pre-Remediation Documentation Report.

If you have any questions please call me at (213) 576-6738 or email at atownsend@waterboards.ca.gov.

Sincerely,

Ana M. Townsend
Water Resources Control Engineer
Site Cleanup I Unit

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