



Los Angeles Regional Water Quality Control Board

January 15, 2016

Mr. John A. Simon
Director
Gnarus Advisors LLC
4350 North Fairfax Drive, Suite 830
Arlington, Virginia 22203

TENTATIVE ORDER – TERMINATION OF WASTE DISCHARGE REQUIREMENTS FOR BREEZE-EASTERN CORPORATION (FORMERLY SPACE ORDNANCE SYSTEMS), 25977 SAND CANYON ROAD, CANYON COUNTRY, CALIFORNIA (ORDER NO. 89-16, CI-6857, FILE NO. 88-02, GLOBAL ID WDR100000755)

Dear Mr. Simon:

On February 27, 1989, Regional Water Quality Control Board, Los Angeles Region (Regional Board) adopted Waste Discharge Requirements Order No. 89-16 (WDRs), and the associated Monitoring and Reporting Program, for Space Ordnance Systems (Division of TransTechnology Corporation) (Discharger) for the disposal of treated groundwater at the facility located at 25977 Sand Canyon Road, Canyon Country, California.

On September 17, 2015, the Discharger notified the Regional Board that the remediation project has been completed as determined by the lead agency, the California Department of Toxic Substances Control (DTSC), and there is no further waste discharged at the subject site pursuant to the WDRs.

In accordance with administrative procedures, this Regional Board, at a public meeting, will consider the enclosed tentative Order, which will terminate WDR Order No. 89-16. The meeting will be held at 9:00 a.m. on March 10, 2016, at the Metropolitan Water District of Southern California, 700 North Alameda Street, Los Angeles, California.

In order to be fully evaluated by Regional Board staff and included in the Board's agenda packet, written comments must be received at the Regional Board office by 5:00 p.m. on February 15, 2016. Failure to comply with these requirements is grounds for the Board to refuse to admit the proposed written comment or exhibit into evidence. Timely submittal of written comments is encouraged to ensure that all comments are accurately and fully included in the administrative record, that Board staff is able to provide a timely review, and that Regional Board Members have sufficient time to give full consideration to the comments and issues raised.

Mr. John A. Simon
Gnarus Advisors LLC

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January 15, 2016

If you have any additional questions, please contact the Project Manager, Mr. David Koo at (213) 620-6155 or me at (213) 576-6683.

Sincerely,



Eric Wu, Ph.D., P.E.
Chief of Groundwater Permitting Unit

Enclosure: Tentative Order No. R4-2016-XXXX, Terminating Waste Discharge Requirements

cc: Mr. Dan Grasmick, Stratus Environmental
Mr. Javier Hinosa, Department of Toxic Substances Control
Ms. Sara Vela, Department of Toxic Substances Control
Mr. Steve Arklin, Property Owner
Mr. Craig Bloomgarden, Esq. Manatt, Phelps & Phillips, LLP
Mr. Mark McMillin, Breeze-Eastern Corporation

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

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ORDER NO. R4-2016-XXXX

**TERMINATION OF WASTE DISCHARGE REQUIREMENTS
FOR DISCHARGES TO LAND/GROUNDWATER
(Breeze-Eastern Corporation, Former Space Ordnance Systems)
File No. 88-02**

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) finds:

1. On February 27, 1989, this Regional Board adopted Waste Discharge Requirements Order No. 89-16 (WDRs) and a Monitoring and Reporting Program (MRP) for Space Ordnance Systems (Division of TransTechnology Corporation) (Discharger) for the disposal of treated groundwater at the facility located at 25977 Sand Canyon Road, Canyon Country, California.
2. The California Department of Toxic Substances Control (DTSC) is the lead agency for the cleanup of the facility. Contaminated groundwater is treated through an activated carbon treatment system to remove organic pollutants. The treated groundwater is returned to the aquifer via three discharge infiltration areas in accordance with the WDRs.
3. On April 4, 2011, Regional Board staff approved a request from the Breeze-Eastern Corporation (formerly Space Ordnance Systems) to modify the MRP to reduce the groundwater monitoring frequency from quarterly to semi-annually and the number of monitoring wells from eight to three.
4. On July 28, 2015, DTSC determined that the subject site has achieved the cleanup goals in accordance with the Remedial Action Plan and no further removal/remedial action is necessary.
5. On September 17, 2015, the Discharger notified the Regional Board that the remediation project has been completed and there is no further waste discharged at the subject site pursuant to the WDRs.
6. The Discharger has been in substantial compliance with the MRP during the term of the WDRs.
7. Because all appropriate response actions have been completed, all acceptable engineering practices were implemented, and no further remedial activities are anticipated at the subject site, the Regional Board finds that WDRs Order No. 89-16 is no longer necessary and shall be terminated, except for purposes of enforcement.
8. The termination of WDRs Order No. 89-16 is exempt from the California Environmental Quality Act because the termination of WDRs and the discharge authorized by the WDRs does not have the potential for causing a significant impact on the environment. See Title 14, Cal. Code Regs. § 15061(b)(3).

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Breeze-Eastern Corporation
Former Space Ordnance Systems
Order No. R4-2016-XXXX

The Regional Board has notified the Discharger and interested agencies and persons of its intent to consider termination of WDRs Order No. 89-16 and associated MRP, and has provided them with an opportunity to submit comments. The Regional Board, in a public hearing, heard and considered all comments and testimony pertinent to the Order.

IT IS HEREBY ORDERED that Order No. 89-16 is terminated, except for enforcement purposes.

The Executive Officer of this Regional Board is authorized, and is hereby directed, to certify and submit copies of this Order to the Discharger, and to such individuals and governmental agencies that request it.

I, Samuel Unger, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region on March 10, 2016.

Samuel Unger, P.E.
Executive Officer

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