



GENESIS ENGINEERING & REDEVELOPMENT

December 18, 2020

Mr. Kevin Lin
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90015

Subject: Requests for Extension
Skypark Commercial Properties
SCP Case No. 1499

Dear Mr. Lin:

This correspondence will serve to request an extension on submission of the various required work plans and reports for the Skypark Commercial Properties investigation. Outlined below is the current status of project deliverables along with the new requested due dates.

SVE System Expansion – the October 20, 2020 letter from the RWQCB reviewing the Module II report requires expansion of the SVE system on the Hi-Shear site. This requirement is premature. As you are aware, we have replaced the SVE system and will be conducting radius of influence (“ROI”) testing on the existing vapor extraction wells. A comprehensive evaluation of the ROI of the existing network must be performed to understand where vapor is and is not being extracted from the unsaturated zone. The RWQCB letter also cites the vapor intrusion (“VI”) risk as another reason for expansion. However, indoor air sampling conducted in Building 1 indicates that there is no VI risk and a plan for sampling indoor air in the remaining buildings on the Hi-Shear site is being prepared. Since the ROI and indoor air data are critical to understanding is an expansion is necessary and if so, where expansion is necessary, we request an extension for developing an SVE expansion plan (if necessary) to after collection, analysis and interpretation of the ROI and indoor air data.

Source Area Assessment – the requirement for additional source area assessment in near borings VB-03, MW-18, and L-31 primarily cites historical data while apparently not considering vapor extraction that has occurred that have dramatically changed VOC concentrations in these areas. In addition, the rationale for additional source area assessment does not appear to take into account the recent comprehensive soil vapor sampling that was presented in the Module II report. We request that this requirement be postponed until a meeting can be scheduled with the RWQCB to discuss whether this requirement is even necessary, and if so, which potential source areas need further assessment.

ENA Plan – the November 20, 2020 RWQCB letter approving the March 6, 2020 Vapor Intrusion Response Plan requires submission of a map and plan for vapor intrusion

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assessment in the Evaluate Need for Action zone (“ENA”). However, the Decision Flow Charts are an integral part of the vapor intrusion assessment east of Crenshaw Boulevard. As our December 4, 2020 letter details, we have concerns with the conditions added to the Decision Flow Charts by the RWQCB without prior knowledge or discussion with the Responsible Parties. Therefore, we request that submission of an ENA Plan be postponed until after a meeting can be held with the RWQCB to discuss our concerns about the conditions added to the Decision Flow Charts and formal written approval by the RWQCB of the Decision Flow Charts.

Based on the discussion above, the table below provides a summary of the current and requested due dates for these deliverables.

Summary of Current and Requested Due Dates

Name of Report	Current Due Date	Request Due Date
SVE System Expansion	December 18, 2020	May 28, 2021
Source Area Assessment	December 18, 2020	Pending meeting with the RWQCB
ENA Plan	July 30, 2020	Pending written approval of the Decision Flow Charts

If you have any questions or require any additional information, please contact me by telephone at (209) 599-2004 or via email at svanderhoven@gercorp.com.

Respectfully submitted,
Genesis Engineering & Redevelopment, Inc.



Stephen J. Van der Hoven, Ph.D., P.G.
 Vice President

cc: T. Schmidt and D. Evans (Hamrick & Evans)
 J. Ly (RWQCB)