



Los Angeles Regional Water Quality Control Board

June 15, 2021

Mr. Christian Darville
Lisi Aerospace/Hi-Shear Corporation
2600 Skypark Drive
Torrance, California 90509-2975

Certified Mail
Return Receipt Requested
Claim No. 7021 0350 0001 7987 4079

Mr. Richard Doyle
Magellan Aerospace, Middletown, Inc.
2320 Wedekind Drive
Middletown, Ohio 45042-2390

Certified Mail
Return Receipt Requested
Claim No. 7021 0350 0001 7987 4086

Mr. Bailey Su
Excellon Technologies, LLC
20001 S. Rancho Way
Rancho Dominguez, California 90220

Certified Mail
Return Receipt Requested
Claim No. 7021 0350 0001 7987 4093

CT Corporation System
c/o Esterline Technologies Corporation
500 – 108th Avenue NE, Suite 1500
Bellevue, Washington 98004

Certified Mail
Return Receipt Requested
Claim No. 7021 0350 0001 7987 4109

Mr. Tim A. Goetz
Robinson Helicopter Company
2901 Airport Drive
Torrance, California 90505

Certified Mail
Return Receipt Requested
Claim No. 7021 0350 0001 7987 4116

Mr. Ward Olson
Dasco Engineering Corporation
24747 Crenshaw Boulevard
Torrance, California 90505

Certified Mail
Return Receipt Requested
Claim No. 7021 0350 0001 7987 4123

Mr. Aram Chaparyan
City Manager
City of Torrance
3031 Torrance Boulevard
Torrance, California 90503

Certified Mail
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Claim No. 7021 0350 0001 7987 4130

LAWRENCE YEE, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

SUBJECT: REVIEW OF RESPONSE TO COMMENTS – DECISION FLOW CHARTS AND ENA ZONE PLAN PURSUANT TO CALIFORNIA WATER CODE SECTION 13267

SITE: SKYPARK COMMERCIAL PROPERTIES (ASSESSOR PARCEL NO. 7377-006-906), 24701 – 24777 CRENSHAW BOULEVARD AND 2530, 2540, AND 2600 SKYPARK DRIVE, TORRANCE, CALIFORNIA (SCP NO. 1499)

Dear Mr. Darville, et al.:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board) is the state agency with primary responsibility for the protection of groundwater and surface water quality within major portions of Los Angeles and Ventura counties. To accomplish this, the Regional Water Board oversees the investigation and cleanup of discharges of waste that may affect the quality of waters of the state as authorized by the Porter-Cologne Water Quality Control Act (California Water Code [CWC], Division 7).

On April 1, 2021, the Regional Water Board required revisions to and resubmittal of the Decision Flow Charts (DFCs) prepared by Genesis Engineering & Redevelopment (GER) on behalf of Hi-Shear Corporation (HSC) for the subject site (Site) and required the submittal of a plan, sequence, and schedule for requesting access to the properties located in the current Evaluate Need for Action zone (ENA Zone Plan).

On April 30, 2021, the Regional Water Board received the technical document titled “Response to Comments: Decision Flow Charts and ENA Zone Plan” (Response Report), prepared by GER on behalf of HSC for the Site. Attached to the Response Report were the revised DFCs and the ENA Zone Plan.

Summaries of the Response Report’s revised DFCs and ENA Zone Plan followed by Regional Water Board comments and requirements are included below.

SUMMARY OF REVISED DECISION FLOW CHARTS

The four revised DFCs submitted were reflective of the comments and requirements in the Regional Water Board’s letters dated November 20, 2020 and April 1, 2021.

GER included a new DFC for raised foundation residential and commercial buildings for scenarios not otherwise covered by the mobile home DFC. The “Residential and Commercial Raised Foundation Soil Vapor and Crawl Space Decision Flow Chart” proposes the installation of soil vapor probes 5 feet below ground surface (ft-bgs) to screen the buildings for vapor intrusion (VI) risks (i.e., determine the presence of volatile organic compounds [VOCs] in the subsurface) prior to performing crawl spacing sampling. Crawl space sampling will be performed if the soil vapor concentrations of VOCs exceed their respective screening levels.

SUMMARY OF EVALUATE NEED FOR ACTION ZONE PLAN

As currently designated, the ENA Zone encompasses over 300 structures. The ENA Zone Plan focuses on prioritization and representative sampling in the response zone. The ENA Zone Plan proposed the following:

1. Designate five sectors defined by nearby soil vapor concentrations from probes in public rights of way. The sectors are located near soil vapor probe locations: VP-33, VP-34, VP-56, VP-70 and VP-71, and VP-75 and VP-76 (see attached figures 6 and 7). Each sector encompasses approximately 6 to 10 properties.
2. Select two properties (one of each type [raised foundation and slab-on grade foundation]) from each sector for VI assessment.
3. Assess a total of 10 properties in the ENA Zone for VI in accordance with the DFCs.
4. "Criteria for Ending VI Assessment" includes:
 - a. If PCE and TCE concentrations in each media are below their respective screening levels, no additional sampling will be conducted in the Accelerated Response Zone (ARZ) and ENA Zone.
 - b. DFCs will be followed based on initial and confirmation rounds of sampling. If after confirmation rounds of sampling lead to "No Additional Sampling," then no additional VI assessment will be performed in the ENA Zone.

REGIONAL WATER BOARD COMMENTS AND REQUIREMENTS

Based on the information provided in the Response Report, the Regional Water Board has the following comments and requirements:

1. The Regional Water Board approves the Response Report's five DFCs with the following note regarding the new "Residential and Commercial Raised Foundation Soil Vapor and Crawl Space Decision Flow Chart":
 - Consistent with the February 2020 "Draft – Supplemental Guidance: Screening and Evaluating Vapor Intrusion," prepared by the Department of Toxic Substances Control and the California Water Resources Control Boards (Supplemental Guidance), if crawl spaces are easily accessible from the outside of the buildings, the Regional Water Board recommends sampling the crawl space concurrently with soil vapor as it may reduce inconvenience for the occupants, reduce mobilization and sampling time for the consultant and/or subcontractors, and provide additional line(s) of evidence regarding VI.
2. The DFCs were never intended for and shall not be limited to just tetrachloroethene (PCE) and trichloroethene (TCE). Although PCE and TCE have been the primary

chemicals of potential concern (COCs) and the drivers in these investigations, other VOCs are known to have been associated with the Site.

Therefore, the DFCs may be utilized to assess VI for other VOCs associated with the Site and the COCs considered in the ENA Zone Plan shall not be limited to PCE and TCE.

3. Based on available soil vapor data to date, the following modifications shall be made to the ENA Zone Plan:
 - a. Additional sectors shall be designated near the following soil vapor probe locations:
 - i. VP-66 – in the last two sampling events, soil vapor PCE concentrations exceeded its residential screening level at 5 ft-bgs (103 micrograms per cubic meter [$\mu\text{g}/\text{m}^3$] on January 28, 2020 and $46 \mu\text{g}/\text{m}^3$ on November 28, 2020) and 15 ft-bgs ($126 \mu\text{g}/\text{m}^3$ on January 28, 2020).
 - ii. VP-69/72 – in the most recent sampling event, soil vapor PCE and TCE concentrations exceeded their residential screening levels at 5 ft-bgs ($136 \mu\text{g}/\text{m}^3$ of PCE and $50 \mu\text{g}/\text{m}^3$ of TCE).
 - iii. VP-77 – in the last two sampling events, soil vapor PCE concentrations exceeded its residential screening level at 5 ft-bgs ($63 \mu\text{g}/\text{m}^3$ on January 20, 2020 and $79 \mu\text{g}/\text{m}^3$ on November 28, 2020).
 - b. The sector addressing soil vapor probe locations VP-75 and VP-76 shall be extended to include properties to the south and across 250th Street.
 - c. The sector addressing soil vapor probe location VP-34 shall be extended to include properties located at the southeast corner of the Pennsylvania Avenue and 247th Street intersection.
4. A minimum of four properties (two of each type of property [raised foundation and slab-on grade foundation], where possible) from each sector shall be selected for VI assessment. Based on the results of these selected properties during the implementation of the ENA Zone Plan, sampling of additional properties in each sector may be warranted.
5. The “Criteria for Ending VI Assessment” in the ENA Zone Plan noted that no additional sampling will be conducted in the ARZ if PCE and TCE in each media are below their respective screening levels. The Regional Water Board does not concur with this note. While the primary COCs at the Site are PCE and TCE, other VOCs associated with the Site shall be consider prior to determination of no further sampling.

6. The “Criteria for Ending VI Assessment” in the ENA Zone Plan also noted that no additional VI assessment will be performed in the ENA Zone if all DFCs’ pathways lead to “No Additional Sampling” after confirmation sampling.

We generally concur with this statement, however, the Regional Water Board qualifies this note and reiterates that the DFCs may not address all of the possible scenarios and in those instances, the Regional Water Board, with input from the Office of Environmental Health Hazard Assessment (OEHHA) will evaluate and consider these situations on a case-by-case basis.

Additionally, if the VI assessment guided by the DFCs proceed to indoor air (IA), “No additional IA sampling” should not be considered prematurely. As stated in the Regional Water Board letter dated April 1, 2021, evaluations and calculations for cumulative risk attributable to VI should be performed in accordance with Step 3 and 4 of the Supplemental Guidance.

This above shall be applicable to both response zones (ARZ and ENA Zone).

7. The current boundaries of the ENA Zone shall not limit the investigative and/or assessment work warranted for the protection of public health. The boundaries of the response zones were intended for prioritization and organization purposes and were not intended to define any remaining scope of investigative and/or assessment work for the Site.

For example, on February 24, 2021, the Regional Water Board approved of the “Additional Soil Vapor Delineation Investigation Scope of Work” (Additional Scope), prepared by GER on behalf of HSC. The results of the Additional Scope may be considered in refining and updating the boundaries of the ENA Zone.

8. The Regional Water Board generally concurs with GER’s stepwise approach in prioritization and representative sampling of the ENA Zone.
9. Revise the ENA Zone Plan and Figure 7 – Proposed VI Assessment Sectors to reflect items 2 through 7 above and resubmit it to the Regional Water Board by **August 13, 2021**.

The above requirement for submittal of technical reports constitutes an amendment to the requirements of the California Water Code section 13267 Orders originally dated October 29, 2009 and May 12, 2020. All other aspects of the Orders originally dated October 29, 2009 and May 12, 2020, and the amendments thereto, remain in full force and effect. The required technical reports are necessary to investigate the characteristics of and extent of the discharges of waste at the site and to evaluate cleanup alternatives. Therefore, the burden, including costs, of the report bears a reasonable relationship to the need for the report and benefits to be obtained. Pursuant to section 13268 of the California Water Code, failure to submit the required technical report by the specified due date may result in civil liability administratively imposed by the Regional Water Board in an amount up to one thousand dollars (\$1,000) for each day each technical report is not received.

If you have any questions regarding this letter, please contact Mr. Kevin Lin at (213) 576-6781 or via email at kevin.lin@waterboards.ca.gov, or contact Ms. Jillian Ly, Unit IV Chief, at (213) 576-6664 or via email at jillian.ly@waterboards.ca.gov.

Sincerely,

 Digitally signed by
R Purdy
Date: 2021.06.15
13:12:29 -07'00'

Renee Purdy
Executive Officer

Attachments:

1. Figure 6 – Soil Vapor Sampling Results
2. Figure 7 – Proposed VI Assessment Sectors

cc:

Dmitriy Ginzburg, State Water Board Division of Drinking Water
Joseph Liles, Water Replenishment District
Carla Dillon, City of Lomita
Ryan Smoot, City of Lomita
Travis Van Ligten, Rutan & Tucker, LLP
Richard Montevideo, Rutan & Tucker, LLP
Sonja A. Inglin, Cermak & Inglin, LLC
Patrick L. Rendon, Lamb and Kawakami, LLP
William J. Beverly, Law Offices of William J. Beverly
Brian M. Ledger, Gordon Rees Scully Mansukhani, LLP
Thomas Schmidt, Hamrick & Evans, LLP
David L. Evans, Hamrick & Evans, LLP
Steve Van der Hoven, Genesis Engineering & Redevelopment

Legend:

- ▲ Soil Vapor Probe Location
- NF No Flow

Scale in Feet

0 125 250 500

SOIL VAPOR SAMPLING RESULTS

Evaluate Need for Action Zone Plan
Sky Park Commercial Properties
2600 Skypark Drive, Torrance, California

Designed:	CH	Project Number:	237-T-6	Figure
Drawn:	DH	File:	237T6_3	6
Checked:	SV	Revision:	xxxxx	Date: 04/20/21

GENESIS ENGINEERING & REDEVELOPMENT
115 S. School Street · Lodi, CA 95240
Tel: 209.599.2004 · Fax: 209.433.3990
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VP-32
NF

VP-33
Sampling Date 1/30/20 11/28/20
PCE (µg/m³) 60 <8
TCE (µg/m³) <8 <8

VP-34
Sampling Date 1/28/20 11/28/20
PCE (µg/m³) 82 50
TCE (µg/m³) <8 8

VP-35
Sampling Date 1/23/20 11/28/20
PCE (µg/m³) 356 191
TCE (µg/m³) 824 334

VP-61
Sampling Date 1/28/20 11/28/20
PCE (µg/m³) 103 <8
TCE (µg/m³) <8 <8

VP-62
Sampling Date 1/29/20
PCE (µg/m³) 741
TCE (µg/m³) 14,900

VP-63
Sampling Date 1/30/20 11/28/20
PCE (µg/m³) 6,070 878
TCE (µg/m³) 1,300 30,100

VP-64
Sampling Date 1/29/20
PCE (µg/m³) 69
TCE (µg/m³) 963

VP-65
Sampling Date 1/23/20 11/28/20
PCE (µg/m³) 25 115
TCE (µg/m³) <8 256

VP-66
Sampling Date 1/28/20 11/28/20
PCE (µg/m³) 103 46
TCE (µg/m³) <8 <8

VP-67
Sampling Date 1/29/20
PCE (µg/m³) 18
TCE (µg/m³) 69

VP-68
Sampling Date 1/29/20
PCE (µg/m³) <8
TCE (µg/m³) 7

VP-69/72
Sampling Date 1/31/20 11/28/20
PCE (µg/m³) <8 340
TCE (µg/m³) <8 50

VP-70
Sampling Date 1/20/20 11/28/20
PCE (µg/m³) <8 45
TCE (µg/m³) <8 <8

VP-71
Sampling Date 1/20/20 11/28/20
PCE (µg/m³) 26 <8
TCE (µg/m³) <8 <8

VP-74
Sampling Date 1/20/20 11/28/20
PCE (µg/m³) 15 <8
TCE (µg/m³) <8 <8

VP-75
Sampling Date 1/30/20 11/28/20
PCE (µg/m³) 47 54
TCE (µg/m³) <8 <8

VP-76
Sampling Date 1/21/20 11/28/20
PCE (µg/m³) 32 44
TCE (µg/m³) <8 <8

VP-77
Sampling Date 1/20/20 11/28/20
PCE (µg/m³) 63 79
TCE (µg/m³) <8 <8

VP-73
Sampling Date 1/20/20 11/28/20
PCE (µg/m³) <8 <8
TCE (µg/m³) <8 <8

VP-38
Sampling Date 1/23/20 11/28/20
PCE (µg/m³) 199 <8
TCE (µg/m³) 41 <8

VP-27
Sampling Date 1/21/20
PCE (µg/m³) 27
TCE (µg/m³) <8

Attachment 2

