



GAVIN NEWSOM  
GOVERNOR



JARED BLUMENFELD  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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## Los Angeles Regional Water Quality Control Board

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November 15, 2021

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7020 3160 0000 7679 8653**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7020 3160 0000 7679 8660**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7020 3160 0000 7679 8677**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7020 3160 0000 7679 8684**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7020 3160 0000 7679 8691**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7020 3160 0000 7679 8707**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7020 3160 0000 7679 8714**

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LAWRENCE YEE, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

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**SUBJECT: REVIEW OF SOIL VAPOR MONITORING WORK PLAN, PURSUANT TO CALIFORNIA WATER CODE SECTION 13304 CLEANUP AND ABATEMENT ORDER NO. R4-2021-0079**

**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 (Los Angeles 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 Los Angeles 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).

In a letter, dated February 24, 2021 (Letter), the Los Angeles Water Board conditionally approved the “Additional Soil Vapor Delineation Investigation Scope of Work,” dated November 13, 2020, prepared by Genesis Engineer & Redevelopment (GER) on behalf of Hi-Shear Corporation (Hi-Shear), for the subject site (Site). The Letter required submittal of tri-annual soil vapor monitoring reports for the network of soil vapor probes east of Crenshaw Boulevard; this requirement is consistent with the Cleanup and Abatement Order No. R4-2021-0079 (Order), issued on June 18, 2021. As required in the Order, the first, second, and third tri-annual soil vapor monitoring reports shall be submitted to the Los Angeles Water Board by May 15, September 15, and January 15 of each year, respectively.

On May 10, 2021, the Los Angeles Water Board received the technical document titled “Soil Vapor Monitoring Work Plan” (SVMWP), prepared by GER on behalf of Hi-Shear for the Site. On September 15, 2021, the Los Angeles Water Board received a letter titled “Extension Request for Groundwater Monitoring and Soil Vapor Monitoring Report” (Extension Request), prepared by GER on behalf of Hi-Shear for the Site.

Brief summaries of the SVMWP and the Extension Request followed by Los Angeles Water Board comments and requirements are included below.

## **SUMMARY OF SOIL VAPOR MONITORING WORK PLAN**

The SVMWP proposed the following:

1. Monitor soil vapor probes installed at 5 and 15 feet below ground surface (ft-bgs). The soil vapor probes include VP-33 through VP-35, VP-38, VP-56, VP-61 through VP-71, and VP-75 through VP-77 (see attached Figure 1).

- a. Analyze soil vapor samples for volatile organic compounds (VOCs) by EPA Method 8260B using a mobile laboratory.
2. Exclude the following soil vapor probes from the monitoring program:
  - a. VP-73 and VP-74 – Tetrachloroethene (PCE) and trichloroethene (TCE) have not been detected above screening levels
  - b. VP-55, VP-57, and VP-59 – PCE and TCE have not been detected in the 5 and 15 ft-bgs soil vapor probes and are outside of the designated response zone.
  - c. Soil vapor probes located on private properties.
3. Reduce the soil vapor monitoring frequency from tri-annual to semi-annual.
  - a. To account for seasonal variations and long-term trends.
  - b. To be 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).
4. Collect soil vapor samples in June and December and submit reports on July 31<sup>st</sup> and January 31<sup>st</sup>, respectively.
5. Discontinue the soil vapor monitoring program upon completion of the activities associated with the Vapor Intrusion Response Plan (VIRP).
6. Incorporation of additional and/or future soil vapor probe(s) into the monitoring program will be made in consultation with the Los Angeles Water Board as an addendum to the monitoring program.

## **SUMMARY OF EXTENSION REQUEST**

The Extension Request responds to the tri-annual groundwater and soil vapor monitoring requirements of the Order and requests an extension to submit the soil vapor monitoring and groundwater monitoring report. This letter addresses the soil vapor monitoring report. The groundwater monitoring report will be addressed under separate cover.

The reason provided for the requested time extension is that more time is needed for the Dischargers to come to an agreement as to how to comply with the Order’s requirement, and for the Los Angeles Water Board to consider and respond to the SVMWP.

## LOS ANGELES WATER BOARD COMMENTS AND REQUIREMENTS

The Los Angeles Water Board has the following comments and requirements:

1. The SVMWP is conditionally approved with the following comments to be incorporated into the work plan implementation:
  - a. The boundaries of the response zones (i.e., Accelerated Response Zone [ARZ] and Evaluate Need for Action Zone [ENA Zone]) were designated as a means of referring to various areas and prioritizing work. They are not intended to be fixed boundaries for the soil vapor monitoring network. Additional soil vapor probes may be added to the soil vapor monitoring network, including in areas outside of those zones, as new data is collected and evaluated.
  - b. Soil vapor probes VP-55, VP-57, VP-59, VP-73, and VP-74 shall be included in the monitoring program. Their low PCE and TCE soil vapor detections, or a lack thereof for some probes, continue to serve as known lateral extents of the soil vapor plume. Additionally, soil vapor probes VP-55, VP-57, and VP-59 have only been sampled once, and VP-73 and VP-74 have previously detected PCE at or above its residential screening level in the 5 ft-bgs and/or 15 ft-bgs probes.
  - c. The soil vapor monitoring program is a requirement of the Order that is independent of the tasks and actions associated with the VIRP. The soil vapor monitoring program shall not be discontinued or halted without prior written approval from the Los Angeles Water Board.
  - d. All laboratory reporting limits for each VOC analyte shall be sufficiently low to continue to adequately evaluate and assess risk.
2. The Los Angeles Water Board approves the Extension Request and the semi-annual soil vapor monitoring schedule proposed in the SVMWP as follows:
  - a. Beginning the second half of 2021, semi-annual soil vapor monitoring reports are due to the Los Angeles Water Board according to the schedule listed below:

Sampling Month	Report Due Date
June	July 31
December	January 31

The first semi-annual soil vapor monitoring report is due **January 31, 2022**.

The revisions to Attachment B Revised Time Schedule of Order (attached) constitute an amendment to the requirements of Cleanup and Abatement Order No. R4-2021-0079 originally dated June 18, 2021. All other aspects of the Order No. R4-2021-0079 originally dated June 18, 2021, and the amendments thereto, remain in full force and effect. Pursuant to section 13350 of the California Water Code, failure to comply with the requirements of Order No. R4-2021-0079 by the specified due date, including date(s) in this amendment, may result in civil liability administratively imposed by the Los Angeles Water Board in an amount up to five thousand dollars (\$5,000) for each day of failure to comply.

**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](mailto: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](mailto:jillian.ly@waterboards.ca.gov).**

Sincerely,

**Hugh  
Marley**  
 Digitally signed by  
Hugh Marley  
Date: 2021.11.15  
11:30:40 -08'00'

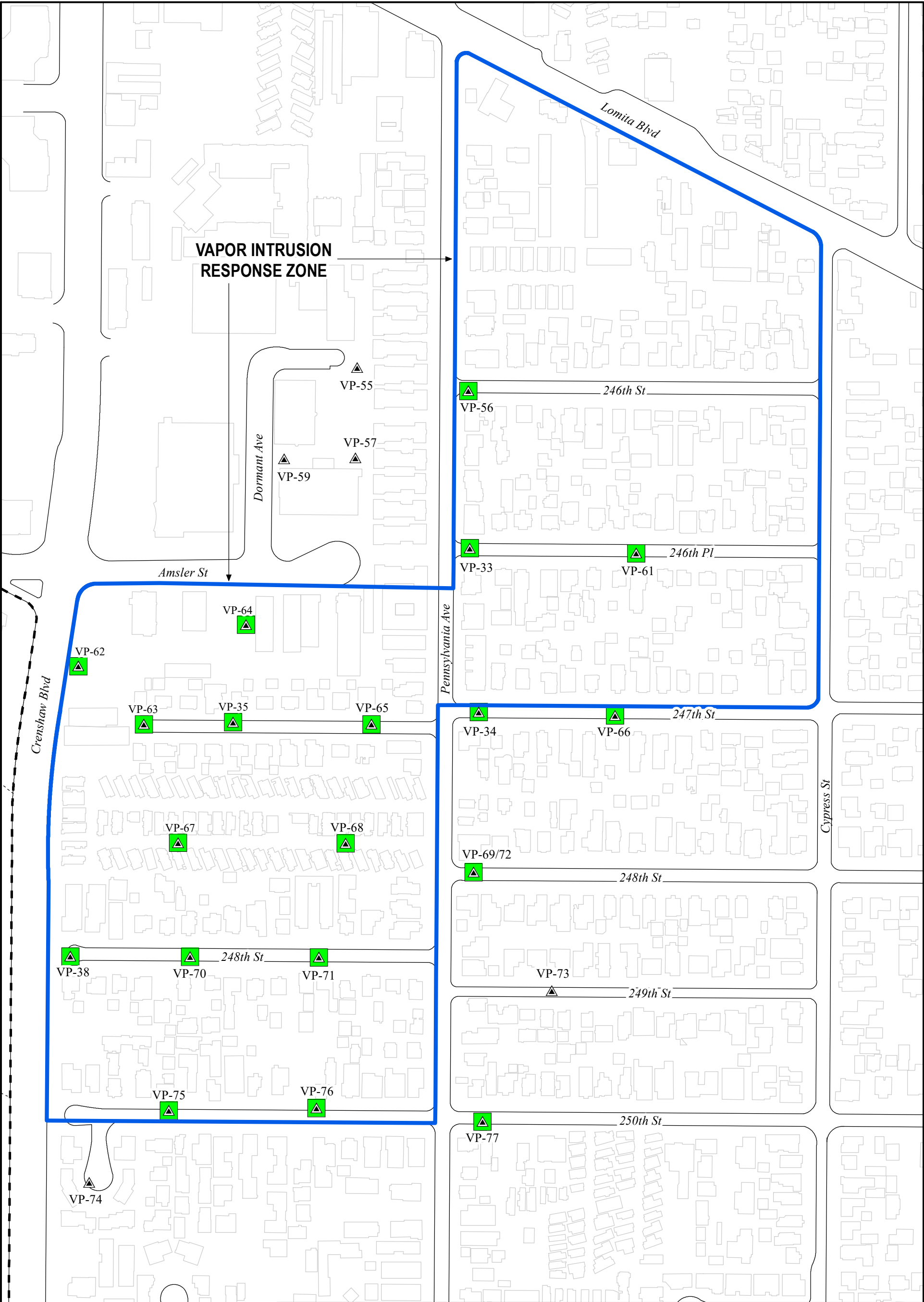
Renee Purdy  
Executive Officer

Attachments:

1. Figure 1 – Soil Vapor Probe Locations, Soil Vapor Monitoring Work Plan
2. Attachment B Revised Time Schedule of Order
3. Attachment B Revised Time Schedule of Order (underline/strikeout version)

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  
Trevor Rusin, City of Lomita  
Travis Van Ligten, Rutan & Tucker, LLP  
Richard Montevideo, Rutan & Tucker, LLP  
Alan Fenstermacher, Rutan & Tucker, LLP  
Tim Wood, GSI Environmental Inc.  
Peter Scaramella, GSI Environmental Inc.  
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
- Soil Vapor Probe Included in the Monitoring Plan



**GENESIS ENGINEERING & REDEVELOPMENT**  
115 S. School Street · Lodi, CA 95240  
Tel: 209.599.2004 · Fax: 209.433.3990  
www.gercorp.com

**SOIL VAPOR PROBE LOCATIONS**  
Soil Vapor Monitoring Work Plan  
Hi-Shear Corporation  
2600 Skypark Drive, Torrance, California

Designed:	SV	Project Number:	237-X-1	Figure 1
Drawn:	DH	File:	237X1_1	
Checked:	SV	Revision:	xxxxx	Date: 04/19/21

**ATTACHMENT B: REVISED TIME SCHEDULE OF ORDER**

DIRECTIVE	DUE DATE
<p><b>1. Site Conceptual Model:</b></p> <p>The Dischargers shall prepare and submit to the Regional Board a Site Conceptual Model which provides details on and illustrates waste discharge scenario(s), geology and hydrogeology, waste constituent fate and transport in soil, soil vapor, and groundwater, distribution of waste constituents, exposure pathways, sensitive receptors and other relevant information.</p> <p>[Note that the Regional Board may require revisions to the Site Conceptual Model as necessary to complete the Model.]</p>	<p>Site Conceptual Model due <b>September 10, 2021.</b></p> <p>Revisions due within 60 days of receiving directive from the Regional Board.</p>
<p><b>2. Risk Assessment:</b></p> <p>The Dischargers shall:</p> <ul style="list-style-type: none"> <li>a. Prepare and submit a comprehensive HHRA</li> <li>b. Prepare and submit a complete implementation report for the Vapor Intrusion Response Plan. Complete implement includes both response zones, Accelerated Response Zone and Evaluate Need for Action Zone.</li> <li>c. Submit a revised Evaluate Need for Action Zone Plan and its Figure 7 – Proposed VI Assessment Sectors</li> <li>d. Prepare and submit <b>semi-annual</b> soil vapor probe monitoring reports for the network of soil vapor probes east of Crenshaw Boulevard according to the following schedule:</li> </ul> <p><b>Monitoring Period</b> June December</p>	<p><b>September 10, 2021</b></p> <p>Implementation of the Vapor Intrusion Response Plan must be completed no later than <b>August 15, 2022.</b></p> <p><b>August 13, 2021</b></p> <p><b>Semi-annually beginning January 31, 2022</b></p> <p><b>Report Due Date</b> July 31<sup>st</sup> January 31<sup>st</sup></p>

DIRECTIVE	DUE DATE
<p><b>3. Site Assessment:</b></p> <p>a. The Dischargers shall prepare and submit Site Assessment Work Plan(s) for each Property</p> <p>The Dischargers shall implement the Site Assessment Work Plan(s) according to the approved schedule</p> <p>The Dischargers shall submit the Site Assessment Completion Report(s)</p> <p>b. Hi-Shear Corporation shall submit the Additional Scope Report</p> <p>c. Hi-Shear Corporation shall submit the Module IV Report</p> <p>d. Hi-Shear Corporation shall submit the Onsite Vertical Groundwater Investigation Report</p> <p>e. The Dischargers shall submit the Groundwater Modeling Work Plan</p>	<p><b>September 10, 2021</b></p> <p>According to the schedule approved by the Executive Officer. Vertical and lateral delineation must be completed no later than <b>September 12, 2022</b></p> <p>According to the schedule approved by the Executive Officer</p> <p><b>October 15, 2021</b></p> <p><b>October 15, 2021</b></p> <p><b>August 27, 2021</b></p> <p><b>January 7, 2022</b></p>
<p><b>4. Conduct Remedial Action:</b></p> <p>The Dischargers shall:</p> <p>a. Develop and submit the IRAP(s)</p> <p>Implement the IRAP(s)</p> <p>Prepare and submit Remediation Progress Reports for the implementation of the IRAP(s)</p> <p>b. Develop and submit the RAP(s)</p>	<p><b>August 31, 2021</b></p> <p>According to the schedule approved by the Executive Officer</p> <p>Quarterly beginning January 15 of the year implementation of the IRAP begins.</p> <p><b>March 31, 2022</b></p>



DIRECTIVE	DUE DATE
<p>Implement the RAP(s)</p> <p>Prepare and submit Remediation Progress Reports for the implementation of the RAP(s)</p> <p>Upon completion of implementation of the RAP, submit a Remedial Action Completion Report</p>	<p>According to the schedule in the RAP approved by the Executive Officer. RAP Implementation must be complete and cleanup achieved by <b>March 31, 2027</b>.</p> <p>Quarterly beginning January 15 of the year implementation of the RAP begins</p> <p>60 days after completion of implementation of the RAP</p>
<p><b>5. Groundwater Monitoring:</b></p> <p>The Dischargers shall conduct tri-annual groundwater monitoring according to Attachment C (Monitoring and Reporting Program) and the following schedule.</p> <p><b>Monitoring Period</b> January – April May – August September – December</p>	<p>The next groundwater monitoring report is due on <b>September 15, 2021</b>.</p> <p><b>Report Due Date</b> May 15th September 15th January 15th</p>
<p><b>6. Public Participation:</b> The Dischargers shall submit information and take actions addressing public participation requirements of CWC sections 13307.5 and 13307.6, including, but not limited to:</p> <ul style="list-style-type: none"> <li>a. Submit a baseline community assessment</li> <li>b. Submit an interested persons contact list</li> <li>c. Submit a draft fact sheet</li> </ul>	<p>According to the schedule approved by Executive Officer.</p> <p>According to the schedule approved by Executive Officer.</p> <p>According to the schedule approved by Executive Officer.</p>

**ATTACHMENT B: REVISED TIME SCHEDULE OF ORDER**

DIRECTIVE	DUE DATE
<p><b>1. Site Conceptual Model:</b></p> <p>The Dischargers shall prepare and submit to the Regional Board a Site Conceptual Model which provides details on and illustrates waste discharge scenario(s), geology and hydrogeology, waste constituent fate and transport in soil, soil vapor, and groundwater, distribution of waste constituents, exposure pathways, sensitive receptors and other relevant information.</p> <p>[Note that the Regional Board may require revisions to the Site Conceptual Model as necessary to complete the Model.]</p>	<p>Site Conceptual Model due <b>September 10, 2021.</b></p> <p>Revisions due within 60 days of receiving directive from the Regional Board.</p>
<p><b>2. Risk Assessment:</b></p> <p>The Dischargers shall:</p> <ul style="list-style-type: none"> <li>a. Prepare and submit a comprehensive HHRA</li> <li>b. Prepare and submit a complete implementation report for the Vapor Intrusion Response Plan. Complete implement includes both response zones, Accelerated Response Zone and Evaluate Need for Action Zone.</li> <li>c. Submit a revised Evaluate Need for Action Zone Plan and its Figure 7 – Proposed VI Assessment Sectors</li> <li>d. Prepare and submit <del>tri-annual</del><u>semi-annual</u> soil vapor probe monitoring reports for the network of soil vapor probes east of Crenshaw Boulevard according to the following schedule:</li> </ul> <p><b>Monitoring Period</b>  <del>January – April</del>  <del>May – August</del>  <del>September – December</del><u>June</u>  <u>December</u></p>	<p><b>September 10, 2021</b></p> <p>Implementation of the Vapor Intrusion Response Plan must be completed no later than <b>August 15, 2022.</b></p> <p><b>August 13, 2021</b></p> <p><del>Tri-annually beginning September 15,</del><u>2021</u><del>Semi-annually beginning January 31, 2022</del></p> <p><b>Report Due Date</b>  <del>May 15th</del>  <del>September 15th</del>  <del>January 15th</del><u>July 31<sup>st</sup></u>  <u>January 31<sup>st</sup></u></p>

DIRECTIVE	DUE DATE
<b>3. Site Assessment:</b>  a. The Dischargers shall prepare and submit Site Assessment Work Plan(s) for each Property  The Dischargers shall implement the Site Assessment Work Plan(s) according to the approved schedule  The Dischargers shall submit the Site Assessment Completion Report(s)  b. Hi-Shear Corporation shall submit the Additional Scope Report  c. Hi-Shear Corporation shall submit the Module IV Report  d. Hi-Shear Corporation shall submit the Onsite Vertical Groundwater Investigation Report  e. The Dischargers shall submit the Groundwater Modeling Work Plan	<b>September 10, 2021</b>  According to the schedule approved by the Executive Officer. Vertical and lateral delineation must be completed no later than <b>September 12, 2022</b>  According to the schedule approved by the Executive Officer  <b>October 15, 2021</b>  <b>October 15, 2021</b>  <b>August 27, 2021</b>  <b>January 7, 2022</b>
<b>4. Conduct Remedial Action:</b>  The Dischargers shall:  a. Develop and submit the IRAP(s)  Implement the IRAP(s)  Prepare and submit Remediation Progress Reports for the implementation of the IRAP(s)	<b>August 31, 2021</b>  According to the schedule approved by the Executive Officer  Quarterly beginning January 15 of the year implementation of the IRAP begins.

DIRECTIVE	DUE DATE
<p>b. Develop and submit the RAP(s)</p> <p>Implement the RAP(s)</p> <p>Prepare and submit Remediation Progress Reports for the implementation of the RAP(s)</p> <p>Upon completion of implementation of the RAP, submit a Remedial Action Completion Report</p>	<p><b>March 31, 2022</b></p> <p>According to the schedule in the RAP approved by the Executive Officer. RAP Implementation must be complete and cleanup achieved by <b>March 31, 2027</b>.</p> <p>Quarterly beginning January 15 of the year implementation of the RAP begins</p> <p>60 days after completion of implementation of the RAP</p>
<p><b>5. Groundwater Monitoring:</b></p> <p>The Dischargers shall conduct tri-annual groundwater monitoring according to Attachment C (Monitoring and Reporting Program) and the following schedule.</p> <p><b>Monitoring Period</b> January – April May – August September – December</p>	<p>The next groundwater monitoring report is due on <b>September 15, 2021</b>.</p> <p><b>Report Due Date</b> May 15th September 15th January 15th</p>
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