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## Los Angeles Regional Water Quality Control Board

March 29, 2021

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7019 2970 0001 1914 5747**

**SUBJECT: REVIEW OF TECHNICAL MEMORANDUM – RESPONSE TO COMMENTS AND REQUIREMENTS PURSUANT TO CALIFORNIA WATER CODE SECTION 13267**

**SITE: HI-SHEAR, 2600 SKYPARK DRIVE, TORRANCE, CALIFORNIA (SCP ID NO. 2042300; SCP CASE NO. 0218)**

Dear Mr. Darville:

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).

The Regional Water Board conditionally approved the “Onsite Vertical Groundwater Investigation Work Plan,” dated May 22, 2020 (Work Plan), in an amendment dated September 22, 2020 (Letter) to the CWC 13267 Order, dated October 29, 2009 for the subject site (Site). The Regional Water Board received the technical memorandum titled “Requests for Extension” (Tech Memo), dated February 11, 2021, prepared by Genesis Engineering & Redevelopment (GER) on behalf of Hi-Shear Corporation, that provides responses to the comments and requirements of the Letter.

This letter provides Regional Water Board comments to your Tech Memo summarized below. For the purposes of this letter, the summary excludes GER’s responses that are explicitly in concurrence with the comments and requirements in the Letter.

**GER Response to Comment 2 of the Letter:** Collection of reconnaissance groundwater samples at 10-foot depth intervals via low-flow centrifugal submersible pump is infeasible based on the Site’s conditions (i.e., sediment, flowing sands, heaving sands). GER

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LAWRENCE YEE, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

explained that the primary method to keep sands from flowing into the drill casing would be to introduce a head of water; however, this introduction of water would result in non-representative reconnaissance groundwater samples.

**Regional Water Board Response:** If collection of reconnaissance groundwater samples at 10-foot depth intervals via low-flow centrifugal submersible pump is infeasible based on the Site's conditions, GER and the subcontracted driller should propose alternative drilling and sampling techniques to collect depth discrete reconnaissance groundwater samples.

**GER Response to Comment 3 of the Letter:** Collection of soil samples in the unsaturated zone during the installation of groundwater monitoring wells is not warranted for the following reasons:

1. Outside the scope of work of the Regional Water Board's February 18, 2020 letter;
2. No clear definition for exhibition of photoionization detector (PID) readings for volatile organic compounds (VOCs); and
3. No definition for the type of staining that indicates the presence of VOCs

**Regional Water Board Response:** VOCs in soil above the water table have the potential to migrate into the water bearing zones; therefore, soil samples shall be collected during the installation of proposed groundwater monitoring wells, MW-42 (associated with MW-3) and MW-41 (associated with MW-18). MW-3 is located between AOPC 8 and AOPC 2, while MW-18 is located north of the former Building 5. MW-3 and MW-18 are located in and/or in the vicinity of areas that have historically been associated with historical contaminant source areas and/or potential source areas; these areas lack the environmental data to determine if there is (or is not) a secondary source potentially contributing to the vertical migration of VOCs to the underlying water bearing zones.

For the purposes of this work, PID "hits" shall be defined as any reading greater than the background (i.e., ambient air) following instrument calibration. Staining shall be defined as, but not be limited to, discoloration of soil, odors, and sheen.

Based on the abovementioned reasons and definitions, soil samples shall be collected at 10-foot intervals and submitted for laboratory analyses if PID "hits" and/or staining is observed.

**GER Response to Comment 4 of the Letter:** GER agrees that the newly installed groundwater monitoring wells should be incorporated to the monitoring network; however,

GER requests that the Regional Water Board provide comments to their "Proposed Revisions to the Groundwater Monitoring Plan," dated August 19, 2020 (Proposed Plan).

**Regional Water Board Response:** The Regional Water Board will respond to the Proposed Plan under separate cover. Any proposed changes to the groundwater monitoring program must be approved by the Regional Water Board in writing prior to implementation. The Regional Water Board's pending review and response to the Proposed Plan is not an acceptable justification for any alterations and/or deviations to the existing tri-annual groundwater monitoring program.

**GER Response to Comment 5 of the Letter:** GER contends that further vertical groundwater assessment is not warranted, and that the deep groundwater zone is being adequately monitored. There are two existing deep groundwater monitoring wells (MW-22A and CMW-11A) that have not detected VOCs above their respective screening levels in more than 15 years.

**Regional Water Board Response:** Regional Water Board acknowledges GER's response to Comment 5 of the Letter; however, additional vertical groundwater assessment will be determined following the implementation of the Work Plan and the review of available and pertinent environmental data.

**GER Response to Comment 6 of the Letter:** GER states that after receipt of written comments to this letter, the work plan will be implemented with a report submitted within 14 weeks.

**Regional Water Board Response:** The due date for the technical report documenting the implementation of the Work Plan (Report) was January 4, 2021. On February 4, 2021, Regional Water Board staff sent an email notifying you of the past due Report. The Tech Memo was submitted 38 days after the due date. Therefore, your request to submit the Report 14 weeks after receipt of written comments to the Tech Memo is denied.

Submit the Report, incorporating the above Regional Water Board Responses in this letter, to the Regional Water Board **immediately**. In responding to the Tech Memo, the Regional Water Board is not extending the original due date.

Pursuant to section 13268 of the California Water Code, failure to submit the required technical reports by the specified due dates 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](mailto:kevin.lin@waterboards.ca.gov), or 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,

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Renee Purdy  
Executive Officer

cc:

Dmitriy Ginzburg, State Water Board Division of Drinking Water  
Joseph Liles, Water Replenishment District  
Carla Dillon, City of Lomita  
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