



Los Angeles Regional Water Quality Control Board

March 1, 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 5877

**SUBJECT: NOTICE OF VIOLATION – FAILURE TO SUBMIT TECHNICAL REPORT
BY DUE DATE PURSUANT TO CALIFORNIA WATER CODE SECTION
13267 ORDER**

**SITE: HI-SHEAR, 2600 SKYPARK DRIVE, TORRANCE, CALIFORNIA (SCP ID
NO. 2042300; SCP CASE NO. 218)**

Dear Mr. Darville:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board), is the public agency with primary responsibility for the protection of groundwater and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura counties, including the above-referenced Site.

On October 29, 2009, the Regional Water Board issued a California Water Code (CWC) section 13267 Order (Order) (Attachment 1) to Hi-Shear Corporation, current operator of the Site (herein you). The Order required you to install new groundwater monitoring wells and incorporate them into the existing triannual groundwater monitoring program and submit a conceptual site model to completely assess and delineate the subsurface impacts.

On November 25, 2019, the Regional Water Board issued an amendment to the Order requiring compliance with the triannual groundwater monitoring program (Attachment 2). The amendment required the submittal of the first, second, and third triannual groundwater monitoring reports by May 15, September 15, and January 15 of each year, respectively.

On February 4, 2021, the Regional Water Board sent an email notifying you of the past due third triannual 2020 groundwater monitoring report (Report). The Regional Water Board received the Report in Table 1 below 34 days late.

LAWRENCE YEE, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

TABLE 1

Requirement	Due Date	Status
Third Triannual 2020 Groundwater Monitoring Report	January 15, 2021	Submitted on February 18, 2021. Report submitted 34 days late.

YOU ARE HEREBY NOTIFIED that you are in violation of the Investigative Order issued by the Regional Water Board Executive Officer pursuant to California Water Code section 13267 on October 29, 2009, amended on November 25, 2019, for failing to submit the technical report by its corresponding due date. You are required to immediately:

1. Ensure full compliance with the Investigative Order pursuant to CWC Section 13267.
2. Submit future triannual groundwater monitoring reports by the due dates established in the Order.

Please submit the required documents to the Regional Water Board to the attention of:

Mr. Kevin Lin, PE
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013-2343.

Compliance with the tasks listed in this Notice of Violation does not affect the Regional Water Board's authorization to take enforcement action against you for the violation noted herein. This Notice of Violation does not extend the prior deadlines listed above.

This violation may subject you to further enforcement actions, including administrative civil liabilities of up to one thousand dollars (\$1,000) for each day that you are out of compliance with the Order, pursuant to Water Code section 13268. The Regional Water Board reserves its right to take any further enforcement action authorized by law, including referring the matter to the Attorney General.

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
Hugh Marley
Date: 2021.02.25
15:46:40 -08'00'

Hugh Marley
Assistant Executive Officer

Attachments:

1. Regional Water Board CWC section 13267 Order, October 29, 2009
2. Regional Water Board Amendment to the Order, November 25, 2019

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



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

October 29, 2009

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

REQUIREMENTS FOR TECHNICAL REPORTS AFTER IMPLEMENTATION OF REVISED WORKPLAN FOR WELL INSTALLATION AT THE HI-SHEAR SITE, 2600 SKYPARK DRIVE, TORRANCE, CALIFORNIA 90509 (SITE CLEANUP PROGRAM CASE NO. 218, SITE ID NO. 2042300)

Dear Mr. Darville:

California Regional Water Quality Control Board Los Angeles Region (Water Board) is the regulatory agency responsible for oversight of subsurface soil, soil vapor, and groundwater investigations and cleanup for your Hi-Shear site located at 2600 Skypark Drive, Torrance, California. You are the responsible party for subsurface environmental investigations and cleanup at the Hi-Shear site.

On September 2, 2009, Mr. Mohammad Zaidi of the Regional Board staff had a meeting and site visit with your staff Mr. William Strayhorn and your consultant Mr. Mike Cassidy of Winefield & Associates, Inc. In the meeting, Mr. Zaidi presented our preliminary comments on the *Well Installation Work Plan* dated July 22, 2009 and required submittal of a revised Well Installation Work Plan and modifications of some proposed well locations to optimize the groundwater monitoring and soil vapor extraction. On September 30, 2009 and October 2, 2009, Winefield & Associates submitted the *Revised Well Installation Work Plan* (Revised Work Plan) and Figure 2 showing modified well locations (See Attachment 2). Regional Board staffs have reviewed and concurred with the Revised Work Plan and modified locations. You are required to implement the Revised Work Plan and submit a technical report of the investigations to the Regional Board for our review by **January 15, 2010**.

After installation of the new groundwater monitoring wells, you are required to include the wells in your triannual groundwater monitoring program, and start analyzing the groundwater samples collected from all the existing and new groundwater monitoring wells for TPH (total petroleum hydrocarbons) full scan, Title 22 metals including hexavalent chromium, and emerging chemicals [1,4-dioxane, perchlorate, nitrosodimethyl amine (NDMA), and 1,2,3-trichloropropane (1,2,3-TCP)], in addition to the volatile organic compounds (VOCs). If any of the emerging chemicals is detected in the samples, you will be required to include it in the triannual groundwater monitoring program.

You are also required to submit a conceptual site model (CSM), based on results of the previous investigations conducted at the site, to the Regional Board by **March 15, 2010** for our review. The CSM must show complete lateral and vertical extent of soil, soil gas, and groundwater contamination in the

California Environmental Protection Agency



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Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Christian Darville
Lisi Aerospace / Hi-Shear

- 2 -

October 29, 2009

impacted onsite and offsite areas of the site by all the chemicals of concern including TPH, VOCs, and Title 22 metals including hexavalent chromium. The CSM must include a 3-dimensional illustration of the potential pollutant pathways through different types of subsurface lithologies, relationship of the lithologies to contaminant concentrations, cross sections, groundwater flow directions, isoconcentration maps for significant contaminants, groundwater plume maps, and locations of all the water supply wells within one mile radius of the site as well as other receptors that may be affected by the release and migration of the contaminants to the subsurface environment.

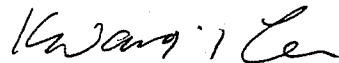
Update Document Upload in Geotracker: You are required to upload all the previous and future workplans and technical reports of site investigation and cleanup for your site in our Geotracker. Submit a list of all the above documents after uploading to the Regional Board by **December 7, 2009**.

All the above technical reports including the CSM are required to be submitted under the attached 13267 Order. Please note that effective immediately, the Regional Board requires you to include a perjury statement in all reports submitted under the 13267 orders. The perjury statement shall be signed by a senior authorized Hi-Shear/Lisi-Aerospace representative (and not by a consultant). The statement shall be in the following format:

"I [NAME], do hereby declare, under penalty of perjury under the laws of the State of California, that I am [JOB TITLE] for Hi-Shear/Lisi-Aerospace, that I am authorized to attest to the veracity of the information contained in the reports described herein, and that the information contained in [NAME AND DATE OF REPORT] is true and correct, and that this declaration was executed at [PLACE], [STATE], on [DATE]."

If you have any questions regarding this project, please contact the project manager Mr. Mohammad Zaidi at (213) 576-6732 or me at (213) 576-6734.

Sincerely,



Kwang-il Lee, Ph.D, P.E.
Chief, Site Cleanup Program Unit IV

Attachments:

1. *Requirements to Provide Technical Reports (California Water Code Section 13267 Order), Hi-Shear, 2600 Skypark Drive, Torrance, CA 90509, dated October 23, 2009*
2. Figure 2 showing Modified Well Locations

cc:

William Strayhorn, Lisi-Aerospace / Hi-Shear
Mike Cassidy, Winefield & Associates, Inc.

California Environmental Protection Agency



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Agency Secretary

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful
320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

REQUIREMENT TO PROVIDE TECHNICAL REPORTS (CALIFORNIA WATER CODE SECTION 13267¹ ORDER)

HI-SHEAR

2600 SKYPARK DRIVE, TORRANCE, CALIFORNIA 90509
(SCP NO. 218; SITE ID 2042300)

You are legally obligated to respond to this Order. Please read this carefully.

You are the responsible party identified for soil and groundwater investigation at the referenced site. Due to historical use of halogenated solvents, petroleum hydrocarbons and title 22 metals at the site, soil and groundwater beneath the site have been impacted with volatile organic compounds (VOCs), and total petroleum hydrocarbons (TPH).

Pursuant to section 13267(b) of the California Water Code (CWC), you are hereby directed to submit the following:

1. By **January 15, 2010**, a technical report describing the results of tasks performed in implementation of the Revised Well Installation Work Plan to the Regional Board.
2. By **March 15, 2010**, you are also required to submit a technical report containing a conceptual site model (CSM) to the Regional Board for our review. The CSM must show complete lateral and vertical extent of soil, soil gas, and groundwater contamination in the impacted onsite and offsite areas of the site by all the chemicals of concern including TPH, VOCs, and Title 22 metals including hexavalent chromium. The CSM must include a 3-dimensional illustration of the potential pollutant pathways through different types of subsurface lithologies, relationship of the lithologies to contaminant concentrations, cross sections, groundwater flow directions, isoconcentration maps for significant contaminants, groundwater plume maps, and locations of all the water supply wells within one mile radius of the site as well as other receptors that may be affected by the release and migration of the contaminants to the subsurface environment.
3. You are also required to revise the existing triannual groundwater monitoring program to include both the existing and new wells and start monitoring for TPH (total petroleum hydrocarbons) full scan, and Title 22 metals including hexavalent chromium. You must also start analyzing the triannual groundwater samples for emerging chemicals [1,4-dioxane, perchlorate, nitrosodimethyl amine (NDMA), and 1,2,3-trichloropropane (1,2,3-TCP)]. If any of the emerging chemicals is detected in the samples, you will be required to include it in the triannual groundwater monitoring program.

¹ California Water Code section 13267 states, in part: (b)(1) In conducting an investigation. . . , the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region . . . shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.



October 27, 2009

4. The Regional Board requires the above technical reports in order to completely assess and delineate contaminants that have come in contact with the waters of the state. Please note that effective immediately, the Regional Board requires you to include a perjury statement in all reports submitted under the 13267 orders. The perjury statement shall be signed by a senior authorized Hi-Shear/Lisi-Aerospace representative (and not by a consultant). The statement shall be in the following format:

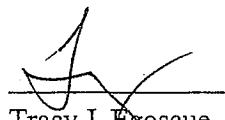
"I [NAME], do hereby declare, under penalty of perjury under the laws of the State of California, that I am [JOB TITLE] for Hi-Shear/Lisi-Aerospace, that I am authorized to attest to the veracity of the information contained in the reports described herein, and that the information contained in [NAME AND DATE OF REPORT] is true and correct, and that this declaration was executed at [PLACE], [STATE], on [DATE]."

Pursuant to section 13268(b)(1) of the CWC, failure to submit the required technical reports by the above due date may result in the imposition of civil liability penalties by the Regional Board, without further warning, of up to \$1,000 per day for each day the report is not received after the above due date.

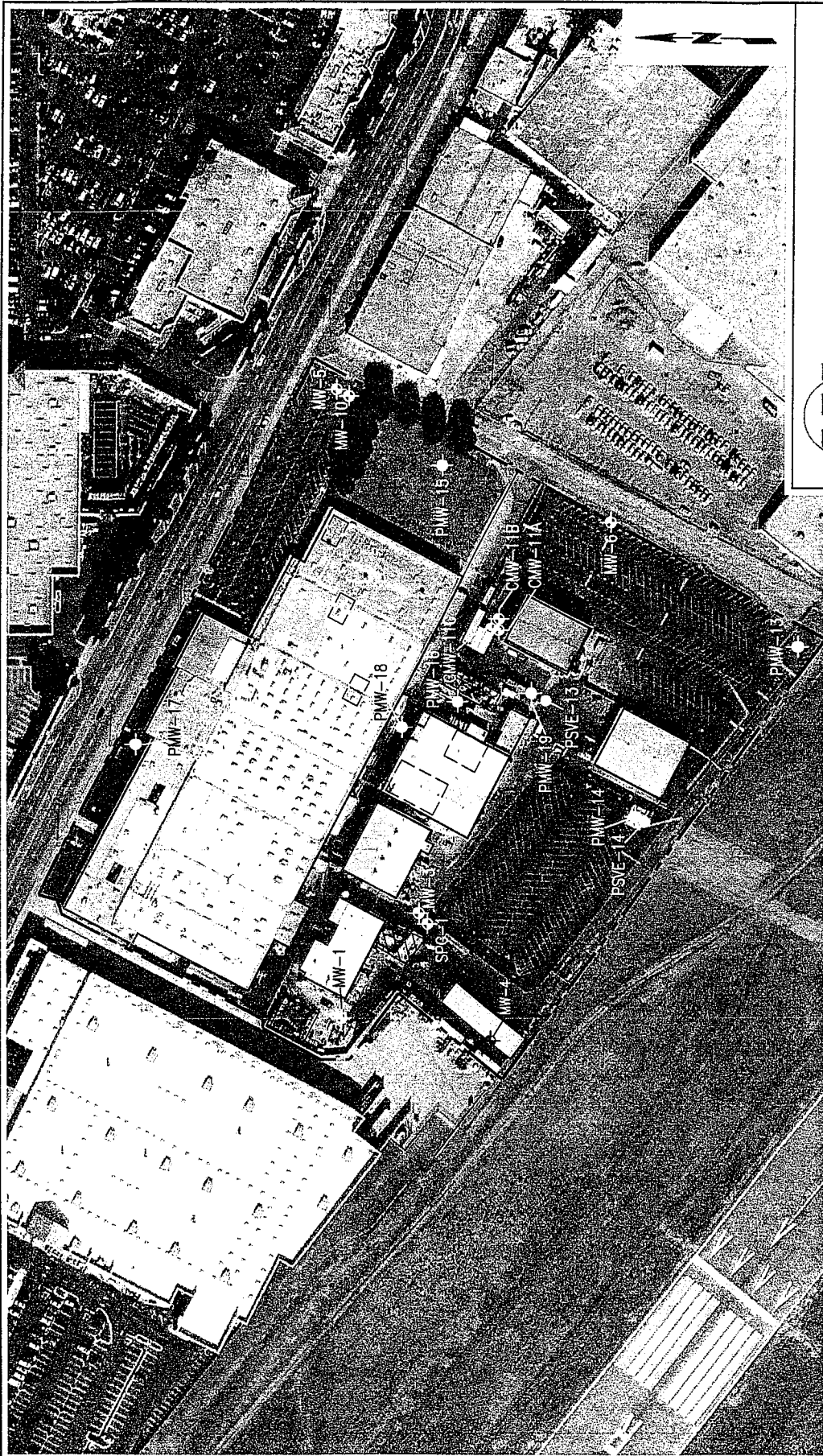
We believe that the burdens, including costs, of the reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. If you disagree and have information about the burdens, including costs, of complying with these requirements, provide such information to Mr. Mohammad Zaidi within ten days of the date of this letter so that we may reconsider the requirements.

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

SO ORDERED.


Tracy J. Egoscue
Executive Officer

October 29, 2009

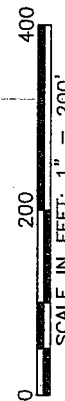



Legend

- Property Line
- Building Footprint
- Proposed Vapor Extraction Well Location
- Proposed Groundwater Monitoring Well Location
- Existing Groundwater Monitoring Well Location

Notes:

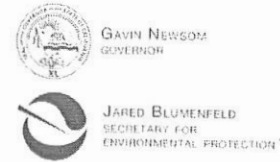
1. Site Features and Locations are Approximate. Not a Surveyed Map.
2. Georeferenced Satellite Imagery From Google Earth, Copyright 2009. Imagery Date: July 31, 2007.





WINEFIELD & ASSOCIATES, INC.
ENVIRONMENTAL AND SAFETY CONSULTANTS

DESCRIPTION	SITE PLAN		
PROJECT	LSI AEROSPACE		
LOCATION	2600 SKYPARK DRIVE TORRANCE, CALIFORNIA 90505		
JOB NO. LAP.09109	DATE 10/09	FIGURE NO. 2	



Los Angeles Regional Water Quality Control Board

November 25, 2019

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7018 2290 0002 2267 3986

SUBJECT: AMENDMENT TO THE WATER CODE SECTION 13267 ORDER DATED OCTOBER 29, 2009

SITE: HI-SHEAR CORPORATION, 2600 SKYPARK DRIVE, TORRANCE, CALIFORNIA (SCP CASE NO. 218, SITE ID NO. 2042300)

Dear Mr. Darville:

On October 29, 2009, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) issued a Water Code section 13267 Order to Hi-Shear. In an August 12, 2019 meeting held at the Regional Board office with representatives of Hamrick & Evans, LLP, Genesis Engineering and Redevelopment (GER), and Regional Board staff, additional requirements for the subject site (Site) were discussed. The August 12, 2019 meeting was followed by conference calls on August 29, 2019 and September 17, 2019. As discussed in the August 12, 2019 meeting and in the August 29, 2019 and September 17, 2019 conference calls, the Regional Board has the following additional requirements for the Site:

1. By **January 15, 2020**, submit a workplan to conduct flow and transport groundwater modeling for the onsite and offsite groundwater contaminant plumes. The groundwater modeling should predict the extent of the onsite and offsite groundwater contamination based on currently available monitoring data, determine the potential impacts of the contamination to nearby water supply wells, specifically City of Lomita Well No. 5, and plume travel/migration time to reach the water supply well.
2. Submit the first, second and third triannual groundwater monitoring reports, respectively, by **May 15, September 15, and January 15** each year. Any changes to the groundwater monitoring program must be approved by the Regional Board prior to implementation.

IRMA MUNOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

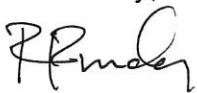
320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

3. On October 1, 2019, the Regional Board received your Waste Discharge Requirement (WDR) Termination Report stating that enhanced in-situ bioremediation (EISB) was not effective in treating the onsite groundwater volatile organic compound (VOC) plumes. Submit a groundwater remedial evaluation report (GWRER) by **January 15, 2020** that proposes the use of proven effective onsite and offsite groundwater remedial technology(ies) that can achieve the Regional Board-approved groundwater cleanup goals in a reasonable amount of time.

The above requirement for submittal of the technical reports constitutes an amendment to the requirements of the Water Code section 13267 Order originally dated October 29, 2009. All other aspects of the Order originally dated October 29, 2009, 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 reports bear a reasonable relationship to the need for the reports and benefits to be obtained. Pursuant to section 13268 of the California Water Code, failure to submit the required technical reports by the specified due date may result in civil liability administratively imposed by the Regional 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, please contact Mr. Mohammad Zaidi, Project Manager, at (213) 576-6732 or (Mohammad.Zaidi@waterboards.ca.gov), or Ms. Jillian Ly, Unit Chief, at (213) 576-6664 or (Jillian.ly@waterboards.ca.gov).

Sincerely,



Renee Purdy
Executive Officer

cc: Mr. Thomas P. Schmidt, Hamrick & Evans, LLP
Mr. Stephen Van der Hoven, Genesis Engineering & Redevelopment
Mr. Aram Chaparyan, the City of Torrance
Mr. Ryan Smoot, City Manager, the City of Lomita
Ms. Carla Dillon, the City of Lomita