



Los Angeles Regional Water Quality Control Board

October 31, 2022

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

Certified Mail
Return Receipt Requested
Claim No. 7020 2450 000 3231 8287

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

Certified Mail
Return Receipt Requested
Claim No. 7020 2450 000 3231 8270

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

Certified Mail
Return Receipt Requested
Claim No. 7020 2450 000 3231 8263

Corporate Secretary
Esterline Technologies Corporation
1301 East 9th Street, Suite 3000
Cleveland, Ohio 44114

Certified Mail
Return Receipt Requested
Claim No. 7020 2450 000 3231 8256

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

Certified Mail
Return Receipt Requested
Claim No. 7020 2450 000 3231 8249

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

Certified Mail
Return Receipt Requested
Claim No. 7020 2450 000 3231 8195

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

Certified Mail
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Claim No. 7020 2450 000 3231 8232

JAMES STAHL, ACTING CHAIR | RENEE PURDY, EXECUTIVE OFFICER

SUBJECT: REVIEW OF REVISED OFF-SITE ASSESSMENT 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).

On June 18, 2021, the Los Angeles Water Board issued Cleanup and Abatement Order No. R4-2021-0079 (Order) directing you to submit site assessment work plan(s) to assess, characterize, and delineate the extent of wastes in soil, soil vapor, and groundwater for the property(ies) you have been identified with. On September 9, 2021, the Los Angeles Water Board staff received an *Off-Site Assessment Work Plan* (Work Plan), submitted on behalf of the Hi-Shear Corporation (Hi-Shear) by Genesis Engineering & Redevelopment (GER) for review. In a letter dated June 7, 2022 (Letter), the Los Angeles Water Board determined that the scope of the work proposed in the Work Plan did not address certain data gaps on the 2700 Skypark Drive property (Lowe's Property).

On August 5, 2022, the Los Angeles Water Board received the *Revised Off-Site Assessment Work Plan* (Revised Work Plan), prepared by GER on behalf of Hi-Shear for the Site.

A brief summary of the Revised Work Plan followed by Los Angeles Water Board comments and requirements are included below.

SUMMARY OF REVISED OFF-SITE ASSESSMENT WORK PLAN

The objectives of the Revised Work Plan are to assess the south-southwestern, north-northwestern, and western extent of volatile organic compound (VOC) impacts to soil vapor on and in the vicinity of the Lowe's Property and to assess potential additional VOC sources beneath former buildings. The Revised Work Plan proposed the following:

1. Install nested soil vapor probes at 11 locations (VP-137 through VP-147) on the Lowe's Property, as shown in the attached *Figure 12 – Proposed Sampling Locations*

- a. Soil vapor probes will be installed at 5, 15, 30, 45, 65, and 75 feet below ground surface (ft-bgs). The probes are proposed to 75 ft-bgs because of concerns for rising groundwater levels in the vicinity.
2. Collect soil samples at soil vapor probe locations VP-139, VP-140, and VP-141 where there is significant reading on the photoionization detector (PID) or at the corresponding soil vapor probes' depth intervals as listed above. Analyze soil samples for VOCs.
 - a. Soil samples at VP-139 and VP-140 will provide confirmation of previous soil sampling results associated with former Building No. 10 as required by the Letter.
 - b. Soil samples at VP-141 will provide confirmation of previous soil sampling results associated with former Building No. 1 as required by the Letter.
3. GER provided its rationale for why the Letter's requirement for confirmation sampling of soil and soil vapor beneath former Building No. 12 is not warranted as follows:
 - a. *Table 4.2 – Organics and Inorganics in Soils of the Phase 3 Soils Investigation*, dated October 11, 2005 and prepared by BD Environmental, a Brian Douglas Corporation, on behalf of La Caze Development Company, indicated that total VOCs were non-detect for soil samples collected within the footprint of the former Building No. 12. Total VOCs is inclusive of tetrachloroethene, trichloroethene, and the associated degradant compounds.
 - b. Historical soil vapor location VP-5 east-adjacent to former Building No. 12 reported that total VOCs were non-detected from 10 ft-bgs to 30 ft-bgs and minimal detections (attributed to trans-1,2-dichloroethene and 1,1-dichloroethene) at 39 ft-bgs and 44 ft-bgs.
 - c. Soil vapor results from existing probes on the Lowe's Property indicate a relative concentration low near former Building No. 12.
 - d. Technical infeasibility due to access and logistical obstacles (e.g., business operation disturbance, proper clearance for drilling machinery, drilling hours limitations, etc.) and historical data's lack of VOC source(s).
4. Sample the newly installed and existing soil vapor probes on the Lowe's Property, as shown in the table below, and analyze for VOCs using a mobile laboratory.

Soil Vapor Probe	Depth (ft-bgs)
VP-1, VP-122, VP-125, VP-126, VP-127, VP-129, VP-130	5, 15, 30, 45, 65, and 85

VP-137 through VP-147	5, 15, 30, 45, 65, and 75
VP-128	5 and 15

LOS ANGELES WATER BOARD COMMENTS AND REQUIREMENTS

Based on our review, the Revised Work Plan is approved with the following comments and requirements:

1. Los Angeles Water Board staff recognizes that the Revised Work Plan is proposing to install soil vapor probes at a maximum depth of 75 ft-bgs due to concerns about the local rising groundwater levels. Soil vapor results from the newly installed soil vapor probes should not be combined with results from the existing 85 ft-bgs soil vapor probes; contours at these depths should be generated independently of one another.
2. The Revised Work Plan proposed to collect soil samples where there is a significant reading on the PID or at the proposed soil vapor probe depth intervals. Los Angeles Water Board staff is concerned with the interpretation and subjectivity of "significant" reading(s) on the PID; therefore, soil samples at VP-139, VP-140, and VP-141 shall be collected at 5-foot intervals to the total depth and soil samples from the proposed soil vapor probe depth intervals 5, 15, 30, 45, 65, and 75 ft-bgs shall be submitted for laboratory analysis of VOCs. Soil samples shall also be submitted for laboratory analysis of VOCs at any depth interval that exhibit PID readings or visual staining.
3. Los Angeles Water Board staff concurs with GER's explanation for why confirmation soil and soil vapor sampling beneath former Building No. 12 is not warranted at this time.
4. Prior to starting fieldwork, obtain all applicable permits from appropriate regulatory and local agencies, as necessary. Copies of agency-approved permits should be included in the report(s) submitted to the Los Angeles Water Board.
5. Notify the Los Angeles Water Board at least seven days before the commencement of fieldwork.
6. Submit a report, at minimum documenting the results of the soil and soil vapor investigation, field observations, laboratory data, conclusions and recommendations by **April 7, 2023**.
7. Upload the report and the required electronic submittals of information, including the soil vapor probe and/or sub-slab soil vapor probe locations and analytical data, to GeoTracker. All necessary data and parameters (e.g., sampling/field points) shall be entered into GeoTracker in accordance with the Attachment 4 of the "Public Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion,"

prepared by the Department of Toxic Substances Control and California Water Resources Control Boards dated February 2020. For your convenience, the GeoTracker Global ID for this Site is T10000014333.

Task 3 of Cleanup and Abatement Order No. R4-2021-0079 (Order) (requiring site assessment work plan[s] to delineate the extent of wastes and implementation of said work plan[s]) is the underlying requirement related to Hi-Shear's submittal. The above required modifications are necessary to ensure that the Work Plan complies with the Order, but do not amend the Order. The Order remains in full force and effect. Pursuant to section 13350 of the California Water Code, failure to comply with the requirements of the Order by the specified due date, 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, or contact Ms. Jillian Ly, Remediation Section II Manager, at (213) 576-6664 or via email at jillian.ly@waterboards.ca.gov.

Sincerely,

 Digitally signed by R Purdy
Date: 2022.10.29 16:01:39 -07'00'

Renee Purdy
Executive Officer

Attachments:

1. Figure 12 – Proposed Sampling Locations

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
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Sonja A. Inglin, Cermak & Inglin, LLC
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