Los Angeles Regional Water Quality Control Board

November 15, 2021

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

Certified Mail
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Claim No. 7020 3160 0000 7679 8486

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

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Claim No. 7020 3160 0000 7679 8493

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

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Claim No. 7020 3160 0000 7679 8509

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

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Claim No. 7020 3160 0000 7679 8516

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

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Claim No. 7020 3160 0000 7679 8523

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

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Claim No. 7020 3160 0000 7679 8530

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

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Claim No. 7020 3160 0000 7679 8547

SUBJECT: REVIEW OF ADDENDUM TO THE ON-SITE INDOOR AIR 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).

In a letter dated June 24, 2020 (Letter), the Los Angeles Water Board approved the "On-Site Indoor Air Assessment Work Plan," dated April 28, 2020 prepared by Genesis Engineer & Redevelopment (GER) on behalf of Hi-Shear Corporation (Hi-Shear) for the Hi-Shear Property located at 2600 Skypark Drive, Torrance (Property) at the subject site (Site). The Letter approved the vapor intrusion assessment proposed for the northern portion of Building No. 1 of the Property. The Letter also required a proposal for sub-slab and indoor air sampling in Building No. 1 and Building No. 2 through 8 to determine the potential vapor intrusion risk to workers in these buildings.

On February 25, 2021, the Los Angeles Water Board received the technical document titled "Addendum to the On-Site Indoor Air Assessment Work Plan" (Work Plan), prepared by GER on behalf of Hi-Shear for the Property.

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

SUMMARY OF ADDENDUM TO ON-SITE INDOOR AIR ASSESSMENT WORK PLAN

The Work Plan proposed the following:

1. Conduct building surveys at least 48 hours prior to collecting indoor air samples.

2. Install and sample sub-slab soil vapor probes via vapor pins at 26 locations inside Building No. 1 through 3 and 6.

    a. Building No. 4 (i.e., Processing building) is excluded because it has a spill containment foundation.

b. Building No. 7, the Hi-Kote building where degreasing and coating occurs, is excluded from both sub-slab soil vapor probe sampling and indoor air sampling because of disruptions to the manufacturing process, employees' required use of organic vapor respirators, and the likely high concentrations of methyl ethyl ketone, used as a degreasing solvent, that would result in potential laboratory dilutions and damage to laboratory analytical instruments.

3. Analyze sub-slab soil vapor samples for volatile organic compounds (VOCs) by EPA Method TO-15.

4. Collect 32 indoor air samples collocated with the sub-slab soil vapor probe locations over an 8-hour period as follows:

   a. Six locations in the eastern portion of Building No. 1

   b. Ten locations in the western portion of Building No. 1

   c. Two locations in Building No. 2

   d. Two locations in Building No. 3

   e. Six locations in Building No. 4 (not collocated with sub-slab soil vapor probes)

   f. Six locations in Building No. 6

5. Collect 18 ambient air samples (i.e., three ambient air samples per building [Building No. 1 will be treated as two buildings with an eastern and western portion]).

6. Analyze indoor and ambient air samples for VOCs using EPA Method TO-15 (full scan and selective ion modes).

7. A correction factor (CF) will be applied to the measured indoor air concentration when any individual VOCs is detected in the respective ambient air sample(s) via subtraction of the individual VOC's mean ambient air concentration. If the corrected concentrations are above their respective indoor air screening levels, the measured indoor air concentrations will then be used to calculate the cancer risk (CR) and hazard quotient (HQ).

LOS ANGELES WATER BOARD COMMENTS AND REQUIREMENTS

The Work Plan is approved with the following comments and requirements:

1. One of the two proposed collocated indoor air and sub-slab soil vapor locations in Building No. 3 shall be relocated towards the north-northwestern half of the building to be in closer proximity to soil vapor probe location VP-1. Soil vapor probe

location VP-1 has historically detected the highest shallow VOCs soil vapor concentrations on the Property.

2. A minimum of one sub-slab soil vapor sample duplicate and one indoor air sample duplicate shall each be collected at a sampling frequency of one per building and/or one per every ten or fewer samples, consistent with GER's April 2020 Sampling and Analysis Plan for the Property, whichever of the two is more frequent.

3. During a September 2020 site reconnaissance of the Property, Hi-Shear noted that Building No. 6, the Nut Factory, operated nearly 24 hours a day, in two shifts, from Monday through Thursday. The indoor air sampling period for Building No. 6, and any other building with multiple work shifts, shall be sampled for the duration of each work shift (e.g., 8-hour, 10-hour, 12-hour, etc.).

4. All laboratory reporting limits for each analyte shall be sufficiently low to adequately evaluate and assess risk.

5. Indoor air, ambient air, and sub-slab vapor samples shall be evaluated in accordance with the Department of Toxic Substances Control (DTSC) June 2020 update to Human and Ecological Risk Office (HERO) Human Health Risk Assessment (HHRA) Note 3 and/or the 2019 San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels.

6. Indoor air data should also be evaluated in accordance with the DTSC HERO HHRA Note 5, which identifies the EPA Region 9 Interim Indoor Air Response Action Levels for indoor air concentrations of TCE under differing exposure scenarios. If necessary, any interim measures and/or response actions should adhere to the DTSC HERO HHRA Note 5.

7. Response action(s), for managing current vapor intrusion risks and hazards shall follow the Decision Flow Charts approved by the Los Angeles Water Board on June 15, 2021.

8. Los Angeles Water Board staff is concerned about the designation of "respective ambient air samples" and the applicability of CF(s) as ambient air samples are not collocated with the indoor air samples. The uncorrected indoor risk(s) and outdoor risk(s) should be calculated for comparison.

    a. The Work Plan proposes that the CR(s) and HQ(s) will only be calculated if the individual corrected VOC concentration exceed its screening level at individual sample locations in which the highest value will then be applied for the overall building CR and HQ. Los Angeles Water Board staff does not approve of this approach as it neglects additivity. The CR and hazard index (i.e., sum of individual VOC HQs [including HQs for noncarcinogenic effects]) should be determined in the aggregate (i.e., additive or cumulative) regardless of whether individual VOC concentrations exceed their

screening levels. Risk assessment and calculations from indoor air and subslab soil vapor shall be consistent with Step 3C of DTSC's February 2020 "Public Draft – Supplemental Guidance: Screening and Evaluating Vapor Intrusion" (Supplemental VI Guidance).

9. Notify the Los Angeles Water Board case manager at least ten working days in advance of field work.

10. Hi-Shear shall submit a technical report for the implementation of the Work Plan (Report) by **February 14, 2022**. All indoor air, ambient air, and sub-slab vapor sample concentrations shall be reported in units of microgram per cubic meter.

    a. Upload the Report and the required electronic submittals of information, including the indoor air, 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 Supplemental VI Guidance. For your convenience, the GeoTracker Global ID for this site is T10000014333.

Task 2 of Cleanup and Abatement Order No. R4-2021-0079 (Order) (requiring a Human Health Risk Assessment) 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. Along those lines, the deadlines established in this letter are to ensure that the project moves forward in a timely manner, but do not amend the original September 10, 2021 deadline established in 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, Unit IV Chief, at (213) 576-6664 or via email at jillian.ly@waterboards.ca.gov.

Sincerely,

Hugh Marley

Digitally signed by Hugh Marley
Date: 2021.11.15 11:17:00 -08'00'

Water Boards

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Executive Officer

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