



Los Angeles Regional Water Quality Control Board

November 20, 2020

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

Certified Mail
Return Receipt Requested
Claim No. 7019 2290 0001 8504 0856

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

Certified Mail
Return Receipt Requested
Claim No. 7018 2290 0001 8504 2003

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

Certified Mail
Return Receipt Requested
Claim No. 7018 2290 0001 8504 2010

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

Certified Mail
Return Receipt Requested
Claim No. 7018 2290 0001 8504 2027

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

Certified Mail
Return Receipt Requested
Claim No. 7018 2290 0001 8504 2034

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

Certified Mail
Return Receipt Requested
Claim No. 7018 2290 0001 8504 2041

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

Mr. Christian Darville, et al.
Skypark Commercial Properties

- 2 -

November 20, 2020
SCP No. 1499

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Claim No. 7018 2290 0001 8504 2058

**SUBJECT: REVIEW OF TECHNICAL DOCUMENTS PURSUANT TO CALIFORNIA
WATER CODE SECTION 13267**

**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 March 20, 2020, Hi-Shear Corporation (Hi-Shear) submitted a "Vapor Intrusion Response Plan (VIRP)" as required in the Los Angeles Water Board's letter dated March 6, 2020. On May 12, 2020, the Los Angeles Water Board issued a CWC section 13267 Order (Order) to all parties listed above. Requirement No. 2 of the Order required the Parties to implement and complete the VIRP or a substantively similar work plan to assess the vapor intrusion threat to human health and the environment for buildings east of Crenshaw Boulevard. The Los Angeles Water Board conditionally approved the VIRP in an amendment to the CWC section 13267 Order dated June 1, 2020, issued to Hi-Shear (Hi-Shear Amended Order).

The Los Angeles Water Board received the following documents prepared by Genesis Engineering & Redevelopment, Inc. (Genesis):

1. "Proposed Property Maps, Vapor Intrusion Response Plan" (Proposed Maps), dated July 1, 2020
2. "Accelerated Response Zone, Mobile Home Decision Flow Chart" (see attached Figure 1), "Accelerated Response Zone, Residential (Slab-on-Grade Foundation) and Commercial Soil Vapor Decision Flow Chart" (see attached Figure 2), "Accelerated Response Zone – Slab on Grade Buildings, Residential (Slab-on-Grade Foundation) and Commercial Indoor Air Decision Flow Chart" (see attached Figure 3), and "Accelerated and Urgent Response for TCE in Indoor Air,

Residential and Commercial Decision Flow Chart” (see attached Figure 4) [collectively referred to as Decision Flow Charts], dated August 4, 2020 and revised on October 1, 2020 following a September 11, 2020 conference call with the Los Angeles Water Board, Hi-Shear, and Genesis.

The submittal of the Proposed Maps and Decision Flow Charts dually complies with the requirements in the Hi-Shear Amended Order and Requirement No. 2 of the Order issued to you.

Summaries of the Proposed Maps and Decision Flow Charts followed by Los Angeles Water Board comments and requirements are included below.

SUMMARY OF PROPOSED MAPS

The Proposed Maps identified the properties to be included within the “Accelerated Response Action” Zone (ARZ) for sampling. The ARZ includes:

1. Seventeen residential structures and six commercial structures with slab-on-grade foundations
2. Sixty mobile homes with raised foundations and two slab-on-grade community buildings. Sampling will be spatially distributed throughout the park beneath 10 mobile homes to account for different types or conditions of the skirts enclosing the crawl space.

The Proposed Maps also outline the steps proposed in the “Vapor Intrusion Response Plan” dated March 20, 2020, for assessing vapor intrusion in this zone. Sampling is contingent on access to the properties and consultation with the property owner and/or individual tenant.

If indoor air sampling is warranted, two samples will be collected within each residential structure and three samples will be collected within each commercial structure. Outdoor (ambient) air samples will be collected at the same time.

SUMMARY OF DECISION FLOW CHARTS

The Decision Flow Charts propose the soil vapor and indoor air response actions within the ARZ for the following four settings (see attached Figure 1 through Figure 4):

1. Mobile Home (i.e., crawl space) (see attached Figure 1)
2. Residential (slab-on-grade foundation) and commercial soil vapor (see attached Figure 2)
3. Residential (slab-on-grade foundation) and commercial indoor air (see attached Figure 3)

4. Accelerated and urgent responses for trichloroethylene (TCE) (see attached Figure 4).

The Decision Flow Charts noted that decisions will be made taking ambient air concentrations into account.

LOS ANGELES WATER BOARD COMMENTS AND REQUIREMENTS

The Los Angeles Water Board approves the Proposed Maps and Decision Flow Charts with the following comments and requirements:

1. The Decision Flow Charts provide response actions for managing current vapor intrusion (VI) risks and hazards, but the Los Angeles Water Board is concerned that they do not adequately address future VI risks and hazards. For this reason, Decision Flow Charts should be updated to include the following scenarios:
 - a. If a volatile organic compound (VOC) of concern is detected above the screening level in the crawl space sample, and it has been determined that the source of the VOC is from the subsurface, then interim mitigation measures such as installation of air purifiers or ventilation should be performed. The “Mobile Home Decision Flow Chart” (see attached Figure 1) should be updated with this note and resubmitted to the Los Angeles Water Board by **December 7, 2020**.
 - b. If a VOC of concern is detected in sub-slab and/or soil vapor samples at concentrations that exceed the corresponding San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (SFRWQCB ESLs), then interim mitigation measures should be performed. The “Residential (Slab-on-Grade Foundation) and Commercial Soil Vapor Decision Flow Chart” (see attached Figure 2) should be updated with this note and resubmitted to the Los Angeles Water Board by **December 7, 2020**.
2. The “Accelerated and Urgent Response for TCE in Indoor Air Residential and Commercial Decision Flow Chart” did not adequately represent applicable guidance and response actions. The decision flow chart should be updated with the edits marked in red on the attached Figure 4 and resubmitted to the Los Angeles Water Board by **December 7, 2020**.
3. If interim mitigation measures are warranted, a monitoring program should be developed to evaluate their effectiveness.
4. Interim mitigation measures (such as air purifiers or fans) should be turned off 24 hours prior to sampling indoor air to allow environmental conditions to equilibrate to represent worst-case conditions.

5. Before consideration for “No additional IA sampling,” the additivity or cumulative cancer risk of all the VOCs of concern detected in indoor air shall meet the cancer risk for the existing building’s use scenario, either commercial or residential.
6. The Decision Flow Charts are not response-zone specific; they may be used in other response zones with similar scenarios.
7. Decisions, including response actions, to scenarios not explicitly defined within the Decision Flow Charts will be evaluated on a case by case basis by the Los Angeles Water Board and the California Office of Environmental Health Hazard Assessment.
8. In the Hi-Shear Amended Order, the Los Angeles Water Board required submittal of a map with the proposed properties for the “areas needing action evaluation/less than accelerated response” (ENA). The ENA zone map was provided to the Los Angeles Water Board on October 21, 2020 (see attached Figure 5). Based on review of the ENA zone map, owners/occupants of all buildings located in the current ENA zone shall be approached for access to allow additional vapor intrusion investigation activities on their properties. The vapor intrusion investigation activities should follow the steps outline in the VIRP and the Proposed Maps. A plan, sequence, and schedule for requesting access to the properties located in the current ENA zone is due to the Los Angeles Water Board by **December 21, 2020**.
9. Status reports documenting the implementation and results of the ENA investigation are due on a tri-annual basis according to the schedule below, with the first status report due on **January 15, 2021** to the Los Angeles Water Board.

Reporting Period	Report Due Date
January – April	May 15
May – August	September 15
September – December	January 15

The above requirement for submittal of technical reports constitutes an amendment to the requirements of the California Water Code section 13267 Orders originally dated October 29, 2009 and May 12, 2020. All other aspects of the Orders originally dated October 29, 2009 and May 12, 2020, and the amendments thereto, remain in full force and effect. The required technical reports are necessary to investigate the characteristics and extent of the discharges of waste at the site and to evaluate cleanup alternatives. Therefore, the burden, including costs, of the reports bears a reasonable relationship to the need for the report and benefits to be obtained. Counsel for Hi-Shear has estimated the cost of these additional reports will exceed \$3,000,000. The reports are necessary to ensure protection

of human health of residents overlying the impacted groundwater and soil vapor. Pursuant to section 13268 of the California Water Code, failure to submit the required technical report by the specified due date may result in civil liability administratively imposed by the Los Angeles 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, or contact Ms. Jillian Ly, Unit IV Chief, at (213) 576-6664 or via email at jillian.ly@waterboards.ca.gov.

Sincerely,

Renee Purdy
Executive Officer

Attachments:

1. Figure 1 - Accelerated Response Zone, Mobile Home Decision Flow Chart
2. Figure 2 - Accelerated Response Zone, Residential (Slab-on-Grade Foundation) and Commercial Soil Vapor Decision Flow Chart
3. Figure 3 - Accelerated Response Zone – Slab on Grade Buildings, Residential (Slab-on-Grade Foundation) and Commercial Indoor Air Decision Flow Chart
4. Figure 4 - Accelerated and Urgent Response for TCE in Indoor Air, Residential and Commercial Decision Flow Chart
5. Figure 5 – Site Map Showing Proposed VI Response Zones East of Crenshaw Blvd

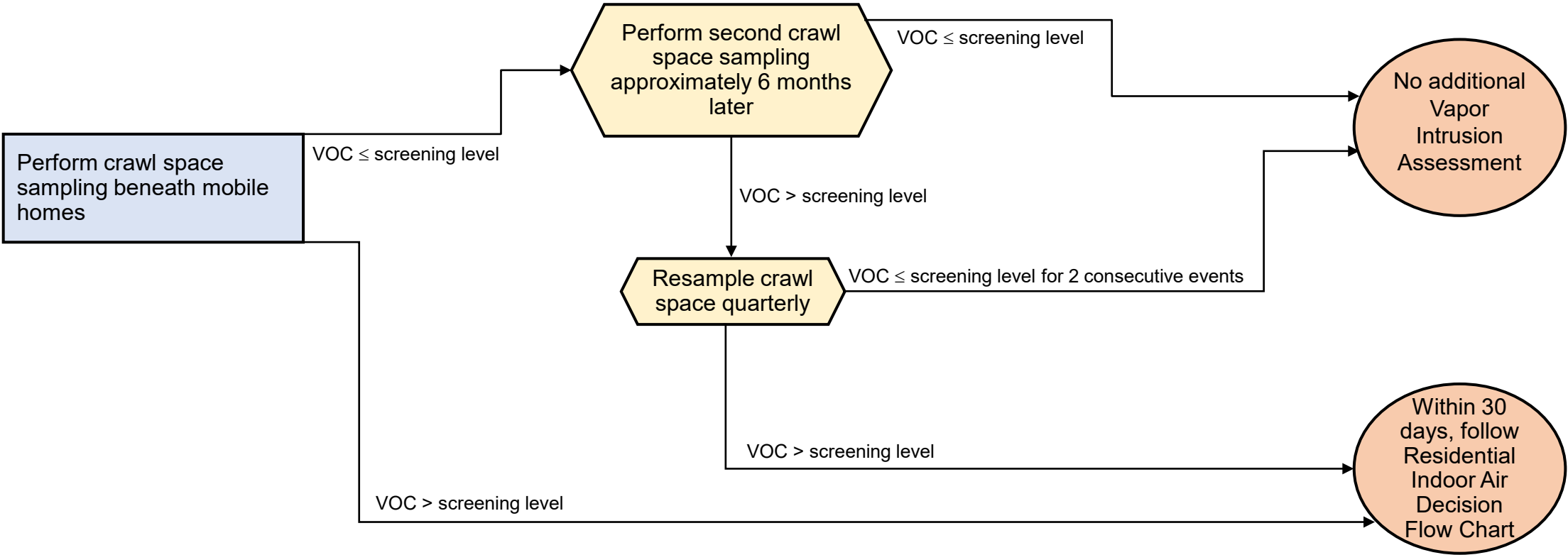
cc:

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Thomas Schmidt, Hamrick & Evans, LLP
David L. Evans, Hamrick & Evans, LLP
Steve Van der Hoven, Genesis Engineering & Redevelopment

FIGURE 1

Accelerated Response Zone

Mobile Home Decision Flow Chart



Abbreviations

-“VOC”- volatile organic compounds, defined in the *Vapor Intrusion Response Plan* as tetrachloroethene (“PCE”) and trichloroethene (“TCE”)

Notes

1. Decisions will be made using crawl space concentrations that are corrected for ambient air concentrations.
2. All IA sampling will be paired with sampling of either sub-slab soil vapor or soil vapor probes at a depth of 5 feet.

Skypark Commercial Properties
Mobile Home Decision Flow
Chart

Date: 10/1/2020

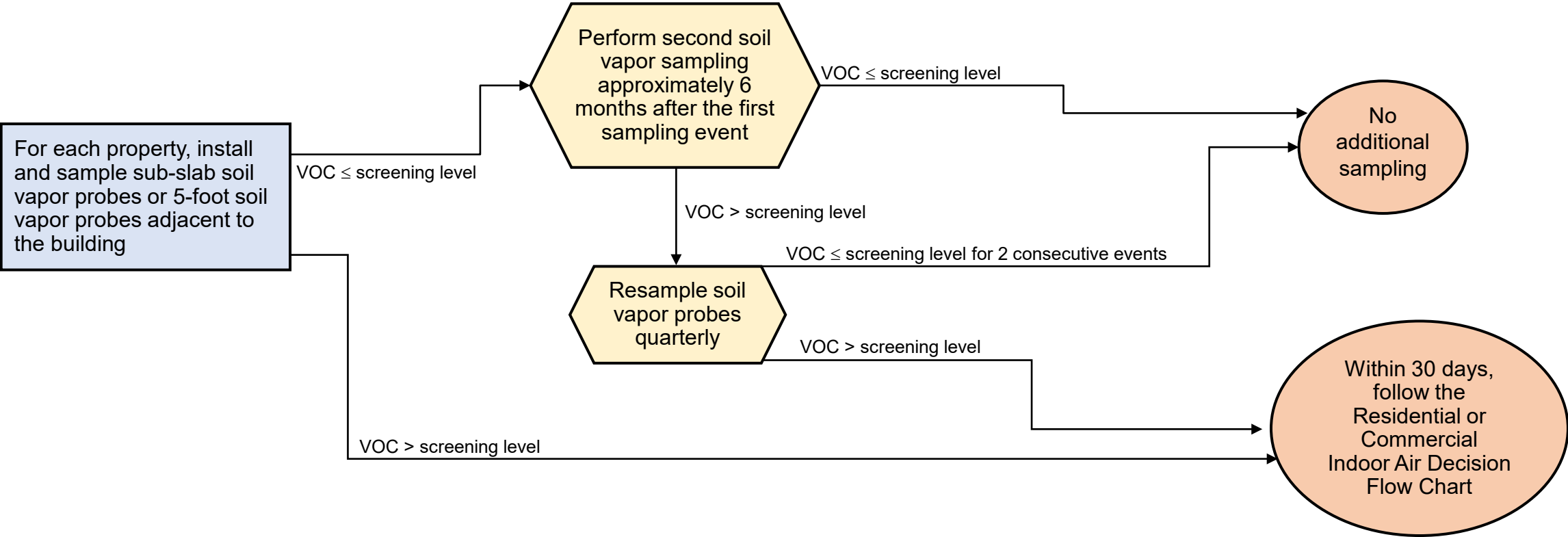


GENESIS ENGINEERING & REDEVELOPMENT

FIGURE 2

Accelerated Response Zone

Residential (Slab-on-Grade Foundation) and Commercial Soil Vapor Decision Flow Chart



Abbreviations

-“VOC”- volatile organic compounds, defined in the *Vapor Intrusion Response Plan* as tetrachloroethene (“PCE”) and trichloroethene (“TCE”)

Skypark Commercial Properties
Residential and Commercial Soil
Vapor Decision Flow Chart

Date: 10/1/2020

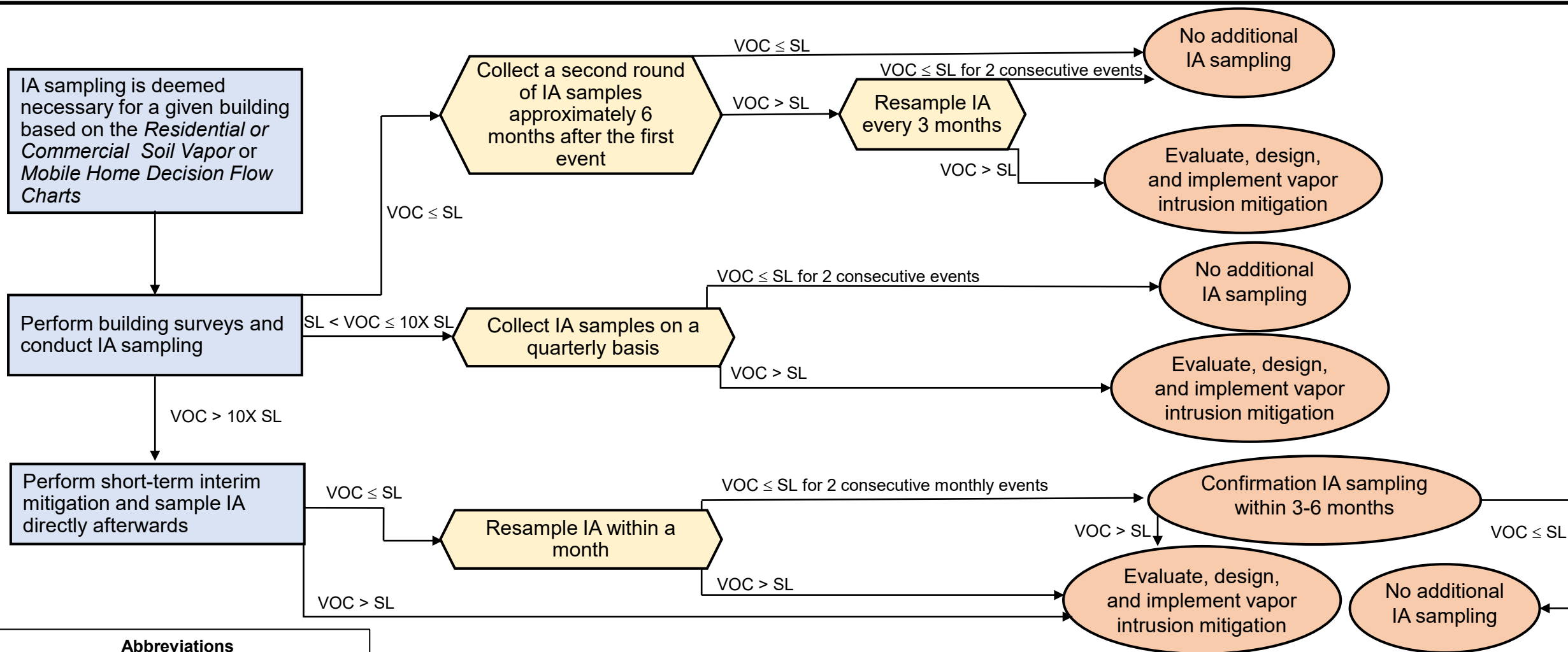


GENESIS ENGINEERING & REDEVELOPMENT

FIGURE 3

Accelerated Response Zone – Slab on Grade Buildings

Residential (Slab-on-Grade Foundation) and Commercial Indoor Air Decision Flow Chart



Abbreviations

- "IA" - Indoor Air
- "SL" - screening level
- "VOC" - volatile organic compounds, defined in the *Vapor Intrusion Response Plan* as tetrachloroethene ("PCE") and trichloroethene ("TCE")

Notes

1. Decisions will be made using IA concentrations that are corrected for ambient air concentrations.
2. All IA sampling will be paired with sampling of either sub-slab soil vapor or soil vapor probes at a depth of 5 feet.

Skypark Commercial Properties
Residential Indoor Air Decision Flow Chart

Date: 10/1/2020



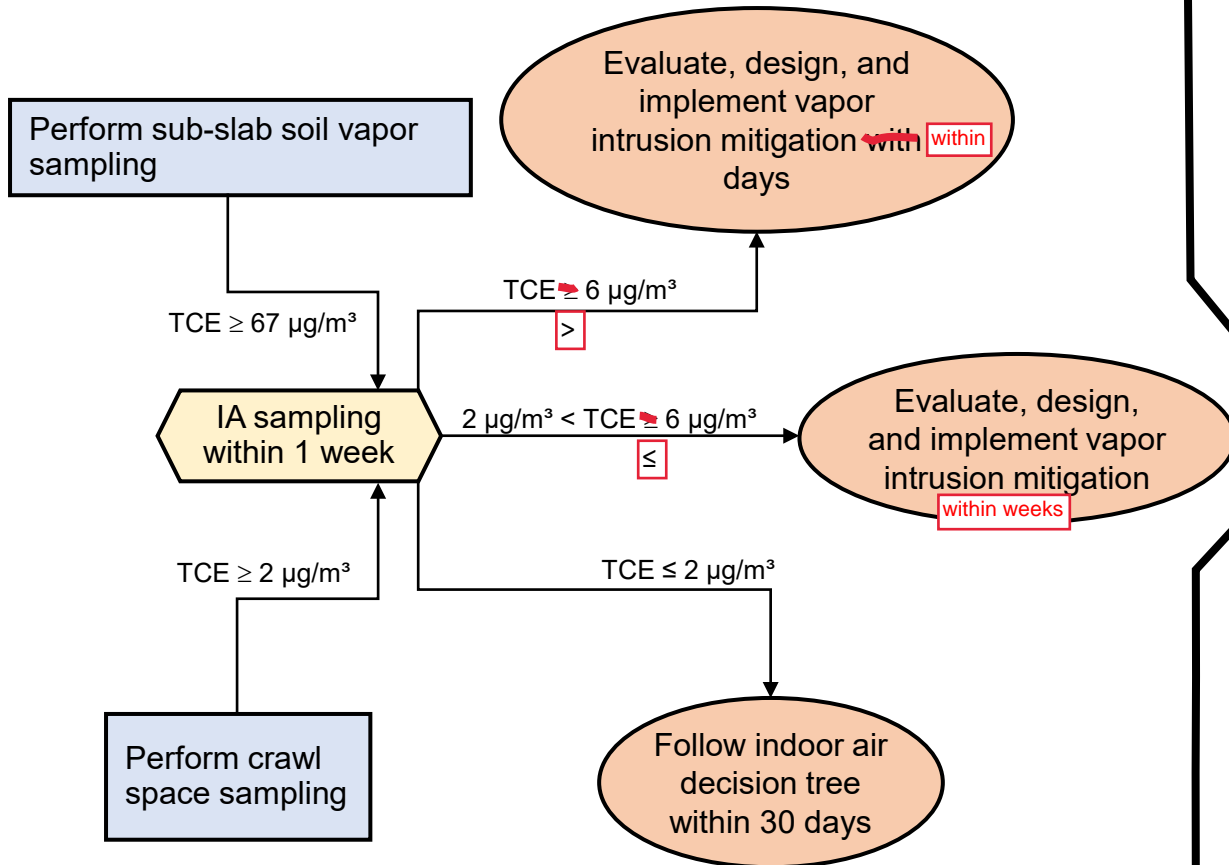
GENESIS ENGINEERING & REDEVELOPMENT

FIGURE 4

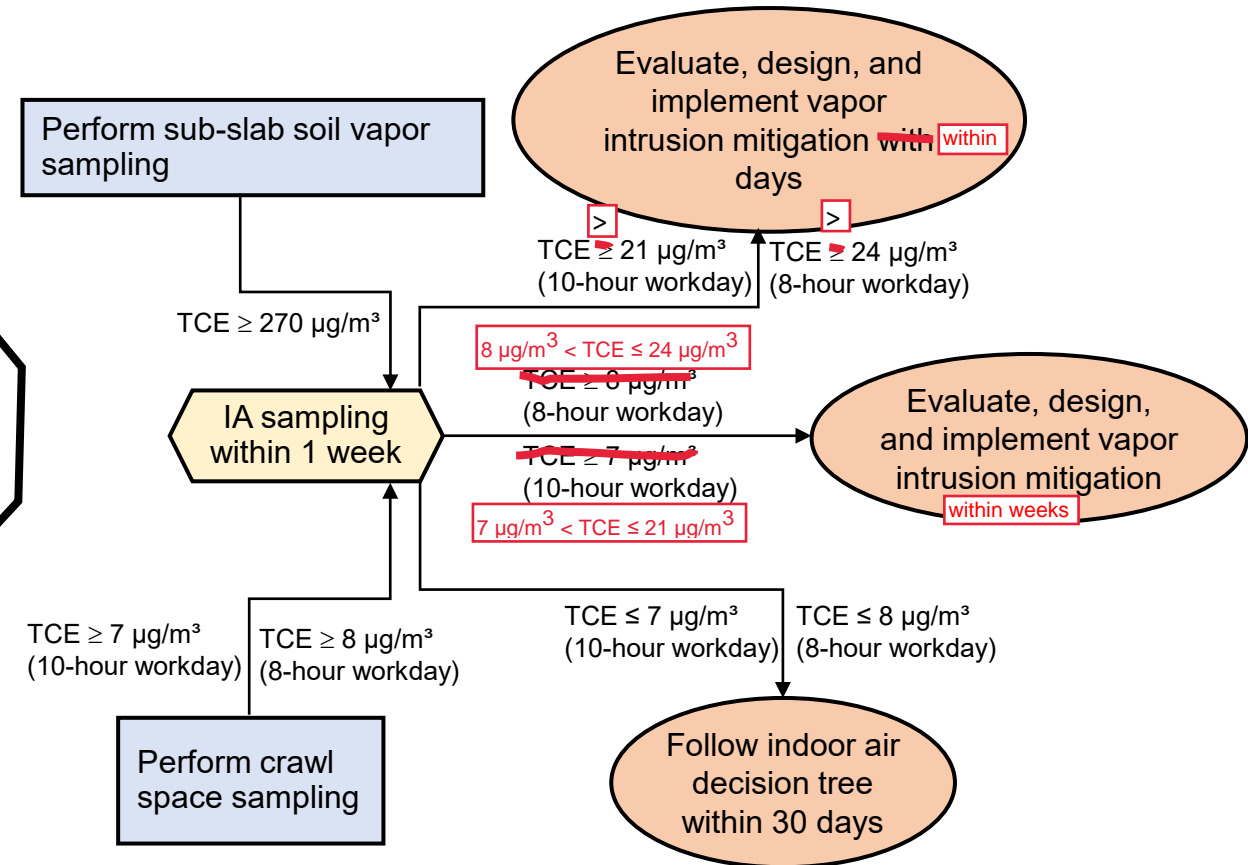
Accelerated and Urgent Response for TCE in Indoor Air

Residential and Commercial Decision Flow Chart

RESIDENTIAL SCENARIO



COMMERCIAL SCENARIO



Abbreviations

- "IA"- Indoor Air
- "TCE"- Trichloroethene
- " $\mu\text{g}/\text{m}^3$ "- micrograms per cubic meter

Notes

1. Decisions will be made using crawl space and IA concentrations that are corrected for ambient air concentrations.
2. All IA sampling will be paired with sampling of either sub-slab soil vapor or soil vapor probes at a depth of 5 feet.

Skypark Commercial Properties
Accelerated and Urgent Response
for TCE Indoor Air Decision Flow
Chart

Date: 10/1/2020



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FIGURE 5

