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CITY OF LOMITA

June 17, 2022

Mr. Kevin Lin, P.E.
320 West 4th St., Suite 200
Los Angeles, Ca. 90013
Kevin.Lin@waterboards.ca.gov

Dear Mr. Lin:

The City appreciates the efforts of the Los Angeles Regional Water Quality Control Board (Los Angeles Regional Board) related to the matter now referred to as Skypark Commercial Properties Site (Site). The City has reviewed the reports, Groundwater Removal Action Workplan (Groundwater RAW) prepared by Terraphase in 2022 and East Adjacent (EA) Properties Removal Action Workplan also by Terraphase in 2022.

The Groundwater Removal Action Workplan addresses groundwater beneath the Skypark Commercial Properties Site in the City of Torrance and proposes actions to address the Skypark Properties contamination/plumes. The East Adjacent (EA) Properties Removal Action Workplan addresses the plume margin within the Site. These removal actions are designed to achieve the remediation action objectives and the remedial goals, by abating further migration of the plume downgradient into the EA Properties and into the residential areas of Lomita, and reducing the vapor intrusion potential and VOC adverse impacts on water quality.

Following review of the two reports, while the proposed actions will have a positive effect, it does not appear the selected removal actions will adequately achieve the remediation action objectives, be protective of human health and the environment, and lower the observed soil and groundwater impacts to the community in Lomita. Further action is needed, particularly to address the contamination currently present in the City of Lomita.

The proposed removal method does not address risks posed by contamination (soil vapor and groundwater) already present in the City of Lomita. The most recent maximum TCE and PCE groundwater concentrations recorded beneath the City of Lomita in groundwater monitoring well MW-20 were 2,450 µg/L (490 times the MCL) and 433 µg/L (87 times the MCL), respectively. Also, the portion of the plume existing within the City of Lomita will continue to migrate and degrade the quality of regional groundwater as it moves into "cleaner" parts of the aquifer and away from the source.

Inconsistency as to the primary source of soil vapor east of Crenshaw Blvd. in the City of Lomita indicate the sources of VOC soil vapor have not been sufficiently characterized to support selected removal actions. Since characterization of the plume in the workplans are limited, the achievability of the remediation action objectives is questionable.

While the Groundwater Removal Action Workplan is directed at regional groundwater impacts and the EA Removal Action Workplan is directed at the on-Site plume, neither the Groundwater Removal Action Workplan nor the EA Removal Action Workplan address the soil vapor impacts (notably PCE, TCE, and 1,1-DCE) that have been observed east of Crenshaw Boulevard, or for the perched groundwater system east-northeast of the EA Properties (i.e., TCE and PCE concentrations above their respective MCLs at monitoring well VP-63; Figure 6 and 7 in the EA Removal Action Workplan). A human health risk assessment (HHRA) should be conducted to identify whether the current soil vapor and perched groundwater conditions pose a potential risk to human health and/or require removal or treatment action.

While the City supports taking action to prevent further migration of the plume, more is needed to address the contamination at levels well above action levels already present within Lomita. In addition, Lomita has one drinking water production well located within a mile of the currently estimated boundary of the plume. This proximity warrants a greater level of action to address the contamination already in Lomita.

Again, the City appreciates the Los Angeles Regional Board's efforts. Should you have any questions, I can be contacted at (310) 325-7110.

Sincerely,

A handwritten signature in cursive script that reads "Ryan Smoot".

Ryan Smoot
City Manager