



Los Angeles Regional Water Quality Control Board

December 21, 2020

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 2290 0001 8504 0894

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 2290 0001 8504 0900

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 2290 0001 8504 0917

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 2290 0001 8504 0924

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 2290 0001 8504 0931

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 2447

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

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



SUBJECT: PARTIAL AND CONDITIONAL APPROVAL OF WORK PLAN FOR PROPERTY 1; NOTICE OF DEFICIENT TECHNICAL WORK PLAN FOR PROPERTIES 2 AND 3

SITE: EAST ADJACENT PROPERTIES OF HI-SHEAR CORPORATION (EAST-NORTHEAST PORTION OF ASSESSOR PARCEL NO. 7377-006-906, 24701 – 24777 CRENSHAW BOULEVARD AND 2530 AND 2540 SKYPARK DRIVE, TORRANCE, CALIFORNIA) (ORDER NO. R4-2020-0003, SCP CASE NO. 1481)

Dear Mr. Doyle et al.:

The California Regional Water Quality Control Board, Los Angeles Region (Regional 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 (Site).

On January 13, 2020, the Regional Board issued a California Water Code (CWC) Section 13267 Order (Order) to the City of Torrance; Magellan Aerospace, Middletown, Inc. (formerly known as Aeronca, Inc., formerly known as Aeronca Manufacturing Corporation); Excellon Industries, Inc. (also known as Excellon Automation Company and now known as Excellon Technologies, LLC); Esterline Technologies Corporation; Robinson Helicopter Company; and Dasco Engineering Corporation (hereinafter referred to as Parties). The Order required the Parties to submit a technical work plan for the complete delineation of the vertical and lateral extent of impacts from volatile organic compounds (VOCs) to soil, soil vapor, and groundwater beneath the Site and off Site (Work Plan). For the purposes of the Order and ease of reference, the Site was compartmentalized into Property 1, Property 2, and Property 3.

On July 21, 2020, the Regional Board approved an extension request for the Work Plan submitted jointly by Lamb and Kawakami LLP (L&K; representing Magellan Aerospace, Middletown, Inc.), Law offices of William J. Beverly (representing Excellon Technologies, LLC and Dasco Engineering Corporation), Cermak and Inglin, LLC (C&I; representing Esterline Technologies Corporation), and Gordon Rees Scully Mansukhani, LLP (representing Robinson Helicopter); the new due date for the Work Plan was August 21, 2020.

On August 21, 2020, two nearly identical work plans to evaluate potential source areas in the shallow soil for Property 1 were prepared by Ramboll US Corporation and MK Environmental Consulting, Inc., and submitted by C&I and L&K on behalf of Esterline Technologies Corporation and Magellan Aerospace, Middletown, Inc., respectively. Each work plan was accompanied with cover letters prepared by C&I and L&K noting that in submitting the work plans, Magellan Aerospace, Middletown, Inc. and Esterline Technologies Corporation are not agreeing to implement the work. The Order required the Parties to delineate VOCs impacts to soil, soil vapor, and groundwater beneath the Site

(Property 1, Property 2, and Property 3), but the two work plans were only addressed assessment of shallow soils on Property 1. For the purposes of this letter the two work plans submitted for Property 1 will be discussed as one (Property 1 Work Plan).

SUMMARY OF PROPERTY 1 WORK PLAN

The Property 1 Work Plan proposed 16 membrane interface probe (MIP) locations on Property 1 (see Figure 1 in work plan prepared by Ramboll US Corporation and submitted by C&I). The proposed MIP locations will be advanced to depths of approximately 15 to 20 feet below ground surface (ft-bgs) to evaluate sources of VOCs; collocated confirmation soil boring locations will be based on initial evaluation of MIP results.

PROPERTY 1 WORK PLAN APPROVAL

The Property 1 Work Plan is approved with the following conditions:

1. The Regional Board considers the lack of environmental data at the following areas as data gaps and require additional MIP locations be placed:
 - a. Between VP-46 and VP-25
 - b. Between VP-47 and VP-107
 - c. Between VP-106 and VP-42
 - d. Between VP-25 and the most east-northeast proposed MIP/Soil Sample Location along the northeast facing portion of the main building
 - e. Between VP-42, VP-113, and VP-109
 - f. Between VP-108, VP-42, and VP-113
2. Based on offsite investigation conducted by Hi-Shear Corporation, perched groundwater was encountered in the south and southeast portion of Property 1 at approximately 60 ft-bgs. Groundwater samples at VP-50, VP-114, VP-113, VP-108, and VP-42 detected VOCs at concentrations which exceeded their respective maximum contaminant levels. The proposed MIP locations in the vicinity of these data points (i.e., proposed locations near VP-50, Comment 1.e. and Comment 1.f.) shall be advanced to groundwater and accompanied by a collocated soil boring. Soil samples shall be collected at 5-foot intervals at these collocated soil borings beginning at 5 ft-bgs to groundwater and analyzed for VOCs and metals.

Groundwater samples shall be collected and analyzed for VOCs, metals, 1,4-dioxane, hexavalent chromium, and perchlorate.

3. Historical VOC concentrations in soil at VP-49 demonstrate a track from surface soil to groundwater in the soil column; therefore, the two proposed MIP locations in the immediate vicinity of this probe shall be advanced to groundwater and accompanied by a collocated soil boring. Soil samples shall be collected at 5-foot intervals at these collocated soil borings beginning at 5 ft-bgs to groundwater and analyzed for VOCs and metals. Groundwater samples shall be collected and analyzed for VOCs, metals, 1,4-dioxane, hexavalent chromium, and perchlorate.
4. If the MIP detects VOCs in the proposed upper 20 ft-bgs, the MIP and a collocated confirmation soil boring(s) shall be advanced beyond the proposed 20 ft-bgs until groundwater and/or until below the detection limits of the detectors. Soil samples shall be collected at 5-foot intervals at these collocated soil borings beginning at 5 ft-bgs to groundwater and analyzed for VOCs and metals. Groundwater samples shall be collected and analyzed for VOCs, metals, 1,4-dioxane, hexavalent chromium, and perchlorate.
5. Based on historical permits and inspections from local agencies, operations at Property 1 included, but was not limited to: solvent storage, degreasers, sumps, clarifiers, and wash basins. The exact locations of these features and operations remain unidentified and unaddressed by the work plan. Therefore, the Regional Board considers the work proposed in the work plan as a screening investigation for Property 1 and additional work plans may be warranted based on results of this investigation and as new information is provided.
6. Notify the Regional Board case manager at least seven (7) working days in advance of field work.
7. Submit a technical report for the implementation of the Property 1 Work Plan by **March 19, 2021**.

NOTICE OF INCOMPLETE TASKS: This letter further notifies the Parties that the Investigative Order issued pursuant to California Water Code section 13267 on January 13, 2020, amended on July 21, 2020 for time extension, by the Regional Board Executive Officer, required a work plan for the complete delineation of the vertical and lateral extent of volatile organic compounds impacts to soil, soil vapor, and groundwater beneath the Site (Property 1, Property 2 and Property) by the required due date of August 21, 2020. While

this conditional, partial approval pertains to Property 1, it is important to note that the Parties have not complied with the requirements of the Investigative Order.

In addition to proceeding with the work plan for Property 1, the Parties must also submit a technical work plan for the complete lateral and vertical delineation of VOCs in soil, soil vapor, and groundwater beneath other areas of the Site, namely Property 2 and Property 3.

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

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

As discussed in the Investigative Order, failure to comply with the Order may result in 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 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 at (213) 576-6664 or via email at jillian.ly@waterboards.ca.gov.

Sincerely,

Hugh Marley
Assistant Executive Officer

cc: (via email)
Patrick L. Rendon (prendon@lkfirm.com)
William J. Beverly (Beverlylawcorp@aol.com)
Sonja A. Inglin (singlin@cermaklegal.com)
Brian M. Ledger (bledger@grsm.com)
Richard Montevideo (rmontevideo@rutan.com)
Hannah D. Bloink (hbloink@cermaklegal.com)
Thomas Schmidt (tpjschmidt@gmail.com)
Carla Dillon (c.dillon@lomitacity.com)
Jeff O'Keefe (jeff.okeefe@waterboards.ca.gov)
Joe Liles (jliles@wrd.org)