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## Los Angeles Regional Water Quality Control Board

June 7, 2022

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7021 0950 0000 7275 6612**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7021 0950 0000 7275 6629**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7021 0950 0000 7275 6636**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7021 0950 0000 7275 6643**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7021 0950 0000 7275 6650**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7021 0950 0000 7275 6667**

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

Certified Mail  
Return Receipt Requested  
**Claim No. 7021 0950 0000 7275 6674**

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JAMES STAHL, ACTING CHAIR | RENEE PURDY, EXECUTIVE OFFICER

**SUBJECT: REVIEW OF 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.

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

## **SUMMARY OF OFF-SITE ASSESSMENT WORK PLAN**

The objective of the Work Plan is to assess the western extent of volatile organic compound (VOC) impacts to soil vapor on the 2700 Skypark Drive property (Lowe's Property). The Work Plan proposed the following:

1. Install nested soil vapor probes at three locations (VP-137 through VP-139) on the Lowe's Property, as shown in the attached *Figure 11 – Proposed Sampling Locations*
  - a. Soil vapor probes will be installed at 5, 15, 30, 45, 65, and 85 feet below ground surface (ft-bgs)
2. 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, VP-138, VP-139	5, 15, 30, 45, 65, and 85
VP-128	5 and 15

## LOS ANGELES WATER BOARD COMMENTS AND REQUIREMENTS

Based upon the review of the information in the Work Plan and case files, the Los Angeles Water Board has the following comments and requirements:

1. The offsite assessment shall not be limited to soil vapor as there may still be potential source(s) of VOC contamination on the Lowe's Property.
2. The lateral and vertical extent of VOC impacts south-southwest of the Lowe's Property (i.e., beyond soil vapor probe locations VP-121, VP-124, VP-125 [onto Torrance Airport]) and north-northwest of the 2600 Skypark Drive property (Hi-Shear Property) (i.e., beyond soil vapor probe locations VP-78, VP-127, VP-128, and VP-129 [across Skypark Drive]) has not been delineated and assessed. The concentrations of VOCs in soil vapor at these soil vapor probe locations are elevated and greater than applicable regulatory screening levels. Additional soil vapor probes should be proposed south-southwest of the Lowe's Property and north-northwest of the Hi-Shear Property to delineate the soil vapor plume.
3. According to the Work Plan, former Building No. 10 on the Lowe's Property was used to store outdated equipment and machinery for Hi-Shear. The Work Plan noted that historical inspections identified machinery containing oils and lubricants, an oil skimming trough, and three empty storage tanks that held 1,1,1-trichloroethane. The historical soil sampling locations associated with former Building No. 10 were limited in depth and did not investigate deeper than 10 ft-bgs. Additionally, it is unclear in the available historical technical reports and data that the subsurface soil was adequately assessed for VOCs. Based on the attached *Table 1A – COPC Concentrations in Soil* (Table 1) and *Figure 49 – Lowe's Property – Boring Locations (2004-2006 & 2020)* (Figure 49) of the *Updated Site Conceptual Model* (Updated SCM), dated November 24, 2021 and prepared by GER on behalf of Hi-Shear, of the six historical soil sampling locations associated with former Building No. 10, only three locations (SB-10-1, SB-10-1A, and SB-10-2) appeared to have been analyzed for tetrachloroethene (PCE) with non-detections at 5 ft-bgs. Trichloroethene (TCE) and associated degradant compounds did not appear to be analyzed. Based on current guidance and having reviewed the limited information and analytical data, we have determined that additional investigation, assessment, and confirmation sampling of subsurface soil and soil vapor beneath former Building No. 10 is warranted.

4. According to the Work Plan, former Building No. 11 housed raw stock materials used in manufacturing of metal fasteners and various chemicals may have been stored there. The historical soil sampling locations associated with former Building No. 11 were limited in depth and did not investigate deeper than 10 ft-bgs. It is also unclear in the available historical technical reports and data that the subsurface soil was adequately assessed for VOCs. Based on the attached Table 1 and Figure 49 of the Updated SCM, of the seven historical soil sampling locations associated with former Building No. 11, only three locations (SB-11-1, SB-11-2, and SB-11-2A) appeared to have been analyzed for PCE. TCE and the associated degradant compounds did not appear to be analyzed. SB-11-1 and SB-11-2 detected PCE at 2 micrograms per kilograms ( $\mu\text{g/kg}$ ) and 14  $\mu\text{g/kg}$  at 5 ft-bgs, respectively; however, no additional soil samples deeper than 5 ft-bgs were collected and analyzed at these locations. Based on current guidance and having reviewed the limited information and analytical data, we have determined that additional investigation, assessment, and confirmation sampling of subsurface soil and soil vapor beneath former Building No. 11 is warranted.
5. According to the Work Plan, former Building No. 12 on the Lowe's Property was used for manufacturing purposes by Hi-Shear's Tool Division Engineering and "may have involved the use of chlorinated VOC." The historical soil sampling locations associated with former Building No. 12 were limited in depth and did not investigate deeper than 10 ft-bgs. Additionally, it is unclear in the available historical technical reports and data that the subsurface soil was adequately assessed for VOCs. Based on the attached Table 1 and Figure 49 of the Updated SCM, of the eight historical soil sampling locations associated with former Building No. 12, only three locations (SB-12-1, SB-12-2, and SB-12-2A) appeared to have been analyzed for PCE. TCE and the associated degradant compounds did not appear to be analyzed. SB-12-2 detected PCE at 2.2  $\mu\text{g/kg}$  at 5 ft-bgs; however, no additional soil samples deeper than 5 ft-bgs were collected and analyzed at this location. As with the above comments concerning Buildings 10 and 11, there is limited information and analytical data concerning the area around and beneath Building 12 and additional investigation, assessment, and confirmation sampling of subsurface soil and soil vapor beneath former Building No. 12 is warranted.
6. Submit a revised Work Plan addressing the Los Angeles Water Board Comments No. 1 to 5 by **August 5, 2022**.

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](mailto:kevin.lin@waterboards.ca.gov), or contact Ms. Jillian Ly, Unit IV Supervisor, at (213) 576-6664 or via email at [jillian.ly@waterboards.ca.gov](mailto:jillian.ly@waterboards.ca.gov).**

Sincerely,

Digitally signed  
by Hugh Marley  
Date: 2022.06.07  
14:05:21 -07'00'  


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Renee Purdy  
Executive Officer

Attachments:

1. Figure 11 – Proposed Sampling Locations
2. Table 1A – COPC Concentrations in Soil
3. Figure 49 – Lowe's Property – Boring Locations (2004-2006 & 2020)

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  
Alan B. Fenstermacher, Rutan & Tucker, LLP  
Travis Van Ligten, Rutan & Tucker, LLP  
Richard Montevideo, Rutan & Tucker, LLP  
Darren Croteau, Terraphase Engineering Inc.  
Sonja A. Inglin, Cermak & Inglin, LLC  
Patrick L. Rendon, Lamb and Kawakami, LLP  
William J. Beverly, Law Offices of William J. Beverly  
Brian M. Ledger, Gordon Rees Scully Mansukhani, LLP  
Thomas Schmidt, Hamrick & Evans, LLP  
David L. Evans, Hamrick & Evans, LLP  
Jeff W. Poole, Hamrick & Evans, LLP  
Steve Van der Hoven, Genesis Engineering & Redevelopment

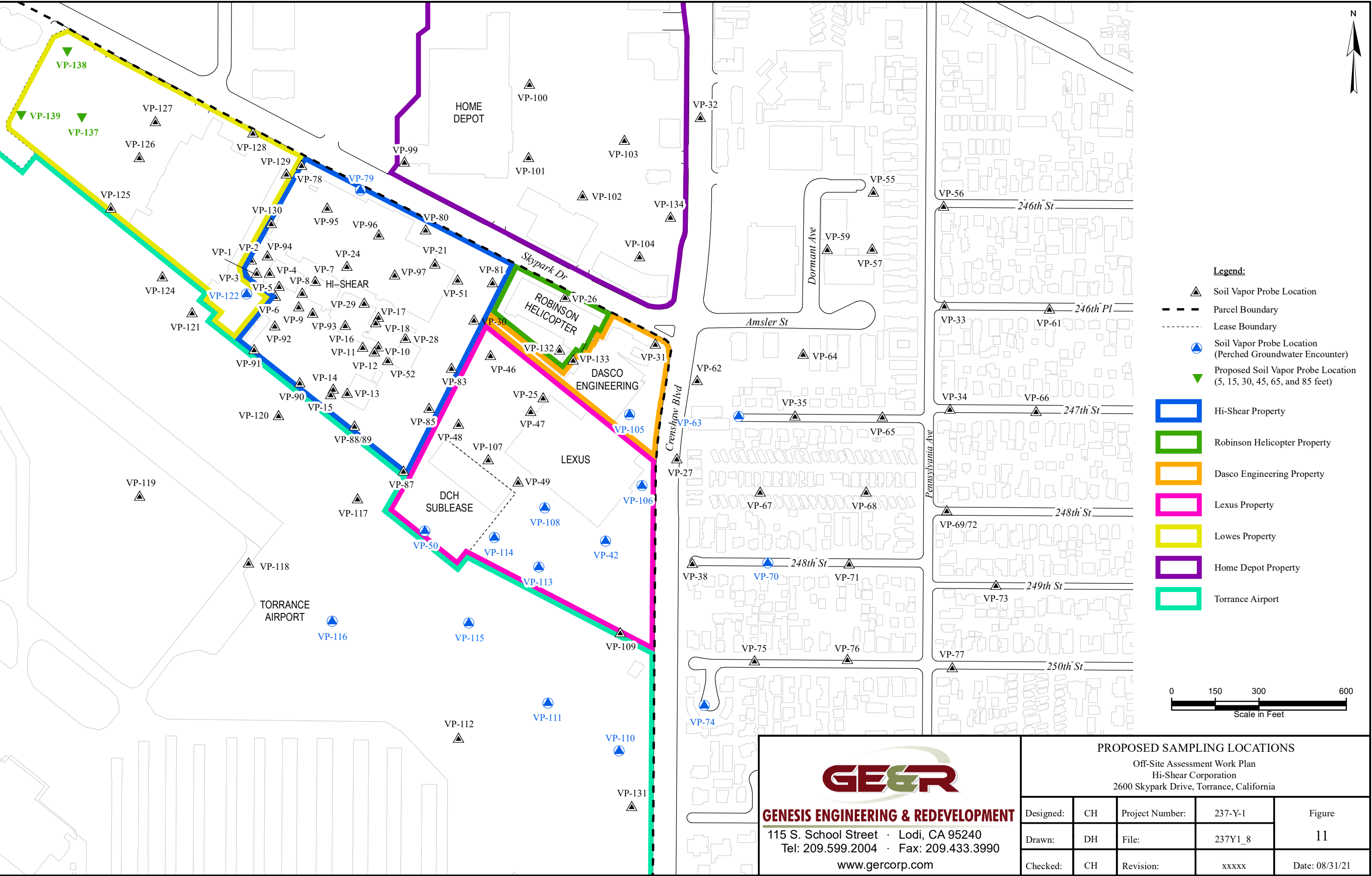




Table 1A

**Skypark Commercial Properties Project  
Updated Site Conceptual Model**

**COPC Concentrations in Soil**

Sample ID	Depth (ft bgs)	Sampling Date	Concentration (mg/Kg)					
			PCE	TCE	cis-1,2-DCE	trans-1,2-DCE	1,1-DCE	VC
Residential Screening Level*			0.59	0.94	18	130	83	0.0082
Commercial Screening Level*			2.7	6	84	600	350	0.15
2700 Skypark Drive - Former HSC Property								
SB-8-1	5	3/25/05	ND	--	--	--	--	--
SB-8-1A	5	3/25/05	ND	--	--	--	--	--
SB-9-1	5	3/25/05	ND	--	--	--	--	--
SB-9-1A	5	3/25/05	ND	--	--	--	--	--
SB-10-1	5	3/25/05	ND	--	--	--	--	--
SB-10-1A	5	3/25/05	ND	--	--	--	--	--
SB-10-2	5	3/25/05	ND	--	--	--	--	--
SB-11-1	5	3/25/05	0.002	--	--	--	--	--
SB-11-2	5	3/25/05	0.014	--	--	--	--	--
SB-11-2A	5	3/25/05	ND	--	--	--	--	--
SB-12-1	5	3/25/05	ND	--	--	--	--	--
SB-12-2	5	3/25/05	0.0022	--	--	--	--	--
SB-12-2A	5	3/25/05	ND	--	--	--	--	--
SB-16-1	5	3/25/05	ND	--	--	--	--	--
SS-1	5	3/25/05	ND	--	--	--	--	--
SF-1	5	3/25/05	ND	--	--	--	--	--
SF-1A	5	3/25/05	ND	--	--	--	--	--
SF-2	5	3/25/05	ND	--	--	--	--	--



Table 1A

Skypark Commercial Properties Project  
Updated Site Conceptual Model

COPC Concentrations in Soil

Sample ID	Depth (ft bgs)	Sampling Date	Concentration (mg/Kg)					
			PCE	TCE	cis-1,2-DCE	trans-1,2-DCE	1,1-DCE	VC
Residential Screening Level*			0.59	0.94	18	130	83	0.0082
Commercial Screening Level*			2.7	6	84	600	350	0.15
2700 Skypark Drive - Former HSC Property								
SF-2A	5	3/25/05	ND	--	--	--	--	--
BS-4-1	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
	20	7/5/05	--	--	--	--	--	--
	30	7/5/05	--	--	--	--	--	--
	40	7/5/05	--	--	--	--	--	--
	50	7/5/05	--	--	--	--	--	--
SB-4-2	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
	20	7/5/05	--	--	--	--	--	--
	30	7/5/05	--	--	--	--	--	--
	40	7/5/05	--	--	--	--	--	--
	50	7/5/05	--	--	--	--	--	--
SB-9-2	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-9-3	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-9-4	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-10-3	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-10-4	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-10-5	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--



Table 1A

**Skypark Commercial Properties Project  
Updated Site Conceptual Model**

**COPC Concentrations in Soil**

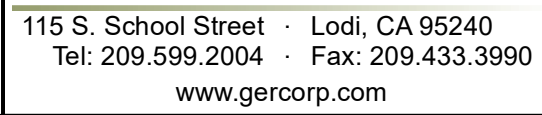
Sample ID	Depth (ft bgs)	Sampling Date	Concentration (mg/Kg)					
			PCE	TCE	cis-1,2-DCE	trans-1,2-DCE	1,1-DCE	VC
Residential Screening Level*			0.59	0.94	18	130	83	0.0082
Commercial Screening Level*			2.7	6	84	600	350	0.15
2700 Skypark Drive - Former HSC Property								
SB-11-3	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-11-4	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-11-5	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-11-6	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-12-3	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-12-4	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-12-5	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SB-16-6	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
	10	7/5/05	--	--	--	--	--	--
SF-3	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
SF-4	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
SF-5	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--

Table 1A

**Skypark Commercial Properties Project  
Updated Site Conceptual Model**

**COPC Concentrations in Soil**

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			PCE	TCE	cis-1,2-DCE	trans-1,2-DCE	1,1-DCE	VC
Residential Screening Level*			0.59	0.94	18	130	83	0.0082
Commercial Screening Level*			2.7	6	84	600	350	0.15
2700 Skypark Drive - Former HSC Property								
SF-6	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
SF-7	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--
SF-8	1	7/5/05	--	--	--	--	--	--
	5	7/5/05	--	--	--	--	--	--



Updated Site Conceptual Model  
Skypark Commercial Properties  
Torrance, California

Designed:	CH	Project Number:	237-H-19	Figure <b>49</b>
Drawn:	DH	File:	237H19SCM_39	
Checked:	CH	Revision:	xxxxx	Date: 09/07/21