

Appendix F5

LARWQCB Approved Workplan

Los Angeles Regional Water Quality Control Board

December 4, 2019

Mr. Scott Putnam
APA III Ltd.
C/o Real Property Resources, Inc
2780 Skypark Drive, Suite 400
Torrance, CA 90505

SUBJECT: APPROVAL OF A REVISED WORK PLAN FOR SOIL VAPOR INVESTIGATION

CASE/SITE: FORMER PACIFIC ELECTRICORD FACILITY, 747 WEST REDONDO BEACH BOULEVARD, LOS ANGELES, CA (SCP NO. 1180B, SITE ID NO. 2040198)

Dear Mr. Putnam:

Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) staff reviewed the October 31, 2019, *Work Plan for Supplemental Soil Vapor Survey and Installation of an Additional Groundwater Monitoring Well* (Work Plan), prepared and submitted by Waterstone Environmental, Inc. (Waterstone) on your behalf for the referenced site. The Los Angeles Water Board in an August 6, 2019 letter requested the submittal of a revised work plan to conduct soil vapor investigation and evaluation of vapor intrusion into indoor air.

SUMMARY OF THE WORK PLAN

The Work Plan proposes the following scope of work:

- A. Install ten permanent dual nested soil vapor probes throughout the site at approximate depths of 5 and 10 feet below ground surface (bgs), respectively. Soil vapor samples will be collected during two different seasons and analyzed for volatile organic compounds (VOCs). Based on the subsurface conditions encountered in the field, the probe depths may be adjusted to avoid soil formations that may not allow soil vapor flow during sampling. Probe installation and sampling will follow the July 2015, or its latest version, *Advisory – Active Soil Gas Investigations*, developed by the California Department of Toxic Substances Control (DTSC), and the San Francisco and Los Angeles Water Boards.
- B. Evaluate the human health risks associated with vapor intrusion into indoor air by using an attenuation factor of 0.03 and the soil vapor data collected during this

investigation. The calculated indoor air concentrations will be compared against the DTSC Human and Ecological Risk Office (HERO) Note 3, or the United States Environmental Protection Agency Regional Screening Levels (RSLs).

C. Install two sets of multi-depth groundwater monitoring wells.

LOS ANGELES WATER BOARD RESPONSE

Based on the information provided in the Work Plan and case files, Los Angeles Water Board staff provides the following responses:

1. The Work Plan adequately addressed the comments provided by the California Office of Environmental Health Hazard Assessment (OEHHA) in a memorandum dated June 26, 2019.
2. The proposed installation of permanent dual-nested soil vapor probes at 10 locations throughout the site is adequate.
3. The proposed evaluation of the risk associated with vapor intrusion into indoor air is adequate. However, the evaluation should consider the most recent version of the HERO Note 3 and RSLs.
4. A technical report summarizing the soil vapor probe installation and sampling (two separate events), and the risk evaluations using the data from the two sampling events is due to the Los Angeles Water Board by **December 31, 2020**. The report will also be forwarded to and reviewed by OEHHA staff.
5. The Los Angeles Water Board will respond to the proposed installation of two sets of multi-depth groundwater monitoring wells in a separate letter.

If you have any questions, please contact me at (213) 576-6667 or luis.changkuon@waterboards.ca.gov.

Sincerely,



Luis Changkuon
Engineering Geologist
Site Cleanup Unit I

cc: Howard Chapman, Redondo Beach Boulevard 110 Freeway LA Partnership LTD
Mark Shifflet, Waterstone Environmental Inc.

Los Angeles Regional Water Quality Control Board

January 22, 2020

Mr. Scott Putnam
APA III Ltd
C/o Real Property Resources, Inc
2780 Skypark Drive, Suite 400
Torrance, CA 90505

RETURN MAIL
RETURN RECEIPT REQUESTED
CLAIM No. 7018 2290 0002 2267 4310

SUBJECT: APPROVAL OF REVISED WORK PLAN FOR GROUNDWATER MONITORING WELL INSTALLATION, PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER

SITE: FORMER PACIFIC ELECTRICORD FACILITY, 747 WEST REDONDO BEACH BOULEVARD, LOS ANGELES, CA (SCP NO. 1180B, SITE ID NO. 2040198)

Dear Mr. Putnam:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) staff reviewed the October 31, 2019, *Revised Work Plan for Supplemental Soil Vapor Survey and Installation of Additional Groundwater Monitoring Wells* (Work Plan), prepared and submitted by Waterstone Environmental, Inc. on your behalf for the referenced site. The Los Angeles Water Board in an August 14, 2019 amendment to the California Water Code (CWC) section 13267 Order originally dated November 1, 2008, required the submittal of a revised work plan for additional groundwater monitoring well installation.

SUMMARY OF THE WORK PLAN

The Work Plan proposes the following scope of work:

- A. Install multi-depth groundwater monitoring wells at two locations: 1) in the general vicinity of the southwest corner of the site, and 2) off-site location, approximately 130 feet east of hydropunch boring PE-OS-HP2. The proposed four screen intervals will be approximately 25 to 50, 60 to 65, 80 to 85, and 100 to 105 feet below ground surface.

After installation, the new wells will be developed and surveyed. Groundwater samples will be collected from all new wells and analyzed for volatile organic compounds (VOCs) for four consecutive semi-annual events. Then, the sampling and monitoring of these new wells may be modified to less frequency.

- B. Install ten on-site permanent dual nested soil vapor probes.

LOS ANGELES WATER BOARD RESPONSE

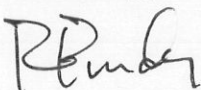
Based on the information provided in the Work Plan and case files, the Los Angeles Water Board provides the following responses:

1. The installation of multi-depth groundwater monitoring wells at the two proposed locations is approved. Any modifications to the groundwater monitoring program must be approved by the Los Angeles Water Board. A technical report summarizing the installation, development and first sampling of these wells is due to the Los Angeles Water Board via GeoTracker by **July 31, 2020**.
2. Well installations at off-site properties require access agreements that may take time. To keep the Los Angeles Water Board informed on the status of off-site access, you are required to submit bi-monthly status reports to the Los Angeles Water Board via GeoTracker by the 15th of the month following the end of a 2-month period, until access is obtained. The first access status report is due to the Los Angeles Water Board via GeoTracker by **March 15, 2020**.
3. The Los Angeles Water Board responded to the proposed soil vapor probe installation in a separate letter dated December 6, 2019.

The requirement for submittal of the technical reports by the specified due dates constitutes an amendment to the CWC Section 13267 Order originally dated November 13, 2008 (Order). All other aspects of the Order originally dated November 13, 2008, and the amendments thereto, remain in full force and effect. The required technical reports are necessary to investigate the characteristics of and extent of the discharges of waste at the site and to evaluate cleanup alternatives. Therefore, the burden, including the costs of the reports bear a reasonable relationship to the need for the reports and benefits to be obtained. Pursuant to section 13268 of the CWC, failure to submit the required technical report by the specified due date may result in civil liability administratively imposed by the Regional 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, please contact Luis Changkuon, Project Manager at (213) 576-6667 or luis.changkuon@waterboards.ca.gov, or Su Han, SCP I Unit Chief at (213) 576-6735 or su.han@waterboards.ca.gov.

Sincerely,



Renee Purdy
Executive Officer

See next page for cc list

Mr. Scott Putnam
APA III Ltd.
SCP No. 1180B

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January 22, 2020

cc: Howard Chapman, Redondo Beach Boulevard 110 Freeway LA Partnership LTD
Mark Shifflet, Waterstone Environmental Inc.
Brian Partington, Water Replenishment District of Southern California
Jeff O'Keefe, State Water Resources Control Board, Department of Drinking Water
Kelvin Lew/George Faustele, Los Angeles Department of Water and Power