

From: jodencrantz@tri-s.com
Sent: Monday, July 8, 2024 8:08 AM
To: 'Landaverde, Carlos@Waterboards'
Cc: 'Susana.Arredondo@waterboards.ca.gov'; 'Joan Davidson'; 'jodencrantz@tri-s.com'; 'Dave.Kereazis@dtsc.ca.gov'; 'acm@cbcearthlaw.com'; 'Richard Drury'
Subject: RE: 2325 Crenshaw Blvd.
Attachments: Tri-S Environmental to Torrance City Attorney Sullivan Re 2325 Crenshaw Blvd Env Impacts June 12, 2024 with Exhibits.pdf

Dear Mr. Landaverde:

Please find attached the first letter to the City Attorney of Torrance dated June 12, 2024. You are in receipt of the June 27, 2024 letter sent to City Attorney of Torrance (sent to Ms. Arredondo on June 27, 2024) and I am attaching the initial letter for sake of completeness plus to provide additional background. I strongly recommended a soil gas survey be conducted prior to any construction activities and delivered this recommendation at a City Council meeting on June 18, 2024.

I look forward to learning of your findings and please let me know if you have any questions during the course of your review.

Respectfully,
Joe Odencrantz

Joe Odencrantz, PhD, BCEE, PH, PE
Board Certified Environmental Engineer (Site Remediation)
Professional Hydrologist (Groundwater)
California Licensed Professional Civil Engineer
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From: Landaverde, Carlos@Waterboards <Carlos.Landaverde@Waterboards.ca.gov>
Sent: Monday, July 8, 2024 7:28 AM
To: jodencrantz@tri-s.com
Subject: 2325 Crenshaw Blvd.

Hello Mr. Odencrantz,

I have received the documents that you emailed over to me. I will be reviewing them today and providing my summary to management.

Thank you,

Carlos M. Landaverde, P.G.

Engineering Geologist

Los Angeles Regional Water Quality Control Board

Site Cleanup Program Unit IV

320 West 4th Street, Suite 200

Los Angeles, CA 90013

D: 213-620-6070



June 12, 2024

Delivered Via Email and Hand Delivery

City Attorney Patrick Q. Sullivan
City of Torrance Attorney's Office
3031 Torrance Boulevard
Torrance, CA 90503

RE: Proposed Torrance Del Amo Project

Recognized Environmental Conditions from Disposal/Waste Pond and Four Above Ground Storage Tanks at Former Oil Operations: Subsurface Investigation of Methane, Hydrocarbons and Solvents
2325 Crenshaw Boulevard, Torrance, California

Dear City Attorney Sullivan:

The purpose of this letter is to advise you that four above ground storage tanks and a waste pond were within the subject site perimeter for twenty years and the subsurface has yet to be investigated to determine the presence of residual contamination associated with former oil-field operations. These contaminants could include petroleum hydrocarbons (benzene, naphthalene, trimethylbenzene, etc.), solvents (trichloroethylene, tetrachloroethylene, etc.) and/or methane. At a minimum, a thorough subsurface soil gas survey should be conducted prior to any construction activities taking place or building permits granted. If contamination is found, an additional subsurface investigation should take place to determine the lateral and vertical extent of contamination.

I have reviewed the Phase I Environmental Assessment Report for the subject property dated July 5, 2022 prepared by Geocon West, Inc. (See Environmental Documents Appendix F on the City of Torrance documents for Torrance Del Amo Project) and signed off by environmental professional Mr. Jim Blake, Professional Geologist. Mr. Blake does not recommend a subsurface investigation prior to construction and recommends handling apparently contaminated soils, if encountered, during construction (there is no plan to address the left in place contamination). The Department of Toxic Substances and Control (DTSC) prepared a letter dated February 23, 2024 addressed to Mr. Peerapol Suree in which the author recommends "a proper evaluation of the Project is completed". I found this DTSC letter at pdf 100-104 out of 436 pdf pages of the Torrance RTCs found on the City of Torrance, Torrance Del Amo Project website (The letter can also be found at <https://ceqanet.opr.ca.gov/2024020302>). I spoke to the author of the DTSC letter on May 17, 2024, Mr. Dave Kereazis, Associate Environmental Planner, for approximately thirty minutes and he agreed with me that a soil gas survey should be completed prior to any construction. He verified the conversation in an email to me on the same day at 2:14PM.

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Tel: (949) 698-8851

As part of my investigation of the documented environmental concerns at the subject property, I contacted the Los Angeles County Methane hotline on May 14, 2024. I received a return phone call from Mr. Jonathan Rinella, PE, Associate Civil Engineer, Los Angeles County Public Works on May 15, 2024. Mr. Rinella, PE and we spoke for approximately thirty minutes. Mr. Rinella informed me there are potential subsurface environmental concerns after he simply entered the subject site address in the Los Angeles County Public Works Solid Waste Management System (SWIMS) "Do I need Methane Mitigation?" website <https://dpw.lacounty.gov/epd/swims/OnlineServices/search-methane-hazards-esri.aspx>. That search resulted five large circles around oil wells near/on the site (see *Exhibit A*) and contained the following alert:

The address [2325 CRENSHAW BLVD , TORRANCE CA] is located within 300 feet of one or more oil or gas wells. A methane mitigation system may be required. The address is located within the City of TORRANCE and is therefore subject to the City's methane code. For information about the City's methane zones and mitigation standards, please visit the City's website here.

Mr. Rinella, PE sent an email to me on the same day, May 15, 2024, at 5:36 PM. He attached a copy of Los Angeles County Public Works' Gas Hazard Mitigation Policy and Standards for my reference. He also included the SWIMS website link and stated "The Torrance Fire Department's Certified Unified Program Agency (CUPA), Hazardous Materials Administration is the lead for remedial action dealing with contaminated sites....". Mr. Rinella agreed with me when I suggested a subsurface investigation be conducted prior to any construction taking place and during the course of our conversation.

I reviewed the 21-page Project Plans in the Projects Documents section of the Torrance Del Amo Project files on the City of Torrance website (<https://www.torranceca.gov/our-city/community-development/planning-division/reports-land-use-studies/environmental-documents/torrance-del-amo-project>) and found two items I would like to draw your attention to. Those two items are described below:

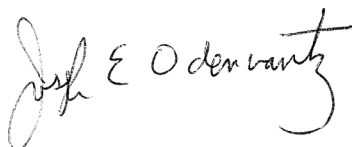
The first item is pdf 4 of 21 which is entitled "LEVEL 1 SITE PLAN" and it can be seen on the lower, middle portion of the page "APPROX LOCATION OF WELL 49 LISTED AS "PLUGGED" NOT FOUND IN FIELD" (Attached as *Exhibit B* and dated August 10, 2023). The four above ground storage tanks and the waste pond were not mapped but are described on page 14 in the Phase I Report dated July 2022 in the Observations section for the 1928 aerial photograph-attached as *Exhibit C*. The four above ground storage tanks were located within, near the center, of the proposed project area (Note: the former Chevron USA well number 49 is described in the 1928 aerial description). I have included pdf 806 of 889 of the July 2022 Phase I Report which is the 1928 aerial photograph, with the site boundaries in red, and in which the waste pond/four aboveground storage tanks are clearly visible (See *Exhibit D*). The 1947 aerial photograph description on page 14 of the July 2022 Phase I report states "The oil derrick and pond on the southern site boundary appears to have still been present." There is ample evidence from aerial photographs to warrant follow-up in the form of a subsurface soil investigation to ensure the soil gases does not contain elevated levels of contamination. Elevated levels of contamination left in place in the subsurface could expose local residents to environmental risks that may result in adverse health conditions.

The second item is pdf 16 of 21 which is entitled "SECTIONS" and is attached as *Exhibit E* (dated August 10, 2023). There are three sections shown on the drawing and each of the sections shows two levels of subterranean parking to a depth of approximately 15 feet below the surface to the bottom of level B2 (265

underground parking stalls proposed). There will be excavation to a depth of approximately 20 feet below current grade and over a large percentage of the foot print of the proposed structures. The author would like to examine the details of the five elevators proposed to be constructed and to check the depths of all elevator components. It is vitally important, and within acceptable standards of care, to investigate vapor phase concentrations of contaminants as part of due-diligence especially when a residential (multifamily) project is concerned. Please note that one of the three parcels in the project is described as "All Minerals, Petroleum, Oil, Asphaltum, Gas And/Or Hydrocarbon Substances, Including Helium, Within Or Underlying Said Parcel At A Depth Of More Than 500 Feet Below The Surface, As Reserved By Santa Fe Energy Company". It is more likely than not that there are residual levels of gases and hydrocarbon substances brought to the surface as described in the July 2022 Phase I report.

In closing, the developer should embark on a thorough soil gas investigation for the entire project area immediately and with a mutually agreeable scope of work. My client would like to have their expert review the sampling procedures, protocols and soil gas investigation work plan. Further, my client requests their environmental consultant be granted access to the sampling event and be allowed to obtain spilt soil gas samples to have analyzed independently. My client requests an opportunity to present our environmental contamination concerns to the City Council at the upcoming City Council meeting on June 18, 2024 at 6:30PM. Please forward this letter (with Exhibits) to the City Council members in advance of the meeting.

Very truly yours,



Joseph E. Odencrantz, Ph.D., P.E., BCEE
California Registered Professional Civil Engineer C 61137 (expiration 12/31/2024)
Board Certified Environmental Engineer 23-E0041 (expiration 12/31/2024)

Enclosures

- Exhibit A SWIMS Database results with five circles around oil wells and methane warning (6/11/2024)
- Exhibit B Level 1 Site Plan from the Project Plans Shows former Chevron Oil Well 49 and No Waste Ponds or Tanks (8/10/23)
- Exhibit C 1928/1947 Aerial Photograph Observations-Page 14 from 2022 Phase I Report (7/5/22)
- Exhibit D 1928 Aerial Photograph Shows Waste Pond, Four Above Ground Storage Tanks and Chevron Oil Well 49 from 2022 Phase I Report (7/5/22)
- Exhibit E Three Sections from the Projects Plans showing parking structure two levels underground at least 15 feet below surface (8/10/23)

Cc: Mr. Richard Windisch, President, South Bayport Homeowners Association

Exhibit A

SWIMS Database results with five circles around oil wells
and methane warning (6/11/2024)



Solid Waste Information Management System

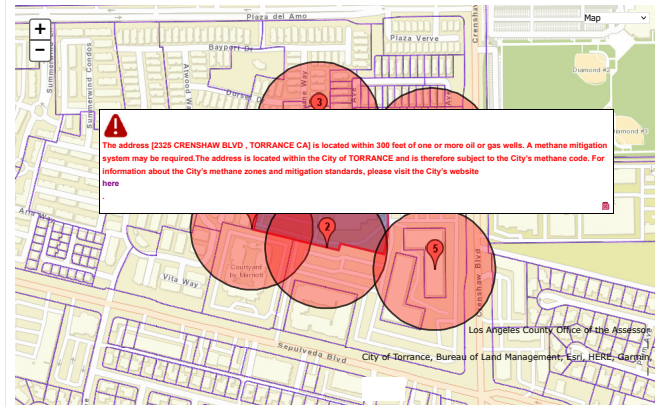
- Home
 - Residents »
 - Businesses »
 - Jurisdictions »
 - Online Services »
 - News & Resources »
 - Help »
- Do **1** Log In
Need

Methane Mitigation?

Find out if your property is within 1,000 feet of a methane producing site or 300 feet of an oil or gas well.

Search by:
 Address or Intersection ▾
 2325 Crenshaw Blvd., Torrance
 Search

[Measure Tool](#) [Report a Problem](#)



SITE INFO

- ADA Accessibility
- Title VI
- Privacy Policy / Terms of Use

EXPLORE

- Do Business with Public Works
- Organizational Chart
- Careers
- Projects

NEED HELP?

- 211 LA County
- Contact Public Works
- Public Works FAQ
- Report a Problem
- Submit Feedback



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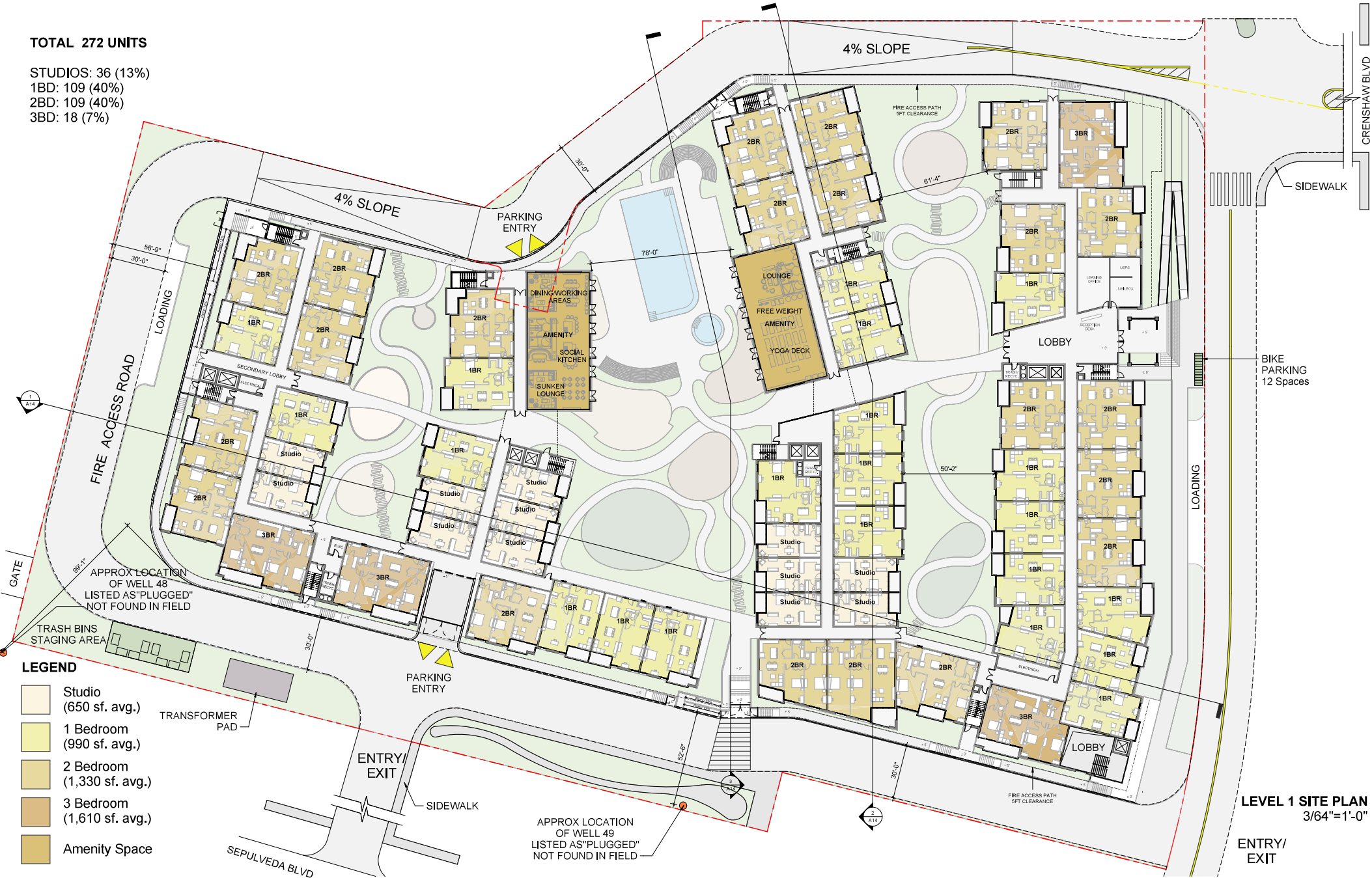
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Exhibit B

Level 1 Site Plan from the Project Plans Shows former
Chevron Oil Well 49 and No Waste Ponds or Tanks
(8/10/23)

TOTAL 272 UNITS

STUDIOS: 36 (13%)
 1BD: 109 (40%)
 2BD: 109 (40%)
 3BD: 18 (7%)



LEGEND

- Studio (650 sf. avg.)
- 1 Bedroom (990 sf. avg.)
- 2 Bedroom (1,330 sf. avg.)
- 3 Bedroom (1,610 sf. avg.)
- Amenity Space

LEVEL 1 SITE PLAN
 3/64"=1'-0"

ENTRY/
 EXIT

Exhibit C

1928/1947 Aerial Photograph Observations-Page 14 from
2022 Phase I Report (7/5/22)

4.3.5 County of Los Angeles Agricultural Commissioner/Weights & Measures

We submitted a request to the County of Los Angeles Agricultural Commissioner/Weights & Measures (ACWM) regarding the use of restricted pesticides at the Site and adjoining properties. Ken Pellman, ACWM's Public Information Officer, indicated "We do not keep records beyond the past 5 years. Also, unless the location has a pesticide program, we will not have records specific to an address."

5.0 HISTORICAL USE

We evaluated the historical use of the Site and adjacent properties through review of historical aerial photographs, topographic maps, and city directories provided by EDR. This section summarizes information obtained from these sources.

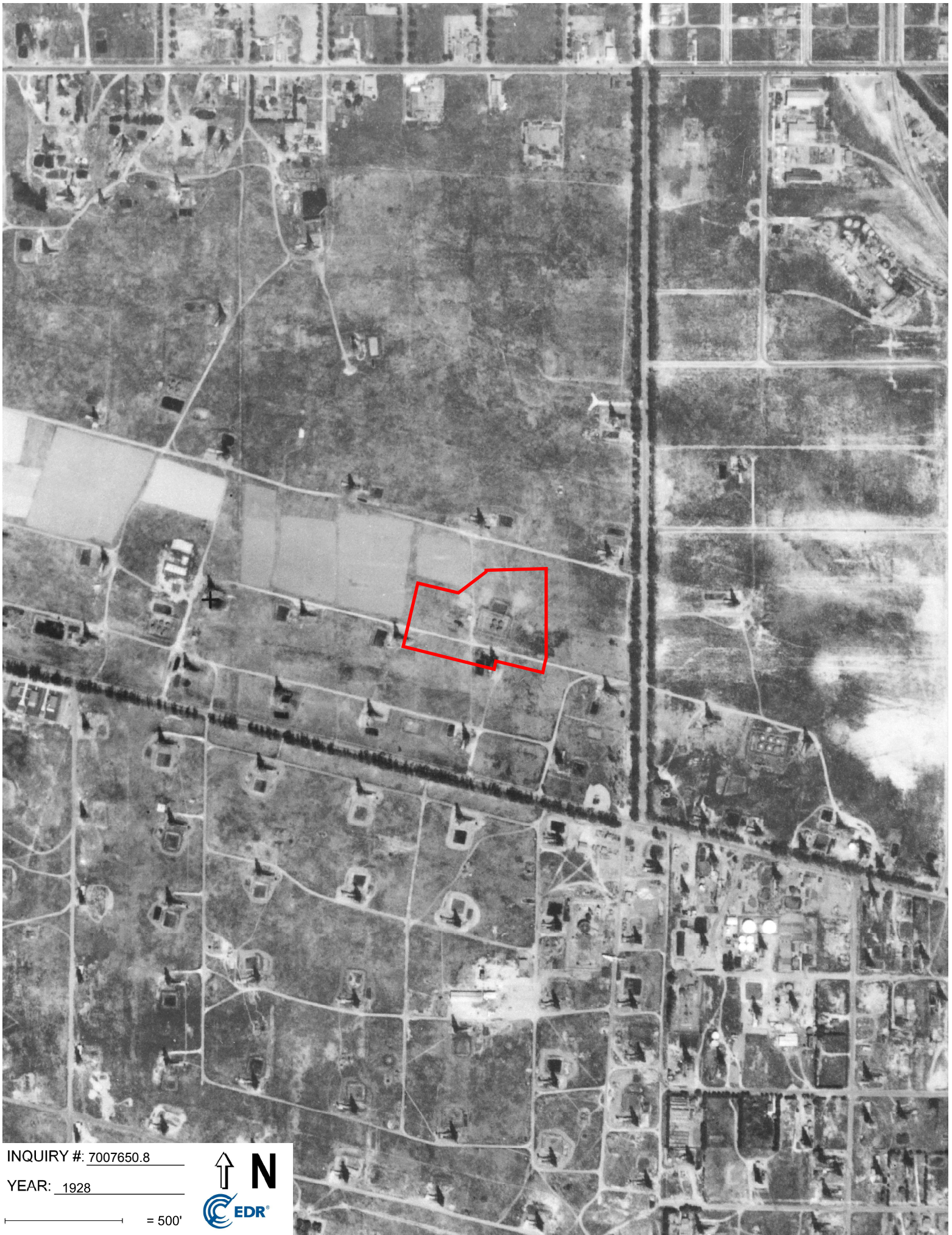
5.1 Aerial Photographs

We reviewed the historical aerial photographs for the years 1928, 1947, 1954, 1963, 1977, 1981, 1989, 1994, 2002, 2005, 2009, 2012 and 2016 (provided by EDR and Appendix D) for indications of past land uses that could have potentially impacted the Site through the use, storage, or disposal of hazardous substances and/or petroleum. The following table summarizes our observations of the Site and site vicinity on the historical aerial photographs.

Year	Observations	
	Site	Adjoining and Adjacent Properties
1928 (1" = 500')	Four aboveground storage tanks (AST) surrounded by a soil berm and what appears to have been a waste pond on the northern side of the berm were present near the center of the Site. An oil well derrick (likely the former Chevron USA well number 49) and waste pond were present at the southern site boundary. An unimproved road was present across the southern portion of the Site.	Oil well derricks and waste ponds were present at approximate 450-foot-intervals west, east, and south of the Site with one (likely former Chevron USA well number 48) adjacent to the southwest of the Site. Oil derricks and waste ponds were also present north of the Site, but with larger spacing between them. Improved roads were present in the locations of present day Crenshaw Boulevard and Sepulveda Boulevard.
1947 (1" = 500')	The resolution of the photo is poor, but the four ASTs and pond appear to have been removed and the berm graded down/spread out on the surrounding ground surface. The oil derrick and pond on the southern site boundary appears to have still been present. What appears to have been a farm field was present in the northeastern portion of the Site.	Conditions appear to have been somewhat similar to those observed on the 1948 photo except that farm fields were present on adjoining properties east and northeast of the Site and an airfield or railroad and possible military or industrial facility are partially visible east of Crenshaw Boulevard.

Exhibit D

1928 Aerial Photograph Shows Waste Pond, Four Above
Ground Storage Tanks and Chevron Oil Well 49 from
2022 Phase I Report (7/5/22)



INQUIRY #: 7007650.8

YEAR: 1928

— = 500'

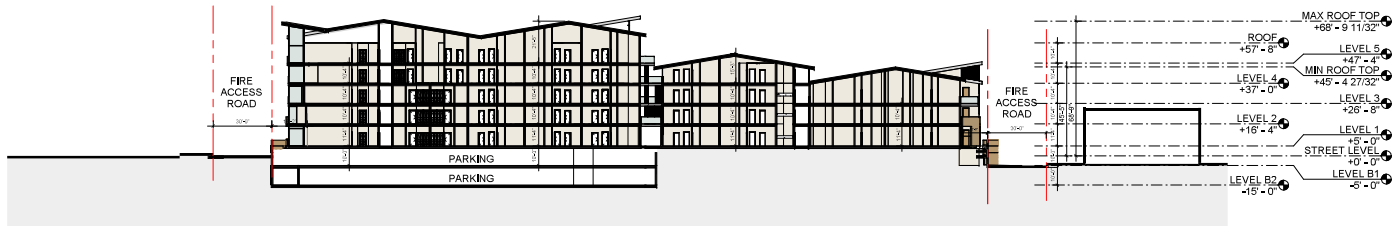


Exhibit E

Three Sections from the Projects Plans showing parking structure two levels underground at least 15 feet below surface (8/10/23)



SECTION 1
1"=1'-30"



SECTION 2
1"=1'-30"



SECTION 3
3/64"=1'-0"

