



Los Angeles Regional Water Quality Control Board

July 22, 2024

Leonard Glickman Rose Equities 8383 Wilshire Boulevard, Suite 632 Beverly Hills, CA 90211 Certified Mail Return Receipt Requested Claim No. 7022 1670 0001 3482 1350

SUBJECT: NOTICE OF INTENT FOR REGULATORY OVERSIGHT

SITE: TORRANCE DEL AMO PROJECT LOCATED AT 2325 CRENSHAW BOULEVARD, TORRANCE, CA 90501 (AIN 7359-028-233)

Dear Mr. Glickman:

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 27, 2024, July 2, 2024, and July 8, 2024 the Los Angeles Water Board was notified by a concerned citizen of a proposed residential development known as the Torrance Del Amo Project on potentially contaminated property. The Los Angeles Water Board reviewed a series of documents pertaining to the Torrance Del Amo Project (Site) and a summary is present below.

SUMMARY OF PROVIDED DOCUMENTS

The 5.5-acre project site assessor identification number is 7359-028-233. The project includes the development of four residential buildings with a total of 272 multi-family units and two levels of subterranean parking.

A subsurface investigation was conducted in 1987 by LeRoy Crandall and Associates (LeRoy & Associates) at the Site and it was determined that petroleum hydrocarbons impacts were found in boring 4. The boring had various depths of odor/staining in soil beginning at approximately 5 feet below ground surface (bgs), and petroleum odor at 16 feet bgs. LeRoy & Associates did not determine the extent or type of hazardous material at the Site because it was not within the scope of investigation to be conducted.

In July 2022, a Phase I Environmental Site Assessment (ESA) was prepared for the project by GEOCON West, Inc (GEOCON). The ESA identified past petroleum production at the Site, above-ground storage tanks, an oil derrick and oil well, and a waste oil and water pond. Based on the information provided in the ESA, no assessment and cleanup activities or regulatory oversight have occurred. GEOCON recommended a soil management plan (SMP), along with testing for asbestos and lead-based paint when demolition occurs at the Site.

LOS ANGELES WATER BOARD COMMENTS

The reviewed documents and aerial photography from the Site indicate the historical presence of an oil derrick, oil well and waste pond(s). These features have the potential to be a source of soil, soil vapor and groundwater contamination. Soil vapor impacts have the potential to cause soil vapor intrusion in current and future buildings. It is imperative that the potential sources of contamination from the historical activities and operations at the Site is properly identified, assessed and if warranted, remediated to avoid unintended exposure to future residents and to protect the environment. Therefore, to ensure protection to human health and the environment, the Los Angeles Water Board recommends the following assessment prior to redevelopment of the property:

- 1. Conduct soil and soil vapor sampling in a grid pattern to determine if the subsurface is impacted and the extent of the impacted subsurface at the Site.
- 2. Screen groundwater using discrete/grab sampling methods (e.g. hydropunch) to determine if groundwater is impacted beneath the Site.
- 3. A SMP approved by the regulatory oversight agency is recommended prior to redevelopment of the Site. The SMP should include sampling and segregation of impacted soil if excavation were to occur at the Site and impacted soil is encountered. If clean fill is to be imported to the Site, the clean fill is recommended to be tested before it is imported to the Site.

The environmental work shall be conducted under the proper regulatory agency oversight, either the Department of Toxic Substances Control or the Los Angeles Water Board. Therefore, please notify the Los Angeles Water Board and Mr. Carlos Landaverde of the Los Angeles Water Board in writing of your intent to obtain oversight and conduct the proper site assessment or characterization prior to redevelopment, no later than **August 5, 2024**. Mr. Carlos Landaverde can be contacted:

Carlos M. Landaverde Los Angeles Regional Water Quality Control Board Site Cleanup Program Unit IV 320 West 4th Street, Ste. 200 Los Angeles, CA 90013 P: 213-620-6070 Los Angeles Water Board staff are available to meet with you to work out all the necessary details to ensure the completion of the required environmental investigations.

We thank you in advance for your prompt attention in this matter and look forward to working with you on conducting an environmental investigation of all media at the Site.

If you have any questions regarding this letter, please contact Carlos M. Landaverde at (213) 620-6070 or via email at Carlos.Landaverde@waterboards.ca.gov, or Dr. Angelica Castaneda, Site Cleanup IV Supervisor. (213) 576-6737 Unit at or via email at Angelica.Castaneda@waterboards.ca.gov.

Sincerely,



For Susana Arredondo Executive Officer

cc (via email):

Sarah Larese, Department of Toxic Substances Control (<u>sarah.larese@dtsc.ca.gov</u>) Dave Kereazia, Department of Toxic Substances Control (<u>dave.kereazis@dtsc.ca.gov</u>) Aram Chaparyan, City of Torrance (<u>achaparyan@torranceCA.gov</u>) Leo Oorts, City of Torrance (<u>loorts@torranceCA.gov</u>) Kevin Milikan, Assistant Chief – Planning Division, City of Torrance (<u>kmilikan@torranceCA.gov</u>) Brent Stoll, Chief Operating Officer, Rose Equities (<u>brent@roseequities.com</u>) Joe Odencrantz, Tri-S Environmental (jodencrantz@tri-s.com)