

From: jodencrantz@tri-s.com
Sent: Thursday, April 17, 2025 2:22 PM
To: kwalker@coxcastle.com
Cc: 'Landaverde, Carlos@Waterboards'; 'Castaneda, Angelica@Waterboards'; 'Arredondo, Susana@Waterboards'; 'Carder, Amelia@Waterboards'; 'Ly, Jillian@Waterboards'; 'Kereazis, Dave@DTSC'; 'Rosas, Anthony@DTSC'; 'Larese, Sarah@DTSC'; 'Richard Drury'; hayley@lozeaudrury.com; 'Sullivan, Patrick'; jodencrantz@tri-s.com; 'Tasnif-abbasi, Maryam@DTSC'
Subject: Report on Environmental Conditions: Torrance Del Amo Project, 2325 Crenshaw Blvd, Torrance, California 90501 (AIN 7359-028-233)
Attachments: Aug 6 2024 email from Carlos and Walker Cox Castle.pdf; Review_SCP4_CL_AC_Intent for Regulatory Oversight_Torrance Del Amo Project from walker aug 6 2024.pdf

Mr. Walker:

We spoke this Tuesday morning, 4/15, and you stated you are required to receive permission from Rose Equities to release any information regarding recent subsurface testing at the subject site. I have yet to hear back from you. You stated the environmental testing consultant was Geocon Incorporated. As you know, I am interested in obtaining the report of recent subsurface investigation/testing (conducted in ~October 2024). I suggested subsurface testing on environmental conditions be conducted at the June 18, 2024 Torrance City Council Meeting/Hearing. I called you Tuesday to request a copy of the Investigation Report. The report has yet to be posted to either EnviroStor or Geotracker.

You wrote an email to Mr. Carlos Landaverde of Los Angeles Regional Water Quality Board on August 6, 2024, in response to the July 22, 2024 Notice of Intent for Regulatory Oversight letter issued to Rose Equities (attached hereto), in which you stated:

"In any event, responding to your letter, Rose Equities is obtaining oversight from DTSC's Cypress Office. I am in communication with Maryam Tasnif-Abbasi and we are submitting the oversight applications and paying the requisite fees for a case file opening and will proceed with the work required by DTSC in relation to the environmental condition of the subject property."

The aforementioned email was sent to me from the Los Angeles Regional Water Quality Board and is also attached hereto.

Ms. Tasnif-Abbasi of DTSC wrote to Water Board (Angelica Castaneda, Amelia Carder, Jillian Ly, Carlos Landaverde and Susana Arredondo), DTSC (Dave Kereazis, Anthony Rosas and Sarah Larese) and myself on Tuesday August 13, 2024 at 12:21 PM:

"Angelica: Thank you for copying us on your response. We are on the same page; once the Request for Lead Agency Oversight is received, we will follow the MOA process for lead agency determination"

Please provide the testing results and investigation report as requested (plus the DTSC Case Number) as soon as possible. Please also include:

1. Case File Opening and Requisite Fees Documentation,
2. Ambient Air/Soil Vapor/Soil/Groundwater Investigation Work Plan,
3. Access Agreement,
4. Work Plan Approval Letter from Agency,
5. Drilling Permits,
6. Boring Logs,
7. Hydropunch Sampling Results (Include purging operation description, water sampling forms, sampling methods and analytical results),
8. Vapor/Soil Gas Testing Results (Include sampling forms, sampling methods and analytical results),
9. Ambient Air Testing Results (Include sampling forms, sampling methods and analytical results),
10. All Analytical Results and Laboratory Reports Including All QA/QC and Calibration Data/Validation Results (Tier II Data Validation)
11. All Analytical Results for Duplicates, Field Blank and Trip Blank,
12. Laboratory Chain of Custodies,
13. Describe All Methods Used to Prevent/Minimize Cross-Contamination of The Geologic Formation (Soil and Groundwater) and Sampling/Drilling Equipment
14. Summary Tables of Analytical Results with Screening and Action Levels for Each Constituent, e.g. Benzene, Ethylbenzene, Toluene, Trichloroethylene, Trimethylbenzene, Naphthalene, Methane, and plus Metals/Metalloids such as Barium, Cadmium, Nickel, Vanadium, Arsenic, Lead, Manganese, Copper, Vanadium and Mercury, etc.
15. Site Map(s) Showing Ambient Air/Soil Vapor/Boring/Hydropunch Locations,
16. Calibration Logs of All Field Testing/Screening Instruments,
17. Site-Specific Health&Safety Plan (Include Personal Protective Equipment Used, Route to Hospital, Anticipated Contaminants of Concerns/Levels Anticipated and Emergency Response Plan),
18. All Waste Characterization Documentation and Disposal Records of Waste(s) Generated Including Manifests, Certificates of Destruction and/or Landfill Information (if applicable),
19. All Appendices to the Report, and
20. Letter of Submittal/Transmittal of The Report/Test Results to The Lead Governmental Oversight Agency.

Very truly yours.

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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"One World, One Environment"

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From: Landaverde, Carlos@Waterboards <Carlos.Landaverde@Waterboards.ca.gov>
Sent: Tuesday, August 6, 2024 4:28 PM
To: jodencrantz@tri-s.com
Subject: FW: Notice of Intent for Regulatory Oversight - Torrance Del Amo Project - 2325 Crenshaw Blvd., Torrance
Attachments: Review_SCP4_CL_AC_Intent for Regulatory Oversight_Torrance Del Amo Project.pdf

Here is the email from Keith Walker.

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

From: Walker, Keith B. <kwalker@coxcastle.com>
Sent: Tuesday, August 6, 2024 7:21 AM
To: Landaverde, Carlos@Waterboards <Carlos.Landaverde@Waterboards.ca.gov>
Subject: Notice of Intent for Regulatory Oversight - Torrance Del Amo Project - 2325 Crenshaw Blvd., Torrance

Caution: External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

Mr. Landaverde,

My name is Keith Walker and I'm environmental counsel for Rose Equities. We received your letter dated July 22, 2024 (attached), and I tried to reach you *via* telephone but it would not let me leave a message.

In any event, responding to your letter, Rose Equities is obtaining oversight from DTSC's Cypress Office. I am in communication with Maryam Tasnif-Abbasi and we are submitting the oversight applications and paying the requisite fees for a case file opening and will proceed with the work required by DTSC in relation to the environmental condition of the subject property.

Please let me know if you need any further information from me or Rose Equities. I'm sorry for the delay but members of the landowner team have been out of the office, and it took longer than expected to respond.

Thank you,

Keith

Keith B. Walker



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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.

NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

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 Unit IV Supervisor, at (213) 576-6737 or via email at Angelica.Castaneda@waterboards.ca.gov.

Sincerely,

 Digitally signed by
Jillian Ly
Date: 2024.07.19
15:52:20 -07'00'
Water Boards

For Susana Arredondo
Executive Officer

cc (via email):

Sarah Larese, Department of Toxic Substances Control
(sarah.larese@dtsc.ca.gov)

Dave Kereazia, Department of Toxic Substances Control
(dave.kereazis@dtsc.ca.gov)

Aram Chaparyan, City of Torrance (achaparyan@torranceCA.gov)

Leo Oorts, City of Torrance (loorts@torranceCA.gov)

Kevin Milikan, Assistant Chief – Planning Division, City of Torrance
(kmilikan@torranceCA.gov)

Brent Stoll, Chief Operating Officer, Rose Equities (brent@roseequities.com)

Joe Odencrantz, Tri-S Environmental (jodencrantz@tri-s.com)