Appendix E4 County of Los Angeles Fire Department Letter



COUNTY OF LOS ANGELES FIRE DEPARTMENT

HEALTH HAZ MAT DIVISION 5825 RICKENBACKER RD COMMERCE, CA 90040 (323) 890-4045 www.fire.lacounty.gov

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FORESTER & FIRE WARDEN

DARYL L. OSBY

FIRE CHIEF

July 26, 2019

Hoi Man Chan Opfiniti LLC 1515 W. 178th Street Gardena, CA 90248

Dear Mr. Chan:

ROADEX, 1515 WEST 178th STREET, GARDENA CALIFORNIA 90248 (SMU FILE #18-1126/RO0001744)

The Site Mitigation Unit (SMU) of this Department has completed a review of the reports entitled, "Further Site Assessment With LACFD Oversight, 1515 West 178th Street. Gardena, California 90248," dated April 16, 2019; "Quarterly Groundwater Monitoring Event — Second Quarter 2019, 1515 W. 178th Street, Gardena, California," dated June 20, 2019; and, "Remedial Action Plan, 1515 West 178th Street, Gardena, California 90248," dated June 27, 2019, prepared by your consultant, Stantec Consulting Services, Inc. (Stantec). Based on this review, an approval is hereby granted for implementation of the Remedial Action Plan (RAP) at the above referenced site. The onsite implementation of the field activities outlined in the RAP should meet general expectations presented in applicable U.S. EPA guidance, Cal-EPA guidance and other applicable guidance/advisory documents. In addition, please note the following:

1. All necessary permits and/or approvals for any work activities associated with the RAP should be obtained from the appropriate agencies. The requirements listed herein do not exempt the responsible party or their agent from compliance with any other applicable laws, regulations, or ordinances (including pertinent disclosure and notification requirements to current/future occupants and/or tenants, if applicable). This Department's approval of the RAP leaves unaffected any further restriction or restraint which may be contained in other statutes or required by other agencies.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- 2. All engineering and/or geological work should be performed or supervised by California Registered Professionals in accordance with the Business and Professions Code, Sections, 6700-6799, 7800-7887 & 8700-8805, and the California Code of Regulations, Title 16, Sections 400-476 & 3000-3067.
- 3. Earth-moving activities of 50 cubic yards or more of contaminated soil may be subject to AQMD's Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants.
- 4. This Department adheres to the proposed excavation cleanup goal levels noted in the RAP, Section 3.1, for total petroleum hydrocarbon (TPH) concentrations in soil of 1,000 mg/kg (which could present a nuisance in the upper ten feet of soil) and the Regional Water Quality Control Board (RWQCB) TPH soil screening levels established for the protection of groundwater. In addition, this Department also adheres to the Department of Toxic Substances Control (DTSC) Hero and U.S. EPA Regional Screening Levels (RSLs) for TPH concentrations in soil established for protection of human health.
- 5. The RAP activities should be adhered to as approved. Any significant deviation or change should be submitted in writing (e.g., email or letter) and written approval obtained by this Department prior to implementation. Any phone notifications pertaining to deviation/change during "real time" implementation of RAP activities should be followed-up by written correspondence. Notify this Department at least three (3) working days prior to the implementation of RAP field activities at the site. The RAP should be implemented by August 30, 2019.
- 6. The two trenches located within the onsite truck maintenance/service area that are tributary to the northern unpaved strip of land should be plugged or otherwise managed to eliminate any potential discharge from the trenches to the unpaved area (north of the building). Please provide a description and photos of the best management practices implemented for the trenches in the final report provided to SMU.
- 7. A stand-alone Soil Management Plan (SMP) and associated Health and Safety Plan (HASP) should be provided for SMU review prior to any future request for no further action from this Department and prior to any site-wide grading activities.
- 8. Note that the authority of SMU does not extend to the permitting and/or removal of any potential onsite clarifiers; this is the jurisdiction of the City of Gardena and Los Angeles County Department of Public Works, Environmental Programs Division (LACoDPW-EPD). However, SMU can oversee the assessment and cleanup of onsite contamination resultant from past clarifier use, if applicable. In addition, LACoDPW-EPD has jurisdiction of underground storage tanks (USTs) in the event that USTs are encountered during future onsite grading and/or development activities. The Los Angeles Regional Water Quality Control Board (LARWQCB) would initially have jurisdiction for any UST associated releases that potentially threaten the underlying groundwater at the site.

9. The owner(s) of properties with soil and soil vapor contaminant concentrations exceeding their associated State/Federal residential screening levels (after site cleanup activities or human health risk assessments) will have to provide documentation to this Department of the filing of an environmental notification/restriction (Notice) with the County Recorder, which serves to notify future buyer(s) and occupants of the existence of contaminated media on the site and of any associated mitigation measures.

In addition to the hardcopy, please submit subsequent report(s) in pdf format on CD/USB. If you have any questions, please feel free to call Jennifer Levenson at (323) 890-4114.

Respectfully submitted,

RICHARD CLARK, SUPERVISOR

SITE MITIGATION UNIT

Ridd & Clark

HEALTH HAZARDOUS MATERIALS DIVISION

RC:jl

ec: K. Emerson, Stantec

D. Monge, Stantec