



COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
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VIA EMAIL

June 3, 2021

New SWS Southland Real Estate, LLC
c/o
Agnes So
11730 Valley Blvd.
El Monte, CA 91732

Dear Ms. So:

PROPOSED RESIDENTIAL DEVELOPMENT 11640 - 11730 VALLEY BLVD, EL MONTE, CA 91732 (SMU FILE #20-1208/RO0001826)

This Department has completed a review of the reports entitled, "Limited Phase II Environmental Site Assessment, Including Sampling Test Results, APN: 8566-021-011, Portion of Lot 3, Lot 4 of Tract No. 3480, 11710 Valley Boulevard, Including APN: 8566-021-012, -013, -014 and -015, Portions of Lot 5 of Tract No. 3480, 11640, 11646, 11650 and 11654, Valley Boulevard, El Monte, California," dated July 24, 2013, prepared by Environmental Geotechnology Laboratory, Inc. (EGL); "Response to the City of El Monte Economic Development Department, Environmental Review Sheet dated August 1, 2013, Reviewed by SCS Engineers for City of El Monte, SCSE File No. 01213005.10, 11710 Valley Boulevard (APN: 8566-021-011, Portions of Lot 3 and Lot 4 of Tract No. 3480), Including 11640, 11646, 11650 and 11654 Valley Boulevard (APN: 8566-021-012, -013, -014 and -015, Portions of Lot 5 of Tract No. 3480), El Monte, California," dated October 3, 2013, prepared by EGL; "Vapor Intrusion Risk Evaluation: 11640-11730 Valley Blvd., El Monte, CA," dated March 29, 2021, prepared by Hartman Environmental Geoscience; and, "Environmental Soil and Vapor Sampling, 11640-11730 Valley Boulevard, El Monte, CA," dated April 14, 2021, prepared and submitted by your consultant, Smith-Emery GeoServices (SEG).

Based on this Department's review of the submitted reports, we concur with your consultant that the site has been adequately environmentally assessed on the condition that a soil / soil vapor management plan (SMP) is implemented at the site prior to onsite grading and construction activities for the proposed residential development.

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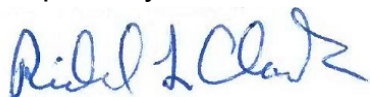
A SMP is typically necessary because unknown soil impacts (i.e., buried contaminant sources) that could be encountered, such as drums, tanks, clarifiers, sumps, trash/inert debris, septic tanks/systems and so on, would be mitigated by SMP implementation. A SMP is a pre-approved plan of action to manage, assess and cleanup onsite environmental impacts. Meaning, SMP implementation would expedite mitigation efforts, while allowing onsite development activities to continue rather than be delayed or halted. Please submit the SMP to this Department by July 15, 2021. The SMP to be submitted 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 proposed work activities to be included in the SMP should be obtained from the appropriate agencies. The requirements listed herein do not exempt the responsible party or their agents from compliance with any other applicable laws, regulations, or ordinances (including pertinent disclosure/notification requirements to current/future occupants and/or tenants, if applicable).
2. Please update your site-specific health and safety plan (HASP), if applicable. The HASP should meet the requirements of the California Code of Regulations (CCR) Title 8, Section 5192, "Hazardous Waste Operations and Emergency Response." The HASP should include (but not limited to): Site map, key personnel, responsibilities and qualifications, job hazard analysis, risk assessment summary, exposure monitoring plan, protective equipment, work zones and security measures, decontamination procedures, general safe work practices, standard operating procedures, nearest hospital location and map, contingency plan, training requirements and documentation of the medical surveillance program. Also, the HASP should address COVID-19 precautionary measures, including personal protection and/or social distancing.
3. All engineering and/or geological work outlined in the SMP 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 CCR, Title 16, Sections 400-476 & 3000-3067.
4. It appears that the soil vapor beneath the site has been adequately assessed for gaseous volatile organic compound (VOCs); however, this Department recommends that at least three (3) soil vapor sub-slab samples be collected along the southern property border immediately beneath hardscape concrete pads/slabs to verify VOC (equilibrium) concentrations immediately beneath onsite pad/slab locations. The proposed sub-slab soil vapor samples should be analyzed for full-list VOCs.
5. The SMP should specify the vertical and lateral delineation (i.e., step-out sampling and testing) of encountered contaminated soil before the soil is excavated, stockpiled, and transported off-site. If contaminated soil cannot be subject to in-situ sampling, then, such soil, if excavated and stockpiled onsite, would have to be transported and disposed off-site at a permitted disposal and/or treatment facility. The said soil could not be reused onsite.

6. The SMP should specify that any known contaminated soil stockpiled onsite (i.e., waste soil stockpile) during future grading/excavation activities cannot be reused onsite even if chemical profile soil sample results indicate concentrations of contaminants in stockpiled soil are below screening levels. Stockpiled contaminated soil should be properly disposed at a permitted off-site disposal/treatment facility. The SMP should also address the handling of onsite nuisance (discolored and/or odorous) soil if encountered at the site.
7. If underground storage tanks (USTs) are encountered during future onsite grading activities, the SMP should specify the Los Angeles County Department of Public Works, Environmental Programs Division, UST Program (DPW EPD) as the lead environmental/permitting agency to oversee onsite UST removal 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.
8. If a responsible party or their agent wishes to demonstrate that any hazardous constituents left in soil and/or soil vapor exceeding State/Federal residential screening levels will not cause unacceptable risks to public health, the data should be of sufficient quality for this Department and Cal-EPA Office of Environmental Health Hazard Assessment (OEHHA) to evaluate the human health risks and hazards of the contaminants.
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 evaluations) are subject to applicable disclosure/notification requirements. An environmental notification/restriction identifying the onsite contaminant concentration/location(s) and any mitigation measures (e.g., vapor barriers) would have to be filed with the county recorder.

In addition to the hardcopy, please submit subsequent reports in pdf format on CD. If you have any questions, please feel free to call Michael Bravo at (323) 890-4031.

Respectfully submitted,



RICHARD CLARK, SUPERVISOR
SITE MITIGATION UNIT
HEALTH HAZARDOUS MATERIALS DIVISION

RC:mb

ec: N. Lee, City of El Monte
S. Elias, City of El Monte
A. Syeda, SEG