



COUNTY OF LOS ANGELES FIRE DEPARTMENT

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VIA EMAIL

February 12, 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, CALIFORNIA 91732 (SMU FILE #20-1208/RO0001826)

This Department has completed a review of the reports entitled, "Phase I Environmental Site Assessment, Vacant Auto Dealership, 11710 Valley Boulevard, El Monte, Los Angeles County, California," dated May 16, 2012, prepared by Terracon Consultants, Inc. (Terracon); "Limited Phase II Environmental Site Assessment and Sampling Test Results, APN: 8566-021-012, -012, -014 and -015, Portions of Lot 6 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; "Phase I Environmental Site Assessment, Proposed Mixed Commercial and Residential Development, 11640-11730 Valley Boulevard, El Monte, Los Angeles County, California," dated December 21, 2018, prepared by Terracon; "Phase I Environmental Site Assessment, Proposed Residential Development, 11640-11730 Valley Boulevard, El Monte, Los Angeles County, CA," dated June 10, 2020, prepared by Terracon; "Review of Environmental Reports, 11640-11730 Valle Boulevard, El Monte, California," dated July 14, 2020, prepared by SCS Engineers; and "Soil and Vapor Sampling Workplan, 11640-11730 Valley Boulevard, El Monte, California," dated February 2, 2021 (revised), submitted by your consultant, Smith-Emerly GeoServices (SEG).

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TEMPLE CITY
VERNON
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Based on this Department's review of the submitted reports, an approval is hereby granted for implementation of SEG's "Soil and Vapor Sampling Workplan" (workplan) at the above referenced site. The onsite implementation of the field activities outlined in the workplan should meet the 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 associated with the workplan 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). This Department's approval of the workplan leaves unaffected any further restriction or restraint which may be contained in other statutes or required by other agencies.
2. A site-specific health and safety plan (HASP), which meets the requirements of California Code of Regulations (CCR) Title 8, Section 5192, "Hazardous Waste Operations and Emergency Response", should be prepared and submitted to this Department prior to implementing onsite workplan activities. 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. In addition, the HASP should address COVID-19 precautionary measures (e.g., social distancing and face masks).
3. 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 (CCR), Title 16, Sections, 400-476 & 3000-3067.
4. In addition to the proposed five-foot depth samples, soil vapor samples should also be collected at depths of 15 feet below the ground surface (bgs) from proposed soil vapor borings SV-2, SV-3, and SV-4 and tested for volatile organic compounds (VOCs).
5. Make sure that the proposed soil borings BH-4 and BH-5 are drilled adjacent to the ends of the onsite clarifier. Move proposed soil vapor boring SV-1 immediately adjacent to outer edge of the onsite clarifier. When drilling and sampling the proposed onsite soil borings, in addition to screening the soil samples with a photo-ionization detector (PID), also screen the samples for discoloration, staining, odor, and so on.
6. This Department considers halogenated VOCs at any detectable concentration (in the soil matrix and/or soil vapor) as a potential threat to groundwater unless the vertical extent of VOC contamination has been delineated to laboratory non-detectable concentrations (including the absence of laboratory "J-values"). A vertical extent evaluation requires establishing a "clean zone" or interval. For VOCs in the soil matrix,

a minimum 20-foot clean soil interval is generally required. The clean zone for VOCs in the soil matrix should be established by at least four appropriate laboratory “non-detects” (NDs) typically at five-foot intervals (and at change in lithology). The clean zone for VOCs in the soil vapor (assuming a soil matrix contaminant source, not a groundwater source) should be established by decreasing VOC concentrations (corresponding with increasing depths) of vapor samples collected at ten-foot intervals (and at change in lithology). The last/deepest soil vapor sample analyzed should be ND for VOCs to verify the “clean zone”, unless it can be shown/evaluated that the regional groundwater contamination in the site vicinity is potentially responsible for the persistence of deep onsite VOC soil vapor impacts.

7. Soil vapor samples to be acquired at the site should be collected in either vapor-tight syringes/glass bulb containers (i.e., in conjunction with a mobile laboratory) or in Summa containers **(or new Tedlar air sample bags, which only have a six hour holding time for VOCs). In addition, soil vapor samples collected in Tedlar air sample bags should not be cooled during transportation to the environmental laboratories. However, the said vapor samples should not be exposed to sunlight. Also, soil vapor probes installed in soil borings drilled by hollow-stem augers should be allowed to equilibrate for a time period of at least 48 hours before collecting soil vapor samples from the said vapor probes.** Soil vapor samples should be analyzed for VOCs using EPA method 8260B (or equivalent) for full list of compounds. The laboratory detection limits for soil vapor VOCs should be determined based on the U.S. EPA residential Regional Screening Levels (RSLs) and the DTSC- modified residential Screening Levels (DTSC-SLs) as shown in the DTSC Human and Ecological Risk Office (HERO), Human Health Risk Assessment (HHRA) Note Number 3 (June 2020), Table 3 (Screening Levels for VOCs in Ambient Air) and HERO HHRA Note Number 5 – TCE Screening Criteria Indoor Air (August 2014). **Meaning, laboratory detection limits should be lower than the residential ambient air RSLs/DTSC-SLs divided by the appropriate attenuation factor (e.g., $\alpha = 0.05$). For example, for perchloroethylene (PCE), the laboratory practical quantitation limit (PQL) should be approximately 0.01 µg/L, calculated as follows:**
 $(\text{PCE DTSC-SL of } 0.46 \text{ µg/m}^3) \div (0.05) = 9.2 \text{ µg/m}^3 = 0.0092 \text{ µg/L} (\sim 0.01 \text{ µg/L}).$
8. The workplan 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 workplan activities should be followed-up by written correspondence. The workplan should be implemented by April 15, 2021. Notify this Department at least three (3) working days prior to the implementation of workplan field activities at the site. Failure to notify this Department of scheduled fieldwork activity implementation dates or of significant deviations/changes in fieldwork activities could result in this Department’s rejection of subsequent report submittals and/or associated data.

9. 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.
10. 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. Please be advised that you are required to notify all present/future tenants, lessees, and buyers of the contamination at the site per state Health and Safety Code, Section 25359.7(a).

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,

A handwritten signature in blue ink, appearing to read "Richard Clark", with a stylized flourish at the end.

RICHARD CLARK, SUPERVISOR
SITE MITIGATION UNIT
HEALTH HAZARDOUS MATERIALS DIVISION

RC:mb

ec: A. Syeda, SEG