



COUNTY OF LOS ANGELES FIRE DEPARTMENT

HEALTH HAZ MAT DIVISION
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VIA EMAIL

October 2, 2020

Catalina Fund, LLC
c/o
Beach City Capital
Jason Muller
Beach City Capital
1240 Rosecrans Avenue, Suite 120
Manhattan Beach, CA 90266

Dear Mr. Muller:

PROPOSED CATALINA DEVELOPMENT 100-132 NORTH CATALINA AVENUE, REDONDO BEACH, CALIFORNIA 90277 (SMU FILE #20-1199/RO0001817)

This Department has completed a review of the reports entitled, "Phase I Environmental Assessment Report, 100-132 N Catalina, Redondo Beach, California, 90277," dated August 22, 2018, prepared by Partner Engineering and Science (Partner); "Phase II Subsurface Investigation Report, 132 N Catalina Avenue, Redondo Beach, California, 90277," dated September 21, 2018 (prepared by Partner); "Soil Vapor Extraction and Soil Treatment Workplan, Former Catalina Cleaners, 100-132 North Catalina Avenue, Redondo Beach, California, 90277," dated May 7, 2020, prepared by your consultant, Environmental Engineering Consulting & Remediation, Inc. (E2C Remediation). In addition, this Department reviewed site data apparently prepared by Lindmark Engineering. Based on this review, an approval is hereby granted for implementation of the "Soil Vapor Extraction and Soil Treatment 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. Please address COVID 19 precautionary measures (i.e., masks and social distancing) in your site-specific Health and Safety Plan (HASP), as applicable.

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

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ROLLING HILLS ESTATES
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SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

2. 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.
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. Due to the presence of potentially greater than 50 cubic yards of arsenic-affected soil at the site, South Coast Air Quality Management District (SCAQMD) Rule 1466 could also be applicable, in addition to SCAQMD Rule 1166. So, please further evaluate this issue and inform this Department regarding the applicability of SCAQMD Rule 1466 to proposed site workplan and soil grading activities.
5. As applicable, obtain a waste discharge requirement (WDR) permit from the Cal-EPA Los Angeles Regional Water Quality Control Board (LARWQCB) for the proposed treatment and reuse of onsite arsenic-affected soil. No waste soil can be re-used onsite without a WDR permit.
6. Please have your current consultant submit a soil management plan (SMP) that can be implemented at the site to address the monitoring, characterization, assessment, delineation, and/or remediation of known onsite environmental impacts and potential "unknown" onsite impacts. In addition, the SMP should evaluate potential human health risk/hazards posed to future construction workers. As for the possibility of encountering "unknown" onsite contaminant sources during future development activities, the implementation of a SMP would be beneficial because it 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 November 16, 2020.
7. 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 November 30, 2020. 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.

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/commercial screening levels will not cause unacceptable risks to public health or environment, the data shall be of sufficient quality for this Department and the Cal-EPA Office of Environmental Health Hazard Assessment (OEHHA) to evaluate the health risks and hazards associated with the contaminants. A human health risk evaluation prepared by a qualified toxicologist or other qualified health professional would be required.
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 restricting the disturbance of mitigation measure (e.g., soil vapor barriers) would have to be filed with the county recorder. In addition, be advised that you are required to notify all present/future tenants, lessees, and buyers of the contamination at the site per Health and Safety Code, Section 25359.7(a).

In addition to the hardcopy, please submit subsequent report(s) 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: P. Goalwin, E2C Remediation