

October 15, 2019

VIA E-MAIL AND
FIRST CLASS MAIL

Mr. Jeremy Barela
Water Resource Control Engineer
Site Cleanup Unit III
Regional Water Quality Control Board, Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, CA 90013
Email: jeremy.barela@waterboard.ca.gov

SUBJECT: City of Torrance Response to Request to Provide Operational, Chemical Storage and Use Questionnaire (CUQ)

SITE: Former (Closed) Mobis Auto Repair Facility, 25210 Crenshaw Blvd., Torrance, CA 90505 (SCP No. 982)

Dear Mr. Barela:

This office represents the City of Torrance ("City"), the current owner and lessor of the subject property located at 25210 Crenshaw Blvd., Torrance, CA 90505 (the "Property") in connection with this matter. The purpose of this letter is to respond to the Los Angeles Regional Water Quality Control Board's ("Regional Board") September 18, 2019, letter regarding the Property sent to the Torrance City Manager.

In your letter, you state "*historical and present information regarding chemical use and storage at the Site is missing*," and proceed to request the completion of a "*Chemical Storage and Use Questionnaire*," a "*Site Audit Questionnaire*," a "*dated and detailed description of operations at the Site*," along with other similar information involving historical operations on the Property. You also assert that the information is being requested because the Regional Board has been informed that benzene above its maximum contaminate level ("mcl") has been detected in a supply well in the City of Lomita, Supply Well # 5, located approximately 3,700 feet southeast from the Property.

We hope the following information is useful to the Regional Board in its investigation into the prior operations on the Property, and satisfactorily answers all questions regarding the status of the Property.

Mr. Jeremy Barela
October 15, 2019
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First, although from the City's records you were not personally involved in communications between the Regional Board and the City previously, it is clear from the City's records that all issues involving possible contamination from the subject Property have been fully resolved, to the point where the Regional Board has already issued a No Further Action ("NFA") letter for the subject Property (dated August 15, 2016). I have attached a copy of this NFA letter as Exhibit A to this letter for your review and records.

In the Regional Board's NFA letter for the Property, it recited the various remediation efforts taken in regards to the Property, including the removal of a clarifier that was considered the cause of certain limited contamination on the Property, as well as the excavation and proper removal of contaminated soil (in 2000). Based on this information, the Regional Board concluded that actions taken at the Property have "*resulted in the cleanup or abatement of the wastes to assure protection of human health and the water of the state at and near the [Property] for their beneficial uses,*" and thus that "*the Regional Board requires no further action be taken for soil and groundwater at the Site at this time.*" (Exhibit A.) Presumably, the attached NFA letter and the information referenced therein, all of which are already in the Regional Board's files, should be sufficiently responsive to the Regional Board's most recent September 18, 2019 information request regarding the Property.

Also, for your information, the City previously responded to a similar information request regarding the Property from the Regional Board back in 2016. Specifically, in a letter dated March 2, 2016, the Regional Board requested that the City submit information virtually identical to what it is requesting now, due to the Regional Board's concerns regarding the former Mobis operations on the Property. (See Exhibit B.) The City responded to this prior information request on March 31, 2016. (See Exhibit C.)

In its March 31, 2016 response, the City explained that Mobis had previously operated on the Property through a sublease with the City's tenant, and the City attached and referred to a report prepared by BATCHELOR Environmental Services, Inc., dated June 26, 2000, entitled "*Removal & Permitted Closure of an Industrial Waste Clarifier Unit & Remedial Action Report of the Contaminated Soil Surrounding the Clarifier Unit Situated at the Former Mobis Automotive Facility Property Located at 25210 Crenshaw Boulevard, Torrance, CA.*" A copy of this report is already in the Regional Board's records.

Based on the information provided to the Regional Board by the City in its March 31, 2016 letter, on June 7, 2016, the Regional Board's Executive Officer, Mr. Samuel Unger, stated the Regional Board intended on issuing an NFA letter, finding that Regional Board staff had determined the Property had "*met the Regional Board requirements for case closure/no further action status at this time*" and that "*no further action can be considered at this time.*" (Exhibit D.) As discussed above, the Regional Board's Executive Officer, Mr. Samuel Unger, then proceeded to issue the subject NFA letter on August 15, 2016 (Exhibit A).

Mr. Jeremy Barela
October 15, 2019
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In addition to all of the above information showing the Regional Board's prior review and closure of the Property, and thus the lack of any connection between the Property and Lomita Supply Well #5, there is no evidence to support the notion that the benzene exceedance in Lomita Supply Well #5 could have in any way resulted from activities on the Property at issue. In the Regional Board's NFA letter, for example, the Regional Board notes that the only materials of concern from the Property were "*waste oil products, solvents, heavy metals, and anti-freeze.*" Notably, the Regional Board makes no mention of any benzene or gasoline related products being stored or otherwise released on the Property. Likewise, the Regional Board noted that the contamination source, a clarifier, had been properly removed, and that necessary soil investigation and excavation had been completed as far back as 2000. There is no mention of a gasoline underground storage tank having been operated on the Property, and the City is not aware of any such gasoline tank ever being used on the Property.

Additionally, the City's March 31, 2016 response to the prior questionnaire makes no mention of any underground storage tank, but only references the clarifier that was properly removed.

Also for your information, there has been no material change in circumstances since the Regional Board's August 15, 2016 NFA letter. As of now, the Property is being leased to Rolling Hills Plaza, LLC for commercial use, not industrial, and no industrial uses have been conducted on the Property since long before the NFA letter was issued by the Regional Board.

In light of the foregoing, the City respectfully requests that the Regional Board consider the above, and review and update its records to reflect the fact that any contamination on the Property has been fully addressed, and that "*no further action*" regarding the subject Property is required at this time. Specifically, the City requests that the Regional Board update its Geotracker website to include this history regarding the Property, and to specifically recognize that the Regional Board has issued an NFA letter in regards to the Property.

Mr. Jeremy Barela
October 15, 2019
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Please contact the undersigned should you have any questions or need any additional information regarding this matter. Thank you.

Sincerely,

RUTAN & TUCKER, LLP

A handwritten signature in black ink, reading "Travis Van Ligten". The signature is fluid and cursive, with a long horizontal flourish extending from the bottom of the name.

Travis Van Ligten

TV
Enclosures

cc: Ms. Thizar Tintut-Williams, Unit Chief
Ric M. Roda, Associate Engineer, Division of Drinking Water
Brian Partington, Senior Hydrologist, Water Replenishment District of Southern California
Carla Dillon, Public Works Director, City of Lomita
Mark Andersen, Chief Water Operations Manager, City of Lomita
LeRoy J. Jackson, Torrance City Manager
Aram Chaparyan, Torrance Assistant City Manager
Patrick Sullivan, Esq., Torrance City Attorney

EXHIBIT A



OFFICE OF THE
CITY MANAGER

2016 AUG 22 AM 10:12



SCOTT G. BROWN JR.
CITY MANAGER



MATTHEW RODRIGUEZ
SECRETARY FOR ENVIRONMENTAL PROTECTION

*Scanned and
email to Ken
Low*

Los Angeles Regional Water Quality Control Board

August 15, 2016

Mr. LeRoy J. Jackson
City Manager
3031 Torrance Boulevard
Torrance, California 90503

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7014 2870 0001 4613 3157

SUBJECT: NO FURTHER ACTION

**SITE/CASE: FORMER MOBIS AUTOMOTIVE FACILITY AT 25210 CRENSHAW
BOULEVARD, TORRANCE, CALIFORNIA (SCP NO. 0982)**

Dear Mr. Jackson:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the State regulatory agency responsible for protecting of groundwater and surface water quality within major portions of Los Angeles and Ventura counties. To accomplish this, the Regional 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).

This letter confirms that based on the available information, and with the provision that the information provided is accurate and representative of site conditions, site investigation and corrective actions are complete on the site and no further action (NFA) is required at this time.

For reference, the Regional Board distributed a Notice of Opportunity to Comment letter to you and potential interested parties dated June 7, 2016 inviting written comments on the proposed NFA. The written comments were due to the Regional Board for review by July 10, 2016. No written comments were received.

SITE HISTORY

The former Mobis Facility is approximately 5 acres in size, and located in a light industrial zone in the City of Torrance, California (the Site). The hazardous chemicals/materials of concern at the Site were waste oil products, solvents, heavy metals, and anti-freeze from the former operation of the Mobis Automotive facility from 1968 through 2000. Soil investigation and excavation were conducted in 2000.

CLOSURE JUSTIFICATION

Regional Board staff has reviewed the site investigation reports, prepared by your environmental consultant, and other relevant information regarding the removal of the clarifier at the Site. The following information is presented in the submitted reports:

1. Onsite contaminant sources consisting of the former clarifier have been properly removed in 2000.
2. Post-excavation confirmatory soil sampling was performed on June 6, 2000. Staff compared the residual soil data to the Environmental Screening Levels (Tier 1 ESL) of the San Francisco Bay Regional Water Quality Board (February 2016) and to US EPA Soil Screening Level for groundwater protection (May 2013, Maximum Contaminant Levels-based). The Tie 1 ESLs are based on a generic conceptual site model designed for use at most sites (resulting from default settings). Staff determined that there is no significant remaining contamination that may threaten public health, safety, or the environment (including the waters of the state).

The activities at the Site have resulted in the cleanup or abatement of the wastes to assure protection of human health and the waters of the state at and near the Site for their beneficial uses.


No Further Action Determination

Based upon information provided to the Regional Board, and with the provision that the information was accurate and representative of site conditions, the Regional Board requires no further action be taken for soil and groundwater at the Site at this time. However, the Site owner/operator must notify the Regional Board immediately if additional waste in soil and/or groundwater is encountered at the Site.

The jurisdiction requirements of other agencies, such as the United States Environmental Protection Agency, are not affected by the Regional Board's issuance of a NFA letter at the Site. Such agencies may choose to make their own determination concerning this site.

We would like to take this opportunity to thank you for your full cooperation with the Regional Board during the course of the site assessment. Should you have any questions regarding this matter, please contact Ms. Ann Lin, Project Manager, at (213) 576-6781, ann.lin@waterboards.ca.gov, or Dr. Kwangil Lee, Unit Chief, at (213) 576-6734, kwang.lee@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Mr. LeRoy J. Jackson
The City of Torrance

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August 15, 2016

cc: Mr. Robert J. Beste, Torrance Municipal Water Department
Mr. Jeff O'Keefe, Division of Drinking Water. Jeff.OKeefe@waterboards.ca.gov
Mr. Brian Partington, Water Replenishment District of Southern California.
bpartington@wrd.org

EXHIBIT B



Los Angeles Regional Water Quality Control Board

March 2, 2016

Ms. Mary Giordano
Assistant City Manager
3031 Torrance Blvd
Torrance, CA 90503

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
9590 9401 0043 5071 0572 09

**SUBJECT: REQUIREMENT FOR TECHNICAL REPORT AND RESPONSE TO
CHEMICAL STORAGE AND USE QUESTIONNAIRES**

**SITE: FORMER MOBIS AUTOMOTIVE FACILITY, 25210 CRENSHAW BLVD,
TORRANCE, CA 90505
(SCP NO. 982)**

Dear Ms. Giordano:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with the primary responsibility for the protection of ground and surface water within major portions of Los Angeles and Ventura Counties. Pursuant to the Porter-Cologne Water Quality Control Act, the Regional Board oversees the investigation, monitoring, cleanup, and closure at the subject facility (Site).

The removal of an industrial waste water clarifier unit (clarifier) was reported in 2001 for the Site. Regional Board staff has reviewed the Site investigation information provided to the Regional Board dated from June 2000 to April 2002. Soil data of total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), halogenated volatile organic compounds, and heavy metals were reported for the former Mobis Automotive facility.

We determined that the update for site assessment is necessary due to the known impacted soil and potential impact to groundwater. Pursuant to the California Water Code, you are requested to complete the attached questionnaire and submit the required technical report to provide information on past or present chemical storage and use practices at your facility.

Please return the completed questionnaires and the technical reports to the Regional Board by **April 11, 2016**. The return of these questionnaires and the required technical reports, properly signed, are required even if no chemicals are stored or used at your facility. If you are the new owners, complete the

Mary Giordano
City of Torrance

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March 2, 2016

questionnaires and answer the questions to the best of your ability and provide available data concerning the past owners including contact information.

If your facilities have conducted an investigation associated with the soil or groundwater contamination, please include a copy of the findings or relevant information along with the questionnaire.

If you have any questions regarding this project, please contact Ms. Ann Lin at (213) 576-6781 or via e-mail at ann.lin@waterboards.ca.gov.

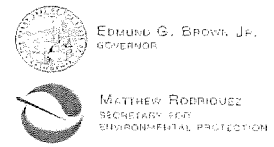
Sincerely,



Kwangil Lee, Ph.D. P.E.
Unit Chief, Site Cleanup Unit IV

Enclosed: Chemical Storage and Use Questionnaires

cc: Martin Serna, City of Torrance. mserna@torranceca.gov
Kenneth Lew, Senior Fire Prevention Specialist. City of Torrance. klew@torranceca.gov
John Mastandrea, La Caze Development Company. john@lacazeddevelopment.com



Los Angeles Regional Water Quality Control Board

CHEMICAL STORAGE AND USE
QUESTIONNAIRE

I. Facility Information

1. Company Name: _____

Company Address: **25210 Crenshaw Blvd**

City: **Torrance** Zip Code: _____ Phone: () _____

2. Size of property (acres): _____ Facility status (active or closed): _____

3. Standard Industrial Classification (SIC): _____ Years of Operation: _____

4. Brief description of business: _____

5. EPA Generator Number: _____ Years in business at this location: _____

6. Answer the following questions relative to **present** operations:

A. Do you do plating or manufacture circuit boards? _____ Yes _____ No

If yes, please explain: _____

B. Do you have plating or anodizing tanks? _____ Yes _____ No

C. Do you perform any metal work? _____ Yes _____ No

CHARLES STINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

D. Do you have a clarifier, sump, tank or other holding tanks for waste water? ☐ Yes ☐ No

E. Do you have an industrial waste permit for sewer for sewer discharge? ☐ Yes ☐ No

F. Do you store chemicals at this location? ☐ Yes ☐ No

G. Has any soil, waste water and/or groundwater investigation
been conducted on the property? ☐ Yes ☐ No

If so, by what state or local agency? _____

7. Answer the following questions regarding **past** operations:

A. Do you know if plating operations existed at this location? ☐ Yes ☐ No

If yes, please explain: _____

B. Did you once have plating or anodizing tanks? ☐ Yes ☐ No

C. Did you perform any metal work? ☐ Yes ☐ No

D. Did you have a clarifier, sump tank, or other holding tanks for waste water? ☐ Yes ☐ No

E. Did you have an industrial waste permit for sewer discharge? ☐ Yes ☐ No

F. Did you have a drum storage area? ☐ Yes ☐ No

G. Have any soil, waste water and/or groundwater investigation
been conducted on the property? ☐ Yes ☐ No

8. List all processes in which metallic compounds are used: _____

9. Name(s) of former tenant(s), dates of operation and type of business (provide a separate sheet if necessary).

Company Name	Type of Business	Dates of Operation at the Site

II. Property Owner Information

1. Name of current property owner: _____

Mailing address of property owner: _____

City: _____ Zip Code: _____ Phone: () _____

2. Prior property owner(s) and the dates of their ownership

Property Owner	Dates of ownership	
	From	To

III. Chemical Storage and Use (past and current operations):

Were the following chemicals used onsite?

- | | | |
|--|---|--|
| <input type="checkbox"/> Tetrachloroethylene (PCE) | <input type="checkbox"/> Trichloroethylene (TCE) | <input type="checkbox"/> 1,4-Dioxane |
| <input type="checkbox"/> 1,1,1-Trichloroethane (1,1,1-TCA) | <input type="checkbox"/> Title 22 metals | <input type="checkbox"/> Hexavalent Chromium |
| <input type="checkbox"/> N-Nitrosodimethylamine (NDMA) | <input type="checkbox"/> 1,2,3-Trichloropropane (TCP) | <input type="checkbox"/> Perchlorate |

Complete the following sections for all chemicals in current use or that have been used in the past. Add separate sheets to complete your listing.

1. Chemical Name: _____
2. Common/Trade name: _____ Quantity stored: _____
3. Storage Method: _____ Underground tank _____ Drums
 _____ Above ground tank _____ Other (specify) _____
4. Waste disposal: _____ Sewered _____ Onsite recycling
 _____ Hauled _____ Offsite recycling _____
5. Is the waste treated prior to disposal? _____ Yes _____ No
 If yes, specify treatment method: _____
6. Is the waste stored prior to disposal? _____ Yes _____ No
7. Is manifest documentation available for designated waste streams? _____ Yes _____ No

Provide additional sheets if necessary

IV. Waste Management

1. What are the sources of industrial waste from the site? (Identify sources by process, composition of wastes generated and approximate quantity disposed of monthly).

2. Have wastes been disposed of onsite? If so, identify the locations of disposal areas.

☐ Yes ☐ No ☐ Not applicable

If yes, identify the locations of disposal areas:

3. Wastes generated onsite (generator type, waste types, amounts, disposal practices)

V. Sewer Information

_____ Industrial _____ Septic Tank _____ Municipal _____ Cesspool

1. Was a different sewer system used in the past? _____ Yes _____ No

If yes, specify type: _____ Date converted: _____

VI. Environmental Conditions

Please provide the following information regarding the site and surrounding area.

1. Distance to nearest municipal supply wells within one-mile radius from the site (list well ID numbers):

2. Distance to nearest groundwater monitoring wells within one-mile radius from the site (list well ID numbers and facilities):

3. Known uses of groundwater:

4. Distance to the nearest surface water body: _____

VII. Releases of Chemical Wastes

1. Does the site have documented releases? ☐ Yes ☐ No

If yes, describe the nature and extent of the releases (date, volume, cause, emergency response actions)

2. Has the source of the release been removed (yes/no)? _____

If no, what sources remain? _____

If yes, what sources adequately removed? _____

3. Has the unauthorized release been stopped?

☐ Yes ☐ No ☐ Not applicable

VIII. Potential Receptors

Surrounding land use (residential, commercial, etc): _____

Locations and distances to the nearest sensitive receptors (i.e., residence, school, day care, hospital, etc):

IX. Site Characterization

1. Has the lateral and vertical extent of contamination at the site been completed?

☐ Yes ☐ No ☐ Not applicable

2. Describe the field activities completed as part of site characterization (by whom, when, etc.)

3. Describe any remaining data gaps: _____

4. Describe the data quality and adequacy of data collected: _____

5. Has a Conceptual Site Model been developed?

☐ Yes ☐ No ☐ Not applicable

6. Was a Human Health Risk Assessment (HHRA) completed?

☐ Yes ☐ No ☐ Not applicable

If yes, describe conclusions of the HHRA:

X. Remedial Actions

1. Have remedial actions been performed for this site?

☐ Yes ☐ No ☐ Not applicable

If yes, describe remedial actions performed: _____

2. Is groundwater monitoring being performed at the site?

☐ Yes ☐ No ☐ Not applicable

If yes, list the contaminants monitored and concentration distribution: _____

3. Was free product present and removed to the maximum extent practicable?

☐ Yes ☐ No ☐ Not applicable

4. Cleanup Scenario

- ☐ Unrestricted
- ☐ Residential
- ☐ Commercial/Industrial
- ☐ Other

5. Letter or Order sent?

- ☐ General Correspondence
- ☐ California Water Code 13267 Order
- ☐ Cleanup and Abatement Order (CAO)
- ☐ Notice of Violation (NOV)
- ☐ Administrative Civil Liability (ACL)
- ☐ No Further Requirements (NFR)
- ☐ Others

6. Was site closure achieved and approved by the appropriate agency

☐ Yes ☐ No ☐ Not applicable

XI. This questionnaire shall be signed below as follows:

1. In the case of corporations, by a principal executive officer at the level of vice-president or his duly authorized representative if such representative is responsible for the overall operation of the facility, or
2. In the case of a partnership, by general partner, or
3. In the case of a sole proprietorship, by the proprietor, or
4. In the case of a municipal, State, or other public facility, by either a principal executive officer, ranking elected official or other duly authorized employee.

This questionnaire has been completed under penalty of perjury and, to the best of my knowledge, is true and correct.

Signature: _____

Date: _____

Printed name: _____

Title: _____

Phone number: () _____

Contact name: _____

Title: _____

Phone number: () _____

EXHIBIT C



CITY OF TORRANCE

OFFICE OF THE CITY MANAGER

LeRoy J. Jackson
City Manager

March 31, 2016

Kwangil Lee, PH.D P.E.
Unit Chief, Site Cleanup Unit IV
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7003 1680 0005 3851 5062

Dear Dr. Lee:

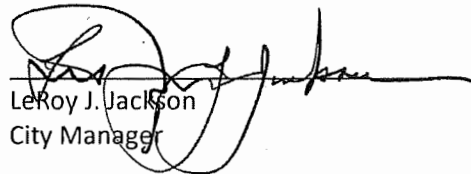
SUBJECT: RESPONSE TO REQUIREMENT FOR TECHNICAL REPORT AND RESPONSE TO CHEMICAL STORAGE AND USE QUESTIONNAIRES

SITE: FORMER MOBIS AUTOMOTIVE FACILITY, 25210 CRENSHAW BLVD, TORRANCE, CA 90505 (SCP NO. 982)

Pursuant to your request of March 2, 2016, attached are the completed questionnaires for Chemical Storage and Use for the former Mobis Automotive Facility previously located at 25210 Crenshaw Boulevard answered to the best of our ability. The City is the land owner of the site. The site during this period was under a long-term lease with Selleck Development Group, Inc, which sub-leased to Mobis Automotive.

Please contact Mary Giordano, Assistant City Manager, at 310-618-5849, if you have follow-up questions or need additional clarification.

Sincerely,



LeRoy J. Jackson
City Manager

cc: Kenneth Lew, M.Sc., CHMM, Senior Fire Prevention Specialist

Enclosed: Chemical Storage and Use Questionnaire

ATTACHMENT 1 – Report dated June 26, 2000 prepared by BATCHELOR Environmental Services, Inc. entitled: "Removal and Permitted Closure of an Industrial Waste Water Clarifier Unit & Remedial Action Report of the Contaminated Soil Surrounding the Clarifier Unit Situated at the Former Mobis Automotive Facility Property Located at 25210 Crenshaw Boulevard, CA" prepared for Selleck Development Group Inc.

LJJ:MKG/dle

Chemical
Storage and Use Questionnaire

-2-

Former Mobis Automotive Facility
SCP No. 0982

- D. Do you have a clarifier, sump, tank or other holding tanks for waste water? ☐ Yes ☒ No
- E. Do you have an industrial waste permit for sewer for sewer discharge? ☐ Yes ☒ No
- F. Do you store chemicals at this location? ☐ Yes ☒ No
- G. Has any soil, waste water and/or groundwater investigation been conducted on the property? ☐ Yes ☒ No

If so, by what state or local agency? _____

7. Answer the following questions regarding **past** operations:

- A. Do you know if plating operations existed at this location? ☐ Yes ☒ No

If yes, please explain: _____

- B. Did you once have plating or anodizing tanks? ☐ Yes ☒ No
- C. Did you perform any metal work? ☐ Yes ☒ No
- D. Did you have a clarifier, sump tank, or other holding tanks for waste water? ☒ Yes ☐ No
- E. Did you have an industrial waste permit for sewer discharge? ☐ Yes ☒ No
- F. Did you have a drum storage area? ☐ Yes ☒ No
- G. Have any soil, waste water and/or groundwater investigation been conducted on the property? ☒ Yes ☐ No

8. List all processes in which metallic compounds are used: ☐ None _____

9. Name(s) of former tenant(s), dates of operation and type of business (provide a separate sheet if necessary).

Company Name	Type of Business	Dates of Operation at the Site
Mobis Auto Repair	Auto Repair	1968 - 2002

II. Property Owner Information

1. Name of current property owner: City of Torrance

Mailing address of property owner: 3031 Torrance Boulevard

City: Torrance Zip Code: 90505 Phone: ()

2. Prior property owner(s) and the dates of their ownership

Property Owner	Dates of ownership	
	From	To
United States of America	Unknown	Deeded to City in 1948

III. Chemical Storage and Use (past and current operations):

Were the following chemicals used onsite?

- ☐ Tetrachloroethylene (PCE) ☐ Trichloroethylene (TCE) ☐ 1,4-Dioxane
- ☐ 1,1,1-Trichloroethane (1,1,1-TCA) ☐ Title 22 metals ☐ Hexavalent Chromium
- ☐ N-Nitrosodimethylamine (NDMA) ☐ 1,2,3-Trichloropropane (TCP) ☐ Perchlorate

Complete the following sections for all chemicals in current use or that have been used in the past. Add separate sheets to complete your listing. Refer to Attachment I: "Removal & Permitted Closure of an Industrial Waste Water Clarifier Unit & Remedial Action Report of the Contaminated Soil Surrounding the Clarifier Unit Situated at the Former Mobis Automotive Facility Located at 25210 Crenshaw Boulevard, Torrance CA" (Pages 7 - 10, Section 3.4 & Section 4.0 - 4.2.).

1. Chemical Name: _____
2. Common/Trade name: N/A Quantity stored: N/A
3. Storage Method: _____ Underground tank _____ Drums
 _____ Above ground tank X Other (specify) Clarifier
4. Waste disposal: _____ Sewered _____ Onsite recycling
 X Hauled _____ Offsite recycling
5. Is the waste treated prior to disposal? _____ Yes X No
If yes, specify treatment method: _____
6. Is the waste stored prior to disposal? X Yes _____ No
7. Is manifest documentation available for designated waste streams? X Yes _____ No

IV. Waste Management

- CLARIFIER - Refer to Attachment 1: "Removal & Permitted Closure of an Industrial Waste Water Clarifier Unit & Remedial Action Report of the Contaminated Soil Surrounding the Clarifier Unit Situated at the Former Mobis Automotive Facility Property Located at 25210 Crenshaw Boulevard, Torrance, CA" (Page 1, Section 1.3).

- ☐ Yes ☒ No ☐ Not applicable

If yes, identify the locations of disposal areas:

- Automotive activities/waste automotive (oil, grease)

- Clarifier

 Industrial Septic Tank X Municipal Cesspool

1. Was a different sewer system used in the past? _____ Yes X No

If yes, specify type: _____ Date converted: _____

Please provide the following information regarding the site and surrounding area.

- City of Torrance - None

City of Lomita - Well #5

2. Distance to nearest groundwater monitoring wells within one-mile radius from the site (list well ID numbers and facilities):

None

3. Known uses of groundwater:

None

4. Distance to the nearest surface water body: 4.5 miles

VII. Releases of Chemical Wastes

1. Does the site have documented releases? ☒ Yes ☐ No

If yes, describe the nature and extent of the releases (date, volume, cause, emergency response actions)

Refer to Attachment I: " Removal & Permitted Closure of an Industrial Waste Water Clarifier Unit & Remedial Action Report of the Contaminated Soil Surrounding the Clarifier Unit Situated at the Former Mobis Automotive Facility Property Located At 25210 Crenshaw Boulevard, Torrance, CA" , prepared for Mr. Dan Selleck, President Selleck Development Group, Inc. by BATCHELOR Environmental Services, Inc, dated June 26, 2000 (Pages 1 -13, Section 1.0 - 5.0).

2. Has the source of the release been removed (yes/no)? YES

If no, what sources remain?

If yes, what sources adequately removed? 1) Clarifier cleaned & removed; 2) Excavation and removal of 63.32 tons of contaminated soil for proper disposal.

3. Has the unauthorized release been stopped?

☐ Yes ☐ No ☒ Not applicable

VIII. Potential Receptors

Surrounding land use (residential, commercial, etc): Residential, commercial, school, hospital

Locations and distances to the nearest sensitive receptors (i.e., residence, school, day care, hospital, etc):

The nearest residences are located approximately 50 feet east along the Westside of Bani Ave in Lomita (25337, 25341 and 25345 Bani Avenue, Lomita, CA 90717); the nearest school is located approximately 3,115 feet northeast, named Lomita

Magnet Elementary at 2211 W 247th St, Lomita, CA 90717; the nearest daycare is approximately 1300 feet east, named Koguma Youchien at 2351 255th St, Lomita, CA 90717; the nearest hospital is located approximately 7,300 feet northwest, named

Torrance Memorial at 3300 Lomita Boulevard, CA 90505.

IX. Site Characterization

1. Has the lateral and vertical extent of contamination at the site been completed?

☒ Yes ☐ No ☐ Not applicable

2. Describe the field activities completed as part of site characterization (by whom, when, etc.) Refer to Attachment I: "Removal & Permitted Closure of an Industrial Waste Water Clarifier Unit & Remedial Action Report of the Contaminated Soil Surrounding the Clarifier Unit Situated at the Former Mobis Automotive Facility Property Located at 25210 Crenshaw Boulevard", (Page 1, Section 1.3).

3. Describe any remaining data gaps: _____

4. Describe the data quality and adequacy of data collected: _____

Data quality appears acceptable and adequate enough to close site.

5. Has a Conceptual Site Model been developed?

☐ Yes ☒ No ☐ Not applicable

6. Was a Human Health Risk Assessment (HHRA) completed?

☐ Yes ☒ No ☐ Not applicable

If yes, describe conclusions of the HHRA:

X. Remedial Actions

1. Have remedial actions been performed for this site?

☒ Yes ☐ No ☐ Not applicable

If yes, describe remedial actions performed: Excavation and removal of soil

2. Is groundwater monitoring being performed at the site?

☐ Yes ☒ No ☐ Not applicable

If yes, list the contaminants monitored and concentration distribution: _____

3. Was free product present and removed to the maximum extent practicable?

☐ Yes ☐ No ☒ Not applicable (No free product)

4. Cleanup Scenario

☒ Unrestricted

☐ Residential

☒ Commercial/Industrial

☐ Other

5. Letter or Order sent?

☐ General Correspondence

☐ California Water Code 13267 Order

☐ Cleanup and Abatement Order (CAO)

☐ Notice of Violation (NOV)

☐ Administrative Civil Liability (ACL)

☐ No Further Requirements (NFR)

☐ Others

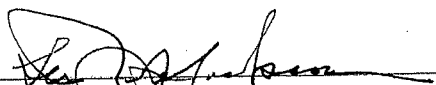
6. Was site closure achieved and approved by the appropriate agency

☐ Yes ☒ No ☐ Not applicable

XI. This questionnaire shall be signed below as follows:

1. In the case of corporations, by a principal executive officer at the level of vice-president or his duly authorized representative if such representative is responsible for the overall operation of the facility, or
2. In the case of a partnership, by general partner, or
3. In the case of a sole proprietorship, by the proprietor, or
4. In the case of a municipal, State, or other public facility, by either a principal executive officer, ranking elected official or other duly authorized employee.

This questionnaire has been completed under penalty of perjury and, to the best of my knowledge, is true and correct.

Signature: 

Date: March 30, 2016

Printed name: LeRoy J. Jackson

Title: City Manager

Phone number: (310) 618-5880

Contact name: _____

Title: _____

Phone number: () _____

EXHIBIT D



OFFICE OF THE
CITY MANAGER

2016 JUN 14 AM 9:30



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

June 7, 2016

Mr. LeRoy J. Jackson
City Manager, City of Torrance
3031 Torrance Boulevard
Torrance, California 90503

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
9590 9401 0063 5071 2773

Mr. Robert J. Beste
Torrance Municipal Water Department
20500 Madrona Ave.
Torrance, CA 90503

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7015 0640 0006 6057 3282

SUBJECT: NOTICE OF OPPORTUNITY TO COMMENT - NO FURTHER ACTION

**SITE/CASE: FORMER MOBIS AUTOMOTIVE FACILITY AT 25210 CRENSHAW
BOULEVARD, TORRANCE, CALIFORNIA (SCP NO. 0982)**

Dear Mr. Jackson and Mr. Beste:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for protection of ground and surface water quality within Los Angeles and Ventura counties. Pursuant to the Porter-Cologne Water Quality Control Act, the Regional Board oversees the investigation and closure at the subject facility (i.e., the Site). Regional Board staff has completed our review and evaluation of the Site investigation information provided to the Regional Board and determined that the Site has met the Regional Board requirements for case closure/no further action status at this time.

BACKGROUND INFORMATION

The former Mobis Facility is approximately 5 acres. The Site currently has commercial office buildings within a light industrial zone in the City of Torrance (see attached Site and Receptor map). The Site is surrounded by residential property to the east, commercial property to the north, south, and to the west.

Site assessments and cleanup activities were performed on the Site. On April 1, 2016, the Regional Board received the *Response to Requirement for Technical Report and Response to Chemical Storage and Use Questionnaires*, dated March 31, 2016 (Response) and *Removal & Permitted Closure of an Industrial Waste Water Clarifier Unit & Remedial Action Report of the Contaminated Soil Surrounding the Clarifier Unit*, dated June 26, 2000 (Report) for the Site. The submittal was conducted in response to a Regional Board request dated March 2,

Mr. LeRoy J. Jackson
The City of Torrance

- 2 -

June 7, 2016

2016. Based on the results of this investigation, and previous data submitted to the Regional Board, we concur that no further action can be considered at this time.


Pursuant to section 13307.1 of the California Water Code (CWC), the Regional Board is required to notify all current fee title holders for the subject Site and other interested parties prior to considering site closure/no further action proposals from the primary or active responsible discharger(s), issue a closure letter, or make a determination that no further action is required with respect to a site subject to a cleanup or abatement order pursuant to section 13304.

You are identified as a fee titleholder or an interested party. We hereby notify you and other interested parties of our intent to consider the closure plan. We request that you provide us with any comments on the proposed plan to close this case by **July 7, 2016**. If you do not wish to comment, you need not respond. If we do not receive a response by July 7, 2016, a "No Further Action" (NFA) letter will be issued to close the case and you will be notified of our action.

If you wish to obtain additional information regarding this Site, you may log on to the state GeoTracker database website <http://geotracker.waterboards.ca.gov> for the Site address, or arrange to review the case file for this Site in our office by mailing in a written request to the address appearing at the bottom of this letter on the first page or by emailing a written request to RB4-Publicrecords@waterboards.ca.gov. Regional Board staff will then contact you and arrange a time and date to visit the Regional Board office and review the files requested.

If you have any questions regarding this matter, please call or email Ms. Ann Lin at (213) 576-6781 or ann.lin@waterboards.ca.gov.

Sincerely,


Samuel Unger, P. E.
Executive Officer

cc: Mr. Jeff O'Keefe, Division of Drinking Water. Jeff.OKeefe@waterboards.ca.gov
Mr. Brian Partington, Water Replenishment District of Southern California.
bpartington@wrd.org



Site and Receptor Map



National Geographic, Esri, DeLorme, NAVTEQ, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, IPC

Mobis Auto Repair
25210 Crenshaw Blvd.
Torrance, CA 90505

Site Type

- Cleanup Program Site
- LUST Cleanup Site
- Production Wells
- Hospital
- Schools

