



COUNTY OF LOS ANGELES FIRE DEPARTMENT

HEALTH HAZ MAT DIVISION
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VIA EMAIL

October 7, 2022

Mr. Bakaly
Beach Cities Health District
1200 Del Amo Street
Redondo Beach, CA 90277

Dear Tom Bakaly:

BERYL SITE, 1272 BERYL STREET, REDONDO BEACH, CA 90277 REMEDIAL ACTION AGREEMENT, ADDENDUM #1 (SMU FILE #22-1237/RO0001856)

The above referenced site currently includes multiple parcels (APNs: 7502-017-902 & -903) as well as an unidentified easement along Flagler Lane. The main parcel is currently developed with four buildings and two parking garages while the 1272 Beryl Street parcel is undeveloped. The proposed redevelopment will encompass both parcels and will entail the demolition of some existing buildings within the main campus and the construction of a new medical building. The Site Mitigation Unit (SMU) of this Department entered into a remedial action agreement (RAA) with Beach Cities Health District (BCHD) and Blue Mountain Development, Inc. to oversee the mitigation of the known onsite environmental impacts and to address/mitigate potential other unknown impacts, if encountered during site development. Currently, the known contaminants impacting the site soils include volatile organic compounds (VOCs), such as tetrachloroethene (PCE), chloroform and benzene, and low concentrations of petroleum hydrocarbons, and heavy metals that pose potential health risks and hazards to future construction and commercial workers and occupants.

This Department has completed a review of reports entitled, "Soil Management Plan, Healthy Living Campus, 514 North Prospect Avenue, Redondo Beach," dated June 27, 2022, prepared by Leighton Consulting. The soil management plan (SMP) also included an assessment report, entitled "Phase II Environmental Assessment Report, Beach Cities Health District 510, 512, 514, and 520 North Prospect Avenue, Redondo Beach, California 90277," dated February 26, 2020, also prepared by Converse Consultants. This Department awaits the submittal of a Phase I Environmental Assessment Report of the site for our review.

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

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Based on this review, an approval is hereby granted for implementation of the SMP which will address known onsite soil impacts and provide a plan of action to assess and remediate any discovered contaminant sources and associated soil contamination. This approval is contingent upon you and your representatives complying with the standards set forth in U.S. EPA and Cal-EPA guidance/advisory documents; Los Angeles Regional Water Quality Control Board's (LARWQCB) "Interim Site Assessment & Clean-up Guide Book"; California Code of Regulations (CCR) Title 8, Section 5192, "Hazardous Waste Operations and Emergency Response"; and the following:

1. All necessary permits and/or approvals for any work associated with 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, tenants/patrons, and/or off-site receptors, if applicable).
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 California Code of Regulations, Title 16, Sections 400-476 & 3000-3067.
3. The SMP 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 SMP activities should be followed-up by written correspondence. Notify this Department at least three (3) working days prior to the implementation of SMP activities at the site. The SMP should be implemented at the site by December 19, 2022. Please contact this Department to request a SMP implementation time-date extension if needed. Failure to notify this Department of SMP/workplan implementation dates or of significant deviations/changes in workplan activities could result in this Department's rejection of subsequent report submittals and/or associated data; it could also potentially terminate the RAA between us.
4. During the implementation of the SMP, all waste soil stockpiles should be transported off-site for legal disposal at a permitted disposal and/or treatment facility. All soil stockpiles considered to be "clean" (e.g., clean overburden) should be sampled and tested for contaminants of concern (COCs). If confirmation soil sample results exceed COC remediation goals, then, the soil cannot be reused on site.
5. 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 the Cal-EPA Office of Environmental Health Hazard Assessment (OEHHA) to evaluate the human health risks and hazards of the contaminants. The submittal of a human health risk assessment (HHRA) will be required.

6. The owner(s) of properties with soil and/or soil vapor contaminant concentrations exceeding their associated State/Federal residential screening levels (after site cleanup activities or human health risk/hazard evaluations) are subject to applicable disclosure and notification requirements. An environmental notification/restriction that identifies the onsite contaminant concentration/location(s) and that restricts site uses and/or requires mitigation measures would have to be filed with the county recorder.
7. Please note that the authority of this Department does not extend to the permitting and/or removal of any discovered onsite clarifiers and/or underground storage tanks (USTs). Clarifiers are under the jurisdiction of the City of Redondo Beach, and USTs (permitting and removals) are under the jurisdiction of Los Angeles County Department of Public Works, Environmental Programs Division. However, this Department does oversee the assessment and cleanup of onsite contamination resultant from past clarifier use. The LARWQCB has jurisdiction for any UST associated releases that potentially threaten the underlying groundwater at the site.
8. Per Assembly Bill (AB) 304 requirements, the adjacent properties to the site will have to be notified (on GeoTracker and by written correspondences) 30 days prior to future site closure.

In addition to the hardcopy, please email and/or submit subsequent report(s) in pdf format on CD/USB. If you have any questions, please feel free to call Aaron Williams at (323) 890-4104.

Respectfully submitted,



RICHARD CLARK, SUPERVISOR
SITE MITIGATION UNIT
HEALTH HAZARDOUS MATERIALS DIVISION

RC: aw

ec: T. Bakaly, BCHD
M. Himmelstein, Leighton Consulting