



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maziar Movassaghi
Acting Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Arnold Schwarzenegger
Governor

DRAFT STATEMENT OF BASIS

PROPOSED REMEDY FOR THE SOUTHERN PORTION OF THE
FORMER HUGHES AIRCRAFT COMPANY ELECTRON DYNAMICS DIVISION
3100, 3110, 3120, 3130, AND 3140 WEST LOMITA BOULEVARD
TORRANCE, CALIFORNIA 90505

ENVIRONMENTAL PROTECTION AGENCY IDENTIFICATION NUMBER CAR000160770
(FORMERLY CAD041666819)

INTRODUCTION

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has prepared this Statement of Basis to identify and explain the proposed remedy for the southern portion (Figure 1) of the former Hughes Aircraft Company (HAC), Electron Dynamics Division (EDD), located at 3100, 3110, 3120, 3130, and 3140 West Lomita Boulevard in Torrance, California. The Statement of Basis is included in the administrative record for the site to solicit public involvement in the selection of the remedy pursuant to Chapter 6.5 of the California Health and Safety Code. DTSC will select a final remedy after reviewing and considering all public comments submitted during the public comment period.

The corrective action activities at the former HAC facility addressed releases of hazardous waste and hazardous constituents at the site. This Statement of Basis summarizes information that is presented in greater detail in the Site Assessment Summary Report dated May 14, 2007, the Human Health Risk Assessment dated December 17, 2007, and the Former EDD Site Property Parceling Document dated May 14, 2009. DTSC encourages the public to review these documents to gain a more comprehensive understanding of the corrective action activities that have occurred at the facility. These documents are available on DTSC's Envirostor website at <http://www.envirostor.dtsc.ca.gov/public>.

In addition to this Statement of Basis, DTSC has prepared a Fact Sheet that summarizes the proposed remedy and provides notification of the public comment period and the community meeting. DTSC has also prepared an Initial Study and Negative Declaration to fulfill the requirements of the California Environmental Quality Act (CEQA). A Notice of Determination for the CEQA environmental analysis will be filed with the State Clearinghouse upon the final decision.

DTSC encourages the public to review and comment on the proposed remedy because DTSC may modify the remedy based on public comments or new information. The public comment period begins on November 2, 2009, and ends December 2, 2009. Public comments must be

received or postmarked by the end of the public comment period and can be emailed to yladuke@dtsc.ca.gov or mailed to the address below:

Yvette LaDuke
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311

PROPOSED REMEDY

DTSC is proposing the following remedies to address the contaminated media at the southern portion of the former HAC facility:

1. Land Use Restrictions: A Land Use Covenant (LUC) will restrict future land use to commercial and industrial use only. The LUC would prohibit residential, school, daycare, or hospital uses. The LUC will require the installation of vapor barriers during construction of any new buildings, allow access for environmental monitoring, and require implementation of a soil management plan.
2. Soil Management Plan: A soil management plan will be instituted to manage subsurface contamination in such a way to alleviate potential exposure. The soil management plan will include procedures for the management of contaminated soil and groundwater. The management measures will address soil excavation, soil stockpiling, stockpile characterization, soil disposal, soil re-use, construction dewatering, site inspection, and compliance documentation.
3. Inspection: Annual site inspection will occur to ensure that land use is in compliance with the LUC. The inspections will be conducted by DTSC.
4. Environmental Monitoring: Soil vapor monitoring will occur annually at two existing semi-permanent, dual-nested soil vapor probes on the eastern portion of the property. The samples would be analyzed for volatile organic compounds (VOCs) using Environmental Protection Agency Method TO-15. Annual sampling would continue until the neighboring property, ALCOA Fastening Systems (ALCOA), achieves clean up goals for soil vapor, or DTSC determines that two successive rounds of soil vapor sampling indicate no unacceptable risk remains for commercial workers in the area. As a contingency, if analysis of soil vapor indicates a VOC concentration exceeding a cumulative cancer risk of 1×10^{-6} , then subslab and/or indoor air sampling would be conducted in any building within 100 feet of the soil vapor probe with the exceedance. Additional sub-slab sampling would be required if indoor air concentrations exceed a 1×10^{-6} cumulative cancer risk.

If the proposed remedies are approved by DTSC and implemented, then DTSC would issue a determination that corrective action is complete with controls for the southern portion of the former HAC Facility and would modify the facility boundary that is subject to Corrective Action under the Resource Conservation and Recovery Act (RCRA). The southern property would be legally described in a Land Use Covenant restricting the use of the property. The property would be removed from the Corrective Action Consent Agreement with Boeing and excluded from RCRA control under Interim Status. Current and future owners of the property described in the

Land Use Covenant would be responsible for maintaining the requirements of the Land Use Covenant.

FACILITY BACKGROUND

The entire site is comprised of approximately 26 acres with five buildings located on the northern portion of the site and the parking lot on the southern portion. The site is located in an area of Torrance that is comprised of commercial and industrial operations. The Torrance Memorial Medical Center is located to the west of the site, and the Torrance Municipal Airport is located to the south. The facility subject to the proposed remedy is the parking area designated for the employees of the five buildings located at 3100, 3110, 3120, 3130, and 3140 West Lomita Boulevard in Torrance, California. Contaminated media from the northern portion of the site is being addressed in a separate document and will be public noticed separately.

HAC began operations at the former farm site with their EDD operations in 1967. The Boeing Company (Boeing) purchased the HAC EDD operations in 2000 and sold the operations to L3 Communications, Inc., in 2005. Boeing sold the property to RREEF America REIT III Corporation (RREEF) in October 2006. RREEF is planning to split the entire property into northern and southern parcels. The southern parcel, which is the subject of this Statement of Basis, is a parking lot that is approximately 9 acres in size.

Boeing has maintained responsibility for the activities specified in the Corrective Action Consent Agreement which includes the characterization of the site and submittal of a Corrective Measures Study (CMS) Report to evaluate corrective measure alternatives for impacted areas. Boeing conducted investigations of groundwater, soil gas, soil, and indoor air, and submitted a characterization report for the entire site, the Site Assessment Summary Report, dated May 14, 2007. DTSC approved the report in 2008. Boeing prepared a Human Health Risk Assessment for the entire site which was approved by DTSC in 2008. Boeing submitted the Former EDD Site Property Parceling Document in May 2009 as the CMS Report for the southern portion of the property. DTSC has accepted the CMS Report for the southern portion of the property and is proposing to select modified remedies that were recommended in the Report. DTSC will follow a similar process for the northern portion of the site and will evaluate the CMS Report for the northern portion separately.

Resource Conservation and Recovery Act (RCRA) Facility Investigation

Under DTSC oversight, Boeing conducted a RCRA Facility Investigation (RFI) to determine the extent of impacts from solid waste management units located in the northern portion of the site. No RCRA regulated units, hazardous waste handling or storage areas, or other facility operations have ever been located on the southern portion of the property. The investigation activities resulted in the discovery of a localized area of shallow soil in the southern portion of the property containing concentrations of lead that were above background levels. Polychlorinated biphenyls (PCBs), other metals, fuel-related volatile organic compounds (VOCs), petroleum hydrocarbons, and semi-volatile organic compounds were also detected sporadically in the same location. The concentrations of these compounds were all below commercial risk-based screening levels established in the Health Risk Assessment.

VOCs exceeding commercial risk-based concentrations were discovered in the southeast corner of the site directly adjacent to the neighboring ALCOA facility. Surface soil excavations

were conducted in the southeast corner in 2008 in accordance with ALCOA's Soil Grading Workplan and a Corrective Action Consent Agreement between ALCOA and DTSC. The excavations were conducted to remove VOC impacted soils near the surface and improve ALCOA's soil vapor extraction (SVE) system operations. ALCOA installed the SVE system to reduce soil gas contaminant concentrations on their property. The SVE system is located directly adjacent to the VOC impacted soils on the former HAC property. Under DTSC oversight, ALCOA will continue operation of their SVE system until a final remedy is selected for their site.

Summary of Facility Risks

Boeing conducted a Human Health Risk Assessment (HHRA) to evaluate the cumulative risk associated with contaminants discovered on the property. The HHRA was developed for the entire site and identified Chemicals of Potential Concern (COPCs) that were detected in at least one sample for each media. COPCs identified in the southern portion of the property include metals, pesticides, semi-volatile organic compounds, polychlorinated biphenyls, and VOCs in soil, and VOCs in soil vapor. No COPCs were identified for groundwater in the southern portion of the property. Although COPCs were identified as indoor air contaminants at the northern portion of the property, there are no buildings in the southern portion.

The HHRA evaluated risk for several exposure scenarios, including the current unchanged site configuration, potential future indoor site workers, construction workers and residents. The HHRA evaluated risk for the following exposure pathways for residents, commercial/industrial workers, and onsite construction workers: incidental ingestion of shallow soil, dermal contact with shallow soil, inhalation of particulates in outdoor air, and inhalation of vapors in outdoor air. Additionally, inhalation of vapors in indoor air was assumed a complete pathway for residents and commercial/industrial workers. The HHRA was reviewed and approved by DTSC and is available for review at DTSC's Envirostor site at <http://www.envirostor.dtsc.ca.gov/public>.

The HHRA estimates the cumulative cancer risk for a commercial worker at 9 in 100,000 for soil and soil vapor at the southeast corner of the property. DTSC considers a cumulative cancer risk of 1 in a million as the point of departure for risk management decisions. The main contaminants contributing to this cancer risk are tetrachloroethene (PCE) and trichloroethene (TCE). The non-cancer hazard index (HI) did not exceed DTSC's threshold of 1.0 for commercial workers at any location in the southern portion of the property, but was estimated at 2.0 for construction workers at the southeast corner of the site. The main contaminants contributing to the non-cancer risk are PCE and TCE. No ecological risks were identified.

SCOPE OF CORRECTIVE ACTION

The scope of corrective action at the site is defined in the Corrective Action Consent Agreement (Agreement) between DTSC and HAC dated June 16, 1995. The Agreement specifies that HAC will prepare and submit a CMS to remediate releases from two underground storage tanks in the northern portion of the property. The Agreement requires the generation of a CMS Work Plan and a CMS Report. Boeing is responsible for fulfilling the terms of the Agreement and has submitted the Former EDD Site Property Parceling Document as the CMS Report for the southern portion of the site. The remedy that DTSC selects after considering public comments will be the final remedy for impacts to the southern portion of the property.

A separate CMS Report is being reviewed by DTSC for the northern portion of the property, which contains more extensive impacts. The remedy for the northern portion of the site will be public noticed for public comment in the near future. The remedy that DTSC selects after considering those public comments will be the final remedy for the northern portion of the property.

EVALUATION OF THE PROPOSED REMEDY

DTSC evaluates corrective measures remedies based on the standards published by the United States Environmental Protection Agency (USEPA). The RCRA Corrective Action Plan by USEPA (1994) provides the RCRA Balancing Criteria to help guide the selection of appropriate remedies. These criteria are summarized below which include four standards (1 – 4) and five decision factors (5 – 9):

1. Be protective of public health and the environment
2. Attain media cleanup standards
3. Control the source of release so as to reduce or eliminate, to the extent practical, further releases that might pose a threat to human health and/or the environment
4. Meet all applicable waste management requirements
5. Short-term and long-term effectiveness
6. Reduction of toxicity, mobility, or volume
7. Long term reliability
8. Implementability
9. Cost

The following table summarizes the evaluation of the proposed remedy:

Table 1 - EVALUATION OF INSTITUTIONAL CONTROLS CORRECTIVE MEASURE

Corrective Measure	Institutional Controls (ICs) comprised of land use restrictions, a soil vapor monitoring and contingency plan (MCP) and soil management plan (SMP)
Protective of public health and the environment	Protection of human health is maintained by restricting land use and limiting exposure to impacted media. Impacted media to be monitored (soil vapor MCP) and tracked (SMP). Protection of the environment is maintained as no surface water bodies are impacted as a result of on-site impacts.
Attainment of media cleanup standards	Subsurface contaminants levels in the southern parcel are currently below risk-based standards for commercial/industrial exposure except for a small area in the southeastern corner of the site adjacent to the ALCOA facility. The VOC contamination at the southeast corner is attributable to ALCOA and will be addressed by ALCOA pursuant to a CACA with DTSC. Soil gas conditions at the southern parcel will be monitored to verify compliance with the risk-based standards.
Control of the source of release	Source control measures are not necessary due to the low concentrations of subsurface contaminants in the southern parcel. The VOC source attributable to ALCOA in the southeast corner was partially removed by excavation with offsite disposal of VOC contaminated soil. The remaining VOC contamination on the southern parcel will be remediated by ALCOA.

Compliance with applicable standards for management of waste	The only generation of waste from the site will be the removal of contaminated soil. The soil will be handled pursuant to the soil management plan in the land use covenant. The management measures will address soil excavation, soil stockpiling, stockpile characterization, and soil disposal.
Short - and long-term effectiveness	Short-term and long-term effectiveness is maintained by institutional controls. Soil gas conditions at the southern parcel will be monitored to verify compliance with the risk-based standards. If standards are exceeded, contingency plans within the LUC will be followed. Also, any potential vapor intrusion exposure within future buildings will be mitigated by the voluntary installation of vapor barriers.
Reduction of toxicity, mobility and/or volume	No reduction of toxicity, mobility, or volume.
Long-term reliability	Reliable as long as the LUC is maintained.
Implementability	Technically and administratively feasible.
Cost	Approximately \$7,000 per year for soil vapor monitoring. Additional administrative and transactional costs associated with preparation of LUC and any required periodic maintenance of the LUC (site inspections to confirm compliance with institutional controls).

The effectiveness of the proposed remedy will be monitored by the soil vapor monitoring and contingency plan and by LUC inspections conducted by DTSC. The proposed remedy would protect human health and the environment by limiting the use of the property through the LUC, limiting the exposure to contaminated soils through the soil management plan, tracking the effectiveness of the neighboring property's remediation system through the soil vapor monitoring and contingency plan, and ensuring appropriate use of the property through the LUC inspections.

PUBLIC PARTICIPATION

DTSC conducted a community survey in January 2009 to evaluate public interest in the site by mailing letters to addresses located within one-half mile of the former HAC facility. DTSC received 79 responses from the survey. DTSC has also been working with Boeing and the current owner of the former HAC property to distribute work notices to employees when sampling or remediation construction is planned or completed for the northern portion of the property.

DTSC is currently soliciting public comments on the proposed remedy during a 30-day comment period. DTSC is accepting comments only for the southern portion of the property at this time; comments on the northern portion of the property will be accepted during its public comment period. If DTSC selects the proposed remedies recommended in the Former EDD Site Property Parceling Document and summarized in this Statement of Basis, Boeing will be authorized to implement the remedies.

Public input on the proposed final remedies and on the information that supports the selection of the remedies is an important contribution to the selection process. After DTSC receives the public comments, DTSC will consider all comments before making a final remedy determination. The final remedies selected could be different from those that have been proposed, depending on the information that is received through the public participation process.

The Former EDD Site Property Parceling Document, RFI Reports, and the HHRA used as the source of information for this Statement of Basis and other project documents are available for review at:

Torrance Public Library
3301 Torrance Boulevard
Torrance, California 90503
Phone: (310) 618-5959

The complete administrative record is available for public review during the public comment period at:

Department of Toxic Substances Control
5796 Corporate Ave
Cypress, California 90630
(714) 484-5300

In addition, the Statement of Basis and other documents are available on the DTSC website at <http://www.envirostor.dtsc.ca.gov/public>.

To be considered in the decision making, all comments on the proposed remedies must be received by December 2, 2009 at yladuke@dtsc.ca.gov or at the following mailing address:

Yvette Laduke
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, CA 91311
1-866-495-5651, press 3, then press 2

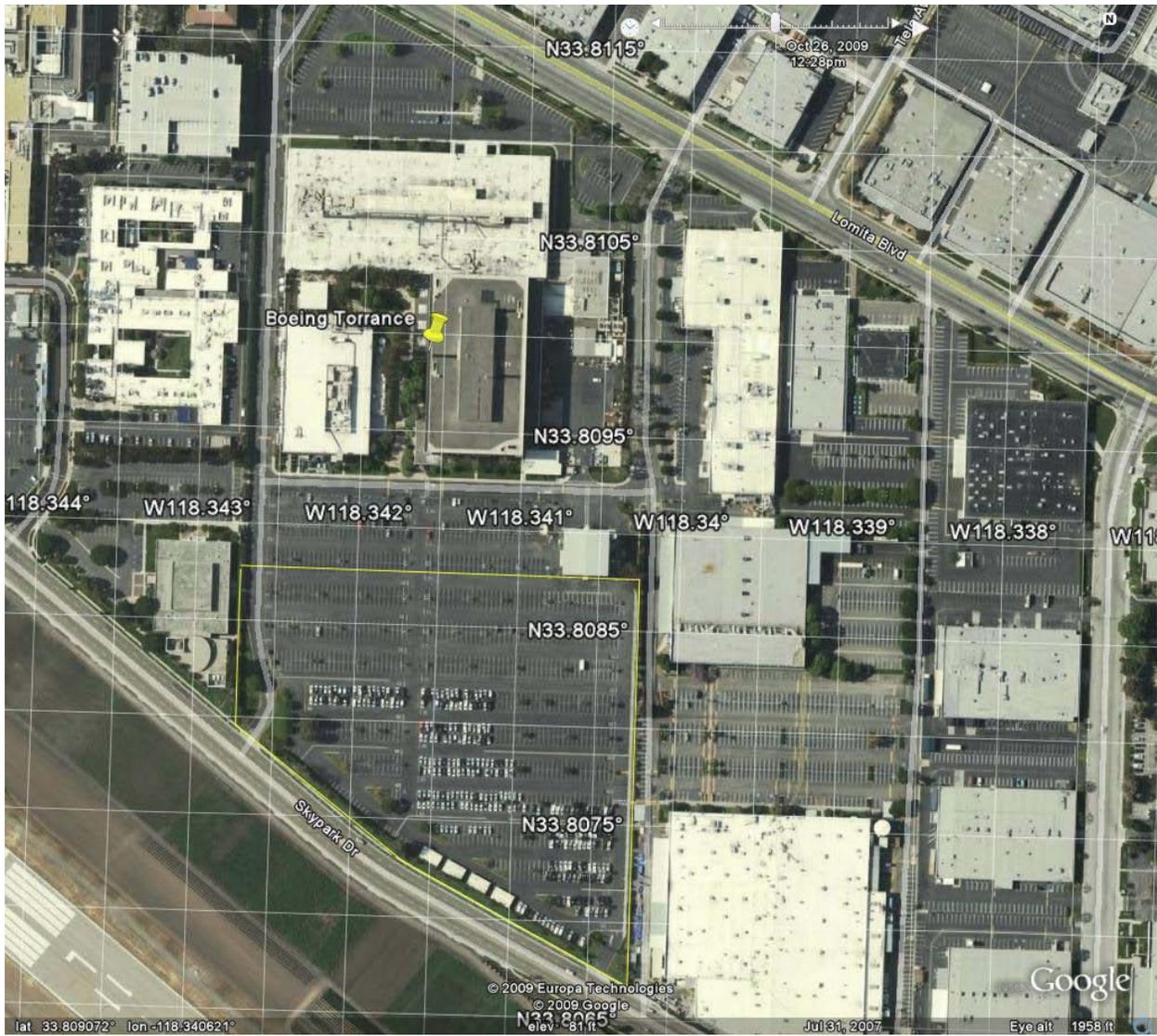


Figure 1 - Southern Portion (Bordered)