



**California Environmental Protection Agency
Department of Toxic Substances Control
Draft
HAZARDOUS WASTE POST CLOSURE FACILITY
PERMIT**

Facility Name:

Former International Light Metal (ILM) Facility
19200 South Western Avenue
Torrance, California 90509

Facility Owner Name:

Lockheed Martin Corporation
2950 N. Hollywood Way, Suite 125
Burbank, California 91505

Operator Name:

Lockheed Martin Corporation
2950 N. Hollywood Way, Suite 125
Burbank, California 91505

Facility EPA ID Number:
CAD030398622

Effective Date:

Expiration Date:

Pursuant to California Health and Safety Code section 25200, this Resource Conservation and Recovery Act (RCRA)-equivalent Hazardous Waste Post Closure Facility Permit is hereby issued to: Lockheed Martin Corporation and Sunshine Distribution LLC.

The issuance of this Permit is subject to the terms and conditions set forth in the Approved Post Closure Application dated April 26, 2012 with subsequent revisions dated June 27, 2012, July 10, 2012 and July 18, 2012. The Permit consists of 24 pages.

Edward Nieto P.E.
Office of Permitting
Department of Toxic Substances Control

Date: _____

**FORMER INTERNATIONAL LIGHT METALS (ILM) FACILITY
19200 SOUTH WESTERN AVENUE
TORRANCE, CALIFORNIA
EPA ID NUMBER CAD030398622
Draft
HAZARDOUS WASTE POST CLOSURE FACILITY PERMIT**

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PART I. DEFINITIONS

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. **“DTSC”** as used in this Permit means the California Department of Toxic Substances Control.
2. **“Facility”** as used in this Permit means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage resource recovery, disposal or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combinations of these units.

For the purpose of implementing corrective action under California Code of Regulations, title 22, division 4.5, a hazardous waste facility includes all contiguous property under the control of the owner or operator required to implement corrective action.

3. **“Permittee”** as used in this Permit means the Owner and Operator.
4. **“RCRA”** as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. Owner of Facility

Lockheed Martin Corporation
2950 N. Hollywood Way, Suite 125
Burbank, California 91505

2. Owner of Real Property

Sunshine Distribution LLC
970 West 190th Street, Suite 220
Torrance, California 90502

3. Operator of Facility

Lockheed Martin Corporation
2950 N. Hollywood Way, Suite 125
Burbank, California 91505

4. Location

The former International Light Metals (ILM) facility (Facility) is located at 19200 South Western Avenue in Torrance, California (see Figure 1). The site comprises approximately 67 acres in a fully developed area zoned for general commercial and industrial use. The Los Angeles County Assessor's Parcel Number (APN) for the property is 7351-003-013.

The developed property is rectangular in shape and is located just south of the San Diego Interstate 405 freeway, southeast of the intersection of Western Avenue and 190th Street. The site is fully developed and contains 5 warehouse/distribution office buildings. Western Avenue comprises the western property boundary. 190th Street forms the northern boundary, across from which various commercial enterprises and the I-405 freeway are located. The site is bordered to the east and south by various commercial enterprises, which are identified in Figure 2.

5. Description of Facility Operations

The Facility was formerly an industrial metal processing plant supporting the military aviation industry. Operations began in the early 1940s after the start of World War II and continued until 1992. At the start of operations, the Facility was part of a larger United States Defense Plant Corp facility that occupied over 300 acres. Site operations included the extruding and forging of aluminum and titanium as well as other metal processes. The buildings and structures were demolished in 1995 and

site soils were remediated. In March 1997, Lockheed Martin Corporation (LMC) and Fremont and Associates, Inc. entered into a sales agreement. In September 1997, the rights to this sales agreement were then assigned to Sunshine Distribution, LLC the current site owner. Shortly after the sale of the site, approximately 55 acres were developed into three warehouse/distribution buildings. In 2000-2001, the remaining 12 acres were redeveloped with two additional buildings to complete the site's current, fully-developed configuration (Figure 2).

During Facility operations, hazardous materials and wastes were stored and/or treated at the facility. Hazardous materials included hydrocarbon fuels, chlorinated solvents, acids, caustics, and other hydrocarbon compounds. Waste streams included wastewater from metal plating, cleaning and quenching operations, spent solvents from degreasing systems, spent acids and caustics, sludge, still bottoms, metal chips, dust, waste hydraulic and cooling oils and greases, oil/water mixtures, and other solid wastes. These former operations are believed to be the source of soil and groundwater contamination at the site, primarily from volatile organic compounds (VOCs) and metals.

6. Facility History

A Closure Plan pertaining to eleven Hazardous Waste Management Units (HWMUs) at the Facility was submitted in 1983, and a permit issued in 1984. A Revised Closure Plan, Contingent Closure Plan and Post-Closure Care Plan for the permitted units were submitted on December 15, 1993 which was based on planned clean-closure of the HWMUs. Soil remediation was conducted in 1995, and the Facility has since been redeveloped. All equipment and structures associated with the regulated HWMUs have been removed. In 1996, the California Department of Toxic Substances Control (DTSC) issued closure certification acknowledgement for two of the eleven HWMUs, and transferred the remaining nine to the ongoing site-wide RCRA groundwater Corrective Action Program. In a March 2002 letter, DTSC stated that clean closure of the nine HWMUs was not achieved and requested further evaluation be performed to determine if the RCRA units had contributed to groundwater impacts. Between 2002 and 2006, further evaluations were performed and submitted to DTSC. In a July 31, 2006 letter, DTSC addressed the closure status of these nine remaining HWMUs and acknowledged that closure was complete for HWMU Numbers (Nos.) 2, 5, 7, 8, and 9.

The remaining four HWMUs, Nos. 1, 3, 4 and 6, did not meet the closure standards and were not considered to be clean closed as they may have contributed to groundwater contamination. These four HWMUs (Figures 3 and 4) are the focus of this Post Closure Permit (PCP). For the purpose of this PCP, HWMUs Nos. 1 and 3 are part of the Former Underground 4,200 Gallon Storage Tank System.

7. Facility Size and Type for Fee Purposes

The Facility is categorized as a large post-closure facility pursuant to Health and Safety Code section 25205.7(d)(5). For the purpose of Health and Safety Code section 25205.4, the post-closure period for the Facility shall be deemed to have started from the effective date of this Post Closure Permit. DTSC may extend the post-closure monitoring period beyond 30 years to protect human health and the environment.

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

The revised Part "A" Application dated April 26, 2012 and the DTSC-approved revised Post Closure Permit Application dated April 26, 2012 with subsequent revisions dated June 27, 2012, July 10, 2012 and July 18, 2012 (Approved Application) are hereby made a part of this Permit by reference.

2. EFFECT OF PERMIT

- (a) The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
- (b) The Permittee is permitted to operate, monitor and maintain this Facility post closure activities in accordance with the terms and conditions of this Permit and the Approved Application. Any management of hazardous wastes not specifically authorized in this Permit or otherwise authorized by DTSC is strictly prohibited.
- (c) Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.

- (f) Failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code Regs., tit. 22, §66270.43).
- (g) In case of conflicts between the Approved Application and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards (RWQCB) and any conditions imposed pursuant to section 13227 of the Water Code.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A Notice of Exemption has been prepared in accordance with the requirements of Public Resources Code, section 21000 et seq. and the California Environmental Quality Act Guidelines, which are codified in title 14, California Code of Regulations, section 15070 et seq.

4. ENVIRONMENTAL MONITORING

The Permittee shall comply with the applicable environmental monitoring and response program requirements of California Code of Regulations, title 22, division 4.5, chapter 14, articles 6 and 17.

- (a) For the purpose of title 22, California Code of Regulations, section 66264.91(b), the elements of the Groundwater Monitoring and Response Program (GWMRP) for the Facility are those described in Section G of the Approved Application and in Appendix B, Section 6 and in Appendix C of the Approved Application.
- (b) For the purpose of title 22, California Code of Regulations, section 66264.92, the Water Quality Protection Standard for the Facility is described in Section G of the Approved Application and in Appendix B, Section 6 and in Appendix C of the Approved Application.
- (c) For the purpose of title 22, California Code of Regulations, section 66264.93, the Constituents of Concern (COC) for the Facility are described in Appendix B, Section 6.1.2 and in Appendix C of the Approved Application. During future sampling events, if the Facility finds constituents listed in title 22 California Code of Regulations, Chapter 14, Appendix IX, in the groundwater that are not already identified in the GWMRP as COCs, the Facility shall add them to the list of COCs. The list of COCs is specified as the Monitoring Parameters for the Water Quality Monitoring Program.

- (d) For the purpose of title 22, California Code of Regulations, section 66264.94, the Concentration Limits for the Facility are described in Appendix B, Section 6.1.3.2 and in Appendix C of the Approved Application. The concentration limit for each COC will be equal to the background value of that constituent, as determined pursuant to the background concentration as established by the approved statistical method.
- (e) For the purpose of title 22, California Code of Regulations, section 66264.97, the Statistical Methodology is described in Appendix B, Section 6.1.3 of the Approved Application.
- (f) For the purpose of title 22, California Code of Regulations, section 66264.95, the Monitoring Points and Points of Compliance for the Facility are described in Section G of the Approved Application and in Appendix B, Section 6.1.2 and in Appendix C of the Approved Application.
- (g) For the purpose of title 22, California Code of Regulations, section 66264.96 the Compliance Period for the Facility's Primary Basin shall be 30 years beginning with the date of the issuance of the post closure permit. DTSC may extend the post-closure monitoring period beyond 30 years to protect human health and the environment.
- (h) For the purpose of title 22, California Code of Regulations, section 66270.31, the monitoring, recording, and reporting program for the Facility is described in Section F and G of the Approved Application and in Appendix B, Section 6.0 and in Appendix C of the Approved Application. The Permittee shall collect groundwater level measurements and monitoring data as required in the Approved Application.
- (i) The Facility shall comply with the requirements of the DTSC Corrective Action Consent Agreement HWCA: P1-98/99-002 dated December 1998 and any other subsequent orders or requirement by DTSC.

5. ANNUAL HAZARDOUS WASTE REDUCTION AND MINIMIZATION CERTIFICATION

The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9).

6. ACCESS

- (a) DTSC, its contractors, employees, agents, and/or any United States Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.
- (b) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit authorizes the operation, monitoring and maintenance of the unit and activities listed below. The Permittee shall not treat, store or otherwise manage hazardous waste in any unit, other than those specified in this Part IV, unless otherwise authorized by DTSC. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22, division 4.5.

For the purpose of title 22, California Code of Regulations, section 66270.1(c) and other similar, unit-specific regulatory requirements, this Facility has three Post Closure Hazardous Waste Management Units for the purpose of this Permit. The three Post Closure units are: 1) The Former Underground 4,200 Gallon Storage Tank System which consisted of the Former Underground 4,200 Gallon Underground Tank (HWMU 3) and the Former Hazardous Waste Storage Yard (HWMU 1); 2) the previously removed 4,000-gallon Underground Storage Tank (HWMU No. 4); and 3) the Former 500-gallon Aboveground Storage Tank (HWMU No. 6). These units are described in detail in the Approved Application and are as follows:

UNIT NAME:

Former Underground 4,200 Gallon Storage Tank System (HWMU No. 1 and 3)

LOCATION:

This Unit was located southeast of the intersection of Western Avenue and 190th Street in the southeast part of the Facility. See Figure 2.

ACTIVITY TYPE:

Groundwater monitoring; operation and maintenance activities; site inspection.

ACTIVITY DESCRIPTION:

See activity description for all the units at the end of this part.

PHYSICAL DESCRIPTION:

The Former Underground 4,200 Gallon Storage Tanks System consisted of the Former Hazardous Waste Storage Yard (HWMU1) and the Former 4,200 Gallon Underground Tank (HWMU3) and its associated piping and sumps.

The Former 4,200-Gallon Underground Storage Tank was 6 feet in diameter by 17 feet long

and constructed of steel. It was used for storage of oil-and grease-containing liquid, petroleum solvents, sludge, and still bottoms prior to off-site disposal. Two collection points in the Former Hazardous Waste Storage Yard fed the tank through underground piping. The tank was removed from the Facility in June 1985.

The Former Hazardous Waste Storage Yard was constructed in 1958 for the temporary storage of all plant-generated wastes, both hazardous and non-hazardous, and for segregation of materials prior to transportation to an approved treatment or disposal facility. The unit was initially 80 feet wide by 125 feet long with an 8-inch thick concrete floor. The Former Storage Yard was enclosed on three sides by 25-foot-high walls, and the concrete foundation was sloped toward two sumps that drained, via underground piping, to a 4,200 gallon underground storage tank (HWMU No. 3) located adjacent to the west side of the building (Figures 4 and 5).

The Former Storage Yard was modified in 1985 for increased segregation of hazardous waste and 55-gallon drum washing capabilities. The Former Storage Yard was divided into two levels. The lower section had dimensions 80 feet wide by 50 feet long. The upper section was elevated approximately 14 inches, with a new 8-inch concrete slab and a 60-inch sand base over a 10 mil polyethylene liner. A ramp connected the upper and lower portions of the yard. The entire concrete slab was roofed.

An additional 40-foot by 125-foot area east of the storage yard was also constructed in 1985 to accommodate three aboveground tanks used in an oil/water management system and equipment cleaning area. Liquid generated from the on-site equipment cleaning and the storage yard drum and equipment cleaning operation was pumped into the oil/water management system. Secondary containment for the 55-gallon DOT drums, steel bins and steel tanks was provided by six-inch concrete curbing constructed around the building perimeter. The three aboveground oil/water management tanks had secondary containment through a 24-inch high concrete containment wall.

In addition to the listed hazardous waste storage, asbestos was periodically kept at the yard in double-bagged, sealed 55-gallon drums for less than 90 days while awaiting offsite disposal.

UNIT NAME:

Previously Removed 4,000-Gallon Underground Storage Tank (HWMU No. 4)

LOCATION:

This Unit was located southeast of the intersection of Western Avenue and 190th Street in the center east part of the Facility. See Figure 2.

ACTIVITY TYPE:

Groundwater monitoring; operation and maintenance activities; site inspection.

ACTIVITY DESCRIPTION:

See activity description for all the units at the end of this part.

PHYSICAL DESCRIPTION:

The Previously Removed 4,000-Gallon Underground Storage Tank (UST) was 5.5 feet in diameters by 17.5 feet in length and constructed of steel. The tank was used for the collection of oil- and grease-containing liquid and stormwater runoff that collected in the immediate vicinity of the tank. One collection point fed the tank by underground piping. The tank was removed in June 1985.

UNIT NAME:

Former 500-Gallon Aboveground Storage Tank (HWMU No. 6)

LOCATION:

This Unit was located southeast of the intersection of Western Avenue and 190th Street.in the center of the Facility. See Figure 2.

ACTIVITY TYPE:

Groundwater monitoring; operation and maintenance activities; site inspection.

ACTIVITY DESCRIPTION:

See activity description for all the units at the end of this part.

PHYSICAL DESCRIPTION:

The Former 500-Gallon Aboveground Storage tank was 78 inches long by 32 inches high and constructed of steel with a closed top. The tank was originally used for storage of spent 1,1,1-trichloroethane solvent, sludge, and still bottoms that were piped from the No. 2 titanium chip cleaning operation. The tank was emptied, steam cleaned and removed from the site in 1987.

ACTIVITY DESCRIPTION FOR ALL THE UNITS:

The activity includes groundwater monitoring, site inspections, repair and maintenance of the monitoring wells and the asphalt/concrete cover as described in Section F and G of the Approved Application and in Appendix B, Section 6 and in Appendix C of the Approved Application. The Facility has an extensive groundwater monitoring network and past and planned remediation activities.

The location of proposed background wells, POC wells, and detection monitoring wells is shown on Figure 6 (see also Figure 3).

The designated background monitoring wells are:

- P-27A (Middle Bellflower B Sand) will be approximately 90 feet east of the eastern curb line of Western Avenue on 186th Street, Los Angeles,
- P-27B (Middle Bellflower C Sand) will be approximately 90 feet east of the eastern curb line of Western Avenue on 186th Street, Los Angeles
- P-12C - Gage Aquifer

The P-27A and P-27B wells are located approximately 1381 feet north of the Facility. These background wells will be sampled quarterly for one year to establish baseline conditions for statistical evaluations and then revert to annual monitoring.

The proposed Point of Compliance (POC) wells are completed in the uppermost water-bearing zone, and immediately downgradient of the HWMUs. The proposed POC wells and associated HWMUs are:

- P-7 – The Underground 4200 Gallon Storage Tank System (HWMUs 1 and 3)
- P-1 – The 4000 Gallon Underground Tank (HWMU 4)
- P-26A – The 500 Gallon Aboveground Tank (HWMU 6)

The proposed detection wells are located downgradient of their respective HWMUs, and some are located offsite on former Boeing Realty Corporation (BRC) property. The wells will monitor conditions in all three water-bearing zones for each permitted unit as follows:

- BL-12A/B/C – The Underground 4,200 Gallon Storage Tank System (HWMUs 1 and 3)
- BL-10A/B/C and P-6B – The 4,000 Gallon Underground Tank (HWMU 4)
- P-16A/C and P-17 and P-6B – The 500 Gallon Aboveground Tank (HWMU 6)

As indicated, some detection well locations provide monitoring for more than one HWMU, and some HWMUs have multiple detection well locations due to variable groundwater flow directions in the HWMU area.

These wells will be monitored annually in accordance with the Sampling and Analysis Plan (SAP) in Appendix C of the Approved Application. The primary COCs for which statistical analyses, plume mapping and graphing will be performed are TCE, PCE, hexavalent chromium and 1,4-dioxane. Secondary COCs which will also be routinely analyzed and tabulated include primary pollutant halogenated and non-halogenated VOCs and CCR Title 22 priority metals. Additionally, once every five years, each of the compliance monitoring wells shall be sampled and analyzed for the constituents listed in title 22 California Code of Regulations, Chapter 14, Appendix IX.

MAXIMUM CAPACITY:

HWMU1 – Former Hazardous Waste Storage Yard – The maximum capacity was about 55,900 gallons.

HWMU3 – Former 4,200 Gallon Underground Tank - The maximum capacity was 4,200 gallons.

HWMU Unit 4 – The maximum capacity was 4,000 gallons.

HWMU Unit 6 – The maximum capacity was 500 gallons.

WASTE SOURCES:

During former operations, hazardous materials and wastes were stored and/or treated at the facility. Hazardous materials included hydrocarbon fuels, chlorinated solvents, acids, caustics, and other hydrocarbon compounds. Waste streams included wastewater from metal plating, cleaning and quenching operations, spent solvents from degreasing systems, spent acids and caustics, sludge, still bottoms, metal chips, dust, waste hydraulic and cooling oils and greases, oil/water mixtures, and other solid wastes. The specific wastes and corresponding EPA codes are provided in the Appendix C of the Approved Application.

WASTE TYPES:

The former site operations are believed to be the source of contamination primarily of volatile organic compounds (VOCs) and heavy metals in the soil and groundwater at the Site.

RCRA WASTE CODES:

D007, F001, F003, F005, U043, U108 listed in Appendix A of the Approved Application reflect the contaminants of concern currently present in soils and/or groundwater in connection with the Facility.

California Waste Code:

211, 213 listed in Appendix A of the Approved Application.

UNIT-SPECIFIC SPECIAL CONDITIONS:

- (a) The Permittee shall comply with the requirements of the Corrective Action Consent Agreement HWCA: P1-98/99-002, dated December 28, 1998 and any subsequent orders or requirements by DTSC.
- (b) The Permittee shall comply with the Annual Report requirements specified in California Code of Regulations, title 22, chapter 14 and shall include the monitoring and response program data in its annual report.
- (c) The Permittee shall conduct annual groundwater monitoring and periodic site inspection, repair and maintenance activities during the post closure care period in accordance with Appendix B and C of the Approved Application.
- (d) For the purpose of California Code of Regulations, title 22, section 66270.31, the Permittee shall conduct the monitoring, recording, and reporting program as described in the Appendix B and C of the Approved Application. The Permittee shall collect groundwater surface level measurements as described in the Approved Application.
- (e) The Permittee shall conduct inspection, visual monitoring, and maintenance during the post closure care period as described in Appendix B and C of the Approved Application.

PART V. SPECIAL CONDITIONS

1. The Permittee shall comply with the requirements specified in California Code of Regulations, title 22, section 66264 in each year's annual report to be submitted each March 1. The Annual Groundwater Monitoring and Response Program Report must be submitted to DTSC by March 1 of each year.
2. The Permittee shall comply with Notification and Record keeping as described in Appendix B and C of the Approved Application.

PART VI. CORRECTIVE ACTION

A. SUMMARY OF THE CORRECTIVE ACTION AND GROUNDWATER REMEDIATION

Site groundwater is present at about 65 to 70 feet below the site in the Bellflower Aquiclude. The groundwater has been impacted by halogenated and non-halogenated VOCs. The principal COCs at the site which are considered to be the primary drivers for remediation include TCE, PCE and hexavalent chromium. DTSC requires that concentrations of 1,4-dioxane in groundwater be monitored although there is no established regulatory limit in drinking water and the California Notification Level is 3 ug/L. In the 2010 groundwater monitoring event, 1,4-dioxane was detected in only one onsite well and three offsite wells above 3 ug/L, the highest at 19 ug/L. Therefore, 1,4-dioxane does not appear to be a remediation driver.

Other constituents, termed Secondary COCs, which are required in the annual groundwater monitoring program, include other halogenated VOCs, such as degradation products of TCE and PCE, as well as non-halogenated VOCs detected in samples primarily from the Middle Bellflower B-Sand and Gage Aquifer. The non-halogenated VOCs are primarily gasoline constituents (e.g., benzene, toluene, ethylbenzene, xylenes/BTEX). Priority Title 22 metals are required to be monitored annually in designated wells as several of these constituents been detected above the MCLs.

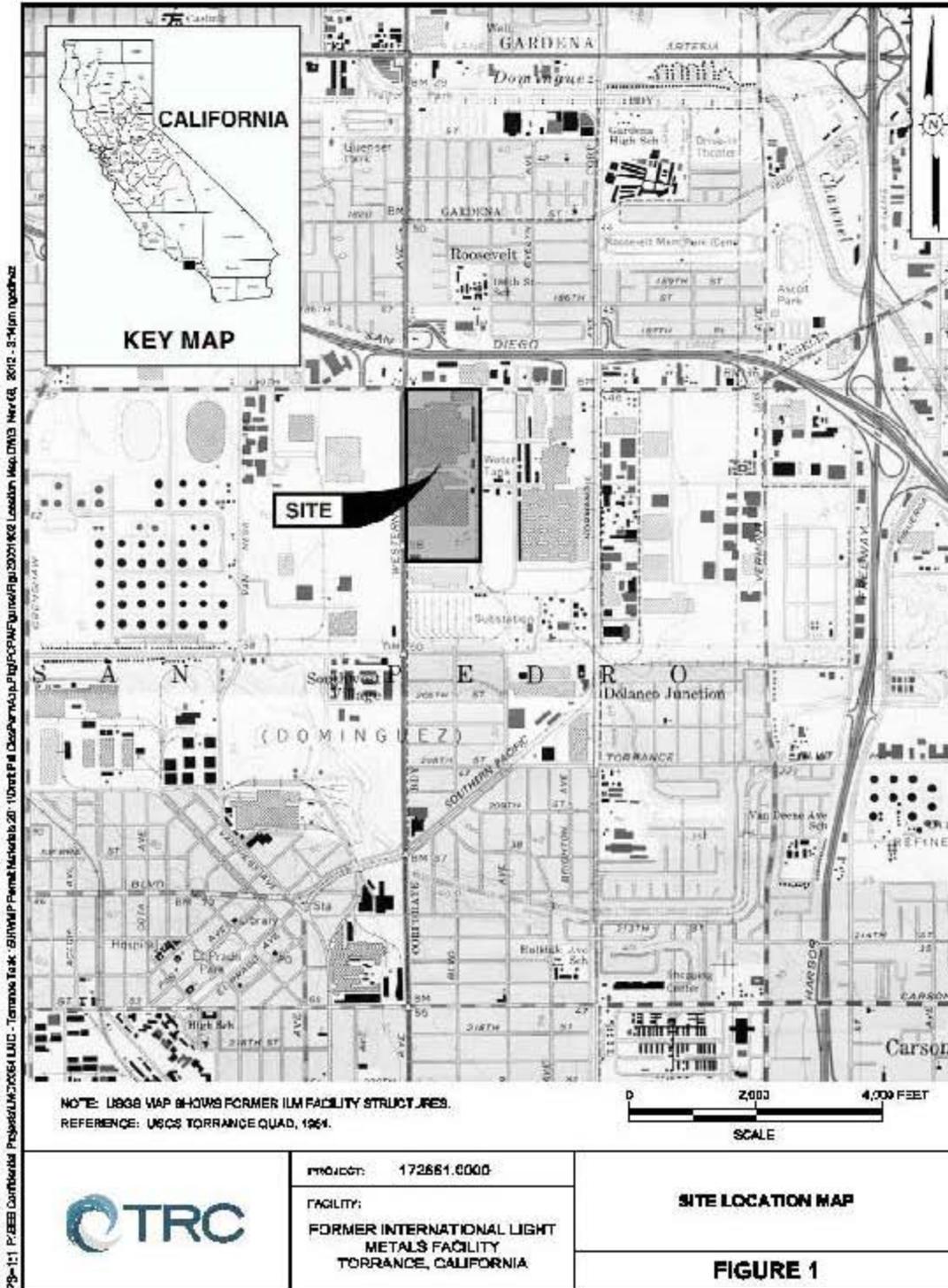
In accordance with CCR Title 22 Section 66264.98 (j)(k), the full suite of Chapter 14, Appendix IX constituents will only be monitored at appropriate locations if the designated detection wells indicate verified statistical exceedance of established control limits, and hence, the possibility of a new release. Due to the completion of prior interim remedial actions, trends observed during the extensive monitoring history at the site, capping of 95% of the site with asphalt and buildings, and the current site use (warehousing), it is unlikely that new releases or increases in the principal COCs will occur. However, the SAP will be modified as necessary to accommodate changes to the monitoring program, which may be warranted by the statistical evaluations, or as requested by DTSC to accommodate inclusion of new emerging chemicals.

Plume maps presented in Appendix B of the Approved Application adequately represent the condition of groundwater below the Facility at the time this Permit was prepared. Additional delineation or groundwater investigations that may be warranted will be conducted as needed based on the revised Corrective Measure Study (CMS) and terms of the Consent Agreement between DTSC and Permittee.

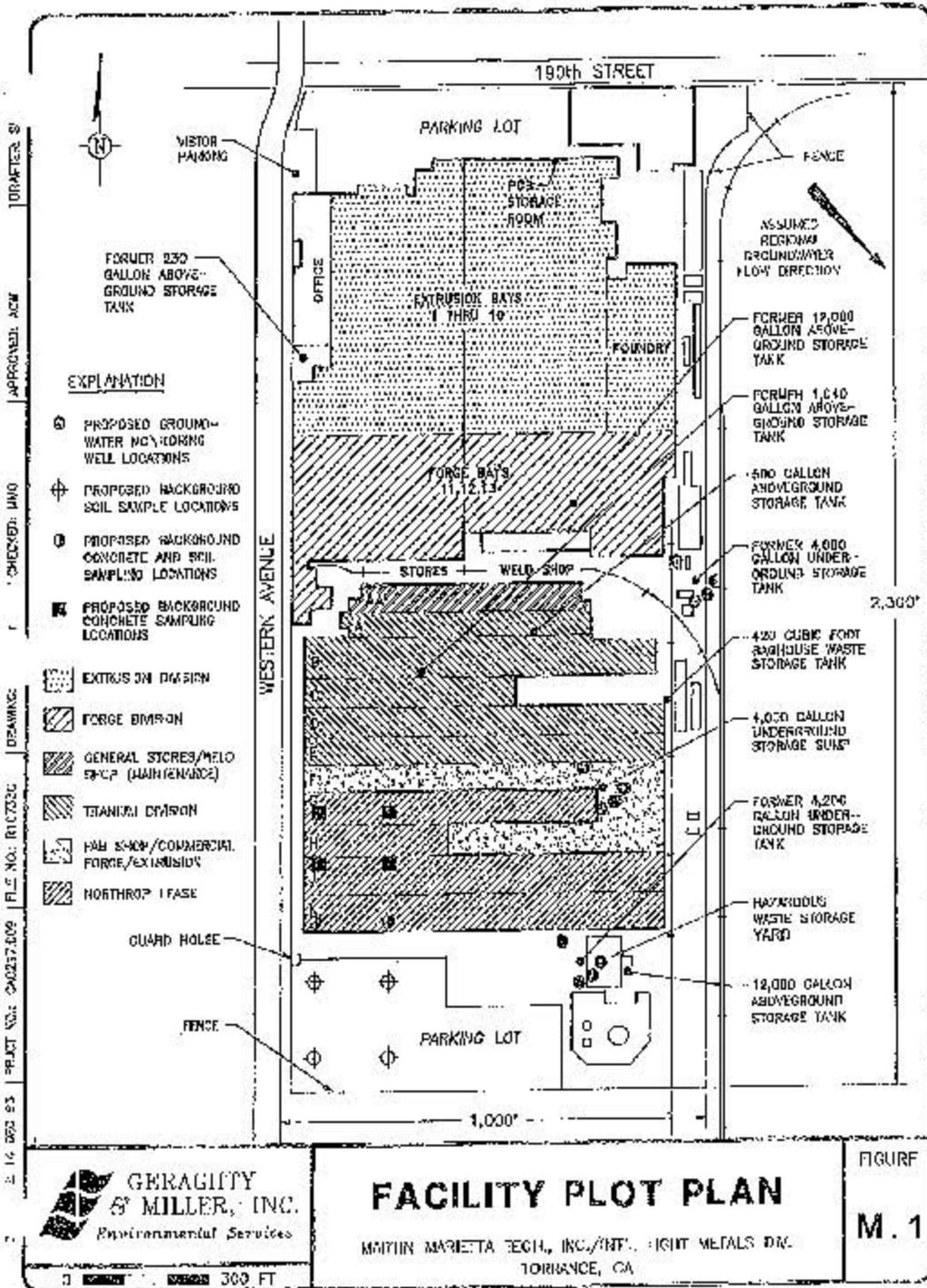
B. CORRECTIVE ACTION CONDITIONS

1. The Permittee shall conduct corrective action at the Facility pursuant to Health and Safety Code sections 25187 and 25200.10. Corrective action shall be carried out under the oversight of the DTSC pursuant to the Corrective Action Consent Agreement HWCA: P1-98/99-002, dated December 28, 1998 and any subsequent orders or requirements by DTSC.

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PG-1-1 PCBES Confidential Project# 172661 LMC - Torrance Task - EIR/EMP Permit/Methods 20 - 10/26/14 04:08 PM Clear/Permit/Map/RI/13021462 Location Map.DWG, 2/13/15, 2:14pm, nashbz



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