

APPENDIX E:

ENVIRONMENTAL SITE ASSESSMENT

E.2: EEC Environmental,
Soil Management Plan, Hernan Norge Cleaners,
11905 Wilshire Boulevard, Los Angeles, California 90025,
September 2, 2022.

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Soil Management Plan

**Hernan Norge Cleaners
11905 Wilshire Boulevard
Los Angeles, California 90025**

September 2, 2022

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1.0 INTRODUCTION

This Soil Management Plan (SMP) has been prepared in advance of anticipated remedial excavation and redevelopment activities at the Hernan Norge Cleaners, located at 11905 Wilshire Boulevard, Los Angeles, California (hereinafter referred to as the Site; Figure 1, *Site Location Map*). The SMP is designed to be a “living” document so that additional data, if any, can be incorporated as collected.

2.0 OBJECTIVES OF THE SMP

The objectives of the SMP are to outline a plan to properly manage soil containing elevated concentrations of contaminants of concern (COC) to protect worker safety during Site remediation and redevelopment activities, adjacent commercial and residential occupant safety during Site remediation and redevelopment activities, and future occupants of new residential and/or commercial structures built on the Subject Property. The SMP addresses soil monitoring, soil management, soil segregation, and soil disposal practices to be implemented during remedial excavation and redevelopment activities.

3.0 ELEMENTS OF THE SMP

To accomplish the objectives stated in the preceding section, this SMP includes the following elements:

- Description of Site, including topography, geology, and hydrogeology;
- Description of historical use, and previous investigations;
- Description of Site redevelopment plans;
- Nature and extent of COCs, remediation goals, and proposed remedial activities;
- Excavation methodology include health and safety, site preparation and security measures, excavation measures, air and meteorological monitoring strategies, and dust control procedures;
- Transportation plan for offsite disposal;
- Stormwater management; and
- Recordkeeping practices.

4.0 SITE DESCRIPTION

The Site is located at 11905 Wilshire Boulevard, Los Angeles, California and is identified by Los Angeles County Assessor’s Parcel Numbers (APNs) 4265-014-037 and 4265-014-038. The Site is approximately 0.52-acre parcel is bounded by South Westgate Avenue to the east, Wilshire Boulevard to the south, a sushi restaurant to the west, and residential apartment buildings to the north. The Site is situated in a mixed residential and commercial area of Los Angeles, California and is currently developed with one approximately 7,500-square foot single-story building that is currently vacant. The remainder of the Site is covered with asphalt paving for parking.

The onsite building was most recently occupied by Hernan Norge Cleaners, a café, and restaurant. Dry cleaning was conducted in the northwestern portion of the building from 1977 to 2021. Hernan Norge Cleaners operated at the Site since 2006.

5.0 TOPOGRAPHY, GEOLOGY, AND HYDROGEOLOGY

The Site is located at an approximate elevation of 270 feet above mean seal level (msl) and is generally flat with a trending elevation decrease to the southwest.

The Site is located on the Santa Monica Plain geomorphic area of the Coastal Plain of Los Angeles County (California Department of Water Resources [CDWR], 1961). The Los Angeles Coastal Plain is characterized as an elongated, northwest-southeast trending, structurally controlled sediment basin within the southern California Peninsular Range Geomorphic Province. Terrestrial and marine sediments are as thick as 30,000 feet in the Los Angeles Coastal Plain and include several notable and important groundwater bearing aquifers used for water resources in the Los Angeles region. The Santa Monica Plain is characterized by Pleistocene-aged undifferentiated sediments of the Lakewood formation, which are approximately 400 feet thick. Soils are characterized by marine and continental gravel, sand, sandy silt, silt, and clay (CDWR, 1961).

Soil encountered during previous investigations at the Site included silt, clayey silt, silty clay, and clay to total depths explored of 40 feet below ground surface (bgs).

The Site is located within the boundaries of the Santa Monica Subbasin of the Coast Plain of the Los Angeles Groundwater Basin. The Santa Monica Subbasin generally occupies the northwestern part of the Los Angeles Coastal Plain. The Santa Monica Subbasin is bounded to the north by impermeable rocks of the Santa Monica Mountains, to the south by the Ballona escarpment, to the west by the Pacific Ocean, and to the east by the Inglewood fault. Holocene age alluvium forms much of the surficial deposits for the central part of the subbasin and fills the Ballona gap. The deposits include the clay-rich Bellflower aquiclude and underlying gravels of the Ballona aquifer (CDWR, 2003).

During previous investigations, groundwater was encountered at the Site at depths between 28 and 40 feet bgs. Based on information available on the State Water Resources Quality Control Board's (SWRQCB) Geotracker database for a nearby facility (Former Mobil #18-484, located at 11666 Wilshire Boulevard), depth to groundwater ranged from 25 to 35 feet bgs. The groundwater flow direction for the facility was reported generally to the south with a hydraulic gradient of approximately 0.04 feet per foot (ft/ft).

6.0 BACKGROUND

This section has been derived using a combination of documentation provided to EEC and available documentation on the Department of Toxic Substance Control's (DTSC) online Envirostor database and California State Water Resources Control Board's (CSWRB) online Geotracker database. Historical boring locations are presented on Figure 2, *Site Layout and Historical Boring Location Map*.

6.1 Previous Investigations

In 2000, Maurison Environmental Engineering Consultants (MEEC) advanced 4 soil borings in the vicinity of the dry-cleaning machine within the dry cleaner space. A total of eight soil samples were collected by MEEC between depths of 3 and 6 feet bgs. Samples were analyzed for Halogenated Volatile Organic Compounds (HVOCs). Tetrachloroethene (PCE) was identified in all eight soil samples at concentrations ranging from 34 micrograms per kilogram (ug/kg) to 5,480 ug/kg (Leymaster Environmental Consulting, LLC [LEC], 2019).

In 2001, Western Environmental Engineers Co. (WEECO) advanced 5 soil borings around the existing dry-

cleaning machine to depths ranging between 5 and 8 feet bgs. A total of 10 soil samples were collected and analyzed for HVOCs. PCE was identified in 9 of the 10 soil samples collected at concentrations ranging from 50 ug/kg to 21,000 ug/kg (WEECO, 2001).

In April 2002, Remediation Science, Inc. (RSI) advanced 5 soil borings to total depth of 20 feet bgs. A total of 24 soil samples were collected between depths of two (2) and 20 feet bgs and analyzed for HVOCs. PCE was detected in soil samples from 15 of the 24 soil samples at concentrations ranging from 14 ug/kg to 5,965,000 ug/kg (LEC, 2019).

In May 2002, RSI installed one groundwater monitoring well (MW-1) in the parking area to the west of the onsite building. The boring was drilled at a 14-degree angle from the vertical and soil samples were collected at five-foot slanted angle intervals starting at 25-feet bgs to a total depth of 45 feet bgs. Perched groundwater was encountered during drilling however the amount of water observed was insufficient to collect a sample for analysis, therefore groundwater was not assessed during this investigation. However, soil samples collected were analyzed for volatile organic compounds (VOCs). PCE was only detected in the sample collected from 25-feet bgs at a concentration of 120 ug/kg (LEC, 2019).

In a letter dated January 7, 2004, the Los Angeles County Fire Department (LACFD) Health and Hazardous Materials Division issued the responsible party a No Further Action letter. The letter stated that high concentrations of PCE are being allowed to remain in place because the soil consists of tight clays making extraction of the soil vapors difficult, and excavation to the depths needed would jeopardize the integrity of the existing building and therefore, not possible (LEC, 2019).

In August 2014, the Los Angeles Regional Water Quality Control Board (LARWQCB) issued Investigative Order No. R4-2014-0158 (Order) for the Site (Creative Concepts Group, Inc., and Hernan Norge Cleaners) in response to a recent sampling conducted by the California DTSC in March 2013. The letter indicates results from the March 2013 sampling identified detectable concentrations of PCE in soil gas samples collected in the vicinity of the Site. The letter also indicates that PCE along with its degradation products were detected in samples collected by the Los Angeles Unified School District (LAUSD) from a natural hot spring nearby University High School (located approximately 0.05 miles southeast of the Site). Based on the presence of detectable concentrations of PCE in the vicinity of the Site, the LARWQCB concluded that the Site could be among the suspected sources of PCE identified in the natural hot springs at the University High School and requested that technical documents, related to historical occupancy, chemical use and storage, onsite chemical management procedures, permits, and previous investigations, for the Site be submitted. In addition, the LARWQCB requested preparation and submittal of Environmental Sampling Workplan to evaluate soil, soil gas, and groundwater at the Site for their approval (LARWQCB, 2014).

In November 2014, LEC submitted a Source Evaluation Report to the LARWQCB. Based on the information included in the report, the Site was owned by Angelina Vinciguerra from 1948 through approximately 2008, followed by Creative Concepts Group, Inc. Relevant historical information reported in this report included the operation of a dry-cleaning business from 1977 through 2006 (listed as Hae Yiong). Additional information regarding the former dry-cleaning business was reported as unknown. However, permits attached to the report from the South Coast Air Quality Management District (SCAQMD) Facility Information Detail (FIND) database, indicate that the former tenant utilized PCE for dry-cleaning operations as early as 1981. Hernan Norge Cleaners was reported to have occupied the Site since 2006 and operated as a dry-cleaning business. The report indicates that Hernan Norge Cleaners utilized aliphatic hydrocarbon fluid as dry-cleaning solvent and had an industrial waste permit for discharge to the sewer with the City of Los Angeles Department of Public Works (LAPW) Bureau of Sanitation. The report indicates

that additional information requested by the LARWQCB could not be provided due to lack of cooperation from the property occupant (LEC, 2014a).

In November 2015, LEC advanced 4 borings to target depths of 30 feet bgs, collected soil samples at depths of 1-foot and 3-feet, 5-feet and at 5-foot intervals thereafter until total depth, and subsequent installation of soil vapor probes at depths of 5 and 15 feet bgs in each boring following collection of soil samples. One additional boring was also drilled for the purpose of collecting one groundwater sample via hydropunch. PCE concentrations in soil samples collected during the investigation ranged from 4.7 mg/kg to 100 mg/kg. The maximum concentration of PCE detected in soil (100 mg/kg) was identified in boring SB2 at three (3) feet bgs. PCE concentrations in soil vapor ranged from 5,700 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to 7,500,000 $\mu\text{g}/\text{m}^3$. The maximum concentration of PCE detected in soil vapor (7,500,000 $\mu\text{g}/\text{m}^3$) was identified in boring SB2/SV2 at 15 feet bgs. Based on soil lithology and the use of limited access drilling equipment, the maximum depth advanced in borings located inside the onsite building was 25 feet bgs and groundwater samples from these borings were unable to be collected. However, LEC advanced one (1) hydropunch boring (HP1) at the southern boundary of the Site and encountered groundwater at a depth of 30 feet bgs. The groundwater sample collected from this boring contained a PCE concentration of 0.50 micrograms per liter ($\mu\text{g}/\text{L}$) (LEC, 2015).

The LARWQCB responded to the Subsurface Investigation Report in a letter dated February 4, 2016. In the letter the LARWQCB requested additional soil, soil vapor, and groundwater assessment be conducted at the Site to further define the extent of VOC contamination and to determine if Site operations have contributed to the impacted natural hot springs at the nearby University High School (LARWQCB, 2016). In accordance with the LARWQCB letter, LEC prepared and submitted another Subsurface Investigation Workplan to further delineate PCE impacts. The scope of work included step out soil and soil vapor borings from locations SB2 and SB4 and two (2) hydropunch borings directly outside and to the south of the onsite building. Based on the available documentation, the proposed work was never implemented (LEC, 2016).

In March 2018, the LARWQCB issued a letter transferring the lead agency regulatory oversight for the Site to the DTSC. In May 2019, the property owner, Creative Concepts Group, Inc., entered into a Standard Voluntary Agreement (SVA) with the DTSC for investigation and remediation of the Site (LARWQCB, 2018).

In November 2019, LEC prepared and submitted a Time Critical Removal Action Workplan (TCRAW) to the DTSC. The overall objective of the TCRAW was to mitigate potential risk to human health and the environmental, consistent with the planned use at the time. The proposed removal action included excavation and off-site disposal of soils highly contaminated with PCE in both soil and soil vapor. The TCRAW was approved by the DTSC on November 26, 2019, however, was never implemented as property ownership and future development plans changed (LEC, 2019).

By June 2021, ownership of the property was transferred to Radha MFH CAL, LLC (Radha). Radha retained Citadel EHS (Citadel) to further assess the lateral and vertical extent of impacts. Citadel advanced a total of five borings within the asphalt-paved parking areas of the Site to depths ranging between 17 feet and 40 bgs. Soil, soil vapor, and groundwater samples were collected during the investigation. The maximum concentration of PCE detected in soil samples collected during the investigation was reported at 1.34 microgram per kilogram ($\mu\text{g}/\text{kg}$). The maximum concentration of PCE detected in groundwater samples collected during the investigation was reported at 4.36 $\mu\text{g}/\text{L}$. The maximum concentration of PCE detected in soil vapor samples collected during the investigation was 218,000 $\mu\text{g}/\text{m}^3$. Concentrations of benzene, ethylbenzene, and trichloroethene (TCE) were also detected in soil vapor at concentrations of 255 $\mu\text{g}/\text{m}^3$,

69 $\mu\text{g}/\text{m}^3$, and 164 $\mu\text{g}/\text{m}^3$, respectively. The results were documented in a Phase II Subsurface Investigation Report (Phase II) and submitted to the DTSC for their review (Citadel, 2021).

On February 28, 2022, the DTSC responded with comments on the Phase II report. In March 2022, Radha and EEC met with the DTSC to discuss remedial and mitigation options for the Site based on the data collected from previous investigations. The DTSC requested a remedial action plan (RAP) be prepared for the Site and submitted to the DTSC for review. The RAP was submitted to the DTSC on August 24, 2022 (EEC, 2022). A response from the DTSC has not been received to date.

6.2 Standard Voluntary Agreement

As of November 30, 2021, Radha has entered into an SVA with the DTSC. The purpose of the SVA is to conduct investigation or evaluation of the Site and remediate, if necessary, under the oversight of the DTSC. Per the SVA, the DTSC is the designated lead regulatory agency for this Site.

7.0 REDEVELOPMENT PLAN

The Site will be redeveloped as a mixed use residential/commercial facility. The proposed development consists of a 7-story, 81-unit residential building, approximately 3,500-square feet of ground floor retail, and subterranean parking.

8.0 NATURE AND EXTENT OF CONTAMINATION

The COCs at the Site are VOCs, specifically PCE, TCE, benzene, and ethylbenzene in soil and soil vapor.

8.1 Regulatory Screening Levels

The remedial objectives are to reduce both the onsite and offsite concentrations in soil and soil vapor to concentrations below the DTSC's Human and Ecological Risk Office (HERO) Human Health Risk Assessment (HHRA) Note 3, DTSC-Modified Screening Levels (DTSC-SLs) and/or future Site-Specific Screening Levels (SSLs) derived from a Human Health Risk Assessment (HHRA). In the absence of a DTSC-SL, for any one constituent, the United States Environmental Protection Agency (USEPA) Regional Screening Level (RSL) will be utilized. Soil vapor screening levels have been developed by modifying the DTSC-SL or RSL utilizing an attenuation factor of 0.001 for future residential development as indicated in the DTSC and California Water Resources Control Boards (CWRCB) Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance), dated October 2011 (DTSC and CWRCB, 2011). Soil vapor screening levels will likely be the ultimate driver of remediation as to achieve the remedial objectives in soil vapor noted in the table below, it will likely be necessary to remove all detectable concentrations of the contaminants of concern in soil.

Remedial Action Objectives/Cleanup Goals		
Contaminant of Concern	Soil ¹ (µg/kg)	Soil Vapor ² (µg/m ³)
Tetrachloroethene (PCE)	590	460
Trichloroethene (TCE)	940 ³	480 ³
Benzene	330	97
Ethylbenzene	5,800 ³	1,100 ³

NOTES:

¹ DTSC HERO HHRA Note 3, DTSC Modified SLs, updated May 2022.² DTSC Modified SL calculated with an attenuation factor of 0.001 for future residential development as indicated in Vapor Intrusion Guidance.³ Value derived using EPA RSLs, updated May 2022.

8.2 Proposed Remedial Activities

Based on discussions with the DTSC and based on information collected from previous investigations, remediation of soil and soil vapor at the Site is necessary. Planned remedial activities will be accomplished largely through soil excavation, transportation, and offsite disposal. Proposed soil excavation depth is anticipated to be approximately 12-15 feet bgs for the entire Site (Figure 3, *Proposed Remedial Excavation Area*). Based on the depth of excavation, shoring will likely be required to be installed to prevent the excavation area from collapsing. Dewatering is not expected based on depths to groundwater reported at the Site. Additional information regarding remedial activities is included in the RAP (EEC, 2022).

8.3 Estimated Quantity of Soil Removal

Based on the anticipated depth of soil excavation, the estimated quantity of soil to be removed during excavation will be between 10,000 and 12,500 cubic yards. Based on results of confirmation soil and soil vapor sampling, additional excavation may be required, particularly in the area of the former dry cleaner operations.

9.0 EXCAVATION METHODOLOGY

9.1 Health and Safety

All contractors will be responsible for operating in accordance with the most current requirements of 8 CCR, Section 5192 (8 CCR 5192) and Title 29, Code of Federal Regulations (CFR), Section 1910.120 (29 CFR 1910.120), Standard for Hazardous Waste Operations and Emergency Response (HAZWOPER). Onsite personnel are responsible for operating in accordance with all applicable regulations of the Occupational Safety and Health Administration (OSHA) outlined in 8 CCR, General Industry and Construction Safety Orders, and 29 CFR 1910 and 29 CFR 1926, Construction Industry Standards, as well as other applicable federal, state, and local laws and regulations. All personnel will operate in compliance with all Cal-OSHA requirements.

9.2 Site Preparation and Security Measures

Following commencing excavation activities, the following Site preparation and security measures should be completed:

- All necessary utility “lock-out/tag-out” and demolition of the building and all associated infrastructure prior to site preparation and security measure implementation.
- Obtain necessary permits from the City of Los Angeles and SCAQMD.
- Premark the proposed excavation area with white paint so it is visible to USA members. USA is a regional notification center that notifies owners and operators of subsurface utilities (water, gas, electric, sewer, oil lines, etc.) and informs them of a contractor’s intent to perform subsurface work.
- Contact USA a minimum of 72 hours prior to initiation of fieldwork.
- Conduct a geophysical survey (with a subcontractor) to identify all subsurface utilities and features in the footprint of the excavation. Detected subsurface features will be marked on the ground with spray paint in a color code established by the American Public Works Association.
- Install fencing around the work areas to ensure that all work areas are secure and safe.
- Plastic sheeting will be placed over adjacent pavement, equipment, vehicles, and materials and these areas will be cleaned as necessary after excavation activities.
- Nearby residents will be informed of site activities and if necessary, sealing off doors and windows will be completed; however, this likely will not be necessary because dust control measures will be implemented, and air monitoring will be completed during excavation activities.
- Ensure that all persons entering the site have a valid purpose for access and that they have received training required by the HASP.
- All site visitors will be documented on daily field logs.
- Notices will be posted at the site entrance directing visitors to see the Site manager.
- Removal action activities will comply with the local noise ordinance limitations. If noise concerns do develop adjacent to residential areas, then temporary sound proofing may be installed along the fence line to reduce noise levels.
- Following the completion of excavation activities, the Site will be secured to ensure safety.

9.3 Excavation

As presented above, Site remediation will include the excavation of more than 10,000 cubic yards of impacted soil. Heavy equipment consisting of, but not limited to, an excavator, backhoe, and loader will be used to remove soil for disposal. During excavation activities:

- Actions will be taken to prevent workers from entering the excavation. However, should entrance be required, prior atmospheric testing will be performed when the excavation is four feet or more in depth. If a hazardous atmosphere or oxygen deficiency is found to exist, then necessary measures, such as ventilation, respiratory equipment, and continued monitoring will be performed. Additionally, as mentioned above, the necessary soil stabilization measures will be implemented to ensure the excavation is safe to enter.
- If the excavation will exceed five feet bgs and workers are required to descend into the excavation, then a permit from the California Department of Occupational Safety and Health (DOSH) may be required.
- If entrance into the excavation is required, scaling, installation of protective barriers, or other methods will be used to protect workers from falling materials.

- Necessary sloping and/or shoring of the excavation will be conducted to ensure and maintain safety.
- A ladder or other safe access equipment will be provided within 25 feet of the excavation.
- As the excavation progresses, EEC will collect confirmation soil samples from the bottom and sides of the excavation, as required by the DTSC or based on professional judgement. Confirmation soil vapor samples will also be collected. The confirmation soil and soil vapor sampling methodology and analytical methods are described in the RAP (EEC, 2022).
- Direct loading of excavated soil is preferred, however, in the case that soil cannot be directly loaded, the soil may be temporarily stockpiled in a designated staging area onsite. Stockpiled soil will be placed in a staging area within the fenced work area. The soil will be maintained on an impermeable surface and covered with plastic sheeting and secured with sandbags to prevent dust generation until offsite transportation and disposal occurs and during non-work hours.
- Haul trucks may be loaded from temporary stockpiles utilizing a front-end loader, excavator, or similar contractor operated equipment. After the soil is loaded into haul vehicles, the soil will be covered with secured tarps according to all Department of Transportation regulations to prevent soil from spilling during transport to the disposal facility.
- Haul vehicles will be inspected to ensure vehicles are cleaned of spilled soil to minimize track out.
- All sampling, excavating, transporting, and storage equipment will be decontaminated using water with detergent, a tap-water rinse, and two rinses with deionized/distilled water. Haul vehicles may also be decontaminated with a dry brush as needed prior to leaving the Site. The decontamination will take place on designated areas covered with plastic sheeting and all decontaminated items will be stored in a manner to keep them clean (i.e., in plastic bags or underneath plastic sheeting).

9.4 Air Monitoring Strategies and Methodologies

- During excavation activities, EEC will use a PID to monitor VOCs in the excavation soil and personal breathing zone. This equipment ensures compliance with the SCAQMD permit requirements and provides relative VOC concentrations allowing field measurements to guide the extent of the excavation. The inlet tip of the PID will be placed approximately 3 inches above the freshly excavated soil and PID measurements will be recorded on SCAQMD Rule 1166 Soil Monitoring Record forms. Copies of the soil monitoring records will be submitted to the SCAQMD following completion of field activities as required and will be available in the field upon request.
- Soil exceeding 50 parts per million by volume (ppmv) is required to be handled separately from other soil not exhibiting this characteristic (per the SCAQMD Rule 1166 permit requirements). This soil will either be stockpiled onsite for later transport to a specific disposal facility, loaded directly into 20 cubic yard roll-off soil bins, or loaded directly into trucks for offsite transport.
- EEC will use a weather station (Vantage Pro2 or equivalent) to determine the wind speed and direction.
- Daily air monitoring will be performed during all periods of active field operations to assess for possible offsite migration of dust and to ensure the health and safety of site workers. The air monitoring will be conducted upwind and downwind and at approximately 15-minute intervals using a PM₁₀ handheld direct-reading personal particulate monitor. If the threshold is reached, the contractor will stop work and implement dust suppression adequate to prevent visible dust from crossing the property boundary and to achieve stabilization of the PM₁₀ reading below the applicable limit.

9.5 Dust Control

- During excavation activities, contractors will implement water spraying as a dust suppression and mitigation measure. Water will be sprayed prior to daily work activities, during excavation and loading activities, and at truck staging locations.
- Onsite materials and equipment will be covered with protective plastic sheeting and cleaned after removal activities to prevent any potential exposure of contaminants to the surrounding area. Similarly, adjacent paved areas will be covered with plastic sheeting and pressure washed following the removal activities, if warranted.
- Onsite speed limits for equipment and truck traffic will be restricted.

10.0 TRANSPORTATION PLAN FOR OFFSITE DISPOSAL

Excavated soil and investigative derived waste (IDW) will be generated during remediation and redevelopment activities. The waste soil will be properly profiled for the specific receiving facility. Each receiving facility has their own acceptance criteria and soil will be tested accordingly to meet their requirements. Approval of waste profile characterizations for all soils scheduled for offsite disposal will be obtained from the disposal facility before transportation. Following approval of waste profile characterization, the waste soil will be removed from the Site by a licensed waste hauler and transported to the appropriate disposal facility.

Designated access areas and driving routes will be established prior to excavation activities and trucks will be staged onsite as much as possible to minimize impacts to local streets and surrounding residential areas. Additional measures (i.e., flag person, traffic control signs, etc.) may be required to assist truck drivers to enter and exit the Site safely. Traffic routes will be submitted to DTSC a minimum of 3 weeks prior to the initiation of excavation activities.

11.0 STORMWATER MANAGEMENT

This SMP does not include details associated with the management of stormwater during remediation and redevelopment activities. However, development of Stormwater Pollution Prevention Plan (SWPPP) is recommended to describe work that will minimize erosion following the finalization of the soil management approach. The SWPPP should include elements such as, but not limited to, silt traps and hay bales to minimize surface water runoff from the Site into storm drains, berms to control Site runoff, and covering of soil stockpiles when there is potential for rain to minimize sediment runoff.

12.0 RECORDKEEPING

Field documentation will include logs to document where, when, how, and from whom vital information was obtained during RA activities. Field logs will be consecutively numbered, and each page dated, and the time of entry noted in military time. All entries will be legible, written in ink, and signed by the individual making the entries. If an error is made, corrections will be made by crossing a line through the error and entering the correct information. Corrections will be dated and initialed. Entries on field logs will include Site name and address, recorder's name, team members and responsibilities, time of arrival and departure, other personnel onsite, summary of any onsite meetings, and quantity of impacted soil removed. The name of the waste transporters, disposal facilities, and number of trucks will also be

included. Photographic documentation will also be collected during RA activities. Photographs will serve to verify information on the field logs.

Manifests or bill of lading from the selected waste hauler will be used to document and accompany each truck load. The shipping documentation will include, but not be limited to, name and address of waste generated, name and address of waste transporter, name and address of disposal facility, and description and quantity of the waste. Copies of the shipping documentation will be maintained for each truckload of excavated soil.

13.0 REFERENCES

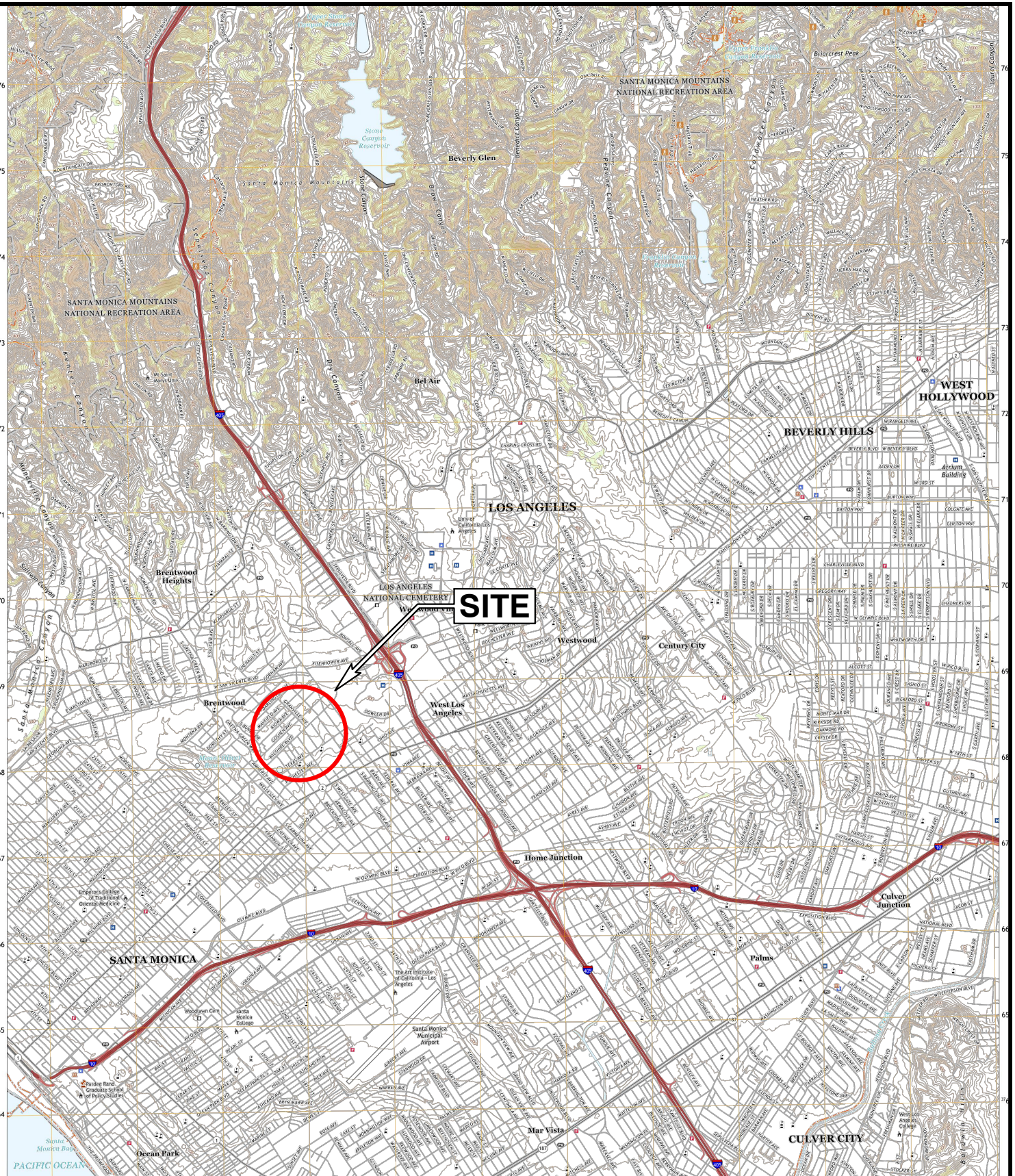
- California Department of Water Resources. 1961. Planned Utilization of the Ground Water Basins of the Coastal Plain of Los Angeles County. Bulletin 104.
- California Department of Water Resources, 2003. Coastal Plain of Los Angeles Groundwater Basin, Santa Monica Subbasin, Department of Water Resources, California Groundwater Bulletin 118.
- California Environmental Protection Agency, Department of Toxic Substances Control, 2011. Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air. October 2011.
- California State Water Resources Control Board, Geotracker. <https://geotracker.waterboards.ca.gov/>.
- Citadel EHS (Citadel). 2021. Phase II Subsurface Investigation Report, Wilshire Westgate, 11905 Wilshire Boulevard, Los Angeles, California 90025. July 13, 2021, revised November 10, 2021.
- Department of Toxic Substances Control (DTSC). 2022. Review of Phase II Subsurface Investigation Report, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, Los Angeles County (Site Code: 401859). February 28, 2022.
- Department of Toxic Substances Control (DTSC). Human and Ecological Risk Office Human Health Risk Assessment Note 3 – DTSC Modified Screening Levels (DTSC-SLs). Revised May 2022.
- EEC Environmental (EEC). 2022 Remedial Action Plan, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. August 24, 2022.
- Leymaster Environmental Consulting, LLC. 2014a. Source Evaluation Report, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. November 13, 2014.
- Leymaster Environmental Consulting, LLC. 2014b. Subsurface Investigation Workplan, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. December 5, 2014.
- Leymaster Environmental Consulting, LLC. 2015. Subsurface Investigation Report, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. November 30, 2015.
- Leymaster Environmental Consulting, LLC. 2016. Subsurface Investigation Workplan, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. February 18, 2016.
- Leymaster Environmental Consulting, LLC. 2019. Time Critical Removal Action Workplan for Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. November 11, 2019.
- Los Angeles Regional Water Quality Control Board, 2013. Requirements for Submittal of Technical Reports, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. August 13, 2014.
- Los Angeles Regional Water Quality Control Board, Work Plan Approval, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. September 4, 2015.
- Los Angeles Regional Water Quality Control Board, Requirement for Submittal of Technical Report, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. February 4, 2016.

Los Angeles Regional Water Quality Control Board, Transfer of the Lead Agency Regulatory Oversight, Hernan Norge Cleaners, 11905 Wilshire Boulevard, Los Angeles, California. May 27, 2018.

United States Geological Survey (USGS). 2022. Beverly Hills 7.5-minute Topographic Quadrangle Map (Topographic).

Western Environmental Engineers Company (WEECO). 2001. Preliminary Phase II Environmental Site Assessment Report. October 30, 2001.

Figures



LEGEND



Site Location



APPROXIMATE
SCALE



SITE LOCATION MAP

Radha Hotels USA, Inc.
11905 Wilshire Boulevard
Los Angeles, California

Date	Drafter
June 7, 2022	AC

Map Source: U.S. Geological Survey, 7.5-Minute
Topographic Quadrangle Map
Beverly Hills, CA; 2022

PE/PG	Project Number	Figure
MZ	S-3680.02T	1
Project Manager	File	
BP	S-3680.02T	



LEGEND

- Approximate Site Boundary
- Approximate Location of Dry Cleaning Machine/Chemical Storage Area
- Soil Boring Location (Maurison, 2000)
- Soil Boring Location (WEECO, 2001)
- Soil Boring Location (RSI, 2002)
- Soil/Soil Vapor Boring Location (LEC, 2015)
- Soil/Groundwater Boring Location (LEC, 2015)
- Soil//Soil Vapor/Groundwater Boring Location (Citadel, 2021)
- Soil/Soil Vapor Boring Location (Citadel, 2021)
- Roto Hammer Soil Vapor Boring Location (Citadel, 2021)

Notes:
Map Source: Google Earth

APPROXIMATE SCALE

Project
Radha Hotels
11905 Wilshire Boulevard
Los Angeles, California

**SITE LAYOUT AND
HISTORICAL BORING
LOCATION MAP**

Project Number S-3680	File Number S-3680.02T
Date June 7, 2022	Figure 2
PE/PG MZ	PM BP
	Drafter AC



LEGEND

- Approximate Site Boundary
- Approximate Location of Dry Cleaning Machine/Chemical Storage Area
- Proposed Excavation Area to 15' bgs
- Proposed Soil Confirmation Sample Location
- Proposed Soil Confirmation Sidewall Location
- Proposed Soil/Soil Vapor Confirmation Sample Location

Notes:

- Map Source: Google Earth.
- Onsite building is expected to be demolished prior to excavation activities.

0 25 50
APPROXIMATE SCALE FEET

Project

Radha Hotels
11905 Wilshire Boulevard
Los Angeles, California

PROPOSED REMEDIAL EXCAVATION AREA

Project Number S-3680		File Number S-3680.02T	
Date June 21, 2022		Figure 3	
PE/PG MZ	PM BP		