



March 17, 2022

Mr. Shean Kim  
Roxford XC, LLC  
3010 Old Ranch Parkway#470  
Seal Beach, CA. 90740

Subject: 15825 Roxford Street Sylmar California-Response to Questions

Dear Mr. Kim,

This letter has been prepared to respond to three questions raised during recent meetings with representatives of the City of Los Angeles Department of Building and Safety. It is our understanding that you own the Site and are in the entitlement process to construct a new industrial building at the Site. HMC is currently conducting the environmental investigations at the Site which are being overseen by the California Department of Toxic Substances (DTSC). These investigations are being conducted to close out the operations of the former occupant (L3) and an open investigation required by the DTSC.

During our call, the representatives of the City raised two questions related to the current environmental conditions at the Site. Their questions and our responses are as follows:

**1) Does the presence of Volatile Organic Compounds in Soil Gas Trigger Remedial or Mitigation Requirements.**

As discussed during our call, detectable concentrations of VOCs are present in soil gas beneath the Site from historic operations. We have prepared a risk assessment and removal action workplan that the DTSC is currently reviewing as part of the closure process. The concentrations of VOCs detected do not exceed requirements for requiring remedial action but could pose a vapor intrusion risk. The risk assessment concluded that the risks to a future occupant would require a vapor mitigation system to be consistent with DTSC's vapor intrusion requirements. The vapor mitigation system is a mitigation requirement to satisfy DTSC.

**2) VOCs in Groundwater**

Trace concentrations of VOCs were detected in groundwater beneath the Site. The  
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groundwater beneath the Site is not used as a drinking water source. The Risk Assessment concluded that there is no exposure pathway for consumption and no risk posed by the VOCs in groundwater. It is anticipated that upon completion of the investigation with DTSC, no further action will be required for the VOCs in groundwater.

### **3) Soil Management Plan**

Due to the presence of hazardous materials in shallow soil and the results of our investigation, DTSC has required a Removal Action Workplan be prepared to address the presence of this soil and how it will be removed. As part of the future grading, DTSC also requires a Soil Management Plan (SMP) which lays out the procedures for site and community monitoring as well as procedures for responding to unknowns. These would be mitigation requirements of DTSC.

I trust this information is responsive to the questions of City staff. If there are any additional questions, please feel free to contact me at your convenience.

Very truly yours,  
Hazard Management Consulting, Inc.

A handwritten signature in black ink, appearing to read "Mark S. Cousineau". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark S. Cousineau  
Principal