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## Los Angeles Regional Water Quality Control Board

March 26, 2026

Pneumo Abex, LLC  
c/o Taft Stettinius & Hollister LLP  
Attn: Ms. Kodi Verhalen  
80 South 8th Street, Suite 2200  
Minneapolis, MN 55402

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
**CLAIM NO.: 9589 0710 5270 0416 9466 54**

**SUBJECT: REVIEW OF UPDATED FIELD AND REPORTING SCHEDULE FOR STAGE I OF THE OFFSITE VAPOR INTRUSION ADDITIONAL ASSESSMENT AND HUMAN HEALTH RISK ASSESSMENT WORK PLAN AND REVISED PASSIVE SOIL GAS PROBE LOCATIONS, PURSUANT TO CLEANUP AND ABATEMENT ORDER NO. 95-021**

**SITE: FORMER PNEUMO ABEX AEROSPACE FACILITY  
3151 WEST FIFTH STREET, OXNARD, CALIFORNIA  
(SCP NO. 0253A, SITE ID NO. 2043000, GLOBAL ID NO. SL204301548)**

Dear Ms. Verhalen:

California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) staff have reviewed the letter *Field and Reporting Schedule for Stage I of the Offsite Vapor Intrusion Additional Assessment and Human Health Risk Assessment Work Plan, Pursuant to Cleanup and Abatement Order No. 95-021* (Letter) dated February 23, 2026, submitted by WSP USA Inc. (WSP), on behalf of Pneumo Abex, LLC for the referenced site (Site). The Letter provides WSP's updated field and reporting schedule for completing Stage I activities proposed in the *Offsite Vapor Intrusion Additional Assessment and Human Health Risk Assessment Work Plan* (Work Plan) dated January 31, 2025. The initial due date for the report detailing Stage I activities in the Work Plan was November 15, 2025, as required in the Los Angeles Water Board's May 16, 2025, amendment to Cleanup and Abatement Order No. 95-021 (Order). On September 24, 2025, the Los Angeles Water Board issued an amendment to the Order extending the due date to March 24, 2026, for submittal of the technical reports detailing the results of the sewer gas, installation and sampling of new soil gas probes PGP-34W-N and PGP-43, passive soil gas probes PSG-1 through PSG-5, and new offsite monitoring well installation and initial sampling activities.

WSP has revised the field and reporting schedule for Stage I activities in the Work Plan due to delays in procuring required access agreements and permits from the City of Oxnard (City). Field activities proposed in Dunkirk Park also require a Right of Entry and

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DAVID NAHAI, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

Indemnification Agreement (Agreement) between the City and WSP. WSP began the permitting and access agreement process with the City in July 2025. In October 2025, WSP submitted applications for well borehole permits and one encroachment permit. The City required additional encroachment and well/borehole permit applications to be submitted following their initial review of WSP's applications. Following submittal of the additional encroachment and well/borehole permit applications, the City required edits to the permit applications, which WSP completed and submitted to the City in December 2025. In January 2026, WSP submitted a signed Agreement to the City for review and approval. The City required additional items which WSP submitted to the City in late February 2026. As of the date of the Letter, the City has not approved and issued the required encroachment and well/borehole permits and has not approved the Agreement to complete site investigation activities.

In the Work Plan, WSP proposed installing a nested soil gas probe north of existing nested soil gas probe GP-34W on the property located at 2947 West Fifth Street in the City of Oxnard (2947 Property). Between June 2025 and November 2025, WSP has made multiple attempts to obtain an access agreement with the owner of the 2947 Property; however, the property owner has not agreed to allow access to their property. On February 18, 2026, the Los Angeles Water Board sent a letter to the owner of the 2947 Property requesting that they work with WSP and allow access to their property for the environmental investigation. The Los Angeles Water Board has not received the property owner's response to the Los Angeles Water Board's request.

WSP has requested additional time to submit the required technical reports so that they can obtain the required permits and access agreements from the City, obtain access to the 2947 Property, perform the Stage I field activities, and prepare and submit the required technical reports.

After reviewing the Letter, and additional information and documents in our files for the Site, the Los Angeles Water Board approves extending the due date from March 24, 2026, to **September 25, 2026**, to submit the technical reports detailing the results of the sewer gas sampling, installation and sampling of new soil gas probes PGP-34W-N and PGP-43, installation and sampling of passive soil gas probes PSG-1 through PSG-5, and new offsite monitoring well installation and initial sampling activities. The due date extension is an amendment to the existing Order.

Submittal of technical documents by the above-specified due dates constitutes an amendment to the existing Order, originally dated February 9, 1995. All other aspects of the Order originally dated February 9, 1995, and amendments thereto, remain in full force and effect. Pursuant to section 13350 of the California Water Code, failure to comply with the requirements of the Order by the specified due dates, including the dates in this amendment, may result in civil liability administratively imposed by the Los Angeles Water Board in an amount up to five thousand dollars (\$5,000) for each day of failure to comply.

**If you have any questions regarding this matter, please contact Mr. James Ryan at (213) 576-6711 or by email at [JamesW.Ryan@waterboards.ca.gov](mailto:JamesW.Ryan@waterboards.ca.gov), or Mr. Joshua Cwikla, supervisor of Site Cleanup Program Unit I, at (213) 576-6735 or by email at [Joshua.Cwikla@waterboards.ca.gov](mailto:Joshua.Cwikla@waterboards.ca.gov).**

Sincerely,

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Russ Colby  
Assistant Executive Officer

cc: Susana Lagudis, California Regional Water Quality Control Board,  
Los Angeles Region  
Shahir Haddad, California Department of Toxic Substances Control  
Vianey Lopez, Supervisor for District 5, Ventura County Board of Supervisors  
Luis A. McArthur, City Mayor, City of Oxnard  
Bert E. Perello, Councilmember for District 1, City of Oxnard  
Alexander Nguyen, City Manager, City of Oxnard  
Daniel Houck, City of Oxnard Community Development Department  
Candice Andrews, Oxnard Fire Department, CUPA Program  
Anabolena DeGenna, Superintendent, Oxnard School District  
Keith Odenweller, Pneumo Abex, LLC  
Elliot Dolin, Pacific Prime Properties  
Robina Suwol, California Safe Schools  
Faith Collari, Sea View Estates Neighborhood Council  
Fabiola A. Hatley, WSP USA, Inc.