



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MEMORANDUM

DATE: FEB 12 2020

SUBJECT: Ceiling Increase Action Memorandum for the Waymire Drum Vapor Intrusion Site, Los Angeles, Los Angeles County, California

FROM: Olivia Trombadore, On-Scene Coordinator
Emergency Response Section II

TO: Enrique Manzanilla, Director
Superfund & Emergency Management Division

THRU: Mindy Clements, Acting Branch Manager
Emergency Response, Planning & Preparedness Branch

I. PURPOSE

The purpose of this memorandum is to request and document approval of the proposed ceiling increase for the Waymire Drum Vapor Intrusion Site (Site) in the City and County of Los Angeles, California. This memorandum requests an additional \$426,000 in direct extramural costs beyond the current ceiling, which increases the regional removal allowance costs from \$1,254,000 to \$1,680,000.

The initial Action Memorandum dated August 14, 2019 and included as Attachment 1, documented trichloroethylene (TCE) in the indoor air and/or crawlspace air of three commercial spaces and five residences at concentrations above EPA's regional screening levels (RSLs). A ceiling increase action memorandum, dated December 12, 2019 and included as Attachment 2, documented the increase in number and complexity of mitigation systems required. The number of commercial spaces and residences requiring mitigation systems increased from three commercial spaces and five residences to six commercial spaces and eleven residences. The six commercial spaces require larger and more complex systems with vapor phase granular activated carbon (VP GAC) units to remove contaminants from the system prior to discharge to the atmosphere. One of these spaces is a dancehall, approximately 8,000 square feet, with multiple rooms, each with varying levels of TCE exceeding RSLs in the indoor air.

Work in these larger, more complex commercial spaces began on January 6th and is requiring more time than originally anticipated extending the final estimated timeline for the removal action by 50 on-site days. Additional funding is required to support the labor and equipment costs associated with the increased time required to install these large mitigation systems,

particularly in the dancehall and the upholstery shop, and to finish installing mitigation systems at the remaining residences at the Site. The proposed ceiling increase will allow for the completion of removal activities at the Site.

This memorandum would serve as approval for the expenditure required for EPA to take actions described herein to abate the imminent and substantial endangerment posed by vapor intrusion to public health or welfare at the Site. The response action at the Site is consistent with removal activities authorized pursuant to Section 104(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(a); and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415.

II. SITE CONDITIONS AND BACKGROUND

Site Name: Waymire Drum Vapor Intrusion Site
CERCLIS ID: CAN000903041
SSID: A9CF
Site Location: 7702 Maie Avenue, Los Angeles, CA
Removal Category: Time Critical
NPL Status: Non-NPL

A. Site Description

1. Physical Location

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

2. Site Characteristics

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

3. Removal Site Evaluation

To date, 39 locations have been sampled as a part of the site evaluation and 17 of them required installation of vapor intrusion mitigation systems. Of those 17 locations, six are large commercial spaces that require more complex systems.

4. Release or Threatened Release into the Environment of a Hazardous Substances, or Pollutant or Contaminant

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

5. National Priorities List (NPL) Status

The Site is not currently listed on the NPL.

B. Other Actions to Date

1. Previous Actions

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

EPA initiated response actions at the Site on September 16, 2019. The indoor air, and crawlspace air or sub-slab gas of 39 commercial spaces and residences have been sampled for TCE, tetrachloroethylene (PCE), and vinyl chloride (VC). Of those spaces, 17 exhibited exceedances of the RSL for TCE in crawlspace and/or indoor air. To date, nine mitigation systems have been installed at four residences and five commercial spaces. Two of the commercial units have had VP GAC units installed on the discharge of the vapor intrusion mitigation systems.

2. Current Actions

United States Environmental Protection Agency

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1 for actions taken prior to August 14, 2019.

EPA is continuing to install vapor intrusion mitigation systems in the residential and commercial spaces where TCE exceeds RSLs in the indoor air and/or crawlspace air. This includes one remaining commercial installation and four residential installations. Several of the existing systems also require minor adjustments.

C. State and Local Authorities' Roles

1. State and Local actions to date

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

2. Potential for continued State/local response

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

IV. ENDANGERMENT DETERMINATION

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

Vapor intrusion mitigation systems will be installed in the remaining four homes and single commercial space where TCE has been detected above the RSLs. Additionally, several of the existing mitigation systems will be modified slightly to increase their functionality. This ceiling increase provides funding to support the labor and equipment costs associated with increased time required to install these large mitigation systems needed at the Site.

1. Proposed Action Description

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

2. Contribution to remedial performance

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

Refer to previous Action Memorandum dated August 14, 2019 and included as Attachment 1.

5. Project Schedule

It is anticipated that the installation of the five remaining mitigation systems and the existing system modifications will take an additional ten weeks. Quarterly air monitoring has already begun and will continue after the final mitigation systems have been installed. It is estimated that each quarterly sampling event will take approximately one week.

B. Estimated Costs

Extramural costs

Regional Removal Allowance Costs:	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Proposed Ceiling</u>
Total ERRS Contractor Costs:	\$770,000	\$250,000	\$1,020,000
Total START Contractor Costs:	\$275,000	\$105,000	\$380,000
Subtotal Extramural Costs:	\$1,045,000	\$355,000	\$1,400,000
Extramural Contingency (20%)	\$209,000	\$71,000	\$280,000
TOTAL PROJECT CEILING:	\$1,254,000	\$426,000	\$1,680,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If the ceiling increase is not granted, EPA will not be able to install mitigation systems in many of the residential spaces where air sampling has demonstrated TCE above RSLs in the indoor air and/or crawlspace air. TCE is known to be carcinogenic to humans by all routes of exposure. If this hazardous substance is not addressed by implementation of the removal action proposed in this Action Memorandum, it may cause an imminent and substantial endangerment to public health or welfare.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

Refer to previous Action Memorandums dated August 14, 2019 and December 12, 2019 and included as Attachment 1 and Attachment 2.

If EPA conducts the removal action, an enforcement cost recovery action may recover the extramural response costs plus the intramural costs.

Intramural Costs¹

	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Proposed Ceiling</u>
U.S. EPA Direct Costs:	\$100,000	\$25,000	\$125,000
U.S. EPA Indirect Costs: (50.65% of AM Ceiling + EPA Direct Costs)	\$735,151	\$240,769	\$975,920
Subtotal Intramural Costs:	\$835,151	\$265,769	\$1,100,920

The total EPA extramural and intramural costs for this removal action, based on full cost accounting practices that will be eligible for cost recovery, are estimated to be \$2,780,920. Of this, an estimated spending of \$1,680,000 comes from the regional removal allowance.

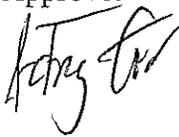
IX. RECOMMENDATION

This decision document represents the selected removal action for the Waymire Drum Vapor Intrusion Site, in Los Angeles, California, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed direct extramural ceiling increase of \$426,000 in order to install vapor intrusion mitigation systems at all of the locations where air samples show

TCE exceeds the EPA's RSLs in indoor air and/or crawlspace air. The total project ceiling, if approved, will be \$2,780,920. Of this, as much as \$1,680,000 comes from the regional removal allowance. If you approve of this action, please indicate your decision by signing this action memorandum.

¹Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

Approve:  2/12/20
 Enrique Manzanilla, Director Date
Superfund & Emergency Management Division

Disapprove: _____
Enrique Manzanilla, Director Date
Superfund & Emergency Management Division

cc: Joseph Carrasco, RWQCB

Attachments

1. Waymire Drum Vapor Intrusion Site Action Memorandum, August 14, 2019.
2. Ceiling Increase Action Memorandum for the Removal Action at the Waymire Drum Vapor Intrusion Site, December 12, 2020.

bcc: D. Prend, ORC
S. Arbaugh, SFD-7-5
O. Trombadore, SFD-9-2
B. Moxley, SFD-9-1
M. Matthews, SFD-9-3
B. Lee, SFD-9-3
K. Castro, SFD-2
P. Guria, SFD-9-2
L. Keller, SFD-9-1
K. Lawrence, SFD-9