



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

MEMORANDUM

DEC 12 2019

DATE:

SUBJECT: Ceiling Increase Action Memorandum for the Removal Action at 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: Kathryn Lawrence, Assistant Director  
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 \$564,000 in direct extramural costs beyond the current ceiling of \$690,000, which increases the regional removal allowance costs to \$1,254,000.

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). As the removal action progressed, EPA continued the removal site assessment as planned and performed additional air sampling, which resulted in an increase in the number of structures requiring mitigation systems. Of the 37 locations sampled to date, 18 have demonstrated indoor air or crawlspace air exceedances for TCE. The number of commercial spaces and residences requiring mitigation systems has increased from three commercial spaces and five residences to six commercial spaces and twelve residences. Because of the size of the commercial spaces, they all 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. This was not previously foreseen. One of these spaces is a dancehall, approximately 8,000 square feet, with multiple different rooms, each with varying levels of TCE exceeding RSLs in the indoor air. In addition, more air sampling than was originally anticipated is required to complete removal activities. Each of the 37 structures sampled require quarterly air monitoring. Additional funding is required to support the labor and equipment costs associated with the increased number and

complexity of mitigation systems needed at the Site, as well as the labor and lab costs associated with increased air sampling. The proposed ceiling increase will allow for the completion of all work 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, 37 locations have been sampled as a part of the site evaluation and 18 of them required installation of vapor intrusion mitigation systems. Of those 18 locations, four are large commercial spaces that require more complex systems with VP GAC units. It is anticipated that four more residential spaces will be sampled to delineate the boundary of the site. They include two, two-unit apartment buildings, and two step back units at residential properties where EPA already plans to install mitigation 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.

**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 initiated response actions at the Site on September 16, 2019. The indoor air, and crawlspace air or sub-slab gas of 37 commercial spaces and residences have been sampled for TCE, tetrachloroethylene (PCE), and vinyl chloride (VC). Of those spaces, 18 exhibited exceedances of the RSL for TCE in crawlspace and/or indoor air. EPA plans to sample the indoor air of four more residential spaces in December 2019. To date, five mitigation systems have been successfully installed at three residences and two commercial spaces. Both the commercial units have had VP GAC units installed on the discharge of the vapor intrusion mitigation systems.

**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 homes and commercial spaces where TCE have been detected above the RSLs. The ceiling increase provides funding to support the labor and equipment costs associated with increased amount and complexity of mitigation systems needed to be installed at the Site; and the labor and lab costs associates with increased sampling.

#### 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 remainder of the mitigation systems will take an additional 12 weeks. Quarterly air monitoring has already begun and will continue after the final mitigation systems have been installed until each structure has been cleared for four quarters. It is estimated that each quarterly sampling event with 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:	\$440,000	\$330,000	\$770,000
Total START Contractor Costs:	\$135,000	\$140,000	\$275,000
Subtotal Extramural Costs:	\$575,000	\$470,000	\$1,045,000
Extramural Contingency (20%)	\$115,000	\$94,000	\$209,000
TOTAL PROJECT CEILING:	\$690,000	\$564,000	\$1,254,000

**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 commercial and 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 Memorandum dated August 14, 2019 and included as Attachment 1.

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

**Intramural Costs<sup>1</sup>**

	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Proposed Ceiling</u>
U.S. EPA Direct Costs:	\$75,000	\$25,000	\$100,000
U.S. EPA Indirect Costs: (50.65% of AM Ceiling + EPA Direct Costs)	\$424,485	\$310,666	\$735,151
Subtotal Extramural Costs:	\$499,485	\$335,666	\$835,151

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 \$2,089,151. Of this, an estimated spending of \$1,254,000 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 \$564,000 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 \$2,089,151. Of this, as much as \$1,254,000 comes from the regional removal allowance. If you approve of this action, please indicate your decision by signing this action memorandum.

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<sup>1</sup>Direct 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.



cc: Joseph Carrasco, RWQCB

**Attachments**

Waymire Drum Vapor Intrusion Site Action Memorandum, August 14, 2019.

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

