



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

MEMORANDUM

DATE: **AUG 14 2019**

SUBJECT: Approval and Funding for a Time Critical 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: Dan Meer, Assistant Director
Emergency Response, Planning & Preparedness Branch

I. PURPOSE

The purpose of this memorandum is to request and document approval of \$690,000 in direct extramural costs for the selected removal action described herein for the Waymire Drum Vapor Intrusion Site (Site) located in the City and County of Los Angeles, California.

The proposed time-critical removal action would mitigate threats to human health and the environment posed by organic vapors originating from tetrachloroethylene (PCE), trichloroethylene (TCE), and vinyl chloride (VC) contaminated soils and groundwater. If Site conditions are not addressed, it may result in an imminent and substantial endangerment to public health or welfare through the continued public exposure to harmful concentrations of contaminated vapors.

The proposed 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

The Waymire Drum Vapor Intrusion source property is located at 7702 Maie Avenue, Los Angeles, California (33° 58' 12.02" North latitude and 118° 14' 38.07" West longitude). The source property is 2.3 acres in a mixed urban industrial and residential area of Los Angeles County. The source property is bordered to the north by a single-family residence and a light manufacturing business. More single-family residences are located along the western border, across Maie Avenue. South of the source property are textile businesses, and railroad tracks run along the eastern border. A public park is located east of the railroad tracks.

The soil and groundwater at the source property are contaminated with PCE, TCE, and VC. These contaminants have migrated off-site via a groundwater plume and are causing a vapor intrusion hazard (primarily TCE) in the surrounding residences and businesses. Therefore, for the purposes of this removal action, the Waymire Drum Vapor Intrusion Site (Site) can be approximated by the general boundaries of the houses and commercial properties west of the source property, lining South Maie Avenue and South Miramonte Boulevard.

According to EPA's environmental justice screening tool, the Site is located in a densely populated, predominately Hispanic, Spanish speaking, low income community. Approximately 15,000 people live within a half mile radius of the source property. Of this population, 99% belong to a minority group, with 93% identifying as Hispanic, and 99% speaking Spanish. Compared to the rest of California, this neighborhood is in the top 4% of minority populations.

2. Site Characteristics

The source property is currently owned by Mitchell Investors, LLC. Until recently, various auto body repair and drum cleaning businesses were operating on the source property. Current on site business operations include a porta potty rental and storage business, and a car repossession business which stores repossessed automobiles on site pending owner retrieval. On site buildings include an occupied single-family residence, two open air warehouses, a storage shed, and an unoccupied residence that is zoned for use as an office.

It is unclear whether the soil and groundwater contamination at the source property stems from the autobody repair business operations or from earlier business operations at the source property, such as the drum cleaning operations.

From approximately 1929 to 1977, the Rooke Cooperage Co., later known as A. Rooke Cooperage Co., operated a drum cleaning, stripping and recycling facility. It is unknown what hazardous substances were used or disposed of by Rooke Cooperage Co. during these operations.

From 1978 to 1993, drum recycling operations continued under the Waymire Drum Company. The facility obtained used drums from various chemical industries and once onsite the facility washed the drums with caustic solution and water, then reconditioned and repainted them. A three-stage clarifier and spray paint booth were utilized in operations, as well as multiple tanks and sumps.

In approximately 1997, the title of the source property transferred from Waymire Drum Company to Mitchell Investors, LLC. At the time, the source property was being used for the storage of empty drums.

Starting in September 1998, Mitchell Investors, LLC claims to have initiated a cleanup effort. Reportedly, the effort included the removal of drummed paint waste, thinner, drained oil filters, and baghouse dust. A cleanup of accumulated debris and pressure cleaning of the acid wash area, caustic wash area, and clarifier structures was also conducted. Subsurface trenching and vaults were backfilled with concrete, and bulk solid wastes and liquids were removed from the source property.

Despite this, an investigation conducted by the California Regional Water Quality Control Board (RWQCB) between 1995 and 2000 demonstrated elevated levels of volatile organic compounds (VOCs) in nearby groundwater wells.

From 2001 to 2017, Prestige Imports and/or Prestige Auto Truck Dismantling, an auto parts salvage company, operated on the source property. Union Batteries and Auto Electric operated briefly on site from 2010 to 2011 as a battery collection facility. High Line Collision Center and Body Shop operated another auto salvage business on the source property from 2011 through 2017. Operations included the sanding and painting of vehicles. Specific hazardous substances used during these operations are not known. However, between 2002 and 2003, approximately two tons of trichloroethylene (TCE) were manifested from the site.

Contamination in the groundwater beneath the source property has migrated into the residential and commercial areas west of the property. Because the contamination is VOCs, the subsurface contamination causes a vapor intrusion hazard in the building overlying the contaminated groundwater plume. This includes the houses and commercial properties lining South Maie Avenue and South Miramonte Boulevard adjacent to the source property. An ongoing removal site evaluation has demonstrated a vapor intrusion hazard in three office buildings and five homes to date. These properties will require vapor intrusion mitigation measures to be installed. Air sampling is ongoing, and contingent on sample results, more than these eight structures may require vapor intrusion mitigation measures to be installed.

3. Removal Site Evaluation

EPA's Site Assessment group began conducting a Preliminary Assessment (PA) in 2017 at the source property. Upon receipt of highly elevated soil gas sample results, they referred the site to EPA's Emergency Response Section on May 28, 2019.

Beginning June 6, 2019, the EPA began collecting residential and commercial air samples.

Sample locations were identified by EPA based on proximity to the source property as well as the expected flow of groundwater in the area. Sources of household chemicals, which have the potential to interfere with samples, were identified and removed prior to sampling. One day after collection of household chemicals, six-liter SUMMA canisters were placed in various locations for twenty-four-hours to obtain indoor air, crawl space air, and outdoor air samples. After collection, samples were sent to one of two labs for analysis. Sample analyses were performed using the EPA TO-15 SIM method by gas chromatography/mass spectroscopy with selective ion monitoring to allow for detection of VOCs below EPA's Regional Screening Levels (RSLs). Sample results were reported for PCE, TCE, and VC.

Indoor air samples were collected in rooms that are typically occupied during the day (i.e. kitchen, living room, and dining room). Ambient air samples were taken on the property outside the home or office to evaluate the potential area wide ambient air as a potential source of indoor air contamination. Air samples were taken in the crawl spaces of structures that had them to demonstrate a complete pathway of vapor intrusion from the soil into the living space. Sample results for PCE and VC did not exceed EPA's RSLs. Sample results did reveal elevated levels of TCE in the crawl spaces and indoor air of five homes and three businesses to date (**Table 1**). The highest levels of TCE in indoor air were found in the commercial upholstery space at $23.11 \mu\text{g}/\text{m}^3$. The RSL for worker air is $3 \mu\text{g}/\text{m}^3$. Fans were installed in the building to determine if levels of TCE in the indoor air could be successfully reduced through ventilation. Follow up samples showed that TCE in the indoor air had indeed been reduced from $23.11 \mu\text{g}/\text{m}^3$ to $4.82 \mu\text{g}/\text{m}^3$ following ventilation. While there is evidence of a complete vapor intrusion exposure pathway in eight structures to date, the levels did not indicate the need for an emergency response action at the commercial upholstery location.

Sampling for the removal site evaluation is ongoing in additional residential and commercial locations surrounding the site. Currently, eight structures have been identified with vapor intrusion levels above RSLs. Assessment activities are continuing, and it is anticipated that additional structures may require vapor intrusion mitigation measures to be installed.

Table 1: Indoor air and crawl space air sample results for businesses and homes with TCE above RSLs

A.

Commercial RSL	Sample Location	Office A	Office C	Commercial Upholstery
3.0 $\mu\text{g}/\text{m}^3$	Crawl Space ($\mu\text{g}/\text{m}^3$)	47.83	N/A	N/A
	Indoor ($\mu\text{g}/\text{m}^3$)	11.29	5.77	23.11

B.

Residential RSL	Sample Location	Exemption 6: PII				
0.48 $\mu\text{g}/\text{m}^3$	Crawl Space ($\mu\text{g}/\text{m}^3$)	1.13	N/A	1.43	5.37	2.58
	Indoor ($\mu\text{g}/\text{m}^3$)	ND	0.59	0.25	0.75	ND

*N/A indicates no sample was taken

**ND indicates non-detect

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

TCE is a CERCLA hazardous substance as defined under CERCLA Section 101(14), 42 U.S.C. § 9601(14), and 40 C.F.R. § 302.4(a).

Both acute and chronic exposure to TCE causes a number of health effects, including effects on a developing fetus. TCE is carcinogenic to humans by all routes of exposure. Exposure to high, acute concentrations of TCE vapors can irritate the respiratory system and skin and induce central nervous system effects such as light-headedness, drowsiness, and headaches. Chronic or prolonged exposure to TCE has been associated with effects in the liver, kidneys, immune system, and central nervous system. Specifically, chronic exposure to TCE is associated with kidney cancer, liver cancer and malignant lymphoma (blood cancer).

Preliminary sample results from the removal site evaluation demonstrate the presence of TCE at levels above the EPA RSLs in the crawl spaces and indoor air of five residences and three office spaces (**Table 1**). To date, the highest level of TCE detected in indoor air was found in a commercial space at a level of 23.1 $\mu\text{g}/\text{m}^3$. Similarly, the highest level of TCE detected in crawl space air was found in an office building at 47.83 $\mu\text{g}/\text{m}^3$. The RSL for commercial indoor air is 3 $\mu\text{g}/\text{m}^3$ while the RSL for residential indoor is 0.48 $\mu\text{g}/\text{m}^3$.

5. National Priorities List (NPL) Status

The Site is not currently listed on the NPL.

B. Other Actions to Date

1. Previous Actions

Sanitation Districts of Los Angeles County (LASD)

The Sanitation Districts of Los Angeles County (LASD) issued a Notice of Violation (NOV) to Waymire Drum in 1989 for discharging metals to the sewer system.

California Environmental Protection Agency, Department of Toxic Substances Control (DTSC)

In 1984, DTSC issued a NOV and Directive to Comply to the Waymire Drum Company for several violations. In August 2016, DTSC completed a Site Screening of the source property for the EPA. It was determined that further assessment was needed.

California Environmental Protection Agency, Regional Water Quality Control Board (RWQCB)

Between 1995 and 2000, multiple groundwater sampling events were conducted on the source property under the oversight of the RWQCB. During each event, groundwater samples were collected from three on-site monitoring wells and analyzed for VOCs only.

Since 2000, the RWQCB has issued Notices of Non-Compliance, Orders under the California Water Code 13267, and NOV's to the former Waymire Drum Company and to Mitchell Investors, LLC, regarding activities and contaminants at the source property. Neither Waymire Drum Company, nor Mitchell Investors, LLC complied with the Orders. In 2010, the RWQCB issued another NOV to both parties and neither of them complied.

2. Current Actions

United States Environmental Protection Agency

The Region 9 U.S. EPA Site Assessment program published a preliminary assessment report of the source property in December 2017. The program has conducted soil gas, soil, and groundwater sampling on-site in the process of determining whether to list the source property on the NPL. In 2019, the Site Assessment program conducted soil gas sampling at the source site and discovered highly elevated concentrations of TCE, PCE, and VC above screening levels. Soil gas sample results for TCE, PCE, and VC were as high as 4,100,000 $\mu\text{g}/\text{m}^3$, 950,000 $\mu\text{g}/\text{m}^3$, and 180,000 $\mu\text{g}/\text{m}^3$ respectively. The residential vapor intrusion screening level (VISL) for TCE, PCE, and VC in soil gas are 16 $\mu\text{g}/\text{m}^3$, 360 $\mu\text{g}/\text{m}^3$ and 5.6 $\mu\text{g}/\text{m}^3$ respectively. Outside of the preliminary assessment and this removal action this is a state lead site led by the Los Angeles RWQCB.

C. State and Local Authorities' Roles

1. State and Local actions to date

The Los Angeles RWQCB issued a 'Request for Federal Action' letter to the EPA, Region 9 on August 1, 2019, formally requesting assistance through an EPA led removal action at the Site.

2. Potential for continued State/local response

This is a RWQCB state lead site and will continue to be a state led site when the removal action is concluded. It is currently unknown what particular actions the RWQCB intends to take at the site subsequent to the removal.

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

Conditions at the Site represent a release, and potential threat of release, of CERCLA hazardous substances threatening the public health, welfare, or the environment based on the factors set forth in the National Oil and Hazardous Substances Pollution Contingency Plan, 40 C.F.R. § 300.415(b)(2). EPA has determined that the following 40 C.F.R. § 300.415(b)(2) factors apply at the Site:

- (i) *Actual or potential exposure to nearby populations, animals or the food chain from hazardous substances or pollutants or contaminants;*

TCE is a hazardous substance as defined by CERCLA Section 101(14) of CERCLA, 41 U.S.C. § 9601(14), and 40 CFR § 302.4(a). TCE is carcinogenic to humans by all routes of exposure. Acute exposure to TCE can potentially affect fetal development, irritate the respiratory system and skin, and cause central nervous system effects such as light-headedness, drowsiness, and headaches. Chronic exposure to TCE has been associated with effects in the liver, kidneys, immune system, and central nervous system. There is strong evidence that exposure to TCE can cause kidney cancer and some evidence that it causes liver cancer and malignant lymphoma (blood cancer). EPA has created RSLs for TCE for the concentration of TCE in air that is associated with a lifetime cancer risk of 1 in 1 million. The indoor air RSLs for TCE are $0.48\mu\text{g}/\text{m}^3$ for residential occupancy and $3\mu\text{g}/\text{m}^3$ for commercial worker/non-residential occupancy.

Twenty-four-hour air samples taken at the Site show elevated levels of TCE above the RSLs in the crawl spaces and indoor air of several residences and business. To date, the highest level of TCE detected in indoor air was found in a commercial space at a level of $23.11\mu\text{g}/\text{m}^3$. The highest level of TCE detected in crawl space air was found in an office building at $47.83\mu\text{g}/\text{m}^3$. To date, the highest level of TCE detected in residential indoor air and crawl space air are $0.75\mu\text{g}/\text{m}^3$ and $5.37\mu\text{g}/\text{m}^3$ respectively. Once TCE has migrated into the indoor air, residents and workers inhabiting these spaces may be exposed to harmful levels of TCE through inhalation.

- (iv) *High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;*

Twenty-four-hour air samples taken in the crawl space of residences and businesses at the Site demonstrate the presence of TCE at the soil air interface. TCE is a VOC, so it evaporates from

the subsurface and can accumulate in overlying buildings above levels of concern. Samples detecting the presence of TCE in indoor air above RSLs further demonstrates that this hazardous substance is migrating from the soil into indoor air spaces in homes and businesses. Once TCE has migrated into the indoor air, residents and workers inhabiting these spaces may be exposed to harmful levels of TCE through inhalation. Without the implementation of mitigation measures this pathway will continue to cause public exposure to hazardous TCE vapors in the indoor air of their homes and work places.

- (vii) *The availability of other appropriate federal or state response mechanisms to respond to the release;*

Local and state agencies, primarily the RWQCB have issued several orders and NOV's to the property owner(s) over the last several decades without compliance. The local and state agencies have attempted and been unable to address the Site in a timely, effective manner. No other local, state, or federal agency has the resources to independently implement a response action in a timely manner to address the ongoing threats presented by the Site.

IV. ENDANGERMENT DETERMINATION

If the actual or threatened releases of the hazardous substance, TCE, above RSLs at this Site are not addressed by implementing the response action selected in this memorandum, they may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

Vapor intrusion mitigation systems will be installed in the homes and commercial spaces where elevated levels of TCE have been detected.

1. Proposed Action Description

The removal actions in the residential or commercial units with slab on grade foundations will include the following steps:

- i. If necessary, occupants of each residential unit will be relocated to a nearby hotel while mitigation systems are installed in their units. This will allow the work crew continuous access to the home thereby reducing the costs and the time required to install the mitigation systems.
- ii. Household items will be moved to provide access for three to four sub-slab monitoring ports to be drilled through the concrete in the corners of each apartment or home.
- iii. One or more, six-inch diameter concrete cores will be advanced through the slab, near the middle of the apartment or home, usually in a closet.
- iv. Any sub-slab material that can be removed by hand through the six-inch hold will be pulled out to optimize the vacuum field achieved at each hole.

- v. Four-inch PVC pipe will be grouted into the hole and will be plumbed to carry the pipe out the side of the building to an in-line radon mitigation fan, and to an exhaust riser well above the roof lines.
- vi. Soffits may be constructed to conceal the pipe runs behind painted and textured drywall.
- vii. The fans will be energized on the existing electricity service to the residence.
- viii. After installation of the systems, sub slab pressure measurements will be taken at the pressure monitoring ports in each home to confirm the extent and strength (minimum of 10 Pascal of vacuum at each point) of the vacuum field created by the system.

The removal actions in the residential or commercial units with crawl space foundations will include the following steps:

- i. If necessary, occupants of each residential unit will be relocated to a nearby hotel while mitigation systems are installed in their units. This will allow the work crews continuous access to the apartment or home thereby reducing the costs and the time required to install the mitigation systems.
- ii. Subject to the safety and adequacy of access, a suitable plastic membrane will be installed to cover exposed soils under the residence and the membrane will be adhered to the perimeter foundation stem wall.
- iii. Four-inch PVC pipe will be placed through the membrane, will be sealed to the membrane at the point of entrance through the membrane, and will then be plumbed to carry the pipe out the side of the building to an in-line radon mitigation fan, and to an exhaust riser well above the roof line.
- iv. The fans will be energized on the existing electrical service to the residence.

After the installation of the mitigation system is complete in each structure, twenty-four-hour indoor air confirmation samples will be collected to demonstrate the success of the mitigation system installed. Ambient air samples will also be collected and analyzed using the same methods.

As stated in the 'Request for Federal Action' letter from the RWQCB to the EPA, "The Regional Water Board and USEPA agree that 40 C.F.R. § 300.415 applies to any work done at the Site, and that the Regional Water Board retains jurisdiction over the Site for all cleanup and abatement actions other than the removal action." As such, the RWQCB recognizes that they will be responsible for ongoing operation and maintenance of the vapor intrusion mitigation systems and remedial actions at the Site. EPA will pay for the first year of electricity required to run the vapor intrusion mitigation systems. After one year, either the RWQCB or the home/business owners will be responsible for the ongoing electricity cost.

2. Contribution to remedial performance

This is a state lead site led by the Los Angeles RWQCB. The proposed removal action will mitigate public exposure to high levels of TCE contaminated vapors while the Region and the RWQCB determine the next steps in Site cleanup. The Site is currently undergoing a site assessment by the Region 9 EPA Site Assessment Program.

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

An EE/CA is not required for a removal action with a planning period of less than six months.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

Pursuant to Section 300.415(j) of the NCP, 40 C.F.R. § 300.415(j), a CERCLA removal action shall, to the extent practicable considering the exigencies of the situation, attain ARARs under federal environmental or state environmental facility siting laws. Federal and state advisories, criteria or guidance may, as appropriate, be considered in formulating the removal action. 40 C.F.R. §§ 300.400(g)(3) and 300.415(j). EPA has consulted with RWQCB and identified following ARARs and To Be Considered (TBCs) for the proposed response action:

ARARs:

Comprehensive Environmental Response, Compensation & Liability Act (CERCLA)

CERCLA Off-Site Disposal Rule, 42 U.S.C. 9621(d)(3), 40 CFR 300.440

CERCLA waste transferred off-site may only be placed in a facility that operates in compliance with the Resource Conservation and Recovery Act (RCRA). The facility to which excavated soil and any other hazardous wastes will be sent must be among the list of approved receiving facilities pursuant to RCRA.

U.S. Department of Transportation (DOT) Hazardous Material Transportation Rules

22 §§ CCR 66262.20, 66262.22, 66262.23, and 66262.30 through 262.33

Off-site transportation of hazardous materials will be governed by U.S. DOT regulations. The substantive provisions of the regulations apply to management of hazardous materials onsite.

To Be Considered (TBC):

EPA Regional Screening Levels for Indoor Air

As explained in section A: Removal Site Evaluation section of this memo, EPA uses the RSLs to determine risk-based indoor air cleanup levels. The RSL for TCE is 0.48 µg/m³ for residential occupancy and 3 µg/m³ for commercial and industrial workers/non-residential occupancy.

5. Project Schedule

Preparations for the removal action are anticipated to start after approval as indicated by the signature on this action memorandum. Each mitigation system requires approximately one week to install. Therefore, it is anticipated that the installation of vapor mitigation systems will take 10 or more weeks and less than 120 days.

B. Estimated Costs

Extramural costs

Regional Removal Allowance Costs:

Total Cleanup Contractor Costs (ERRS)	\$400,000
Total START Contractor Costs	\$100,000
Contractor Cost Contingency (15%)	\$75,000

Subtotal Extramural Costs: \$575,000

Extramural Contingency (20%) \$115,000

TOTAL REMOVAL ACTION PROJECT CEILING: \$690,000

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

A delay in action or no action at this Site would allow for the continued exposure of the public to high levels of VOC contaminated vapors. 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 memorandum, it may cause an imminent and substantial endangerment to public health or welfare.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

Please see the attached Confidential Enforcement Addendum for a discussion regarding potentially responsible parties and enforcement. If the removal action is conducted by the potentially responsible party(ies), an enforcement cost recovery action may recover oversight costs and currently incurred site assessment costs. 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 Costs¹

U.S. EPA Direct Costs	\$75,000
U.S. EPA Indirect Costs	\$387,473
(50.65% of AM Ceiling + EPA Direct Costs)	

TOTAL INTRAMURAL COSTS \$462,473


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 \$1,152,473. Of this, an estimated spending of \$690,000 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 removal action. The total project ceiling, if approved, will be \$1,152,473. Of this, as much as \$690,000 comes from the regional removal allowance. If you approve of this action, please indicate your decision by signing this action memorandum.

Approve:

for/_____
Enrique Manzanilla, Director

Date

Superfund & Emergency Management Division

8/13/19

Disapprove:

Enrique Manzanilla, Director

Date

Superfund & Emergency Management Division

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.

cc: Joseph Carrasco, RWQCB

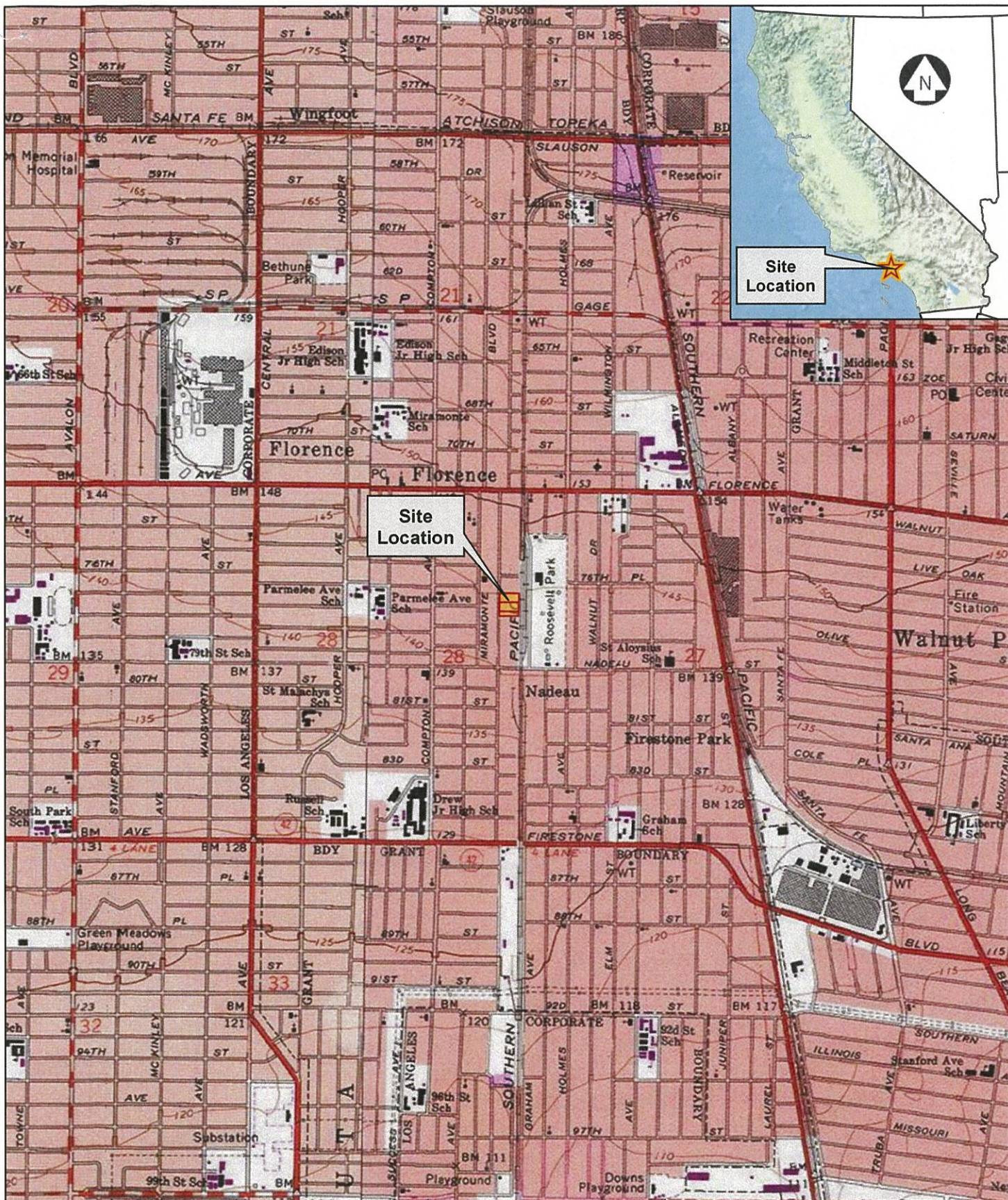
Attachments

Index to the Administrative Record
Enforcement Confidential Addendum
Figures

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

Index to the Administrative Record

1. LA RWQCB Request for Federal Action Letter; August 1, 2019
2. OSWER Vapor Intrusion Technical Guide Final; June 2015
3. R9 TCE Interim Action Levels and Response Recs memo – 2014; July 9, 2014
4. EPA Residential Air Regional Screen Levels Table, May 2019
5. EPA Worker Air Regional Screening Level Table, May 2019
6. Waymire Drum Co Final Preliminary Assessment – Narrative; December 2017
7. Waymire Site Assessment Sample Results; June-July 2019
8. Waymire Drum Company Inc Brief; May 28, 2019
9. Waymire Drum Vapor Intrusion Site Action Memorandum; August 2019



0 Scale in Miles 0.5

PREPARED BY:
Weston Solutions, Inc.
1340 Treat Blvd, Ste 210
Walnut Creek, CA 94597

PREPARED FOR:
EPA Region 9
Site Assessment
Program



FIGURE 1
SITE LOCATION MAP
Waymire Drum Co. Inc.
Preliminary Assessment
7702 Maie Avenue
Los Angeles, Los Angeles County, CA



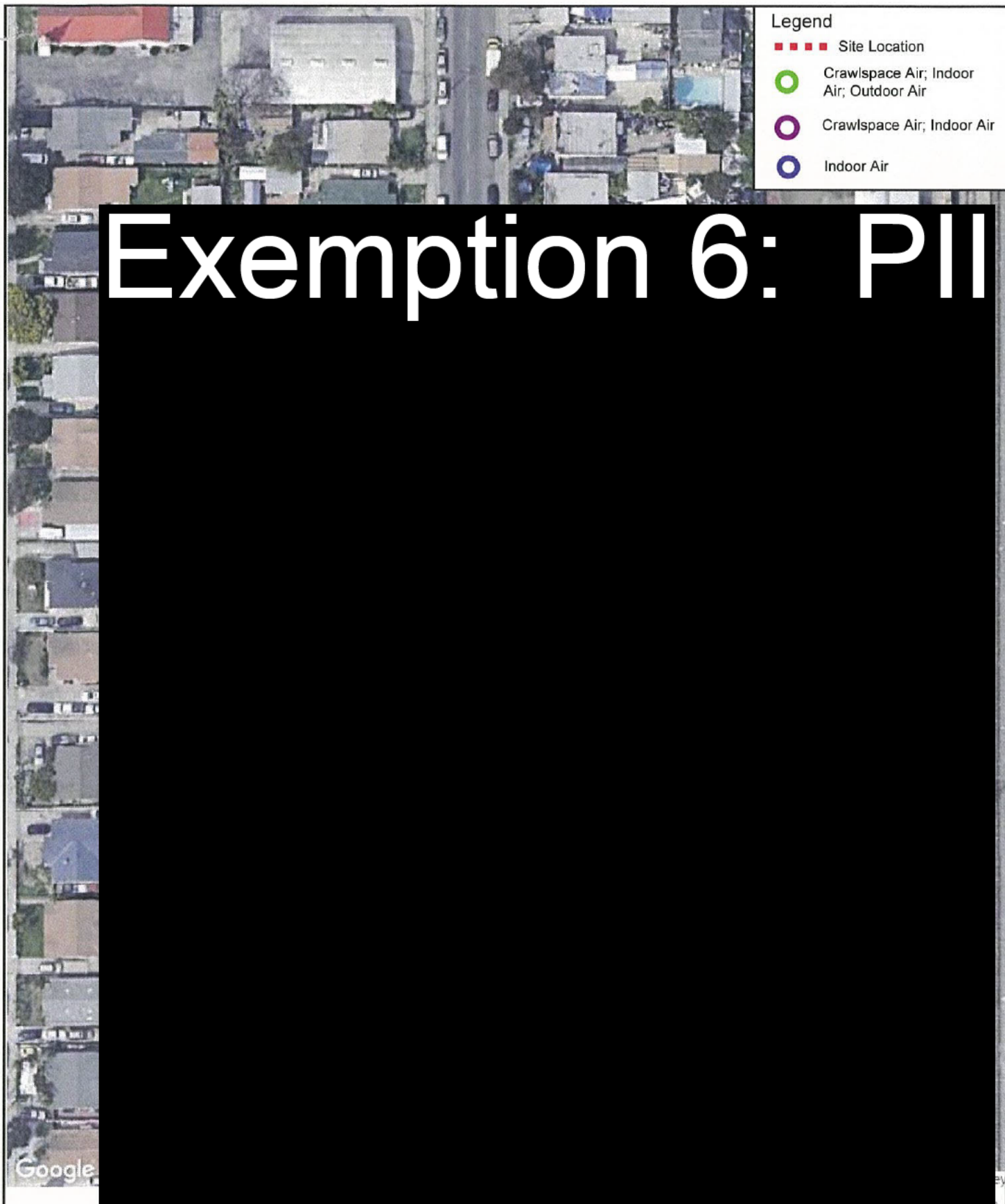
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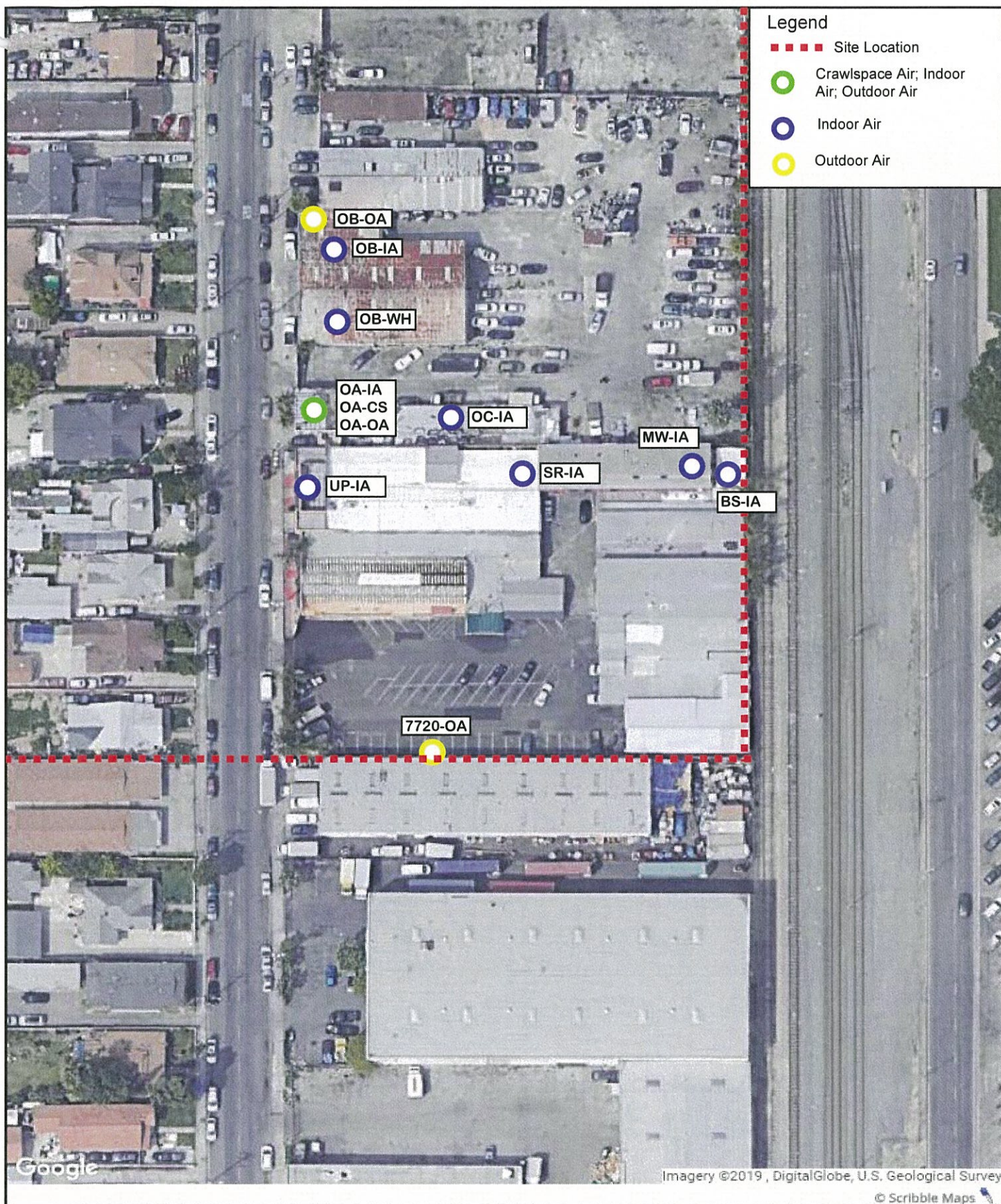
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PREPARED FOR:
EPA Region 9
Site Assessment
Program



FIGURE 2
SITE LAYOUT MAP
Waymire Drum Co. Inc.
Preliminary Assessment
7702 Maie Avenue
Los Angeles, Los Angeles County, CA





 <p>0 Feet 1000</p>	<p>PREPARED BY: Region 9, START Weston Solutions, Inc. 2300 Clayton Rd, Ste 900 Concord, CA 94520</p>	<p>PREPARED FOR: EPA Region 9 Emergency Response Section</p> 	<p>FIGURE 5 TO-15 SIM COMMERCIAL SAMPLES Waymire Drum Response 7702 Maie Avenue Los Angeles, Los Angeles County, California</p>
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