John - here are the draft RI comments, for you to get a head start with. The DTSC comments are final, but the EPA ones are draft. I am still working with my attorneys on their comments, as well as my QC guy.

-Dante

FinalRIIFSDA.wpd  phi.wpd
MEMORANDUM

TO: Safouh Sayed
Project Manager
Site Mitigation Cleanup Operations Branch

FROM: Frank Gonzales, C.Hg.
Engineering Geologist
Geological Services Unit

REVIEWER: Theodore R. Johnson III, C.E.G., C.Hg.
Senior Engineering Geologist
Geological Services Unit

DATE: June 2, 2004

SUBJECT: DRAFT REMEDIAL INVESTIGATION REPORT - SOIL AND NAPL OPERABLE UNIT, DEL AMO SITE, LOS ANGELES, CALIFORNIA

As requested, the Cypress Geological Services Unit (GSU) of the Department of Toxic Substances Control (DTSC) reviewed the Draft Remedial Investigation Report - Soil and NAPL Operable Unit (the Report), dated April 7, 2004. The Report was prepared by URS.

The Report contains results of the Remedial Investigation (RI) at the Del Amo Superfund Site. Comments are provided below that should be addressed prior to finalizing the Report.

GENERAL COMMENTS

1. The Report mainly presents historical information and data relating to non-aqueous phase liquid (NAPL) both light-NAPL (LNAPL) and dense-NAPL (DNAPL) areas. Data from different investigations was compiled to provide key areas where NAPL and volatile organic compounds (VOCs) were identified. The Report does not present a discussion of recommendations or summarize the findings on what data gaps remain. The Report should include
recommendations depending on what data collection is still needed if the risk
assessment or feasibility study are to be revised. Some issues concerning
recommendations for future characterization work are discussed in the specific
comments.

2. The Report contains two main areas that warrant further discussion: the shallow
soils data collected during the 2003 addendum investigation and the current
conditions groundwater conditions as they relate to upward vapor migration from
NAPL. The soils data is not discussed in sufficient detail and should be
integrated into the conceptual model. This would aid in site characterization,
assessment of exposure pathways, and risk assessment modeling. The upward
migration of vapors from NAPL areas is relevant to assessing potential exposure
pathways at ground surface. It is unclear if supplemental data were collected to
update current conditions within the known NAPL source areas. Information
regarding water levels and groundwater elevation, potential NAPL accumulation
or vapor monitoring would be helpful to supplementing the current condition in
the RI. Specific concerns on the data needs to supplement the conceptual
model are discussed below in the specific comments.

3. The inclusion of all potential constituents of concern or breakdown products in
the previous sampling programs is a concern based on the historical plant
operations. 1,3-butadiene and acrylonitrile can be expected as part of the
manufacturing of synthetic rubber. Additionally, methane may be produced as
part of the breakdown of VOCs associated with the NAPL trapped in the vadose
zone and groundwater. Given the focused sampling efforts of previous
investigations, the Report should identify if these constituents were included in
the previous sampling and analysis plan and how this information was
incorporated into the RI. If these constituents were not included, then additional
sampling should be performed.

SPECIFIC COMMENTS

1. Page 12, 3.5.2 Current Conditions. This section indicates the groundwater table
is between 40 and 56 feet below ground surface (bgs). This is based on data
collected and presented for the year 2000. Current conditions should be based
on 2004 data, especially because of historical changes in water elevations, the
occurrence of NAPL below the water table, and spatial variations in
hydrostratigraphy across the site. We recommend collecting water level data for
updating the current conditions in the RI.

2. Page 18, 4.2.8 Shallow Soil Gas Investigation. It is difficult to understand when
soil gas data was collected. Limited historical information was provided to
understand the sequence of the sampling events, decisions made, or how the
data was used to determine the nature and extent of contamination. The Report
should include detailed information regarding the shallow soil gas investigation(s) including, but not limited to: dates, regulatory oversight, sample collection procedures, quality assurance and quality control standards, and on-site analytical laboratory used.

3. Page 18, 4.2.8 Shallow Soil Gas Investigation. This section does not define shallow soil gas in terms of depth. Table 6 indicates most of the 848 sampling locations were between 5 to 6 feet bgs and only 1% extended deeper than 10 feet bgs (i.e., total of 13 feet in depth). The upper 5 feet would probably not be as representative of native materials because the material may contain fill or regraded native material. The Report should indicate the criteria for defining the depth of the shallow soil gas investigation.

4. Page 19, 4.2.10 2003 Addendum Investigation. This investigation primarily focused on the upper 15 feet of shallow soils. VOCs detected within this target depth were used for purposes of filling data gaps for the risk assessment. The Report should incorporate specific soil types in any updating of the risk assessment. Also, the Report should include lithologic cross-sections for this shallow soils based on the lithologic information collected during this investigation.

5. Page 19, 4.2.10 2003 Addendum Investigation. The pH results could not be located in the Report. According to the Workplan pH samples were to be collected at the former neutralization basin (and former dry well (SBL0263). Please clarify if the results of the pH analysis were included in the Report.

6. Page 28, 6.2 Deep Soil Gas. It is difficult to understand when soil gas data was collected. Limited historical information was provided to understand the sequence of the sampling events, decisions made, or how the data was used to determine the nature and extent of contamination. The Report should include detailed information regarding the deed soil gas investigation(s) including, but not limited to: dates, regulatory oversight, sample collection procedures, quality assurance and quality control standards, and on-site analytical laboratory used.

7. Page 28, 6.2 Deep Soil Gas. This section indicates that natural attenuation plays a role in the disparity between deep and shallow soil gas samples. Comparisons of shallow and deep soil gas results was based on limited deep soil gas data from one specific area. It is inconclusive whether any one mechanism is reducing upward vapor migration to the point of non-detect or an acceptable risk level. Shallow soil gas around MW-20 and the northeast corner of the butadiene plancor were elevated. Residual NAPL may still pose certain risk even though concentrations in soil gas are lower. Decreases in soil vapor concentrations may be influenced by the rising water table. Once the NAPL is submerged, volatilization may no longer be an important mechanism. Technical
data supporting natural attenuation should be included such as, but not limited to: vertical profiles of soil gas within the vadose zone, oxygen and carbon dioxide concentrations, and air-water partitioning coefficients. Any evaluation of an attenuation mechanism should be performed separately as part of the risk assessment or feasibility study with adequate supporting technical data.

8. Page 32, 4th Bullet. Soil boring SBL0259 had an exceedance of benzene above the screening criteria. The benzene detected in this boring above the threshold was at 16 feet bgs. Samples from other borings in this area (SBL0260, SBL0323, and SBL0324) were either too shallow or did not include analysis for VOCs. Additionally, no deep soil gas was collected in this area that may aid in the characterization. We concur with the exceedance and identification as suspected residual NAPL. This area gives further evidence of the extent of NAPL area 8 and may warrant further consideration of remedial action to be assessed in the FS.

9. Page 36, 7.3 Deep Soil. This section indicates deep soil will be limited to VOCs. The previous section (Section 7.2.4 Metals) acknowledged deeper soil impacts from solutions containing metals. Most metals data associated with historical operations was only recently collected during the addendum investigation in 2003 and was limited to the upper 15 feet. Exceedances of metals were reported at three locations in the northeast corner of the butadiene plancor where solutions were handled in the unlined surface impoundments and former filtration tank. The potential exists for deeper impacts given the historical waste management and treatment history in this area. Because of the limited sampling and characterization the soil impacts at depth are be undefined. Could there be a localized metals impact to groundwater? If warranted, we may need to refer the issue to those involved with the groundwater operable unit remedial design.

10. Page 44, 10.2 NAPL Identification. The 5% solubility for LNAPL components is used as a criterion for identifying NAPL. Effective solubility may be more important since the NAPL is a mixture and not a pure product. The effective solubility equals the mole fraction times the solubility of a component in the mixture. Over time, the mixture changes in composition due to dissolution and vaporization and the effective solubility changes as the mole fraction of each component changes. Furthermore, dissolution rates may differ because of infiltration, groundwater flow rates, preferential dissolution, changes in the water table, etc. The 5% solubility used to identify NAPL should be considered preliminary evidence and not conclusive.

11. Page 48, 10.5.2 Butadiene Plancor Laboratory LNAPL. This section indicates "the lateral extent of residual LNAPL has not been fully evaluated." We acknowledge the lateral extent is not yet established, and would need to be addressed during remedial design if active remediation is selected in the record
of decision.

12. Table 11, Page 65 of 94. The sample depth in the table for soil boring SBL0382 appears does not match the boring log. Please confirm the depth sample depth and correct, if needed.

13. Figure 11. Hydrographs for select wells indicate a marked rise in groundwater elevation of approximately 5 to 20 feet in some water table wells. Groundwater elevation data for monitoring wells MW-4 and XBF-06 appears to have stabilized over the last two monitoring periods from 1999 to mid-2000. This may indicate the water table has stopped increasing at the rate of increase over the last 15 to 35 years. No additional groundwater elevation data was collected since 2000 at this wells to establish the current conditions or verify previous findings. We recommend collecting water level data to update hydrographs and evaluate current conditions.

If you have questions, please contact Frank Gonzales at 714-484-5410.

cc: Scott Warren, C.E.G., C.Hg.
    Celsa Sanchez
Ms. Niki Pasvantis
Shell Oil Company
P.O. Box 219
Lake Forest, CA 92609-0219

Re: Del Amo Superfund Site, Administrative Order on Consent, Docket No. 92-13
Draft Remedial Investigation Report

Dear Niki:

EPA and DTSC have completed their review of the document entitled "Draft Remedial Investigation Report, Soil and NAPL Operable Unit, Del Amo Superfund Site, Los Angeles, California," dated April 7, 2004. Attached are EPA and DTSC’s comments on the subject report. Please address these comments and incorporate requested changes into a revised submittal.

Thank you very much for your work on this report. I look forward to working with you and your team on the finalization of the remedial investigation work. If you have any questions, contact me at (415) 972-3166.

Sincerely,

Dante Rodriguez, P.E.
Del Amo Project Manager

cc: Safouh Sayed, DTSC
John Dudley, URS
COMMENTS
on
"Draft Remedial Investigation Report
Soil and NAPL Operable Unit
Del Amo Superfund Site
Los Angeles, California"
April 7, 2004

Comments

1. Section 3.5.1, 1st paragraph: The paragraph references a hydrograph that shows data from one well in each water-bearing zone. Add a statement to the paragraph clarifying the Figure 11 shows selected wells that representative of all wells in each respective zone, or that groundwater elevations in all wells in each zone exhibit trends similar to example wells.

2. Section 4.2.10, 1st two paragraphs: Include in this report a copy of the final version of the 2003 sampling effort’s “Summary of Sampling and Analytical Plan” table, and reference it somewhere in these two paragraphs. It very clearly describes the contaminants that we searched for at each former facility, and would fit well into this section’s discussion.

3. Section 4.2.10, 5th paragraph, 1st sentence: Edit the sentence to read as follows, “... regarding the former rubber plant facilities present and chemicals known to have been used or stored therein.” This change will help the paragraph read better.

4. Section 5.2: This section discusses the deep soil data evaluations in the present tense. Change these sentences to the past tense, as the evaluations occurred in the past, during our 2003 sampling work. This applies to the following sentences in this section:
   a. 1st paragraph - 1st sentence,
   b. 2nd paragraph - 1st, 2nd, 4th, and 5th sentences,
   c. 3rd paragraph - 1st, 4th, 6th, and 7th sentences.

5. Section 5.4, 2nd paragraph: As in the above comment regarding section 5.2, this sentence also discusses the data evaluation in the present tense, where it is more appropriate to be discussed in the past tense. Change this sentence to the past tense.

   In the table, 2nd line, 3rd column, put quotation marks around “Threshold values.”

6. Section 6.1.3, 3rd paragraph, 5th sentence: The sentence states that the solvent contamination in the southwest corner of the copolymer placror (the Pits & Trenches area) is more likely associated off-site facilities. Whereas EPA recognizes that there was no evidence in the historical records of TCE use at the former rubber plant, TCE is known to be used in the rubber products manufacturing industry (accounting for 2% of all TCE use nationwide). In addition, there is no historical information about what the Pits & Trenches area of the former rubber plant was used for. Therefore, delete this sentence.
There is no evidence that TCE was not deposited in the Pits & Trenches. Stating a likelihood that it was or was not deposited therein is speculative and should not be included in the RI.

7. **Section 6.1.4, 1st paragraph:** Edit the 2nd sentence to read as follows, "*Priority segments... were located adjacent to current plant site buildings and therefore..."* As currently written, the sentence sounds as if there are former rubber plant facilities still in existence.

Edit the 4th sentence as follows, to improve the clarity of the paragraph, "*Non-priority transmission system segments were those located within...”*

Edit the 5th sentence as follows, to improve the clarity of the sentence, "*A total of 100 randomly located shallow soil gas sampling points were completed along "non-priority" pipeline segments to statistically evaluate "non-priority" pipeline segments then for potential VOC contamination."

8. **Section 6.1.4, 3rd paragraph, 4th sentence:** The sentence states that the 5ppmv value was a conservative level at which further evaluation was appropriate. Add an explanation of how the value was derived and why it is conservative.

9. **Section 7.1.2:** This section discusses SVOC/PAH contamination in the northwestern area of the former copolymer planor. Perform an evaluation of the removal action conducted by the property owner, and determine which of our RI soil samples are no longer relevant to the property as it exists today (which samples were for soil that has since been removed). Incorporate the post-removal confirmation sampling into your database. Add a figure (and possibly a table too) to illustrate the removal of the soil where we had previously detected contamination. Then, in this section, discuss the situation, your findings, and the current state of any remaining contamination on the property. This assessment should enable us to remove the uncertainty from the descriptions of the property in this section. (Saying that something is "likely" or "unlikely" is portraying uncertainty).

10. **Section 7.1.3:** The 3rd sentence contains uncertainty in its description of the property (using the term "unlikely"). Upon addressing the comment for section 7.1.2, revise the property description in this section to remove the uncertainty. Presumably, you will be able to say that the RI soil samples were for soil that has since been removed by the owner, as confirmed by Geraughty & Miller.

Reword the 4th sentence to state that it is possible that the DDT originated from the Montrose site. However, do not speculate as to the likelihood. Reference the wind pattern assessment that was performed, from which we know the prevailing wind patterns.

11. **Section 7.1.4, 1st paragraph, last sentence:** Upon addressing the comment for section 7.1.2, revise the property description for the northwestern copolymer area to remove the uncertainty (use of the term "unlikely"). State what is representative of the property’s current condition.

The sentence also expresses uncertainty regarding the characterization of southern butadeine planor. Expand on this point and be more specific. State that formerly
exposed surface soil, from which x out of the y surface soil samples in the southern
butadeine plancor were taken, are now covered by buildings and landscaping, and thus
the samples, which were composited, do not represent current exposed surface conditions.
Also note that those samples do characterize the soil underlying those buildings.

12. **Section 7.1.4, 2nd paragraph:** Revise the first sentence to state that it can be conjectured
that wind-blown dust from the Montrose site was carried and deposited on the Del Amo
property, causing the elevated arsenic found on that portion of the Del Amo property
directly downwind from the Montrose site. Add a sentence that cites wind-rose studies
showing the prevailing winds to go from the Montrose property to the Del Amo property.
Delete the last sentence, unauthorized soil dumping. Conjecturing that unauthorized
dumping could have caused elevated arsenic levels in the soil in the northwest corner of
the copolymer plancor is so unsubstantiated that it should not even be included in the
report.

13. **Section 7.2.1, last paragraph, 2nd sentence:** Revise the sentence as follows, “TCE
detections are concentrated in the vicinity of the “pits and trenches” feature at the
former rubber plant, but the association between the detections and this rubber plant
feature is tenuous due to the lack of known historical use of TCE at the rubber plant, and the proximity of the area is close to other possible source
facilities that are unrelated to the former rubber plant, both on and offsite (see Section
6.1.3 for further discussion).” The purpose of the RI is to present facts, not to argue a
case of liability. TCE is known to be used in the rubber products manufacturing industry,
even though there was no evidence from the plant’s historical records of TCE specifically
being used. Thus, I deleted the statement about the association being “tenuous” but still
noted the fact about the proximity of off-site sources.

14. **Section 7.2.3, last paragraph:** Delete the first sentence. The purpose of an RI is to present
facts, not present unsubstantiated conjecture or to build a case for liability. The PCB
exceedances conceivably could have originated from on-site power transformers. You
can reword the second sentence to note that the PCB hits were not located where historic
plant facilities were located that could have contained PCBs, but do not use that fact to
draw conclusions about the likelihood of the source being site related or not. The purpose
of an RI is not to argue a case of liability, just to present facts.
Delete the third sentence, as there is no data to support the conjecture that the PCB and
pesticide exceedances in the northwest corner of the copolymer plancor originated from
illegal dumping. You can include a statement indicating that it appeared that some illegal
dumping could have occurred in that area after the plant was dismantled, but do not
conjecture that those sampling results are connected to those activities.

15. **Section 8.0, table and 7th paragraph:** The paragraph uses the table to make the statement
that indoor air conditions are strongly linked to outdoor air conditions. This statement
would be stronger if you can edit the table somehow to also show the magnitude of the
screening criteria exceedances for both indoor and outdoor air. Consider making this
change.

16. **Section 9.0, 4th sentence:** The sentence states that portions of the benzene plume may.
extend downgradient beyond the plant boundaries, but that much of it is attributable to off-site sources. Delete this sentence, as it is unsupported by the groundwater remedial investigation, according to EPA's groundwater team. You can reword the sentence to state factually that other off-site sources do exist that could be contributing to the distribution of VOCs downgradient from the former plant site boundaries.

17. **Section 10.2, 2nd paragraph, 1st sentence:** Edit the sentence as follows, to improve its clarity, "Methods of evaluating the presence of NAPL at the Del Amo site included laboratory measurements of hydrocarbon saturation (Dean Stark testing) and a relatively sensitive..."

18. **Section 10.2, 5th paragraph:** The paragraph includes a description of four categories that into which the plant site areas have been separated. Category "B" consists of areas where dissolved concentrations are at a significant fraction of solubility limits. Add a table or figure (to those respective sections) that provides the dissolved concentrations that were used in determining these Category "B" areas. This will enable readers to check figure 38 against the data tables or figures and see the progression of information from primary data to the interpreted categories within this paragraph.

Category "C" is stated to consist of areas where NAPL is present at residual saturations, as evident from jar testing and laboratory measurements. Provide the jar test and saturation testing results in an appropriate section of the report, and reference it here. This will enable readers to see the primary data upon which this category is based.

Category "D" is stated to consist of areas where NAPL accumulations were observed or measured. Add a table or something that presents the observations or measurements of NAPL that were made. Add to this section a reference to that information.

19. **Section 10.2, 7th paragraph, 1st sentence:** The sentence directs the reader to a summary of the NAPL saturation data in Table 17. Add the complete results of the saturation testing, in an appropriate location within the report, and reference it in this sentence. This will enable readers to see the data upon which Figure 38 is based.

20. **Section 10.3, 1st paragraph, 2nd sentence:** The sentence states that NAPL is expected to be present in only a small percentage of the area where the dissolved concentrations in groundwater exceed 5% of the saturation limit. Expand upon this sentence to explain why this is so. Explain that this is because chemicals spread out via diffusion from the NAPL as they dissolved into the groundwater.

21. **Section 10.5.2, 1st paragraph, 3rd sentence:** The sentence provides the inference that since high concentrations of the following chemicals are present in the nearby groundwater, they are inferred to also be components of the LNAPL: benzene, toluene, ethylbenzene, xylenes, and styrene. What about butadiene? Could it also be co-dissolved in the LNAPL?

22. **Section 12.1.1, 1st paragraph, 3rd sentence:** Edit the sentence as follows, to be more accurate, "An additional area of PCE and TCE... however, there is no known history of use of these compounds at the former rubber plant."

23. **Section 12.1.2, 2nd paragraph, 1st sentence:** The sentence states that concentrations of
SVOCs/PAHs in excess of screening criteria were not detected in deep soil. Note that we sampled for SVOCs/PAHs in deep soil in a limited number of locations. Expand your statement to indicate that only a limited number of deep soil samples were analyzed for SVOCs/PAHs, in only a limited number of locations. Also state that the shallow soil sampling effort (which examined the top 15 feet) only found PAHs in the top X feet.

24. Section 12.1.3, 1st paragraph: Reword the first sentence as follows, to improve clarity, "Detections of pesticides/PCBs screening criteria exceedances were primarily limited to the northwest and the southwest corners of the plant property, with a single exceedance in the Pits & Trenches area as well." Delete the statement that these exceedances were unlikely associated with former rubber plant facilities, for the same reasons as stated in my comments on the body of the report.

Edit the last sentence as follows, to improve clarity, "Soil investigations and removal of contaminated soil were subsequently completed in the northwest area . . ." Also, expand on this statement to explain the revised characterization after the property owner's removal action.

25. Section 12.1.3, 2nd paragraph, 2nd sentence: Edit this sentence as follows, for the same reasons as stated in my comments on the body of the report, "This detection is unlikely to be associated with the target facility since Pesticides and PCBs were not detected at concentrations in excess of screening criteria in any of the other multiple soil samples . . ."

26. Section 12.1.4, 1st paragraph: Edit the fourth sentence as follows, for the same reasons as stated in my comments on the body of the report, "Arsenic was the most frequent and widespread of these metals, but an association with the former rubber plant is unlikely given the arsenic distribution and the plant site history."

Revise the last sentence to state that there is a possibility of an off-site source of arsenic upwind from the southwest corner of the Del Amo plant site. The body of the report did not present "strong evidence," so the conclusions cannot make such a statement either.

27. Section 12.1.4, 2nd paragraph, 4th sentence: Edit the sentence as follows, "Chromium and lead exceedances are limited to a single sample in the area of illegal dumping and are unlikely to be associated with plant site facilities and operations." You could add another sentence stating that there is no known history of use of these chemicals in that area of the former rubber plant, and then say that it is possible that these chemicals came from illegal dumping. Do not, however, make statements as to the likelihood or probability of this theory being correct.

28. Section 12.2, 3rd paragraph: The second sentence states that the likely reasons for the very low VOC concentrations near the surface, even in areas of high VOCs at the water table zone, is the significant depth to groundwater and the fine-grained, low permeability soils in the vadose. Expand on this to explain how the significant depth means there is significant biodegradation and diffusion of the VOCs that migrate upward from the water table zone.

The last sentence states that areas with elevated VOC concentrations in the shallow soil
are the greater concern. This statement is unclear, since the previous two sentences stated that elevated VOC concentrations in shallow soil are uncommon. Clarify your intended message. I believe you intended to convey that there are some areas of elevated VOC concentrations in shallow soil, but you believe they originate from contamination sources within the shallow soil (as opposed to rising up from deeper sources).

29. Section 12.3, last paragraph: The second sentence references a potential chlorobenzene NAPL source area in the southwestern corner of the copolymer plancor. According to figure 38, this reference should be to the southwestern corner of the styrene plancor, not the copolymer plancor. Confirm the appropriateness of this change and revise the sentence accordingly.

30. Section 12.4, table: On the second line, third column, edit the entry as follows, "Pits & Trenches or Offsite properties to west." Since there is no proof that the subject contaminants were not deposited in the Pits & Trenches, it must be retained as a possibility.

31. Section 12.4, 2nd paragraph: Edit the second sentence as follows, for the same reason as the above comment regarding the table, "Source area 2 is unique in that it is potentially attributable to adjacent, offsite sources . . ."

   Edit the third sentence as follows, "It is included in the above table because soil gas and soil data indicate the source area may extend onto be partially located on the plant site."

32. Table 3: In the headings, second column, there is a misspelling of the word “Physical” that needs to be corrected.

   On the eleventh line, second column, there is a misspelling of the word “Specific.”

33. Table 4: The heading for the second column is “Dept (ft.).” Indicate whether this is feet below ground surface or feet above mean sea level.

34. Table 5: Add a legend or notes section at the end of the table that explains or references an explanation in the report body for the term “threshold value.” Also, define “PRG” and “MCL.”

35. Table 6: In the notes section at the end of the table, the second note refers to a “5 ppmv criteria.” Add a statement explaining how this 5ppmv was derived, or reference a location where the derivation can be found.

   Also in the second note, the word “determine” was misspelled.

   Add a note that references the figure where the “Site ID” and “Grid Location” can be found for each sample in the table.

36. Table 7: Add a note explaining the “Threshold Value,” and add a note explaining the “5ppmv Criteria.”

37. Table 9: Add a note that references the figure where the “Site ID” and “Grid Location” can be found.
38. **Table 10**: Add a note that explains the “Screening Criteria.”

39. **Table 11**: Add a note that references the figure where the “Site ID” and “Grid Location” can be found.

40. **Table 12**: Add a note that explains the “Screening Criteria.”

41. **Table 13**: Add a note that references the figure where the “Site ID” and “Grid Location” can be found.

42. **Table 14**: Add a note that explains the “Screening Criteria.”

43. **Table 15**: In the Notes section, add a statement explaining where the PRG comes from (EPA Region 9).

In the Notes section, add a statement explaining where the PEL comes from (OSHA).

44. **Table 16**: Add a note that explains the “Screening Criteria.”

45. **Table 18**: In the “Former Rubber Plant Area” column, line 12, edit the entry as follows, “Offsite source likely possible.”

In the same column, line 13, edit the entry as follows, “Pits and trenches and/or Offsite source likely.”