Hey Dante, I have completed my review below. Some of the issues I raised yesterday are not a problem after all. I will return the printed copy so that you can return to the Superfund Records Center. Thanks.

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Correlation Analysis (Appendix H.1): A correlation analysis was completed to evaluate whether indoor air data reflected subsurface data. The conclusion of the analysis was that there was no apparent correlation. Although this evidence may support the modeling approach for risk assessment, it does not rule out that vapor intrusion is a potentially important source to indoor air.

Indeed, based on recent EPA experience at similar business parks in California where vapor intrusion has been documented, there also is no apparent correlation between these two variables. At the MEW site for example, an analysis of nearly 2000 data points did not find a correlation with subsurface concentrations (shallow groundwater at 7-15 feet) despite the fact that there is vapor intrusion occurring throughout the park. The responsible parties at the MEW site believe (and EPA agrees) that the differences in indoor air levels may be more a function of building features (in particular, the ventilation system and air exchange) than subsurface contaminant concentrations.

Since the correlation is apparently not observed even at sites where vapor intrusion is documented and the data set is robust, it would appear that the authors overstate their conclusion that "poor or nonexistent correlation would indicate that surface sources unrelated to the former rubber plant were the primary contributors to the measured indoor air concentrations" (pages, 45 and H-1). Please edit or delete this statement so that the conclusions of the correlation analysis are not overstated in the final risk assessment.

As noted previously in discussions with the responsible companies, a more definitive conclusion regarding vapor intrusion could be obtained by collecting sub-slab air samples in a few select buildings. Building 23 (P34-57) is well suited for this follow-up evaluation of benzene because it demonstrates the greatest source strength for this compound (i.e., greatest subsurface concentrations) and also the highest indoor air exposure point concentrations. A similar recommendation could be made for Building 16 (Donnelly building?) to assess whether PCE/TCE are intruding indoor air spaces.

"Off-Site" Sources of PCE/TCE: Figure 3 identifies potential off-site sources of PCE/TCE. Whether sufficient information is available to determine the nature of this contamination is a question suited for the remedial investigation. Fortunately to their credit, the responsible parties did not omit these contaminants in the Del Amo risk assessment.

If there is a commingling of contamination on the western edge of the site boundary, it raises the question of whether additional responsible parties to the west should also be held responsible for site cleanup. It also raises the question of whether off-site commercial buildings that are located near PCE/TCE sources (e.g., American Polystyrene Co., PACCAR), should be evaluated in a supplemental risk assessment focusing on this area.

Uncertainty Analysis: Unlike many Superfund sites, the Del Amo business park does not resemble an abandoned waste site. Substantial development had occurred prior to sampling which presented access issues and at times constrained or prevented sampling of locations that were potentially "hot". As noted on page 5: "the majority of the site has been redeveloped with closely spaced commercial-industrial buildings. These factors have resulted in sampling locations being concentrated in currently accessible areas where chemical facilities were formerly present."
The uncertainty analysis does not discuss this issue. Please include a discussion of this site-specific issue in the uncertainty section as it will likely influence the remedy selection. Including this discussion will also strengthen the author's recommendation for additional sampling (pages 81, 86): "Depending upon the outcome of USEPA's remedy selection process, additional limited and focused sampling at some parcels may be appropriate in the future to reduce the above uncertainties."