SDMS DOCID# 1118422

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

October 26, 2009

Gene A. Lucero
Latham & Watkins LLP
355 South Grand Avenue
Los Angeles, CA 90071-1560

RE: General Notice Letters
Omega Chemical Corporation Superfund Site

Dear Mr. Lucero:

Please find enclosed a copy of the general notice letter (GNL) sent to Mission Linen Supply, associated with the address 11920 East Washington Blvd., Whittier, California.

If you have any general questions regarding the GNLs, please contact me at (415) 972-3104. If you have any legal questions regarding this letter, please contact Steve Berninger, Assistant Regional Counsel, at (415) 972-3909.

Sincerely,

Linda Ketellapper

Linda Ketellapper
Enforcement Officer, Superfund Division

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

October 26, 2009

Ms. Linda Page McGaughey, President
Mission Linen Supply
702 E. Montecito St.
Santa Barbara, CA 93103

RE: General Notice Letter and Request for Information
Omega Chemical Corporation Superfund Site

Dear Ms. McGaughey:

The purpose of this letter is to provide you notice of Mission Linen Supply's potential liability under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), as amended, at the Omega Chemical Corporation Superfund Site (the "Site"), in Whittier, California. The Site includes the location of the Omega Chemical Corporation ("Omega Chemical property"), which operated as a used solvent and refrigerant recycling, reformulation, and treatment facility, and was located at 12504 and 12512 East Whittier Boulevard, in Whittier, California. The term "Site" (as used here) refers to both the Omega Chemical property and the areal extent (i.e., plume) of contaminated groundwater emanating from that property.

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and control releases or potential releases of hazardous substances, pollutants or contaminants at the Site. Under Sections 106(a) and 107(a) of CERCLA, also known as the Superfund program, potentially responsible parties ("PRPs") may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs also may be responsible for all costs incurred by EPA in responding to any release or threatened release at the Site. PRPs include current and former owners and operators of facilities at which hazardous substances were released into the environment, persons who arranged for the disposal of hazardous substances at a facility ("generators"), and persons who accepted hazardous substances for transport to a facility ("transporters").

EPA has evaluated information obtained through its investigation of the Site and has determined that the facility at 11920 East Washington Boulevard, Whittier, California is located above the contaminated groundwater plume that originates at, and extends more than four miles downgradient of, the Omega Chemical property. The Agency believes that the facility located at 11920 East Washington Boulevard is a source of hazardous substances that have come to be located in this groundwater plume and commingled with hazardous substances originating from the Omega Chemical property. As such, your company is a PRP at the Site based on your company's status as current owner and former operator of the facility located at 11920 East Washington Boulevard, Whittier, California.

Omega Site Background

During an assessment of the Site in 1995, EPA observed approximately 3,000 drums at the Omega Chemical property in various stages of deterioration. Data gathered indicated the presence of hazardous substances in the subsurface soils and groundwater at the Site, including, but not limited to, methylene chloride, tetrachloroethylene, trichloroethylene, and Freon 11 and 113. On May 3, 1995, EPA issued an Action Memorandum authorizing actions necessary to abate imminent and substantial endangerment at the Site, including securing the Omega Chemical property, conducting sampling, removing grossly contaminated equipment, structures, and debris, removing containerized wastes and disposing, stabilizing and treating grossly contaminated soils.

On May 9, 1995 and August 31, 1995, EPA issued Unilateral Administrative Orders ("UAOs") to approximately 170 major generator PRPs, all of whom sent greater than 10 tons of hazardous materials to the Site, to perform removal activities at the Site. These major contributing parties thereafter formed a workgroup called the Omega Chemical Site PRP Organized Group, or "OPOG", and completed removal activities as required. In September 1998, EPA proposed the Site for listing on the National Priorities List ("NPL"). The Site was placed on the NPL on January 19, 1999.

In order to facilitate cleanup of hazardous substances at the Site, EPA divided the Site into three operable units ("OUs"): OU-1, OU-2 and OU-3. OU-1 includes the former Omega facility and immediate vicinity (also known as the "Phase 1A area" as described below). OU-2 is the extent of contamination in groundwater that originated from the former Omega facility and now extends more than four miles downgradient of OU-1. OU-2 includes contamination in groundwater that has commingled with chemicals released at other source areas. OU-3 refers to vapor intrusion from the Omega Site that occurred in several buildings on and near the Omega Chemical property. The investigation and cleanup of OU-1 is being led by OPOG. EPA has been leading the investigation and cleanup of OU-2.

The members of OPOG (the "Settling Defendants") are performing work under a Consent Decree, entered by the United States District Court, Central District of California, on February 28, 2001, and amended thereafter. Under the agreement, the Settling Defendants agreed to pay a portion of past costs and perform the following work at the Site:

1) implementation of a Remedial Investigation / Feasibility Study ("RI/FS") for contamination in the vadose zone within OU-1;

2) performance of an Engineering Evaluation and Cost Analysis ("EE/CA") addressing groundwater contamination in the OU-1 area;

3) implementation of the response action selected in EPA's Action Memorandum at the conclusion of the EE/CA;

4) performance of a risk assessment addressing contamination within the Phase 1A area; and

5) installation of groundwater monitoring wells at locations downgradient of the Phase 1A area and upgradient of the City of Santa Fe Springs water supply well 30R3.

In August 2002, EPA issued General Notice Letters to approximately 100 additional major generator PRPs, all of whom sent at least 10 tons of hazardous materials to the former Omega Chemical facility. EPA has encouraged these PRPs to initiate dialogue with OPOG concerning joining the established workgroup. The existing Consent Decree was amended to include parties that have joined the established group since 2001.

Prior to signing the Consent Decree, several OPOG members withdrew from the group and elected not to sign the settlement. They formed a new group that later became known as the Omega Small Volume Organized Group, or "OSVOG." On January 5, 2004, EPA issued a UAO to fifteen OSVOG members and three other recalcitrant parties. An Amended UAO was issued on July 2, 2004. The work required under the Amended UAO included the installation of groundwater wells and sampling downgradient from the Omega Chemical property.

On October 28, 2003, EPA sent liability notice letters to approximately 300 *de minimis* parties that had sent 3 to 9.9 tons of hazardous materials to the Site. Approximately 170 *de minimis* parties accepted EPA's settlement offer. The Administrative Order on Consent ("AOC") to resolve these parties' potential liability at the Site was finalized on December 12, 2005.

In 2006, EPA settled with 12 "ability-to-pay" ("ATP") parties, which are parties that were deemed to have limited ability to pay for response costs incurred and to be incurred at the Site, pursuant to Section 122(h) of CERCLA, 42 U.S.C. § 9622(h).

Also in 2006, EPA required OPOG to perform a removal action to address contaminated indoor air in an indoor roller skating rink (Skateland), which was located on Whittier Boulevard, adjacent to the Omega Chemical property. This action was memorialized in an amendment to the Consent Decree. OPOG subsequently purchased Skateland and demolished it in April 2007.

In November 2007, with EPA oversight, OPOG completed an RI for OU-1 soils. OPOG completed the OU-1 FS in May 2008. In June 2008, EPA released for public comment a Proposed Plan for soil cleanup at OU-1, and selected a remedial action to be implemented at OU-1, embodied in a final OU-1 Record of Decision ("ROD"), issued on September 30, 2008. The remedy includes a soil vapor extraction ("SVE") system and

institutional controls. On June 10, 2009, EPA issued special notice letters to approximately 125 PRPs, to perform Remedial Design/Remedial Action ("RD/RA") of the remedy selected in the ROD.

In March 2009, EPA completed a draft RI report of OU-2, relating to groundwater contamination. EPA continues to monitor the extent of contamination in OU-2, and to investigate and notice other PRPs.

EPA currently is preparing an OU-2 FS, which is expected to be completed in 2010. At the conclusion of the FS, a Site-wide groundwater remedy will be proposed and, after public comment, selected by EPA in a ROD.

EPA is preparing to enter into an AOC with OPOG members, to perform certain activities to address indoor air contamination in buildings near the Omega Chemical property. EPA expects that this AOC will be effective by the end of 2009.

General Notice

EPA is not extending a settlement offer or issuing an order for the performance of work to you at this time. The Agency anticipates issuing a ROD to select a groundwater cleanup remedy within the next 18 months. At that point, EPA will initiate settlement discussions with you and other PRPs at the Site for the performance of the RD/RA for the groundwater remedy.

EPA encourages good faith negotiations between the PRPs and EPA, as well as among the PRPs. A complete list of recipients to whom EPA has sent similar General Notice Letters is attached as Attachment A. In addition, OPOG's contact names and numbers are:

Keith F. Millhouse, Esq.
(805) 230-2280

Larry G. Gutterridge, Esq.
(213) 430-2507

Gene A. Lucero, Esq.
(213) 891-8332

Enclosed are three recent Fact Sheets about the Site. Additional Fact Sheets and further information about the Site can be found on the following EPA web page:

http://www.epa.gov/region09/omegachemical

In addition, copies of site-related documents are located at EPA's Regional Office in San Francisco and at the information repository listed below:

Superfund Records Center
95 Hawthorne Street (4th Floor)
San Francisco, CA 94105
Ph: (415) 536-2000

Whittier Public Library
7344 S. Washington Avenue
Whittier, CA 90602
Ph: (562) 464-3450

Also enclosed is an information sheet intended to inform small businesses of their rights under the Small Business Regulatory Enforcement Fairness Act ("SBREFA") to comment to an Ombudsman about EPA enforcement activity. This information sheet also provides information on compliance assistance available to small businesses. We have included this information sheet without making a determination as to whether your business is a small business as defined by Section 222 of SBREFA or related provisions.

Please use the enclosed Primary Contact Designation Form to designate the most appropriate individual to receive all further correspondence on this matter on your behalf. We request that you mail us the completed form within thirty (30) days of your receipt of this letter.

We will continue to send future correspondence to you until we receive this form. The completed Primary Contact Designation Form should be mailed to:

Linda Ketellapper, SFD-7-5
U.S. Environmental Protection Agency
Superfund Division
75 Hawthorne Street
San Francisco, CA 94105

This notice letter does not affect or nullify any other legal obligations you may have regarding your facility. If you are engaged in cleanup or other activities under the direction of federal, state or local authorities, you should continue such activities as appropriate. Likewise, this notice letter has no effect on any obligations which you may have in a court of law.

Although this letter does not affect these other obligations, EPA hereby requests, by its authority under CERCLA Section 104(e), that you provide a written response reporting the status of all of those activities and obligations. The response should include a copy of all agreements and/or orders between you and other parties related to your facility

and ongoing activities and obligations. **Your response should be made in writing and submitted to EPA within thirty (30) days of receipt of this letter. It should be directed to Linda Ketellapper, the EPA Case Developer, at the address provided above.**

If you have general questions regarding the Site, please contact Linda Ketellapper at (415) 972-3104. If you have any technical questions regarding the Site, please contact Lynda Deschambault, the Remedial Project Manager, at (415) 947-4183. If you have any legal questions, you may contact Steve Berninger, Assistant Regional Counsel, at (415) 972-3909.

Sincerely,

Kathleen Salyer
Assistant Director, Superfund Division
California Site Cleanup Branch

cc: Karl Fingerhood, DOJ EES
Steve Berninger, EPA ORC
Fred Schauffler, EPA
Lynda Deschambault, EPA
Linda Ketellapper, EPA
Arthur Heath, RWQCB
Larry G. Gutteridge, OPOG
Gene A. Lucero, OPOG
Keith F. Millhouse, OPOG

Attachments:

- Attachment A: List of Recipients

Enclosures:

- U.S. EPA Fact Sheet: "Update on Site Activities", February 2008
- U.S. EPA Fact Sheet: "EPA Selects Cleanup Plan for Soils at Omega Site", February 2009
- U.S. EPA Fact Sheet: "EPA Issues Draft Remedial Investigation Report for Downgradient Plume at Omega Site", September 2009
- Information Sheet, U.S. EPA Small Business Resources
- Primary Contact Designation Form. Please complete and return this form **within 30 days** of your receipt of this letter.

Omega Chemical Corporation Superfund Site
General Notice Letter Recipients

Date Noticed	Liable Party Name	Title	First Name	Last Name	Address	Supp Address	City	State	Zip	PRP Status	Associated Facility Address
3/1/2007	McKesson Corporation	President	John	Hammergren	One Post Street		San Francisco	CA	94104	Former operator and current owner	9005 Sorensen Avenue Santa Fe Springs, CA 90670
3/1/2007	Estate of Paul Maslin	Executrix of the Estate of Paul Maslin	Lucille	Maslin	*	*	*	*	*	Former owner	9005 Sorensen Avenue Santa Fe Springs, CA 90670
3/1/2007	Harvey Sorkin		Harvey	Sorkin	*		*	*	*	Former owner	9005 Sorensen Avenue Santa Fe Springs, CA 90670
3/1/2007	Seymour Moslin		Seymour	Moslin	*		*	*	*	Former owner	9005 Sorensen Avenue Santa Fe Springs, CA 90670
8/9/2007	Angeles Chemical Co., Inc.	President	John	Locke	*		*	*	*	Former owner and operator	8915 Sorensen Avenue Santa Fe Springs, CA 90670
8/9/2007	Greve Financial Services, Inc.	President	Joseph	Kennedy	*		*	*	*	Current owner	8915 Sorensen Avenue Santa Fe Springs, CA 90670
8/9/2007	Pearl Rosenthal		Pearl	Rosenthal	*		*	*	*	Former owner	8915 Sorensen Avenue Santa Fe Springs, CA 90670
8/9/2007	The Rosenthal Family Trust Dated June 3, 1989	Trustee	Pearl	Rosenthal	c/o The Law Offices of Timothy Cronin, Esq.	202 Fashion Lane Suite 208	Tustin	CA	92780	Former owner	8915 Sorensen Avenue Santa Fe Springs, CA 90670
8/9/2007	John G. Locke & Janyce B. Locke		John Janyce	Locke Locke	*		*	*	*	Former owner	8915 Sorensen Avenue Santa Fe Springs, CA 90670
8/9/2007	Robert O. Berg & Donna M. Berg		Robert Donna	Berg Berg	c/o The Law Offices of Timothy Cronin, Esq.	202 Fashion Lane Suite 208	Tustin	CA	92780	Former owner	8915 Sorensen Avenue Santa Fe Springs, CA 90670
11/7/2007	Phibro-Tech, Inc.	President	W. Dwight	Glover	65 Challenger Road		Ridgefield	NJ	07660	Current operator	8851 Dice Road Santa Fe Springs, CA 90670
11/7/2007	C.P. Chemicals, Inc.	President	Jack	Bendheim	65 Challenger Road		Ridgefield	NJ	07660	Corporate successor to former operator	8851 Dice Road Santa Fe Springs, CA 90670
11/7/2007	First Dice Road Company, a California Limited Partnership	President (Western Magnesium Corp., General Partner)	Jack	Bendheim	65 Challenger Road		Ridgefield	NJ	07660	Current owner	8851 Dice Road Santa Fe Springs, CA 90670

* Home addresses are not provided.

Omega Chemical Corporation Superfund Site
General Notice Letter Recipients

Date Noticed	Liable Party Name	Title	First Name	Last Name	Address	Supp Address	City	State	Zip	PRP Status	Associated Facility Address
11/7/2007	Foss Plating Company, Inc.	President	Victor	Foss	8140 Secura Way		Santa Fe Springs	CA	90670	Current owner and operator	8140 Secura Way Santa Fe Springs, CA 90670
12/18/2007	Bodycote Thermal Processing, Inc.	President	Martyn	Wilton	155 River Street		Andover	MA	01810	Current owner and operator and corporate successor to a former operator	11845 Burke Street Santa Fe Springs, CA 90670
12/18/2007	Pilot Chemical Corp.	President	Paul	Morrisroe	11756 Burke Street		Santa Fe Springs	CA	90670	Current owner and operator	11756 Burke Street Santa Fe Springs, CA 90670
12/18/2007	Earl Mfg. Co., Inc.		Claudette	Earl	*		*	*	*	Former operator	11862 Burke Street Santa Fe Springs, CA 90670
12/18/2007	Claudette A. Earl		Claudette	Earl	*		*	*	*	Current owner	11862 Burke Street Santa Fe Springs, CA 90670
12/18/2007	Union Pacific Railroad Company	Chief Executive Officer and President	James	Young	1400 Douglas Street		Omaha	NE	68179	Former owner	8851 Dice Road Santa Fe Springs, CA 90670
2/24/2009	Chrysler LLC	Principal	Thomas W.	La Sorda	1000 Chrysler Drive		Auburn Hills	MI	48326	Corporate successor to former operator	12128 Burke Street Santa Fe Springs, CA 90670 (part of the property f/k/a 12140 Slauson Avenue)
2/24/2009	Burke Street LLC	Principal	Michael A.	Stadler	12128 Burke Street		Santa Fe Springs	CA	90670	Current owner	12128 Burke Street Santa Fe Springs, CA 90670 (part of the property f/k/a 12140 Slauson Avenue)
2/24/2009	Palmtree Acquisition Corporation	Principal	Jeffrey H.	Schwartz	4545 Airport Way		Denver	CO	80239	Corporate successor to former owner	12128 Burke Street Santa Fe Springs, CA 90670 (part of the property f/k/a 12140 Slauson Avenue)

* Home addresses are not provided.

Omega Chemical Superfund Site

U.S. Environmental Protection Agency • Region 9 • San Francisco, CA • February 2008

UPDATE ON SITE ACTIVITIES

Both the United States Environmental Protection Agency (EPA) and a group of potentially responsible parties (PRPs) working under EPA's oversight have made substantial progress on the investigations of groundwater and soil contamination at the Omega Chemical Superfund Site in Whittier, CA (Figure 1). This fact sheet discusses the ongoing investigations and clean up at the different operable units of the Omega site.

Remedial Investigation Update

In October 2007, the PRP group known as the Omega Chemical Site PRP Organized Group (OPOG) completed the Remedial Investigation (RI) and Human Health Risk Assessment (HHRA) for soils in Operable Unit 1 (OU-1) of the Omega site. The RI report describes the nature and extent of soil contamination in the OU-1 area, which includes the former Omega property and immediate vicinity. The HHRA report in turn evaluates potential current and future risks to human health posed by the contamination.

OPOG used the results of the OU-1 RI and HHRA reports to prepare the draft Feasibility Study (FS) report in December 2007. The FS, which evaluates possible soil cleanup alternatives, is currently being reviewed by EPA and the State. The FS will serve as the basis for EPA's identification of a preferred cleanup alternative for OU-1 soils. The preferred alternative will be described in greater detail in a Proposed Plan, which EPA expects to issue later this year for public comment. As part of the comment process, EPA will host a public meeting (currently scheduled for summer 2008) to solicit comments on the proposed clean-up plan.

EPA is also conducting a RI for the area of groundwater contamination (referred to as OU-2) that extends four miles to the southwest of the Omega property. EPA expects to complete the RI for this part of the site during first half of 2008. The results of the OU-2 RI will be summarized in a future fact sheet.

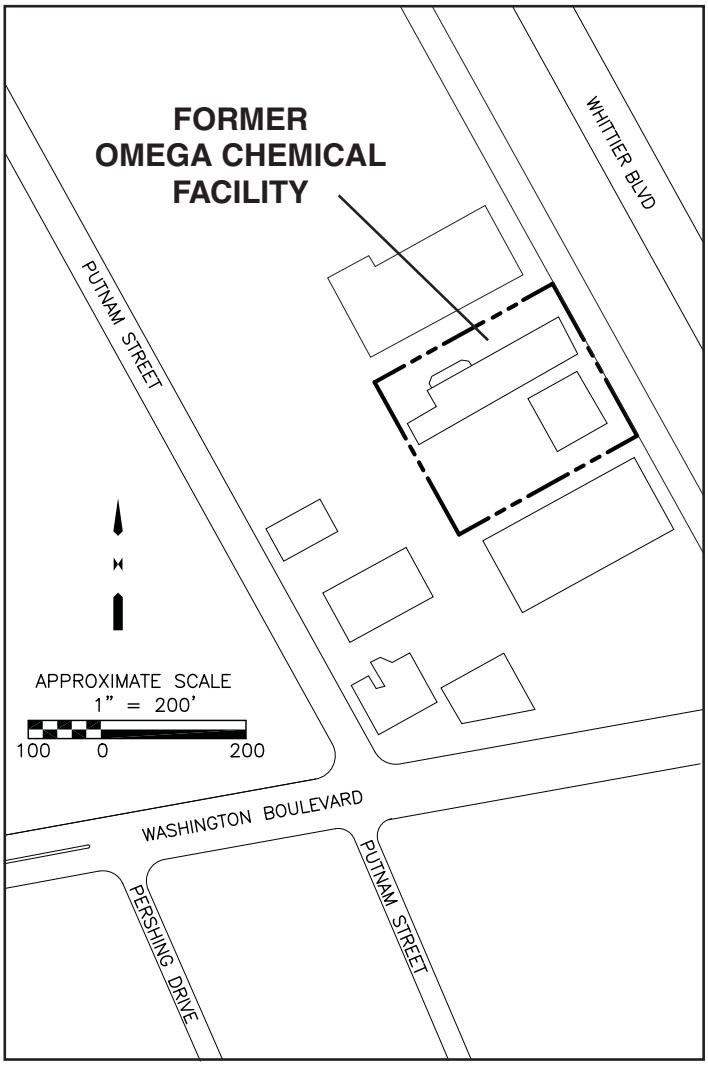

Figure 1: Location of former Omega Chemical facility

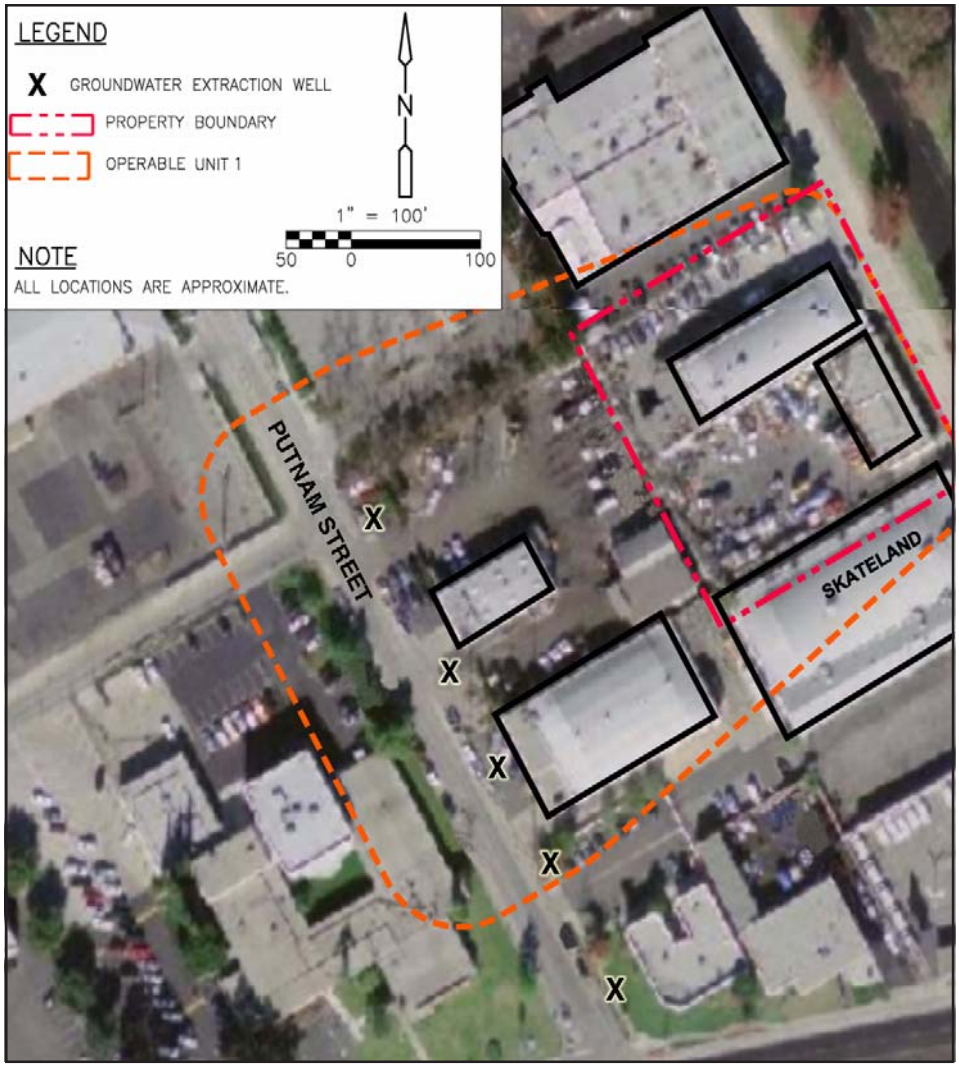

Figure 2: Groundwater Extraction Well Locations

Interim Groundwater Pump and Treat System

In September 2005, EPA selected an interim groundwater remedy for the OU-1 area that will use a groundwater extraction and treatment system to prevent highly contaminated groundwater in the OU-1 area from migrating into OU-2 (See Figure 2). In September 2006, OPOG installed a series of groundwater extraction wells along Putnam Street, and construction of the treatment system began in January 2008. Startup of the extraction wells and treatment plant is scheduled for late 2008.

Indoor Air Investigation

Indoor air sampling was initially conducted at five buildings on and near the former Omega property in May 2004. Sampling results revealed that volatile organic compounds (VOCs), which are primary

For Additional Information, Please Contact:

Lauren Berkman
Community Involvement Coordinator
U.S. EPA Region 9 (SFD-3)
75 Hawthorne Street
San Francisco, CA 94105
Direct Line (415) 972-3292

Christopher Lichens
Remedial Project Manager
U.S. EPA Region 9 (SFD-7-4)
75 Hawthorne Street
San Francisco, CA 94105
Direct Line (415) 972-3149

You may also call the toll-free message line at 800-231-3075. Your call will be returned.

contaminants at the Omega site, have migrated from contaminated soil and groundwater and accumulated in these buildings. The indoor VOC levels were highest in Skateland, adjacent to the former Omega property. In April 2006, EPA directed OPOG to undertake an indoor air cleanup action at Skateland. However, in September 2006, OPOG purchased the Skateland property and in 2007 demolished the building, eliminating the need for the proposed indoor air cleanup action.

In 2008, additional sampling will be conducted in a second building on one of the original properties. EPA will evaluate the results of all indoor air sampling to determine whether cleanup measures are needed at any of the buildings on these properties.

Technical Assistance Program

A Technical Assistance Grant (TAG) is available for citizens who live near the Omega site. The grant helps qualified citizen groups affected by a Superfund site to hire an independent technical advisor to help interpret and comment on site-related information. An initial grant of up to $50,000 is available. For further information about the grant, please call us and request an application (toll-free 800-231-3075) or get it from the TAG web page by typing "TAG" in the search box at www.epa.gov and pressing "GO."

Glossary Terms

Remedial Investigation (RI): An in-depth study to determine the nature and extent of contamination at a Superfund site; assess risks to human health and the environment; and conduct treatability testing as necessary to evaluate potential treatment technologies. The remedial investigation often overlaps with preparation of the feasibility study. Together they are usually referred to as the "RI/FS".

Human Health Risk Assessment (HHRA): Qualitative and quantitative evaluation of the risk posed to human health by the specific pollutants found at the site.

Information Repository: A location accessible to community members (such as a local library) that houses documents, reports and other site-related information, general information about Superfund, newspaper notices and the Administrative Record for the site. EPA also maintains an information repository for all Superfund sites at its offices in San Francisco.

Site Information Repository

The EPA maintains site information repositories at the Whittier Public Library and at the EPA Superfund Records Center in San Francisco. These repositories contain project documents, fact sheets, and reference materials. The EPA encourages you to review these documents to gain a more complete understanding of the site. The information repositories' locations are listed below. The EPA also has a site information web page for Omega Chemical at www.epa.gov/region09/OmegaChemical.

EPA Superfund Records Center
95 Hawthorne Street
San Francisco, CA 94105
(415) 536-2000

Whittier Public Library
7344 S. Washington Avenue
Whittier, CA 90602
(562) 464-3450

Update on Site Activities at Omega Chemical Superfund Site

Printed on 30% Postconsumer Recycled / Recyclable Paper

United States Environmental Protection Agency
Region 9
75 Hawthorne Street (SFD-3)
San Francisco, CA 94105
Attn: Lauren Berkman (Omega 2/08)

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Penalty for Private Use, $300

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OMEGA CHEMICAL SUPERFUND SITE

U.S. Environmental Protection Agency $ Region 9 $ San Francisco, CA $ February 2009

EPA Selects Cleanup Plan for Soils at Omega Site

The United States Environmental Protection Agency (EPA) and a group of potentially responsible parties (PRPs) have been conducting an investigation of the **groundwater** and soil contamination at the Omega Chemical **Superfund** Site in Whittier, CA. This fact sheet summarizes the Record of Decision (ROD) signed on September 30, 2008 to address the contaminated soils on and near the former Omega property.

A ROD is a document that formalizes EPA's decision to implement a specific cleanup action. The ROD for the Omega Site also contains a summary of EPA's response to comments received during the 30-day public comment period as well as comments received during the public meeting held on June 24, 2008. To review the full ROD document, please visit the Site's information repository or view information online at www.epa.gov/region09/OmegaChemical.

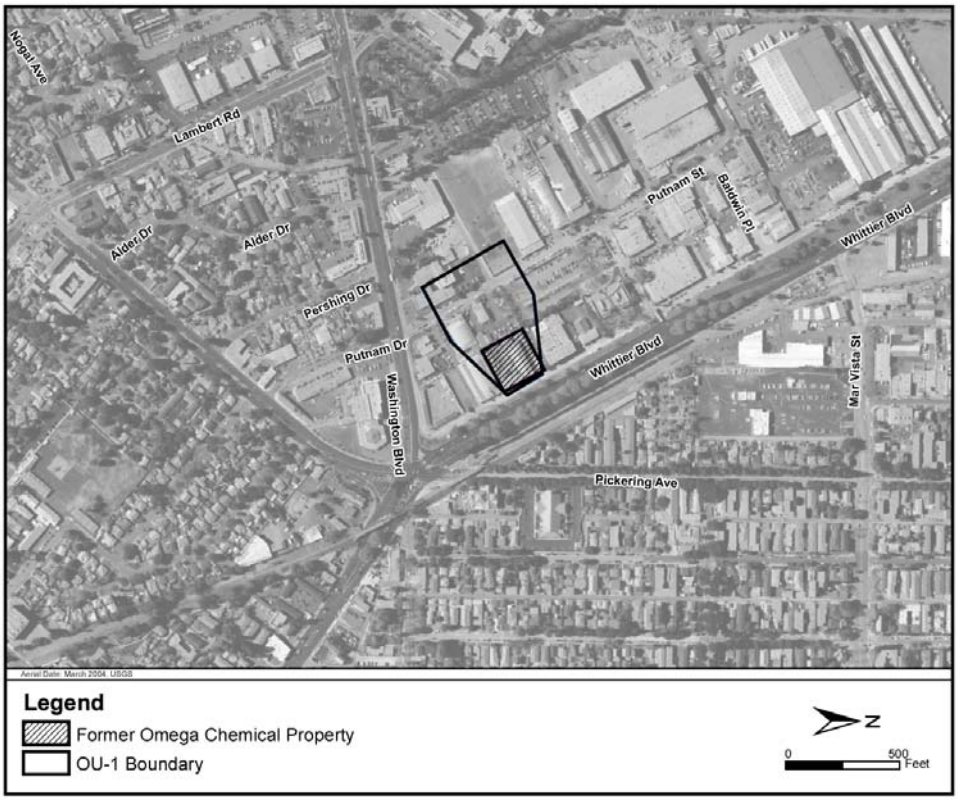

Figure 1: Omega Chemical Superfund Site OU-1 Location Map

Site Background

The Omega Chemical Corporation was a solvent and refrigerant recycler that operated from approximately 1976 to 1991. Drums and bulk loads of waste solvents and other chemicals from various industrial activities were processed at the Omega property to form commercial products. As a result of spills and leaks, the soil and groundwater beneath the Omega property became contaminated. In 1995 a group of PRPs, later known as the Omega Chemical Site PRP Organized Group (OPOG), performed the removal of approximately 2700 drums under EPA oversight.

To better handle large site cleanups, EPA often separates cleanup actions into parts called Operable Units. At the Omega Chemical Superfund site, Operable Unit One (OU-1) includes soil and groundwater contamination on and near the former Omega property (see Figure 1). In 2001, EPA signed a settlement agreement called a Consent Decree (CD) with OPOG to investigate soil and groundwater contamination within OU-1.

OPOG completed a **remedial investigation** (RI) for OU-1 soils in November 2007, which evaluated the nature and extent of soil and soil vapor contamination associated with

Continued on page 2

*Words in **bold** are defined in the Glossary at the end of this fact sheet.

the former Omega property. The **feasibility study** (FS), completed in May 2008, describes potential soil cleanup alternatives and includes a detailed analysis of each alternative. EPA's preferred cleanup alternative, described in this fact sheet, was selected based on the results of the FS and public comments.

The CD also specifies that OPOG will implement an interim groundwater remedy to contain the existing contaminated groundwater within OU-1. Construction of the groundwater treatment system is underway and is expected to be complete in 2009.

Operable Unit Two (OU-2) consists of the groundwater contamination that has migrated downgradient (moving southwest) of OU-1. EPA is near completion of the OU-2 remedial investigation, and the results will be released for public review in early 2009. The OU-2 FS is expected to be complete in late 2009.

Contaminants of Concern

The **contaminants of concern** (COCs) at the Omega site are **volatile organic compounds** (VOCs), meaning that they evaporate readily in air. The primary VOCs of concern are tetrachloroethene (PCE), trichloroethene (TCE), and 1, 1-dichloroethene (1, 1-DCE). PCE and TCE are solvents that have been widely used by industry as cleaning and degreasing agents. 1, 1-DCE is not commonly used in commercial products but can be formed when other VOCs degrade (break down) over time. Another group of VOCs, freons, are also contaminants at the Omega site. Freons are used as coolants and pressurizers in spray can products.

As part of the feasibility study process, the following remedial action objectives were developed. These are the primary goals that the OU-1 cleanup plan is designed to meet:

- Reduce or eliminate the **vapor intrusion** risk associated with VOC vapors in contaminated soils;
- Reduce or eliminate the risk associated with direct exposure to, contact with and/or ingestion of contaminated soils; and
- Reduce or eliminate contaminant migration (movement) to groundwater to ensure protection of the groundwater resources.

EPA's Selected Cleanup

EPA has chosen to install a **soil vapor extraction** (SVE) system to remove and treat the chemical vapors that are in the soil below the ground surface. A series of SVE wells will be located on the former Omega property and adjacent properties. The actual location and number of wells will be determined during the remedial design phase, but Figure 2 is an example of how the system might look. The SVE wells work as a system to remove harmful chemical vapors that are in the soil above the water table. This keeps the chemicals from moving down into the water. Equipment attached to the wells creates a vacuum which pulls air (and vapors) through the soil, out of the soil, and into a **granular activated carbon** (GAC) system. Once the chemicals are removed using the GAC, the clean air created through this process will be released into the atmosphere. Any liquids (condensate) created as part of the process will be removed and treated at the groundwater treatment system. The treatment systems will be constructed, and then before they are put into operation a series of tests will be conducted to make sure everything works as designed. Once the SVE system is in place, its performance will be routinely reviewed to measure how much contaminated soil vapor is being removed and whether the system is meeting the cleanup goals specified in the ROD.

Contingency Plan: Hot Air Injection/Dual Phase Extraction

If the SVE system alone is not removing enough soil vapor to meet the remedial action objectives, EPA will add **hot air injection** and/or **dual phase extraction** (DPE) to increase the performance of the system. Hot air increases the effectiveness of SVE by causing additional vapors to be released from the soil. DPE consists of removing soil vapor and doing groundwater extraction treatment at the same time. This will be used if sampling data indicate that soil vapor concentrations are not sufficiently decreasing to remain above cleanup levels.

Temporary Institutional Controls (ICs)

Temporary institutional controls are measures designed to prevent exposure to contamination while the cleanup is ongoing. In the case of Omega OU-1, existing paved areas will be maintained and excavation will be restricted in certain areas during operation of the SVE system.

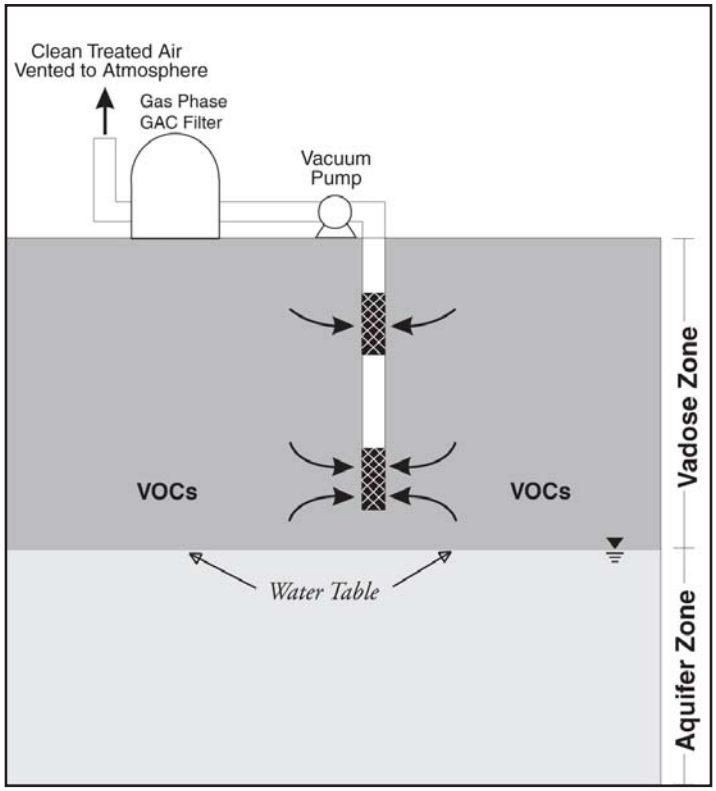

Figure 2: Components of SVE System

Cost of Remedy and Timeframe

The estimated total cost to implement this cleanup plan is $5.6 million (present worth), including $2.1 million in capital costs and $3.5 million in operation and maintenance costs (present worth). The estimated additional costs for hot air injection and DPE are $0.9 million and $2.9 million. The estimated time of operation is five years.

Next Steps

The PRPs will design, construct and operate the cleanup system under EPA oversight. System design will take approximately six to eight months and construction approximately three to six months. The PRPs will develop all design and construction plans, which will be reviewed and approved by EPA before implementation.

Technical Assistance Program

A Technical Assistance Grant (TAG) is available for citizens who live near a Superfund site. The grant helps qualified citizen groups affected by a Superfund site hire an independent technical advisor to help interpret and comment on site-related information. An initial grant of up to $50,000 is available. For further information about the grant, please call us and request an application (toll-free at 800-231-3075) or get it from the TAG web page by going to the EPA website: http://www.epa.gov/superfund/community/tag/index.htm

Glossary Of Terms

Contaminants of Concern: Site-specific chemicals that exceed regulatory levels or pose a potentially significant risk to human health and the environment.

Feasibility Study: A study that determines the best way to clean up environmental contamination.

Groundwater: The supply of water found below the ground surface, usually in aquifers.

Information Repository: A location accessible to community members (such as a local library) that houses documents, reports and other site-related information, general information about Superfund, newspaper notices and the Administrative Record for the site. EPA also maintains an information repository for all Superfund sites at its offices in San Francisco.

Institutional Controls: Land use restrictions that supplement engineering controls to prevent or limit exposure to contamination.

Proposed Plan: A document that summarizes the cleanup alternatives evaluated as part of the feasibility study process, and identifies the preferred cleanup alternative.

Remedial Action Objectives: The cleanup goals established by EPA when implementing a remedial action.

Remedial Investigation: The CERCLA process of determining the type and extent of hazardous material contamination at a site.

Record of Decision: The document that formalizes EPA's decision to implement a specific remedial action.

Soil Vapor Extraction: A technology that removes contaminants from the subsurface by extracting and treating contaminant vapors.

Superfund: The federal program to clean up the nation's uncontrolled hazardous waste sites.

Vapor Intrusion: The process by which contaminant vapors in the soil and/or groundwater migrate through subsurface soils and enter overlying buildings.

Volatile Organic Compounds: Carbon-containing chemical compounds that evaporate readily at room temperature.

OMEGA CHEMICAL SUPERFUND SITE

Site Information Repositories

EPA maintains site information repositories at the Whittier Public Library and the EPA Superfund Records Center. These repositories contain project documents, fact sheets and reference materials. EPA encourages you to review these documents to gain a more complete understanding of the site. The information repositories' locations are listed below. EPA also has a site information web page at: www.epa.gov/region09/OmegaChemical.

U.S. EPA Superfund Records Center
95 Hawthorne Street
San Francisco, CA 94105
(415) 536-2000
Monday-Friday 8:00 a.m. to 5:00 p.m.

Whittier Public Library
7344 S. Washington Avenue
Whittier, CA 90602
(562) 464-3450
Mon, Tues, Wed. 10:00 a.m. to 9:00 p.m.
Thursday, Friday 10:00 a.m. to 6:00 p.m.
Saturday 10:00 a.m. to 5:00 p.m.

U.S. EPA Contacts

Jackie Lane
Community Involvement Coordinator
U.S. EPA Region 9 (SFD-6-3)
Direct: (415) 972-3236
Toll-free: (800) 231-3075
lane.jackie@epa.gov

Lynda Deschambault
Remedial Project Manager
U.S. EPA Region 9 (SFD-7-1)
Direct: (415) 947-4183
Toll-free: (800) 231-3075
deschambault.lynda@epa.gov

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United States Environmental Protection Agency
Region 9
75 Hawthorne Street (SFD-6-3)
San Francisco, CA 94105
Attn: Jackie Lane (Omega 2/09)

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OMEGA CHEMICAL SUPERFUND SITE

U.S. Environmental Protection Agency • Region 9 • San Francisco, CA • September 2009

EPA Issues Draft Remedial Investigation Report for Downgradient Plume at Omega Site

The United States Environmental Protection Agency (EPA) and two groups of potentially responsible parties (PRPs) have been conducting an investigation of the **groundwater** and soil contamination at the Omega Chemical Corporation **Superfund** Site (Omega Site) in Whittier, CA. This fact sheet summarizes the Draft **Remedial Investigation** (RI) for Operable Unit 2 (OU-2), which is defined as the area of contaminated groundwater downgradient of the former Omega Chemical facility. This area has been impacted by the release (via spills and leaks) of hazardous substances at the former Omega Chemical Corporation facility (see map Figure 1).

EPA completed the Draft RI report for OU-2 in March, 2009, and the report is available on-line at www.epa.gov/region09/OmegaChemical. The Draft RI report summarizes investigations that EPA conducted to characterize the nature and extent of groundwater contamination, including the kinds of contaminants, where they are located, and at what depth. To conduct the RI, the EPA reviewed existing data and generated new data by collecting and analyzing groundwater and soil samples from locations **downgradient** from the former Omega Chemical facility.

Contaminants of Concern

The primary **contaminants of concern** (COCs) at the Omega Site are **volatile organic compounds** (VOCs), meaning that they evaporate readily in air. Semi-volatile organic compounds (SVOCs) which evaporate less readily than VOCs, including 1,4-dioxane, are also present at the Omega Site. The primary VOCs of concern are tetrachloroethene (PCE), trichloroethene (TCE), and 1,1-dichloroethene (1,1-DCE). PCE and TCE are solvents that have been widely used by industry as cleaning and degreasing agents. 1,1-DCE is not commonly used in commercial products, but can be formed when other VOCs degrade. Another group of VOCs, Freons, are also contaminants at the Omega Site. Freons are used as coolants and pressurizers in spray can products.

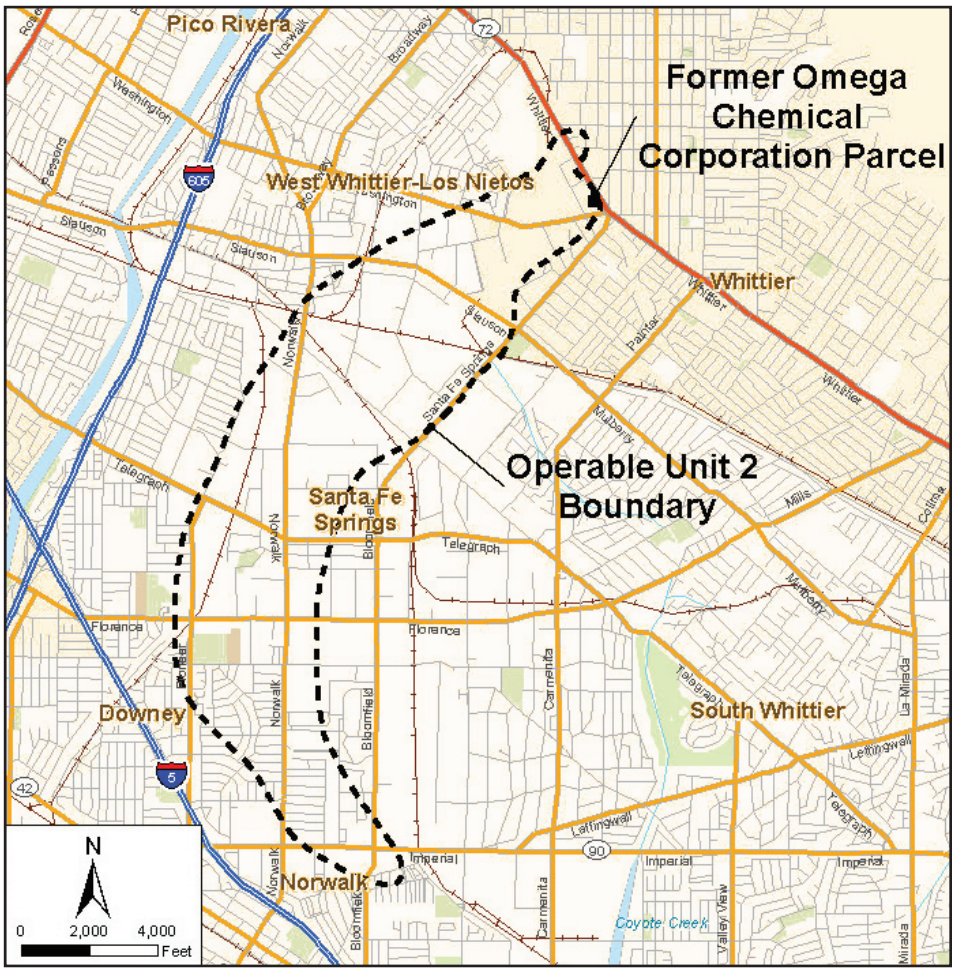

Figure 1: Site Location Map

*Words in **bold** are defined in the Glossary on page 3

Site Background

The Omega Chemical Corporation was a solvent and refrigerant recycler that operated from approximately 1976 to 1991, in Whittier, California. Drums and bulk loads of waste solvents and other chemicals from various industrial activities were processed at the Omega property to form commercial products. As a result of spills and leaks, the soil and groundwater beneath the Omega property became contaminated. In 1995, a group of PRPs, later known as the Omega Chemical Site PRP Organized Group (OPOG), performed the removal of approximately 2,700 drums under EPA oversight.

To better handle large site cleanups, EPA often separates site investigation and cleanup actions into parts called Operable Units. At the Omega Chemical Superfund site, Operable Unit One (OU-1) includes soil and groundwater contamination on and near the former Omega property). Operable Unit Two (OU-2) consists of the groundwater contamination that has migrated downgradient (moving southwest) of OU-1 (see Figure 1).

In September 2005, EPA selected an interim containment action for the highly contaminated groundwater within OU-1. A pump and treat system to contain the groundwater within OU-1 has been constructed and is now operational. OPOG completed a remedial investigation (RI) and **feasibility study** (FS), for OU-1 soils in May 2008, which evaluated the nature and extent of soil and soil vapor contamination associated with the former Omega property. In September 2008, EPA issued a **Record of Decision** for OU-1 soils, in which EPA memorialized its selection of a **soil vapor extraction** (SVE) system to remove and treat the chemical vapors that are in the soil within OU-1. A series of SVE wells will be used to pull the contaminant vapors out of the soil and into a **granular activated carbon** (GAC) filter. Once the contaminants are removed by the GAC filter, the clean air created through this process will be released into the atmosphere.

EPA conducted an Indoor Air sampling investigation in the vicinity of OU-1 and sampling results revealed that volatile organic compounds (VOCs), had migrated from contaminated soil and groundwater and accumulated in some nearby buildings. The indoor VOC levels were highest in Skateland, adjacent to the former Omega property. In April 2006, EPA directed OPOG to undertake an indoor air cleanup action at Skateland. However, in September 2006, OPOG purchased the Skateland property and in 2007 demolished the building, eliminating the need for the proposed indoor air cleanup action. EPA continues to monitor and investigate Indoor Air levels in the vicinity of OU1. In early 2009, EPA directed OPOG to implement temporary indoor air measures including air purifiers and increased air circulation at facilities adjacent to the former Omega property

In addition, EPA has been conducting a remedial investigation (RI) for OU-2 groundwater and released a draft RI report in March 2009. EPA is now working on a feasibility study (FS) to evaluate potential cleanup alternatives for OU-2.

Draft Remedial Investigation Results

The Draft RI found that high concentrations of VOCs are present in the groundwater that is found at depths of between 30 and 100 feet below ground level. The groundwater plume is approximately 4.2 miles in length. Drinking water typically comes from separate aquifers at depths greater than 200 feet in this area. Of the VOCs detected, PCE is generally present at the highest levels. The contamination decreases as the plume moves to the south and southwest (see Figure 1). Other contaminants are also present in the OU-2 groundwater, including TCE, 1,1-DCE, various other VOCs, hexavalent chromium, fuel hydrocarbons, and other chemicals.

In addition to identifying the nature and extent of the contamination, and a review of removal action alternatives to contain contaminated groundwater, EPA conducted a human health risk assessment (HHRA) as part of the Draft RI, which identified possible ways that people might be exposed to the OU-2 groundwater contamination. The HHRA concluded that there is no substantial risk to residents from contaminant volatilization from groundwater, and subsequent contaminant vapor migration through soil and intrusion into buildings within the OU-2 area.

EPA will continue to collect data and update the Draft RI report while we undertake the next phase of the Superfund process, called the Feasibility Study. In this phase, EPA develops cleanup objectives, evaluates possible cleanup technologies and combines them, as appropriate, into possible cleanup. An FS evaluates each alternative against a standard set of criteria used by EPA in the selection of Superfund cleanup actions. The development and evaluation of alternatives will be described in the OU-2 FS, scheduled to be released in 2010.

Following the FS, EPA will issue a **Proposed Plan** that describes the various clean up alternatives reviewed, and EPA's preferred option for cleanup of any contamination that poses a significant threat to human health or the environment. The Proposed Plan will be available for public comment shortly after the FS is completed. There will be a 30-day comment period and a public meeting so the public comment on the Proposed Plan. EPA will consult State and local agencies and consider public comment before selecting the remedy for OU-2.

Technical Assistance Program

A Technical Assistance Grant (TAG) is available for citizens who live near a Superfund site. The grant helps qualified citizen groups affected by a Superfund site hire an independent technical advisor to help interpret and comment on site-related information. An initial grant of up to $50,000 is available. For further information about the grant, please call us and request an application (toll-free at 800-231-3075) or get it from the TAG web page by going to the following EPA website: http://www.epa.gov/superfund/community/tag/index.htm

Site Information Repositories

EPA maintains site information repositories at the locations below. These **Information Repositories** contain project documents, fact sheets and reference materials. EPA encourages you to review these documents to gain a more complete understanding of the site. EPA also has a site information web page at: www.epa.gov/region09/OmegaChemical.

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7344 S. Washington Avenue
Whittier, CA 90602
(562) 464-3450
Mon, Tues, Wed. 10:00 a.m. to 9:00 p.m.
Thursday, Friday 10:00 a.m. to 6:00 p.m.
Saturday 10:00 a.m. to 5:00 p.m.

U.S. EPA Superfund Records Center
95 Hawthorne Street
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(415) 536-2000
Monday-Friday 8:30 a.m. to 4:00 p.m.

Glossary of Terms

Contaminants of Concern: Site-specific chemicals that exceed regulatory levels or pose a potentially significant risk to human health and the environment.

Downgradient: in the direction of groundwater flow

Feasibility Study: A study that determines the best way to clean up environmental contamination.

Granular activated carbon is a form of carbon that has been processed to make it extremely porous and thus it has a very large surface area available for adsorption of chemicals.

Groundwater: The supply of water found below the ground surface, usually in aquifers.

Information Repository: A location accessible to community members (such as a local library) that houses documents, reports and other site-related information and Administrative Records for the site. EPA also maintains an information repository for all Superfund sites at its offices in San Francisco.

Proposed Plan: A document that summarizes the cleanup alternatives evaluated as part of the feasibility study process, and identifies the preferred cleanup alternative.

Remedial Investigation: The process of determining the nature and extent of hazardous material contamination at a site, and assessing risks to human health and the environment for the purpose of developing and evaluating remedies.

Record of Decision: The document that formalizes EPA's decision to implement a specific remedial action.

Soil Vapor Extraction Soil vapor extraction or *SVE* removes harmful chemicals, in the form of vapors, from the soil above the water table. Vapors are the gases that form when chemicals evaporate. The vapors are extracted (removed) from the ground by applying a vacuum to pull the vapors out.

Superfund: The federal program established under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), to clean up the nation's uncontrolled hazardous waste sites.

Vapor Intrusion: The process by which contaminant vapors migrate through subsurface soils and enter overlying buildings. The source of the vapors is usually contamination in soils and/or groundwater.

Volatile Organic Compounds: Carbon-containing chemical compounds that evaporate readily at room temperature.

OMEGA CHEMICAL SUPERFUND SITE

EPA Issues Draft Remedial Investigation Report for Downgradient Plume at Omega Site

U.S. EPA Contacts

Jackie Lane
Community Involvement Coordinator
U.S. EPA Region 9 (SFD-6-3)
Direct: (415) 972-3236
Toll-free: (800) 231-3075
lane.jackie@epa.gov

Lynda Deschambault
Remedial Project Manager
U.S. EPA Region 9 (SFD-7-1)
Direct: (415) 947-4183
Toll-free: (800) 231-3075
deschambault.lynda@epa.gov

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INFORMATION SHEET

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance resources such as workshops, training sessions, hotlines, websites, and guides to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance, and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Compliance Assistance Centers

(www.assistancecenters.net)

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers that provide information targeted to industries with many small businesses.

Agriculture
(www.epa.gov/agriculture or 1-888-663-2155)

Automotive Recycling Industry
(www.ecarcenter.org)

Automotive Service and Repair
(www.ccar-greenlink.org or 1-888-GRN-LINK)

Chemical Industry
(www.chemalliance.org)

Construction Industry
(www.cicacenter.org or 1-734-995-4911)

Education
(www.campuserc.org)

Healthcare Industry
(www.hercenter.org or 1-734-995-4911)

Metal Finishing
(www.nmfrc.org or 1-734-995-4911)

Paints and Coatings
(www.paintcenter.org or 1-734-995-4911)

Printed Wiring Board Manufacturing
(www.pwbrc.org or 1-734-995-4911)

Printing
(www.pneac.org or 1-888-USPNEAC)

Transportation Industry
(www.transource.org)

Tribal Governments and Indian Country
(www.epa.gov/tribal/compliance or 202--564-2516)

US Border Environmental Issues
(www.bordercenter.org or 1-734-995-4911)

The Centers also provide State Resource Locators (www.envcap.org/statetools/index.cfm) for a wide range of topics to help you find important environmental compliance information specific to your state.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page
www.epa.gov

Small Business Gateway
www.epa.gov/smallbusiness

Compliance Assistance Home Page
www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance
www.epa.gov/compliance

Voluntary Partnership Programs
www.epa.gov/partners

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U.S. EPA SMALL BUSINESS RESOURCES

Hotlines, Helplines & Clearinghouses

(www.epa.gov/epahome/hotline.htm)

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. A few examples are listed below:

Clean Air Technology Center
(www.epa.gov/ttn/catc or 1-919-541-0800)

Emergency Planning and Community Right-To-Know Act
(www.epa.gov/superfund/resources/infocenter/epcra.htm or 1-800-424-9346)

EPA's Small Business Ombudsman Hotline provides regulatory and technical assistance information.
(www.epa.gov/sbo or 1-800-368-5888)

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers
(www.epa.gov/clearinghouse)

National Response Center to report oil and hazardous substance spills.
(www.nrc.uscg.mil or 1-800-424-8802)

Pollution Prevention Information Clearinghouse
(www.epa.gov/opptintr/ppic or 1-202-566-0799)

Safe Drinking Water Hotline
(www.epa.gov/safewater/hotline/index.html or 1-800-426-4791)

Stratospheric Ozone Refrigerants Information
(www.epa.gov/ozone or 1-800-296-1996)

Toxics Assistance Information Service also includes asbestos inquiries.
(1-202-554-1404)

Wetlands Helpline
(www.epa.gov/owow/wetlands/wetline.html or 1-800-832-7828)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or the following two resources:

EPA's Small Business Ombudsman
(www.epa.gov/sbo or 1-800-368-5888)

Small Business Environmental Homepage
(www.smallbiz-enviroweb.org or 1-724-452-4722)

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses:

The Small Business Compliance Policy
(www.epa.gov/compliance/incentives/smallbusiness)

Audit Policy
(www.epa.gov/compliance/incentives/auditing)

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an SBA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees, or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.

PRIMARY CONTACT DESIGNATION FORM

Mission Linen Supply

PLEASE COMPLETE AND RETURN THIS FORM WITHIN THIRTY CALENDAR DAYS OF RECEIPT

Please complete this form by printing or typing the requested information. If any of the information provided on this form changes after submission of the form including, but not limited to, changes in corporate relationships, please notify EPA at the address listed below as soon as possible. Thank you for your cooperation.

1. Please provide the following information for the single person who will be the above-named company's or individual's contact for all future communications (including correspondence, informational mailings, etc.) from EPA regarding Omega. You may designate a legal or other representative as the single primary contact. Please enter "N/A" if the requested information is not applicable to you.

Company/Organization/Individual Name: (only if different from above):	
Name of Designated Contact :	Contact's Title:
Contact's Firm Name:	
Street Address (no P.O. Box):	
City, State & Zip:	
Telephone Number:	Fax Number:
E-mail Address:	
Web-site Address:	
2. Other information: Law/Consulting Firm Name (if applicable):	

3. Printed Name and Signature of Person Completing This Form

Printed Name Title Company/Organization

Signature Date

4. Please return this form to:

Linda Ketellapper, Case Developer
Mail Code SFD-7-5
U.S. Environmental Protection Agency
75 Hawthorne St.
San Francisco, CA 94105