UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco, California

SFUND RECORDS CTR
2250886

September 8, 2011

Dear Mr. Modiano:

EPA has reviewed OPOG's *Responses to July 5, 2011 EPA Comments on OM&M Manual* and *Operations, Maintenance and Monitoring Manual of the Sub-Slab Depressurization System, Revision 4, Omega Chemical Superfund Site, Women's and Children's Crisis Shelter and Regional Occupation Programs Buildings*, dated August 9, 2011 and prepared by Jacob & Hefner Associates, Inc., on behalf of the Omega Chemical Site Potentially Responsible Party (PRP) Organized Group (OPOG).

Background: The SSD system was initially installed in July 2010. Several expansions and modifications have occurred. This list provides a chronology of OPOG submittals and EPA reviews:

1. July 2010 Initial Installation: Draft OM&M submitted by OPOG on September 13, 2010; EPA provided comments on September 20, 2010.
2. OM&M resubmitted by OPOG November 12, 21010 along with OPOG's responses to previous EPA comments; EPA provided comments on January 25, 2011.
3. December 2010 Expansion: Installation of one new suction pit, the conversion of two vacuum monitoring points to suction pits, the installation of three new vacuum monitoring points, and installation of a carbon canister to treat vapors from SSDB #8; OM&M, Revision 3 submitted by OPOG on April 25, 2011.
4. March 2011 Expansion: Installation of six suction pits, six vacuum monitoring points, and the conversion of an existing vacuum monitoring point to a suction pit.
5. OM&M, Revision 3 submitted by OPOG on April 25, 2011; EPA provided comments on July 5, 2011.
6. April-May 2011 Expansion: Addition of moisture knockout pot and an additional granular activated carbon canister connected in series to the initial VGAC canister that was installed to treat combined vapor streams from SSDB #8 and #17.
7. June 2011 Modification: Booster blower added upstream of moisture condensate knockout pot and two-stage VGAC system treating SSDB #8 and #17 vapor streams.
8. OM&M, Revision 4 submitted by OPOG on August 9, 2011 along with OPOG's responses to previous EPA comments. OPOG submitted this revision to include new information regarding the latest SSD modifications made in April-May and June 2011 which included addition of second vapor phase granular activated carbon (VGAC) canister to treat extracted vapors and a booster blower for the expanded VGAC system.

Review Comments review comments on OPOG Responses to July 5, 2011 EPA Comments on OM&M Manual

1. OPOG's response to the July 5, 2011 EPA comments on the previous SSD OM&M submittal are satisfactory and have been incorporated into the latest submittal appropriately.

Review Comments review comments on Operations, Maintenance and Monitoring Manual of the Sub-Slab Depressurization System, Revision 4

2. Page 9, Section 2.1.4.2, Granular Activated Carbon. Please correct the first sentence to read two vapor-phase GAC canisters instead of one canister.

3. Page 12, Section 3.2.4, GAC Change Outs. It is our understanding that the GAC vessels will be operated in a lead/lag configuration, such that when the lead vessel is spent, the lag vessel will be placed in the lead position and a new GAC vessel will be placed in the lag position. Please add the appropriate wording to the text to explain this operation.

4. Page 14. Section 4.2.1, SSDB Sampling. This paragraph states that samples will be collected using summa canisters, and submitted to a State Certified Laboratory to analyze the concentrations of extracted vapors "if required". Please identify and/or clarify what will trigger the need for laboratory analysis of extracted vapors in addition to the PID readings. This comment also applies to Section 4.2.2, Vapor Monitoring bullet item, 4th sub-bullet.

5. Page 14, Section 4.2.1.1 SSDB-8 and SSDB-17 Sampling. The sampling frequency and analytical methods specified in this section are not consistent with the frequency and analytical methods in the operational conditions for substantive compliance with SCAQMD regulations described in Appendix D. Please clarify if OPOG plans to conduct two types of sampling and monitoring activities, e.g. one for SCAQMD compliance as specified in Appendix D and one for SSD monitoring as described in Section 4.2.

Prior to submitting a revised OMM, please provide a response to comments within 14 days or by September 22, 2011.

If you have any questions about this letter, please contact me at (415) 947-4183.

Sincerely,

Lynda Deschambault

Lynda Deschambault
Superfund Remedial Project Manager

Cc via EMAIL only:
Stephanie Lewis, California EPA Department of Toxic Substances Control
Tom Perina, Ch2MHill