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

MEMORANDUM

DATE: April 6, 2006

SUBJECT: Request for a Removal Action
Omega Chemical Superfund Site
Whittier, Los Angeles County, California

FROM: Chris Lichens, Remedial Project Manager
Site Cleanup Section 4 (SFD-7-4)

THRU: Frederick K. Schauffler, Chief
Site Cleanup Section 4 (SFD-7-4)

TO: Elizabeth J. Adams, Chief
Site Cleanup Branch (SFD-7)

I. PURPOSE

This Action Memorandum requests and documents approval of this proposed removal action at the Omega Chemical Superfund Site (Omega Site or Site) in Whittier, California. This action is a time-critical removal action pursuant to Section 104 (a) (1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §9601 *et seq.*, and Section 300.415 of the National Contingency Plan (NCP), 40 CFR § 300.415. The purpose of this removal action is to mitigate threats to human health and the environment posed by the presence of uncontrolled hazardous substances, specifically volatile organic compounds (VOCs) such as tetrachloroethene (PCE) and trichloroethene (TCE), which are present in the Skateland building as a result of vapor intrusion from contaminated soil and groundwater at the Omega Site.

II. SITE CONDITIONS AND BACKGROUND

Site Status: NPL
Category of Removal: Time-critical
CERCLIS ID: CAD042245001
Site ID: BC

A. Site Description

1. Removal Site Evaluation

The Omega Chemical Corporation (Omega) was a refrigerant/solvent recycling operation located in Whittier, California, a community of approximately 85,000 people. The former Omega facility was located at 12504 and 12512 Whittier Boulevard (two adjoining parcels), across the street from a residential neighborhood and within one mile of several schools, including three elementary schools and two high schools. The facility operated as a solvent and refrigerant recycling and treatment facility from approximately 1976 to 1991, handling primarily chlorinated hydrocarbons and chlorofluorocarbons. Drums and bulk loads of waste solvents and chemicals from various industrial activities were processed at Omega to form commercial products. Chemical, thermal, and physical treatment processes were reportedly used to recycle the waste materials. Wastes generated from treatment and recycling activities included still bottoms resulting from the distillation of spent solvents, aqueous fractions, and non-recoverable solvents.

Between 1984 and 1988, the Omega Chemical Corporation received many notices of violations from the Los Angeles County Department of Health. In the early 1990's, the California Department of Toxic Substances Control (DTSC) and the United States Environmental Protection Agency (EPA) actively pursued the owner/operator of the Omega Chemical Corporation to remove drums of contaminants and clean up the site. On August 27, 1993, at the request of DTSC, EPA conducted an assessment of the Omega facility to evaluate the condition of over 2,900 drums of unprocessed hazardous waste, which took up most of the available storage space on the property. The drums were situated on pallets, in some cases three high, and many were weathered from years of outside storage. EPA's conclusion from the 1993 assessment was that the Omega facility represented a significant waste management problem. However, the Site remained a State-lead site at that time.

In January 1995, DTSC again requested EPA assistance in re-evaluating the condition of the facility. A preliminary assessment was conducted on January 19, 1995, and the following conditions were observed at the facility:

- Over 3,000 drums were observed stacked three high, some without pallets between them;
- A large majority of the drums appeared to be extremely corroded;
- Numerous drums were observed leaking onto other drums and onto a concrete pad; and
- Numerous spills were observed leading away from the drums to other parts of the property.

On May 9, 1995, EPA issued a Unilateral Administrative Order (UAO) to the owner of the Omega Chemical Corporation and to the generators of the hazardous substances that had shipped more than ten tons of hazardous substances to the Site. During 1995 and 1996, a group of potentially responsible parties (PRPs) later known as the Omega Chemical Site PRP

Organized Group (OPOG), with EPA oversight, performed the removal of approximately 2,700 drums at the Site, and collected subsurface soil and groundwater samples.

Chlorinated hydrocarbons, including tetrachloroethene (PCE), trichloroethene (TCE), 1,1-dichloroethene (1,1-DCE), and Freons were identified as the primary contaminants of concern in soil and groundwater directly beneath the property. Other contaminants are also present. High concentrations of chemicals of concern have also been detected in groundwater west and southwest of the former Omega facility.

EPA has divided the Omega Chemical Superfund Site into two Operable Units (OUs): OU-1 and OU-2. OU-1 includes the former Omega facility property and extends approximately 100 feet southwest of Putnam Street. OU-2 is the contamination in groundwater that originated from the former Omega facility and is downgradient of OU-1.

Vapor intrusion from the Omega Site has occurred in several buildings on and near the former Omega property, including an indoor roller skating rink (Skateland). Skateland is located on Whittier Boulevard, adjacent to the former Omega property. Skateland is open to the public and many of its customers are children.

2. Physical Location

The former Omega property is located at 12504/12512 East Whittier Boulevard in Whittier, California (see Figure 1). It occupies Los Angeles County Assessor Tract Number 13486, Lots 3 and 4. The former Omega property is approximately 41,000 square feet in area and contains two structures, a warehouse and an administrative building. A loading dock is attached to the rear of the warehouse. The exterior areas are concrete-paved and the former Omega property is secured with a perimeter fence and locking gate.

The Skateland building is a 21,200 square foot slab-on-grade building adjacent to the Omega property. Building dimensions are approximately 110 feet by 192 feet. The interior is separated into the rink area on the northwest side and the party room and video game area on the southeast side.

3. Site Characteristics

Current and Former Use

Sierra Bullets, Inc., and various related entities, that manufactured bullets, owned the 12504 Whittier Boulevard property from 1951 to 1963. Before construction of the buildings in 1955, this property was used for agriculture.

Fred R. Rippy, Inc., purchased the parcel at 12504 Whittier Boulevard in 1963 and sold it to Omega Chemical Corporation in 1987. From 1963 to 1966, Rippy operated a machine shop and then leased the facility to the following tenants, in chronological order:

- Accessory Products Company (dry good warehousing) (1966-1967)
- Maples Bros. Inc. (wood furniture manufacturer) (1967-1970)
- Stoner Western Company (ambulance manufacturer) (1970-1974)
- Bachelor Chemical Company (chemical recycler) (1974-1976)
- Omega Chemical Corporation (1976-1987)

From 1976 to 1987, Omega Chemical Corporation leased 12504 Whittier Boulevard for operation of a recycling and treatment facility for commercial and industrial solid and liquid wastes and a transfer station for storage and consolidation of wastes for shipment to other treatment and/or disposal facilities. In 1987, Omega Chemical Corporation purchased the property it was leasing at 12504 Whittier Boulevard and expanded operations onto the 12512 Whittier Boulevard property.

The parcel at 12512 Whittier Boulevard was used for agriculture up until 1951, when it was first sold for development. Between 1951 and 1984, the property was purchased and sold several times. It is not known how the property was utilized during this period. In 1984, the property was purchased by Fred R. Rippy, Inc., who sold it to Omega Chemical in 1987. During the period 1984-87, tenants at the property were Earthly Endeavors, which made handcrafted clay products, and the ANB Construction Company.

The Omega Chemical Corporation ceased operating in 1991, but its president, Dennis O'Meara, continued to operate under a different company name until 1995 on a more limited basis. Subsequent to 1991, the new company primarily accepted Freons. O'Meara owned both parcels until they were foreclosed upon in 2003. Between 1991 and 2003, the properties were occupied by various tenants.

Van Owen Holdings LLC (Van Owen) of Los Angeles, California purchased the former Omega property (12504 and 12512 Whittier Boulevard) in 2003. Currently, two tenants occupy the property. Star City Auto Body occupies the warehouse (12504 Whittier Boulevard) and performs auto body repair and painting. Star City also leases the small paved parking lot north of the warehouse building for automobile parking. Three Kings Construction occupies the former administrative building (12512 Whittier Boulevard) and larger paved parking area south of the warehouse. The building is used for office space, and the parking lot is used for temporary storage and parking for construction vehicles and equipment.

The Skateland building was present in a 1956 aerial photograph and may have operated before that date. Skateland is a public skating rink and children routinely occupy the building. Since children are a sensitive population, minimizing their exposure to VOCs is a high priority.

Local Geology and Hydrogeology

Lithologic data obtained from borings and wells installed at the Omega property and along Putnam Street indicate that the uppermost aquifer in the area southwest of the former Omega property consists of sand, silty sand and well graded gravel containing significant silt. These fluvial deposits pinch out from Putnam Street toward the former Omega property. A 26-foot

clay unit separates the shallow aquifer zone from a deeper sand unit that also appears to pinch out between Putnam Street and the former Omega property.

Soils encountered beneath the former Omega property consist primarily of clay and silt. The depth to groundwater in the shallow zone is about 80 feet below ground surface (bgs). The pieziometric head in the deeper sand unit is about nine feet deeper than in the shallow zone, indicating hydraulic separation between the two aquifer zones. Groundwater in the shallow zone flows from the former Omega property to the southwest. Regional hydrogeologic information is inconclusive on the presence or absence of major regional named aquifers in this portion of the Whittier area.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Groundwater sampling results indicate the highest contaminant concentrations are associated with the former Omega property and primarily limited to the shallower portions of the aquifer. The main contaminants dissolved in groundwater at OU-1 include chlorinated hydrocarbons (primarily PCE, TCE, and 1,1-DCE), Freons, and 1,4-dioxane. These contaminants are hazardous substances as defined in CERCLA 101(14). The highest VOC concentrations are found in well OW-1A, screened from 62.5 to 77.5 feet below ground surface (bgs); PCE concentrations in this well have been as high as 210,000 micrograms per liter (μg/L). The aqueous solubility of PCE is 200,000 μg/L, which indicates that dense non-aqueous phase liquid (DNAPL) is likely to be present in this area.

High VOC levels have also been detected in soil gas on and near the former Omega property. PCE has been detected at over 2,000,000 micrograms per cubic meter ($\mu g/m^3$), TCE at over 450,000 $\mu g/m^3$, and 1,1-DCE at over 1,000,000 $\mu g/m^3$. Freon 11 has been detected at over 900,000 $\mu g/m^3$ and Freon 113 at over 3,000,000 $\mu g/m^3$. Maximum soil gas concentrations measured on the Skateland property in 2004 include 70,000 $\mu g/m^3$ PCE; 79,000 $\mu g/m^3$ TCE; 600,000 $\mu g/m^3$ 1,1-DCE; 540,000 $\mu g/m^3$ Freon 11; and 2,600,000 $\mu g/m^3$ Freon 113.

The results of indoor air sampling in 2004 and 2005 showed evidence of vapor intrusion into the Skateland building (see Table 1). For comparison, the last row of Table 1 lists the EPA Region 9 Preliminary Remediation Goals (PRGs), adjusted for occupational exposure, for the five contaminants presented in the table. PRGs are risk-based concentrations that are derived by combining current human health toxicity values with standard exposure factors to estimate contaminant concentrations in environmental media (such as air) considered by EPA to be health protective of human exposures (including sensitive groups) over a lifetime.

Maximum PCE levels for each sampling event have corresponded to an excess cancer risk of $1x10^{-4}$ to over $1x10^{-3}$ for occupational exposure. PCE levels have generally decreased since the initial sampling event, although this may be due to the December 2004 installation and operation of air purifiers inside the building, which are designed to remove VOCs from indoor air. Levels of other VOCs, however, have not shown a similar trend of decreasing concentrations.

Table 1: Maximum VOC Concentrations in Indoor Air at Skateland during the period May 2004 to September 2005.

Date	PCE ($\mu g/m^3$)	TCE ($\mu g/m^3$)	1,1-DCE ($\mu g/m^3$)	Freon 11 ($\mu g/m^3$)	Freon 113 ($\mu g/m^3$)
May 2004	1,100	19	160	140	480
July/August 2004	770	270	550	350	1,300
December 2004	95	11	87	46	170
January 2005	88	24	280	210	1,000
September 2005	91	37	290	280	1,000
EPA Region 9 Preliminary Remediation Goals (adjusted for Occupational Exposure)	0.9	3	400	1,400	59,000

5. NPL Status

The Omega Site was added to the NPL in 1999.

6. Maps, pictures and other graphic representations

Attachments are listed on the final page of this Action Memorandum. Figure 1 is a general map of the Whittier area, showing the location of the Omega property. Figure 2 shows the Omega property in more detail, the boundary of Operable Unit 1 and the location of Skateland. Figure 3 shows the estimated lateral extent of the PCE groundwater plume, based on 2003 data.

B. Other Actions to Date

1. Previous actions

There have been numerous enforcement and response actions taken at the Omega Site by various regulatory agencies and PRPs. A summary of these actions follows:

1984 - 1991: The Omega Chemical Corporation received numerous Notices of Violations (NOVs) from the Los Angeles County Department of Health. These violations were issued for

the improper labeling of drums, leaking drums, incomplete hazardous waste manifests and numerous safety violations.

November 1990: A preliminary injunction was filed by the Los Angeles County Superior Court enjoining Omega from accepting any offsite hazardous waste.

February 1991: The San Bernardino and Los Angeles County District Attorney's offices issued warrants to search three railcars on the Omega property. The search revealed illegal storage and transport of 700 hazardous waste drums and falsified manifests and drum labels.

April 1991: The Los Angeles County Superior Court ordered the Omega Chemical Corporation to cease operations, remove all hazardous wastes, and close the facility.

October 1991: EPA entered into an Administrative Order on Consent, requiring the Omega Chemical Corporation to perform several interim measures to mitigate current or potential threats to human health or the environment (e.g., improve Site security, repack leaking drums and immediately remove them to an appropriate Class I facility) and to submit a RCRA facility investigation (RFI).

August 1993: DTSC requested assistance from EPA to conduct a site assessment of the Omega Site. EPA tasked the Technical Assistance Team (TAT) contractor to conduct a site assessment, at which time TAT observed approximately 2,900 drums of hazardous wastes that entirely filled all available storage space at the Site. The drums were situated on pallets, sometimes three high and stacked in rows across the Site. Many of the drums were weathered from years of outside storage; however, only a few of the drums inspected displayed any signs of gross deterioration or were leaking. The conclusion reached from this 1993 TAT assessment was that Omega represented a significant waste management problem. The Site remained State lead at that time.

January 1995: The Los Angeles County Superior Court found Dennis O'Meara, president of the Omega Chemical Corporation, in contempt of court for failing to follow its orders and ordered that Mr. O'Meara and Omega cease all operations at the Site and cooperate fully in all efforts to investigate and implement appropriate action at the Site.

March 1995: Dennis O'Meara plead guilty to two felony counts of illegal storage and disposal of hazardous waste.

May 1995: EPA issued a UAO to the Site operators, Omega Chemical Corporation and Dennis O'Meara, and the generators of hazardous substances who each sent more than ten tons of hazardous substances to the Site. This UAO required the Respondents to remove approximately 2,700 drums at the Site and to dispose, stabilize, or treat grossly contaminated concrete, asphalt and/or soils found at or near the surface and to conduct surface and subsurface soil sampling and groundwater sampling to determine the nature and extent of contamination.

February, 2001: EPA and OPOG enter into a Partial Consent Decree to address soil and groundwater contamination on the Omega property and immediately downgradient. The Consent Decree includes the following tasks: (1) design and implement a groundwater containment and mass treatment system for the Phase 1a (OU-1) Area (including conducting a groundwater Engineering Evaluation/Cost Analysis (EE/CA) to evaluate the nature and extent of groundwater contamination in the OU-1 area); (2) implement a vadose zone Remedial Investigation/Feasibility Study (RI/FS) for contaminant releases on or emanating from the Omega Property; and (3) install three sentinel groundwater monitoring wells and conduct quarterly sampling for one year.

May 2004 – September 2005: EPA and OPOG conducted indoor air sampling within two buildings on the former Omega property and three others in close proximity. The results indicated varying degrees of vapor intrusion into each building from the Omega Site, with the highest levels within the Skateland building. In December 2004, air purifiers were installed in the Skateland building to reduce VOC concentrations in indoor air. The PRPs also sealed cracks in the floor that may have been acting as points of entry for vapors to get into the building.

July 2004: EPA issued a UAO to 19 PRPs to install and sample additional OU-2 groundwater monitoring wells. The wells are currently being installed and will be used in determining the nature and extent of OU-2 contamination.

September 2005: OPOG conducted sub-slab depressurization (SSD) field testing to evaluate the potential effectiveness of a full-scale system at Skateland. The results indicated that SSD would be effective in reducing indoor air VOC concentrations.

September 2005: EPA issued an Action Memorandum to construct and operate an interim groundwater pump and treatment system for the OU-1 area (near the former Omega property). The objective of this interim groundwater action is to contain the highest levels of contamination until a permanent remedy is selected.

2. Current actions

Current actions include an ongoing vadose zone RI/FS within OU-1, and design and implementation of the interim groundwater action described above. OU-2 work is primarily EPA-lead and currently consists of groundwater monitoring well installation to determine the nature and extent of contamination. As discussed above, EPA also issued a UAO to a PRP group to install OU-2 monitoring wells.

B. State and Local Authorities' Roles

EPA anticipates that DTSC will be involved in reviewing design documents. Neither DTSC, nor the City of Whittier, will be actively involved in the construction or operation of the treatment system or other mitigation efforts undertaken as part of this removal action.

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

A. Threats to Public Health or Welfare

CERCLA Section 104(a) authorizes removal responses when "(A) any hazardous substance is released or there is a substantial threat of such a release into the environment, or (B) there is a release or substantial threat of release into the environment of any pollutant or contaminant which may present an imminent and substantial danger to the public health or welfare."

Indoor air contamination in the Skateland building provides evidence of a release of CERCLA hazardous substances threatening public health, or welfare, or the environment based upon the factors set forth in the NCP.

1. Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby human populations, animals or the food chain

PCE and TCE are hazardous substances as defined in CERCLA Section 101(14). Vapor intrusion from the Omega Site has occurred at the Skateland building, causing indoor air contamination by PCE, TCE, and other VOCs. Maximum PCE levels for each sampling event in 2004 and 2005 have corresponded to an excess cancer risk of $1x10^{-4}$ to over $1x10^{-3}$ for long-term occupational exposure. Skateland is a public skating rink and children routinely occupy the building. Although children are expected to have less exposure/risk than workers employed for many years, children are considered a sensitive population and minimizing their exposure to VOCs is a high priority..

2. High levels of hazardous substances or pollutants or contaminants in soils at or near the surface that may migrate

VOCs have been documented in soil, soil vapor, and groundwater associated with the former Omega property, including elevated levels in soil gas on the Skateland property. The results of indoor air sampling in 2004 and 2005 showed clear evidence of vapor intrusion into the Skateland building (see Table 1). Workers at Skateland and members of the public that use the building are exposed to the indoor air contamination. Children frequently use the building and are more sensitive to exposure to VOCs than adults

B. Threats to the Environment

Exposure to VOCs in indoor air is a potential human health risk. However, the contamination does not appear to pose a threat to nearby animals, their food chain, or sensitive ecosystems.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of pollutants and contaminants at this Site, if not addressed by implementing the response action selected in this Action Memorandum, will continue to present an imminent and substantial endangerment to public health or welfare. Of specific concern, continued releases and threatened releases of contaminants into the Skateland building pose an imminent and substantial endangerment to the health and welfare of Skateland employees and also customers, a large percentage of whom are children.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

Under this removal action, one or more mitigation alternatives will be implemented to prevent entry of vapors from the Omega Site into the Skateland building and/or remove vapors after entry. The overall objective is to reduce VOC levels in indoor air to acceptable levels.

A. Proposed action description

The initial action necessary for this removal is anticipated to be installation of a sub-slab pressurization (SSP) and/or depressurization (SSD) system at Skateland to prevent contaminant vapors from entering the building. However, other action(s) may be implemented depending on access limitations (see "Description of alternative technologies" below). Periodic indoor air sampling will be conducted after mitigation to determine if the system is functioning effectively.

Venting the removed VOC contamination could potentially trigger requirements pursuant to permitting programs within the South Coast Air Quality Management District (SCAQMD). Because this is a removal action under CERCLA, the action must meet the applicable or relevant and appropriate requirements (ARARs) related to the action to the maximum extent practicable. (See ARARs section below)

The removal action at Skateland will consist of the following activities:

1. Preparation of a Work Plan that will include the following elements:

    - Qualifications of all contractors.
    - System installation plan (including a treatment system, if required).
    - Contacts for public inquiries.
    - Proposed project schedule.
    - Sampling and Analysis Plan which incorporates the elements of a Quality Assurance Project Plan and Field Sampling Plan for confirmation samples, system monitoring, and air emissions.
    - Operation and Maintenance Plan, including proposed shutdown criteria.
    - Reporting to EPA.

2. Installation of the approved system (including treatment units, if required).

3. Confirmation sampling and system performance monitoring.
4. Preparation of Removal Action Completion Report.
5. Continued operation of the system until implementation of the final OU-1 remedy eliminates vapor intrusion in the Skateland building.

B. Contribution to remedial performance

The primary goal of the proposed removal action is to reduce the levels of VOCs in indoor air at Skateland. Assuming continued use of the building, the proposed action will continue until VOC levels in indoor air have been reduced to acceptable levels. EPA is currently overseeing a PRP-lead OU-1 vadose zone (i.e., soils) RI/FS, and the remedy selected through that investigation will likely include actions to reduce VOC levels in soil gas to address the vapor intrusion exposure pathway. The proposed removal action will complement future remedial actions by ensuring continued protection of human health until VOC levels in soils gas have been reduced to acceptable levels.

C. Description of alternative technologies

In the event that SSP/SSD can not be implemented, other mitigation alternatives would be considered. These include heating, ventilation, and air conditioning (HVAC) modifications to maintain positive pressure inside the building; additional ventilation; and/or expanded use of indoor air treatment units using carbon adsorption technology.

D. Applicable or relevant and appropriate requirements

CERCLA 121(e)(1) provides that on-site removal and remedial actions carried out under CERCLA do not require federal, state or local permits. However, 40 C.F.R. § 300.415(j) requires removal actions, to the extent practicable considering the exigencies of the situation, to attain applicable or relevant and appropriate requirements (ARARs) under federal and, where more stringent, state laws.

Because this action is likely to involve an SSP/SSD system which will extract VOCs from the subsurface and discharge the treated air to the outdoors, regulations pursuant to the Clean Air Act may be triggered. The federal Clean Air Act, through implementing regulations at 40 CFR Parts 50 and 52, Subpart D, requires compliance with local air standards. Specifically, any source of criteria pollutants located in a National Ambient Air Quality Standards (NAAQS) non-attainment area must comply with local air quality regulations. The Omega Site is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As a "new source" which will extract toxic air contaminants from the subsurface and discharge the treated air into the atmosphere, the system installed pursuant to this removal action will have to meet SCAQMD substantive requirements.

E. Project schedule

This removal action is expected to begin within 30 days of completion and approval of the Work Plan by EPA.

F. Estimated Costs

The Omega Chemical Site PRP Organized Group (OPOG) is expected to implement and fund this removal action. However, the costs estimated below are based on EPA performing the work.

Estimated EPA Costs:

Direct Costs	$80,000	
Indirect Costs	$32,000	
Subtotal		$112,000
Contingency (20%)		$22,400

Estimated Construction and Operation Costs:

Design	$25,000	
Installation	$150,000	
O&M (5years)	$50,000	
Equipment	$75,000	
Subtotal		$300,000
Contingency (15%)		$45,000
TOTAL		$479,400

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

Delayed action will continue to expose the occupants of the building, including workers and adult and child customers, to airborne VOC contamination at levels that may pose health hazards as a result of long-term exposure.

VII. OUTSTANDING POLICY ISSUES

The proposed removal action does not present any outstanding policy issues.

VIII. RECOMMENDATION

This decision document represents the selected removal action for addressing indoor air contamination at the Skateland building, adjacent to the Omega Chemical Superfund Site in Whittier, Los Angeles County, California. It was developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the removal action.

Because conditions at the Skateland facility meet the NCP section 300.415(b)(2) criteria for a removal action, your approval of this proposed Action Memorandum is requested. The total project ceiling, if approved, will be $479,400. You may indicate your decision by signing below.

Approve: Elizabeth J. Adams April 10, 2006
Elizabeth J. Adams Date
Chief, Superfund Site Cleanup Branch

Disapprove: _____ _____
Elizabeth J. Adams Date
Chief, Superfund Site Cleanup Branch

Figures:
1. Former Omega Property Location
2. Operable Unit One
3. Estimated Extent of PCE Groundwater Plume

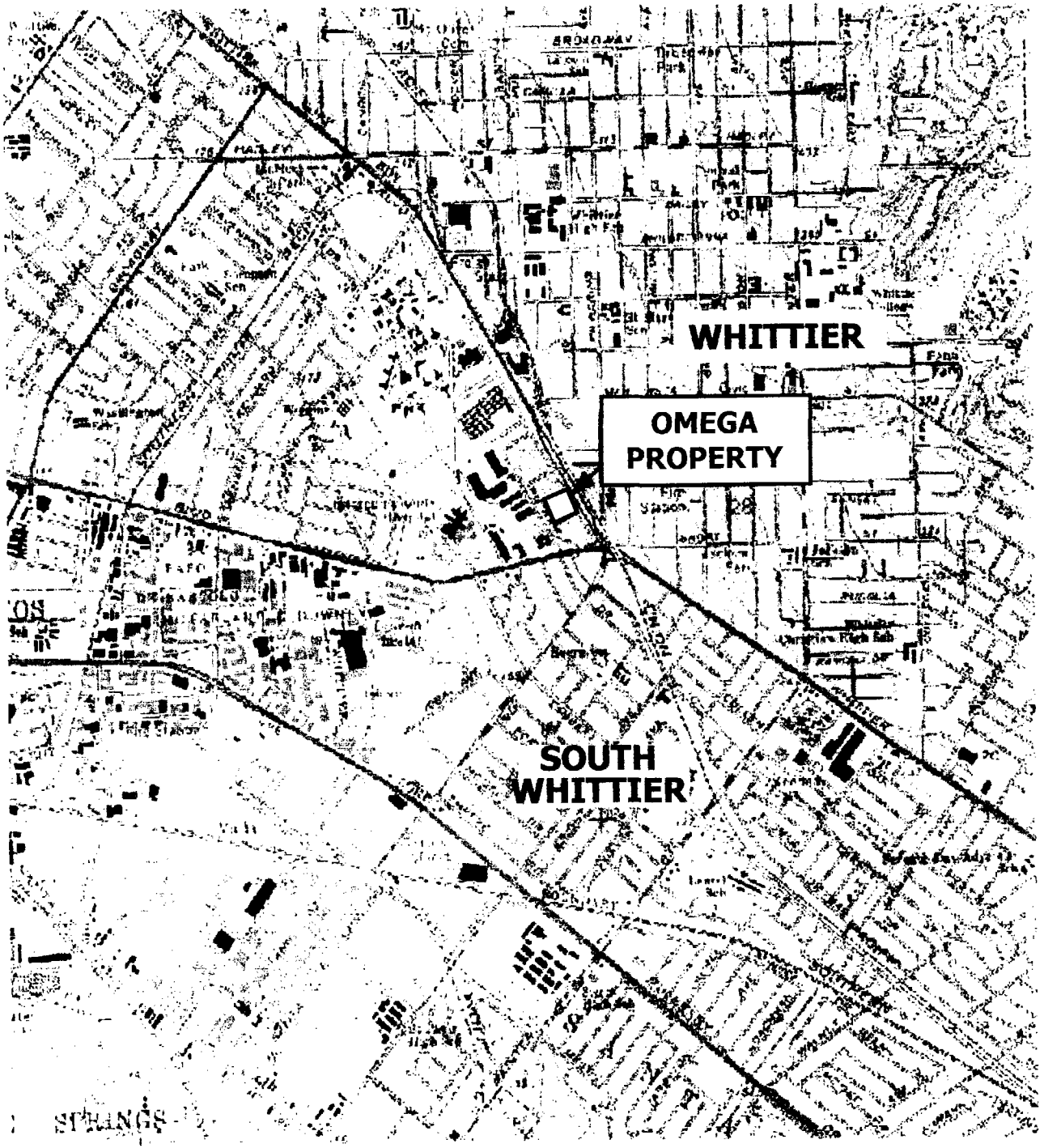

Figure One: Former Omega Property Location

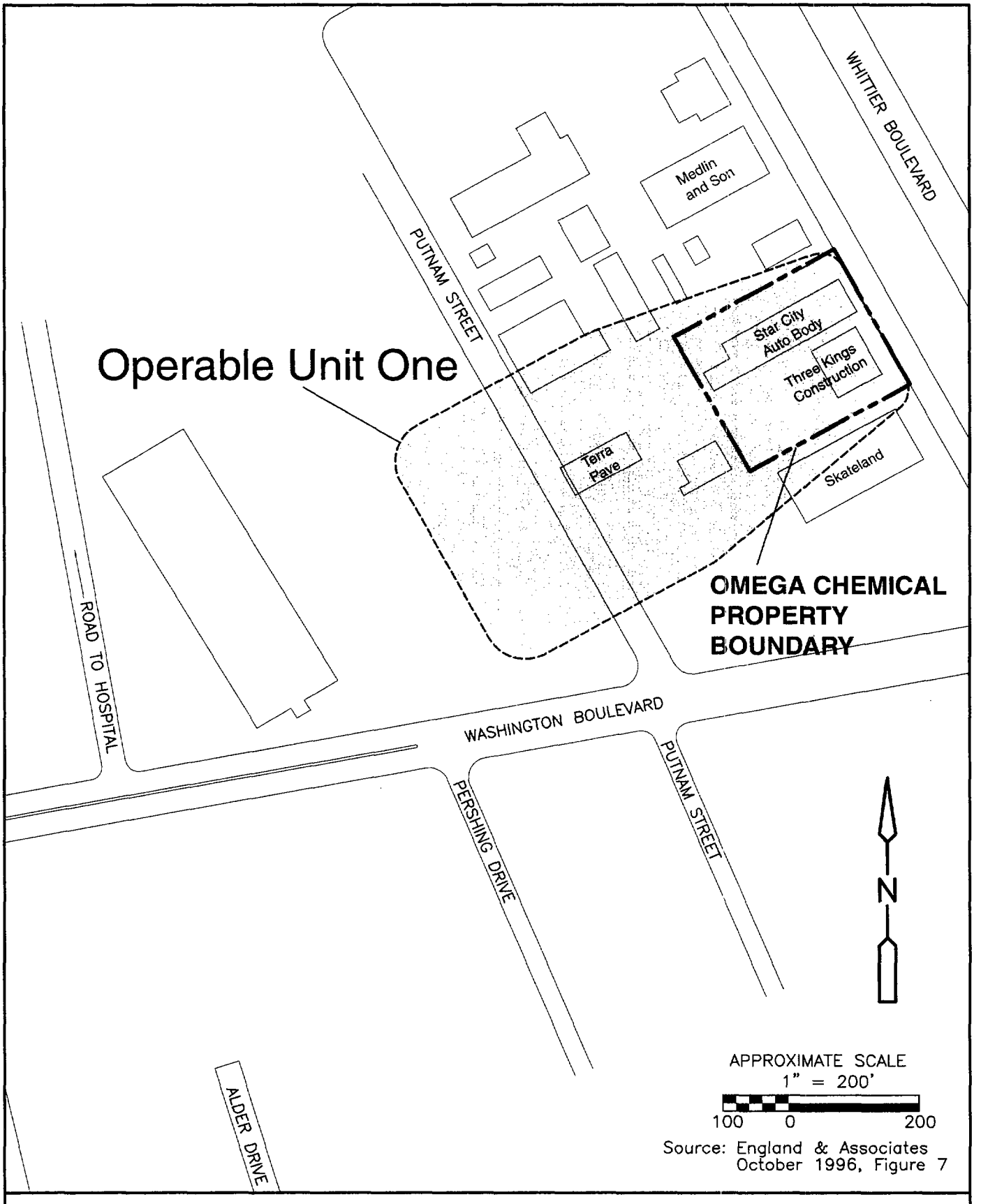

Figure Two: Omega Site - Operable Unit One
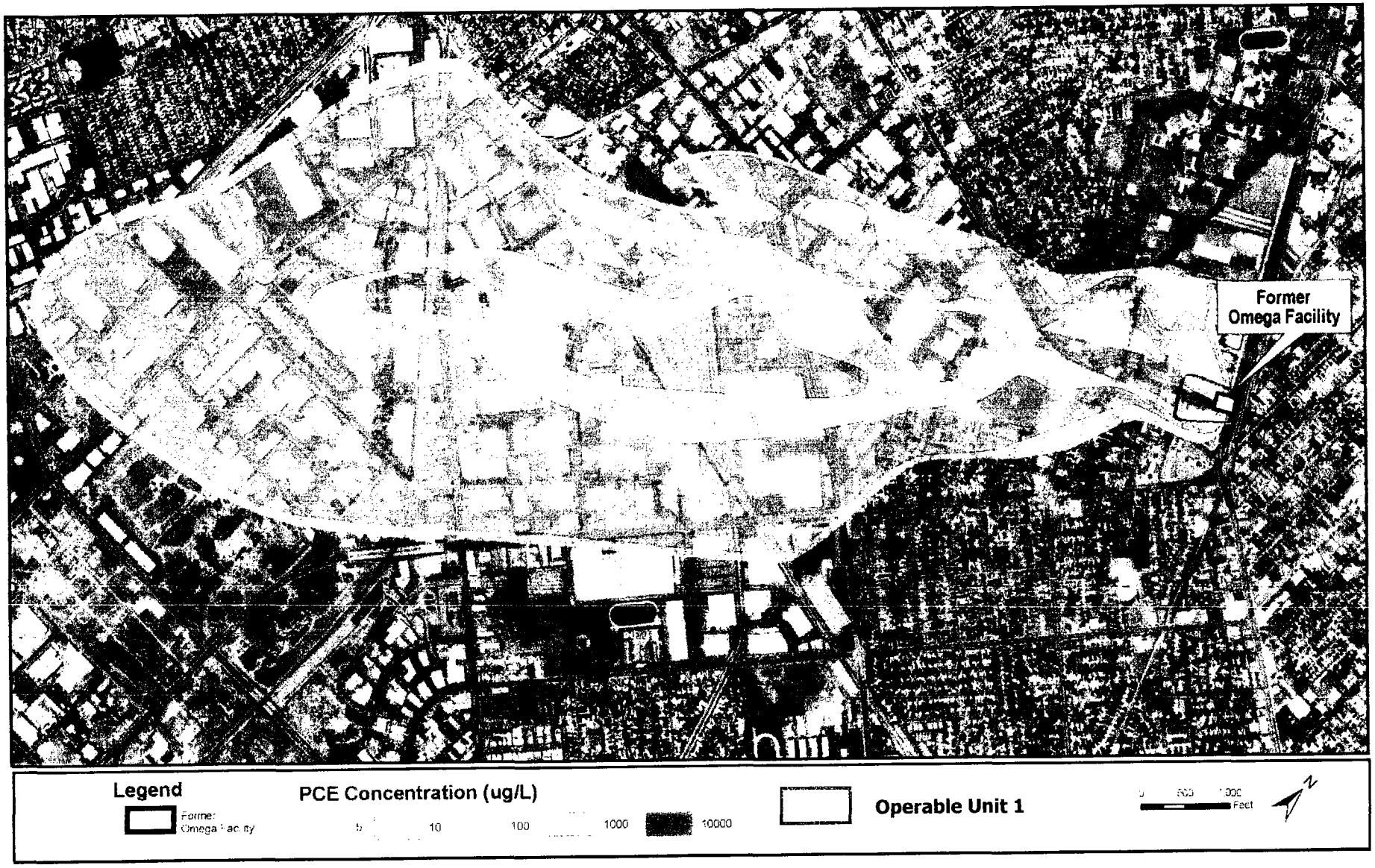
Figure Three: PCE Concentrations 2003