CBS Post Cleaning Sampling – Former Westinghouse Facility, Rancho Dominguez, CA

EPA R9 Comments – May 18, 2016

1. **Indoor air sampling**

   a. Next steps: Conduct air sampling after the PCB cleanup inside the building is completed provided that best management practices (BMPs) are implemented on a routine basis. These BMPs include continued cleaning of building surfaces and wipe samples.

2. **Concrete floor sampling – bulk samples**

   a. Concrete is a very heterogeneous surface and these heterogeneity should be considered in the cleanup approach for this surface.

   b. The current and potential future use of the Building interior must also be considered when developing the cleanup plan for the concrete. Will the interior of the building be subdivided in distinct areas (that we may consider as exposure units) in the future? If so, what would be the size of the exposure units? Is the current and potential future use of the building going to remain as a warehouse? Does the current use includes offices? If the current use of the building changes in the future, will that use include offices or other non-industrial activity?

   c. Subdivision of the concrete floor into quarters for cleanup is recommended given the size of the floor, heterogeneity of the concrete, and spatial distribution of PCB contamination on the floor. Therefore, we recommend the use of the N150 line as the starting point for cleanup of PCBs on the concrete floor due to the heterogeneous distribution of PCBs on the concrete surface. CBS had divided the floor into two sections above and below N220.

3. **Concrete walls – bulk samples**

   a. Some additional samples may be requested. We can discuss during a conference call.

4. **Stairwell to mezzanine level**

   Is the stairwell made of metal?

5. **Surface wipe samples**

   a. We would like to further evaluate this data and need additional figures. Please provide a figure that properly identifies each of the wipe samples collected (1) after cleaning and (2) after re-cleaning.