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

June 6, 2019

Mr. Mark Withrow, P.E.
Environmental Management Division
City of Los Angeles Harbor Department
[HYPERLINK "mailto:MWithrow@portla.org"]

Re: USEPA Request for Submittal of a Risk-Based Cleanup Application under the Toxic Substances Control Act, Former Wilmington Marine Services, 801 South Fries Avenue, Wilmington, California
USEPA ID: PCBCA2018001/CATSCA101162

Dear Mr. Withrow:

Thank you for your submission of the *Site Investigation Report, Former Wilmington Marine Services, 801 South Fries Avenue, Wilmington, California,* dated April 4, 2019 (Site Investigation Report), prepared by Tetra Tech, Inc. (Tetra Tech) on behalf of the City of Los Angeles Harbor Department (Harbor Department). The Site Investigation Report includes a summary of characterization of polychlorinated biphenyls (PCBs) in soil, asphalt, concrete, and groundwater. According to the Site Investigation Report, numerous sampling events have been conducted over the span of many years for PCBs and other chemicals of concern (COCs) in various media at the former Wilmington Marine Services (Site). The U.S. Environmental Protection Agency (USEPA) has reviewed the Site Investigation Report and acknowledges that at this point in time, sufficient PCB characterization has been conducted at the Site.

USEPA is requesting that the Harbor Department prepare and submit to USEPA an application for a risk-based approval under the Toxic Substances Control Act (TSCA) pursuant to 40 C.F.R. § 761.61(c). This application would include removal of PCBs in soil, asphalt, and concrete, as well as a risk evaluation to ensure that adequate removal efforts have taken place, and that any residual PCB contamination that remains in-place at the Site is deemed protective to human health and the environment. Please refer to PCB FAST on our website ([HYPERLINK "http://www.epa.gov/pcbs"]), which provides application checklists for various types of PCB cleanups under TSCA.

As a result of project scoping discussions on May 30, 2019, between the Harbor Department, Tetra Tech and the USEPA, a phased approach for characterization and remediation work has been proposed at the Site. The initial phase would involve removal of soil, asphalt, and concrete containing PCBs for off-site disposal. A subsequent phase(s) would focus on groundwater at the Site and its impacts to off-site sediments and surface water. Long-term monitoring of groundwater and/or sediment and off-site surface water may be warranted as part of the subsequent phase(s) to ensure adequate understanding of the groundwater network, contamination pathways and potential impacts to human and ecological receptors. USEPA will determine if additional characterization and/or cleanup efforts are warranted based upon data gathered during these phase(s), and notify the Harbor Department of additional applications that must be submitted to USEPA pursuant to 40 C.F.R. § 761.61(c).

Also, as discussed during the conference call on May 30, 2019, the USEPA has contacted Mr. Peter Garcia, of the Department of Toxic Substances Control (DTSC) office in Los Angeles, on May 31, 2019, as now is the ideal time for dual agency oversight and collaborative involvement given that other COCs aside from PCBs have been detected in various media at the Site.

We look forward to assisting you during preparation of the risk-based cleanup application under TSCA. If you have any questions or concerns during the process, please contact me at (415) 972-3329. Thank you for your cooperation.

Sincerely,

Cynthia Ruelas
Land, Chemical, & Redevelopment Division

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