Slauson Tanker Fire Excavation Workplan US EPA Review and Comments

item	page	Section
1	i	Title
2	1	1.1 Objectives
3	3	2.0 Site Background
4	3	2.0 Site Background
5	3	2.0 Site Background
6	4	2.2 Description of Release and ER Activities
7	5	2.2 Description of Release and ER Activities
8	7	2.3 Environmental Investigation
9	8	3.0 Scope of Work
RT 1	8	3.0 Scope of Work

Comment
Workplan should include 216 W. Slauson property.
This is the first mention of 216 Slauson; this parcel should be listed in the title as well as the introductory paragraph.
The Los Angeles County Tax Assessors Office lists 210 W. Slauson as zoned for "Single Family Residence" (see https://portal.assessor.lacounty.gov/parceldetail/6005009004). "206 W. Slauson" (parcel 6005009005) is listed as "Vacant Commercial." The term, "Industrial," does not appear in this code group.

There are permanent structures located on the 206 W. Slauson property - please include in the description, as well as their disposition due to the fire.
Please provide parcel numbers for the two parcels (6005009004; 6005009005) and reference the Los Angeles County Tax Assessors Office (https://portal.assessor.lacounty.gov).

A description of the gasoline flow path would be useful here. Include path to storm drain, as well as brief description of cleanup effort in that water body.
Avoid use of "low concentrations," as it is vague. It is better to say "below risk-based and/or site action levels," if this is indeed the case.

Soil vapor samples along the southern boundary exceed health-based action levels, and there are residences within 20 feet of this location. Crawlspace and/or subslab soil vapor sampling is necessary to ensure there are no threats of soil vapor intrusion to human health.

Add crawlspace/subsurface soil vapor sampling for residences to the south.
Will the deeper excavations be benched, sloped or shoring installed?

10	10	3.2 Air Quality and Dust Monitoring
11	11	3.2 Air Quality and Dust Monitoring
12	14	3.4 Phase II Shallow Soil Excavation 7 - 10 Feet
RT 2	14	3.4 Phase II Shallow Soil Excavation 7 - 10 Feet
13	14	3.5 Additional Excavation and Backfilling
14	14	3.5 Additional Excavation and Backfilling
15	14	3.5 Additional Excavation and Backfilling
16	14	3.6

EPA will require continuous perimeter and worker monitoring for dust, VOCs and benzene, pursuant to citations in 40 CFR part 300, specifically part 300.150. The monitoring plan must include location of perimeter monitoring, instrumentation, action levels, and a description of warning and response actions. Perimeter monitoring instruments for VOCs and dust MUST be installed between site activity and the closest residences at all times when work is conducted, regardless of wind direction. For clarification, this means a third perimeter monitoring station specifically to address this data gap. Perimeter monitoring instruments must datalog; the data shall be reviewed and reported daily for excedences, along with comments describing mitigating actions. A record of these data shall be maintained on site and provided electronically.

Concentrations VOCs

The VOC action level of 50 ppm seems arbitrary, and does not account for possible benzene enrichment/fractionation. Please provide a rationale tying VOC screening data to benzene screening data for application to both worker safety and protection of surrounding residences. It's ok if this is based on rudimentary assumptions, provided that they can be verified and/or modified based on comparative field measurements.

How will samples be collected from the bottom and sidewalls for the deeper excavation?

Areas at 216 W. Slauson below 10 feet bgs. with AOCs above site action levels will only be backfilled with concurrence from the RWQCB and the Solis family representative.
Please work with the Solis family for the backfill specs at 216 W. Slauson. These should be included in the workplan, or at lease state here that this is an issue to be resolved prior to final backfill.

Please include a contingency for the collection and inspection of rainwater during the excavations. This should include a plan for closing off the storm drain in front of 216 Slauson. Reference the appropriate BMP document.
No Section 3.6