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

Via Electronic Mail

June 26, 2014

Mr. Fred J. Smalling
Americas Styrenics
605 Crenshaw Blvd
Torrance, California 90503

Re: Polychlorinated Biphenyls Cleanup under Toxic Substance Control Act USEPA Region 9 Amendment 2 to the conditional approval of *Self-Implementation Cleanup Plan – Train 4, Americas Styrenics 305 Crenshaw Boulevard, Torrance California 90503.*

Dear Mr. Smalling

The U.S. Environmental Protection Agency Region 9 (USEPA) thanks you, and your team for taking the time to provide us with your Technical Memorandum "Americas Styrenics Train 4 Recommended Confirmatory Risk-Based Cleanup levels". The Technical Memorandum is in response to **Amendment 1** of the original approval *Self-Implementation Cleanup Plan-Train, Americas Styrenics305 Crenshaw Boulevard, Torrance California 90503* **Condition 3-1(a) Cleanup Levels and Actions.** Condition 3-1(a) states the USEPA is willing to address alternative cleanup levels based on a risk assessment/evaluation based on exposure to human health and the environment.

Therefore, based on Americas Styrenics Technical Memorandum and internal discussion by the USEPA the original approval is modified as described below. As a result this letter is Amendment 2 to the original approval.

<u>Amendment 2 to USEPA original approval – Self-Implementation Cleanup Plan – Train 4</u>

1. **Condition 3-2(a) amending Condition 3-1(a) in Amendment 1 of the original approval. Clean up levels and Actions.** Americas Styrenics shall execute condition 3(a) in the original approval; however, the final cleanup levels shall be (1) **10 µg/100 cm^2** average surface concentration in confirmation wipe samples **not to exceed** (2) **140 µg/100 cm^2** on any **one** confirmatory wipe sample.

Amendment 2 to the original approval does not relieve the owner, Americas Styrenics from complying with all other applicable federal, state, and local regulations and permits. Departure from the amendment and the original approval without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in this approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval.

The original approval, and amendment 1 - 2 only applies to the cleanup of Americas Styrenics Train 4 and the characterization and possible submittal of a cleanup plan for (1) the area surrounding Train 4 and 5 and (2) Train 5 located on the facilities grounds at 305 Crenshaw Boulevard Torrance, California. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the site if new information during additional site characterization, cleanup verification, and/or during future post-cleanup activities (e.g., redevelopment and post redevelopment) at the property shows that PCBs remain at the site above the approved PCB cleanup level. In addition, USEPA may require cleanup in areas immediately adjacent to the site if those areas are found to be impacted by PCBs.

USEPA appreciates the opportunity to assist Americas Styrenics on the PCB cleanup being approved here under 40 CFR 761.61(c). If you have any questions regarding this approval please contact George Randell at 415.972.3439. Thank you for your cooperation.

Sincerely,

Steve Armann, Manager Corrective Action Office
Land Division

Cc Via Electronic Mail Only

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