Site-Specific Justification for the Del Amo National Priorities List (NPL) Partial Deletion, August 2024

I. Purpose

The United States Environmental Protection Agency (EPA) is proposing partial deletion from the National Priorities List (NPL) for 46 acres of the Del Amo Superfund Site where investigations and remedial actions are complete. The synthetic rubber manufacturing plant located on the Del Amo Superfund Site (Site) property was decommissioned starting in 1972, and the property was redeveloped as a commercial business park by 2004 (URS, 2007). The partial deletion request includes 10 parcels and one road section, all located in Operable Unit 1 (OU-1), for a total of approximately 46.05 acres, resulting in a 16.4% reduction in total site area. The soil and vadose zone subsurface matrices for these specified areas will be deleted from the NPL in this partial deletion action. All appropriate response actions have been successfully completed for these areas of the Site. Partial deletion does not preclude EPA from taking future action, if warranted. The remaining 233.95 acres of OU-1 not being deleted, 83.6%, of the Site, will remain on the NPL, require implementation and operation of the remedy as described in the ROD, and require Operations and Maintenance (including verification of Institutional Controls). For detailed descriptions of each property included in the deletion, please see the *Remedial Action Report, Del Amo Superfund Site, Soil and NAPL Operable Unit (OU-1), Los Angeles, California, August 2023* (NewFields, 2023b).

The area proposed for deletion is shown in Figure 1. Parcels proposed for deletion from the NPL are listed in Table 1.



| Figure | 1 – De | eletion | Area |
|--------|--------|---------|------|
|--------|--------|---------|------|

| Property Address | Assessor Parcel Number | Land Size (Acres) | |
|-------------------------------|---------------------------|-------------------------|--|
| 1111 Knox St. | 7351-031-008 | 2.97 | |
| 19401 S Vermont Ave. | 7351-031-012 | 5.07 | |
| 1001 Knox St. | 7351-031-017 | 2.96 | |
| 991 Knox St. | 7351-031-018 | 2.30 | |
| 19191 S Vermont Ave. | 7351-031-021 | 6.50 | |
| 990 W 190 th St. | 7351-031-027 | 3.49 | |
| 980 W 190 th St. | 7351-031-028 | 4.58 | |
| 970 W 190 th St. | 7351-031-029 | 3.79 | |
| 19310 Pacific Gateway Dr. | 7351-031-030 | 6.89 | |
| 1000 W 190 th St. | 7351-031-031 | 5.70 | |
| Knox Street | N/A | 1.79 | |
| Total | • | 46.05 | |
| Percent Reduction (280 Acres) | 16.4% | | |

Table 1 – Deletion Property Summary

The State of California Department of Toxic Substances Control has concurred with EPA's proposed partial deletion in a letter dated October 25, 2023.

II. Partial Deletion Criteria Determination

All required response actions for the parcels included in the partial deletion for the Site have been completed as detailed in the report titled, *Remedial Action Report*, *Del Amo Superfund Site*, *Soil and*

NAPL Operable Unit (OU-1), Los Angeles, California, August 2023 (EPA, 2023b), which may be found in the public docket for this proposed rule. This partial deletion is proposed in accordance with 40 C.F.R. § 300.425(e) and is consistent with the Notice of Policy Change: Partial Deletion of Sites Listed on the National Priorities List. 60 FR 55466 (November 1, 1995).

All Remedial Action Objectives, performance standards, and cleanup levels established in the Record of Decision (ROD) (USEPA, 2013), have been achieved for the proposed deletion. All selected remedial and removal action objectives and associated cleanup goals for the areas proposed for deletion are consistent with agency policy and guidance, and no further Superfund response in the areas proposed for deletion is needed to protect human health and the environment.

III. Community Involvement

Community Involvement requirements under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) have been met for the proposed partial deletion, including public participation procedures required in CERCLA Section 113(k), 42 U.S.C. § 9613(k), and CERCLA Section 117, 42 U.S.C. § 9617. A public notice to satisfy requirements in 40 C.F.R. § 300.425(e)(4) is forthcoming.

EPA community involvement activities for the partial deletion include:

- A fact sheet and virtual meeting explaining the partial deletion and inviting the community to provide comments during the upcoming public comment period.
- A public notice, in local newspapers, of the upcoming public comment period and how to provide comments.
- A responsiveness summary, if warranted, to respond to public comments received concerning the partial deletion action.
- A public notice, in local newspapers, of the completed partial deletion.

Members of the public may review the documents contained in the Administrative Record online or in person, at the locations below.

1) EPA's online Administrative Record https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0901293

2) The Del Amo Public Repositories –

Carson Public Library
Torrance Civic Center Library
151 East Carson Street
Carson, CA 90745
Phone: (310) 830-0901
Torrance, CA 90503
Phone: (310) 618-5959

The key document supporting this proposed partial deletion is the Remedial Action Report (NewFields, 2023b). The Remedial Action Report includes an extensive references section with hyperlinks to documents supporting the remedial action completion for each property proposed for deletion.

IV. Site Background and History

The Del Amo Facility Superfund Site (EPA #CAD029544731) is located in the Harbor Gateway area of Los Angeles, at the southwest corner of the intersection of the 405 and 110 freeways, adjacent to the cities of Torrance to the west and Carson to the east. The Del Amo Superfund Site is the former location of a 280-acre synthetic rubber manufacturing plant constructed in 1942 to produce rubber for World War II (EPA, 2013).

The former plant operated from 1942 through 1972, after which the plant was sold, decommissioned, and redeveloped into the current business park. The former plant used benzene, ethylbenzene, propane, butylene, butane, styrene, 1,3-butadiene, and lesser amounts of other chemicals to create synthetic

rubber. During its operations, chemicals were released into soil and groundwater beneath the plant. Some of the plant's releases were leaks from pipelines, storage tanks, and processing units. Plant operators also disposed of waste in unlined pits and ponds at the Site. These chemical releases contaminated soil and groundwater beneath the former rubber plant facilities. The Site is currently redeveloped and is primarily used for warehousing, manufacturing, and office space (EPA, 2013).

The synthetic rubber plant consisted of three interrelated plancors (a contraction of defense plant corporations): the butadiene and styrene plancors, where the primary chemical components were produced, and the copolymer plancor, where the butadiene and styrene were polymerized to produce synthetic rubber. *See* Figure 2-1. The styrene plancor was located in the southwestern portion of the plant. Its primary chemical feedstocks were benzene and propane. The propane was cracked to produce ethylene, which was then reacted with the benzene to produce ethylbenzene. The ethylbenzene was then converted to styrene through a dehydrogenation process (EPA, 2013).

The butadiene plancor was located in the southeastern portion of the plant. Butadiene production feedstocks included a gas mixture of butane, butylene, and butadiene received via pipeline and tanker truck. Butadiene was separated from the feedstock through distillation and purification steps, and additional butadiene production was achieved through catalytic dehydrogenation of butylene gases. The butadiene product was stored in large aboveground spherical tanks on the plancor (EPA, 2013).

The copolymer plancor was located in the northwestern portion of the plant. Rubber was produced at the plancor in three parallel production lines. First, styrene and butadiene were combined (polymerized) in reactor vessels. Next, carbon black was used to stain the rubber and increase its durability. The final product was stored in packaged bales on pallets pending off-site shipment (EPA, 2013).

Raw materials for the rubber plant arrived via surface transport (truck and rail) and pipelines and were stored along with produced chemicals in aboveground tanks within each of the three plancors. Wastewater was treated by primary treatment systems within each plancor and by a common secondary neutralization and treatment system in the butadiene plancor prior to discharge to the sanitary sewer or the Dominguez Channel. Waste disposal pits in the southern portion of the styrene plancor (Waste Pits Area) were also used during a portion of the rubber plant's operational period. The Waste Pits Area included four evaporation ponds for aqueous waste streams and six waste pits for viscous process wastes from the styrene plancor.

Environmental investigation of the Site began in the 1980s, revealing past releases from pipelines, storage tanks, processing units, and waste pits that impacted underlying soil and groundwater (NewFields, 2023b). Regulatory agency involvement at the former plant site began in 1982, when Western Waste initiated excavation of waste pit 1A under the direction of the State of California, Department of Health Services (DHS; predecessor to the Department of Toxic Substances Control). On May 7, 1992, EPA and State of California Department of Health Services entered into an Administrative Order on Consent (AOC; EPA Docket No. 92-13) with Shell and Dow Chemical Company (hereinafter "Respondents"), to perform a remedial investigation/feasibility study (RI/FS) for the entire 280-acre former plant site and an accelerated RI/FS for the Waste Pits Area. The Site was added to the NPL in 2002 (EPA, 2013). EPA divided the site into three OUs: OU-1 – Soil and Non-Aqueous Phase Liquid (NAPL), OU-2 – Waste Pits Area, and OU-3 – Dual Site Groundwater (EPA, 2013).

The Site currently comprises 84 parcels and surface street segments. Nearly all parcels have been developed with occupied business buildings and associated parking lots. The Waste Pits Operable Unit (OU-2) occupies two parcels along the southern boundary of the Site that are not addressed in the Soil and NAPL ROD. The two parcels immediately north and west of OU-2 were similarly excluded from the Record of Decision (ROD – EPA, 2013). The remaining Site area is almost entirely covered by buildings, paved parking areas, streets, and landscaping (NewFields, 2023b).

Selected Remedy for OU-1

The portions of the Site that are proposed for deletion are under OU-1. The primary contaminants of concern at OU-1 are benzene, tetrachloroethene (PCE), trichloroethene (TCE), various polycyclic aromatic hydrocarbons, arsenic, cadmium, and manganese. These contaminants are contained in soil and NAPL. Exposure pathways for commercial workers, trench workers, and hypothetical future residents were evaluated for the human health risk assessment. This included incidental ingestion of soil, dermal contact with soil, and vapor inhalation.

EPA issued the ROD for OU-1 on September 30, 2011, and revised it per memo to file on July 26, 2013, to correct errors in the 2011 version (USEPA, 2013). The memo to file provided corrections to address inadvertent errors made in compiling the ROD, including corrections to the specified locations where each type of remedial activity will occur, corrections to action levels and clean-up goals, corrections to references, corrections to the table of contents, and statement clarifications. The State of California concurred with the Selected Remedy (DTSC, 2011). The OU-1 ROD remedial action objectives for OU-1 are listed below. These RAOs have been met for the properties proposed for deletion but have not necessarily been met yet at this time for the remainder of OU-1, for which remedial action is ongoing.

- Prevent human exposure through direct contact, ingestion, or inhalation of outdoor shallow soil contaminated above levels for commercial land use or construction activities.
- Prevent inhalation of volatile organic compounds in indoor air above levels for commercial land use.
- Prevent utilization of impacted groundwater and groundwater in adjacent areas.
- Protect groundwater outside the impacted areas by removing NAPL to limit migration to, or contact with, groundwater.

The selected remedy for OU-1 included the following components:

- 1) Institutional Controls (ICs)
 - a. IC Layer 1: Informational Outreach Informational outreach has been applied to all on-Site properties. The outreach includes mailings, websites, publicly accessible databases, and any other venue as determined by EPA. Environmental information about the properties has been made available, including data from the remedial investigation (RI URS, 2007) and information from the Baseline Risk Assessment (BRA Geosyntec, 2006) and ROD, as well as any other information as determined by USEPA. The targeted audience includes owners, tenants, prospective owners and tenants, developers and other professionals supporting the above. The outreach is intended to be used to support the other IC layers.
 - b. IC Layer 2: Building Permit Review Building permit review has been applied to all on-Site properties, with the objective of reviewing planned construction activities that could cause exposure to contaminants. The building permit review IC does not restrict use or directly result in clean-up actions at the Site. Rather, it identifies areas that may need further clean-up. The clean-up, if warranted, would be conducted pursuant to the "Future Areas encountered during redevelopment or construction" component of the remedy. As building permit applications are reviewed by the City of Los Angeles Building and Safety Department, applicants are referred to the Del Amo Environmental Review Team (delamosuperfund.com) to review construction plans and determine whether contaminated

¹ The risk assessment determined that the construction activity that would result in the highest exposure to Siterelated contamination would be laborers working in a trench, thus the construction worker exposure scenario was called the "trench worker" scenario.

soil or groundwater would be encountered. EPA would then require additional sampling and remedial activities, if needed.

- c. IC Layer 3: General Plan Footnote EPA and the Potentially Responsible Parties (PRPs) implemented a General Plan footnote to the Site for properties exceeding the action level for residential use. The action level for residential use was based on the BRA results, and the General Plan footnote applies to any area with an excess cancer risk greater than one in one million or a non-cancer hazard index greater than 1.0. The footnote about the Site will remind future planners about the contamination. Adding a footnote to the General Plan constitutes an amendment to the General Plan and required approval of the Planning Commission and the City Council. The 26 Properties where the General Plan footnote IC was applied included Properties 2, 4-17, 19, 20, 22-24, 28, 30, 32, 33, 35, and 36.
- a. IC Layer 4: Restrictive Covenants The restrictive covenants required for site properties are legal agreements entered into by the property owner and DTSC pursuant to California law (California Civil Code section 1471 and 22 C.C.R. 67391.1). Restrictive covenants were identified for properties exceeding action levels for residential use. The action level for residential use was based on the BRA results and is any area with an excess cancer risk greater than one in one million or a non-cancer hazard index greater than 1.0. These areas, the same 26 Properties as for the General Plan footnote IC, include Properties 2, 4-17, 19, 20, 22-24, 28, 30, 32, 33, 35, and 36.

The restrictions contained in the covenants vary depending on the property, but include the following components:

- Residential use will be prohibited.
- Any construction or redevelopment plans involving excavation must obtain EPA review and approval prior to initiation of such work.
- Interference with remedial activities, systems, or components will be prohibited, including both investigation and cleanup activities.
- Drilling into and use of groundwater will be prohibited without prior approval by EPA.
- 2) Capping for impacted shallow outdoor soil at Properties 2, 16, 28, and 35
- 3) Building Engineering Controls (BECs) for volatile organic compound (VOC)-impacted shallow soil under the building at Property 16
- 4) Soil Vapor Extraction (SVE) for VOC-impacted, shallow outdoor soil at Properties 6, 11 and 23
- 5) SVE for VOC-impacted shallow soil under the building at Property 23
- 6) SVE for deep soil in NAPL-impacted Source Area 6 (SA6)
- 7) In-Situ Chemical Oxidation (ISCO) and SVE for deep soil and groundwater in NAPL-impacted groundwater contamination at Source Areas SA3, SA11, and SA12
- 8) For future areas of contamination encountered during redevelopment or construction; excavation, or BECs, or capping, or SVE; and restrictive covenants

The Site properties applicable to each of the above components are presented on Figure 2 (ROD Figure 12-1).

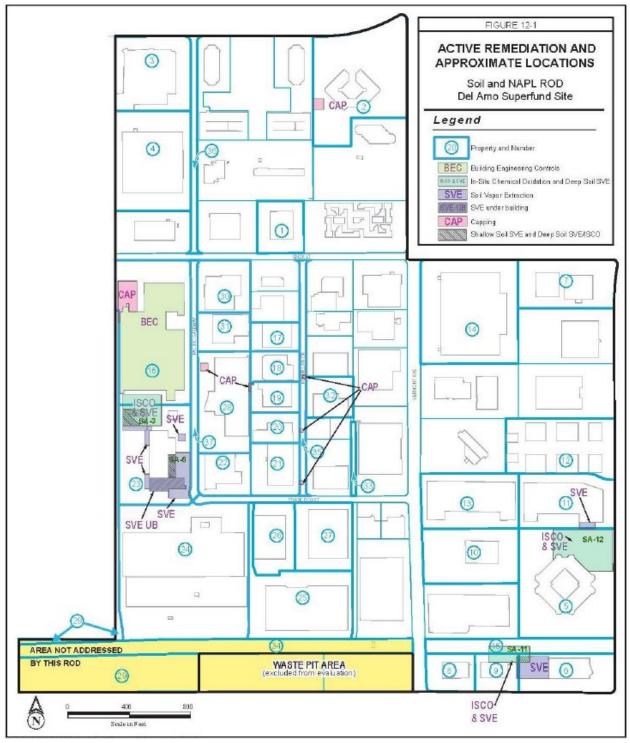


Figure 2 – Remedy Components

Remedy components applicable to each property proposed for deletion are shown in Table 2 (Remedial Action Report, Table 8).

| | APN | Property Number | Institutional Control Layers | | | |
|------------------------------|--------------|--------------------|------------------------------|---|---|---|
| Property Address | | | 1 | 2 | 3 | 4 |
| 1111 Knox St. | 7351-031-008 | none | X | X | | |
| 19401 S Vermont Ave. | 7351-031-012 | none | X | X | | |
| 1001 Knox St. | 7351-031-017 | none | X | X | | |
| 991 Knox St. | 7351-031-018 | 1 | X | X | | |
| 19191 S Vermont Ave. | 7351-031-021 | none | X | X | | |
| 990 W 190 th St. | 7351-031-027 | none | X | X | | |
| 980 W 190 th St. | 7351-031-028 | none | X | X | | |
| 970 W 190 th St. | 7351-031-029 | none | X | X | | |
| 19310 Pacific Gateway Dr. | 7351-031-030 | none | X | X | | |
| 1000 W 190 th St. | 7351-031-031 | 3 | X | X | | |
| Knox Street | N/A | none | X | X | | |

Table 2 – Remedy Components

Notes:

Institutional Controls

- 1. Information
- 2. Permit Review
- 3. General Plan Footnote
- 4. Restrictive Covenants

Remedial action was completed for the properties proposed for deletion, in accordance with the Consent Decree for OU-1 (US DOJ, 2016), as follows:

- 1) Institutional Controls (ICs)
 - a. IC Layer 1: Informational Outreach All properties. Implemented 2016 (NewFields, 2023b, AECOM, 2018, 2019, 2020, 2021, 2022)
 - b. IC Layer 2: Building Permit Review All properties. Implemented 2016 (NewFields, 2023b, AECOM, 2018, 2019, 2020, 2021, 2022)

V. Monitoring Results and Attainment of Clean-up Criteria

<u>1111 Knox St. (7351-031-008)</u> - The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

Two soil borings (SBL0040 and SBL0041) and a temporary well (CWL0048) are located on this parcel with data provided in Appendix D of the RI Report (URS, 2007). No soil concentrations exceeded screening criteria during the RI. Groundwater concentrations at CWL0048 exceeded screening criteria in 1993 for benzene at 1.2 micrograms per liter (μ g/L) and trichloroethene at 8.9 μ g/L, which only slightly exceeded screening criteria at that time. Subsequent groundwater sampling in the vicinity has demonstrated that there are currently no groundwater exceedances on the parcel, as shown in the 2022 Monitoring and Aquifer Compliance Report (MACR) (NewFields, 2023a). Investigation (URS, 2007) and monitoring (NewFields, 2023a) activities have demonstrated that there is no significant threat to public health or the environment originating from this property (Geosyntec, 2006).

<u>19401 S Vermont Ave. (7351-031-012)</u> - The Respondents have implemented all appropriate response

actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

<u>1001 Knox St. (7351-031-017)</u> - The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (USEPA, 2013).

In 2018, Unire Real Estate Group, Inc. performed excavation that required approximately 400 tons of off-Site soil disposal. Manifests and weight tickets for the soil, which was disposed to the Simi Valley Landfill, are included in the Removal Action Report (NewFields, 2023a). Remedial investigation (URS, 2007), and the supporting analysis included in the BRA concluded that there is no significant threat to public health or the environment originating from this property, which was not identified as an EAPC (Geosyntec, 2006). Furthermore, no evidence of soil impacted at concentrations greater than ROD cleanup standards was observed during the 2018 excavation activities.

<u>991 Knox St. (7351-031-018)</u> – Property 1 The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

<u>19191 S Vermont Ave. (7351-031-021)</u> - The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

<u>990 W 190th St. (7351-031-027)</u> - The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

<u>980 W 190th St. (7351-031-028)</u> - The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

<u>970 W 190th St. (7351-031-029)</u> - The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

<u>19310 Pacific Gateway Dr. (7351-031-030)</u> - The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

In 2013, Prudential Real Estate demolished the two existing buildings on the property and constructed a 142,000 square foot warehouse. Eight areas of impacted soil were discovered and excavated. Confirmation sample results were either below screening criteria or below detection limits. Approximately 1,243 tons of non-hazardous waste and 55 tons of hazardous waste were removed. EPA issued a Close-out Letter (EPA, 2013) indicating that impacted materials are no longer known to be present in shallow soil at the property at concentrations that would pose a human health risk.

<u>1000 W 190th St. (7351-031-031)</u> – **Property 3** The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

Knox Street - The Respondents have implemented all appropriate response actions, including implementation of IC Layers 1 and 2. The Respondents have implemented appropriate performance guarantees for activities identified in the ROD (EPA, 2013).

VI. Demonstration of Cleanup Activity OA/OC

No active remedies were selected for implementation for the properties proposed for deletion. Therefore, no construction quality assurance/quality control (QA/QC) plans were required. However, as described in Section V, an excavation was performed in 2013 by the property owner at 19310 Pacific Gateway Drive, for the purpose of redevelopment. Soil testing was performed by the property owner, and confirmation samples were collected by URS Corporation on behalf of the Del Amo Potentially Responsible Party contractor (URS, 2013). URS confirmation samples were collected in accordance with the RI Field Sampling Plan (Dames &Moore, 1993). The technical memorandum and sampling results are provided in the Remedial Action Report (NewFields, 2023b).

VII. Summary of Operation and Maintenance Required

Following deletion, IC Layer 1 (Informational Outreach) and IC Layer 2 (Building Permit Review) will remain on those properties to which they currently apply.

Remedies selected in the ROD will continue to be implemented for areas of the Del Amo Superfund Site not proposed for deletion, as summarized below.

- 1) Institutional Controls at all properties
- 2) Capping for impacted shallow outdoor soil at Properties 16, 28, and 35
- 3) BECs for VOC-impacted shallow soil under the building at Property 16
- 4) SVE for VOC-impacted, shallow outdoor soil at Properties 6, 11 and 23
- 5) SVE for VOC-impacted shallow soil under the building at Property 23
- 6) SVE for deep soil in NAPL-impacted Source Area 6 (SA6)
- 7) ISCO and SVE for deep soil and groundwater in NAPL-impacted groundwater contamination at Source Areas SA3, SA11, and SA12
- 8) For future areas of contamination encountered during redevelopment or construction; excavation, or BECs, or capping, or SVE; and restrictive covenants.

VIII. Five-Year Review

EPA completed statutory Five-Year Reviews for OU-1 in 2015 and 2020. Five-Year Reviews are conducted for OU-1 and OU-2 together. The triggering action for this statutory review was the start of the Remedial Action at the OU-2 Waste Pits on May 27, 1999. Initial Five-Year Reviews were conducted in 2005 and 2010 for OU-2 alone. Following the remedy selection in for OU-1 in 2011, the Five-Year Reviews were expanded to include OU-1. Completed Five-Year Reviews are listed below.

- First Five-Year Review Report for Del Amo Superfund Site, Waste Pits Operable Unit, Los Angeles, California (2005).
- Second Five-Year Review Report for Del Amo Superfund Site, Waste Pits Operable Unit, Los Angeles, California (2010).
- Third Five-Year Review Report for Del Amo Superfund Site, Operable Unit #1 and #2, Los Angeles County, California (2015).
- Fourth Five-Year Review Report for Del Amo Superfund Site, Operable Unit #1 and #2, Los Angeles County, California (2020).

The Fourth Five Year Review (EPA, 2020) indicated the following:

- The implemented remedy components at the Soil and NAPL area are functioning as intended by decision documents.

- The exposure assumptions, toxicity data, cleanup levels and remedial action objectives used at the time of the remedy selection are still valid.
- The OU-1 remedy area is expected be protective of human health and the environment. In the interim, remedial activities completed to date have adequately addressed all exposure pathways that could result in unacceptable risks in these areas.

The next Five-Year Review is scheduled to be completed by September 2025. Future Five-Year Reviews will continue to apply to the properties proposed for deletion until recommended for discontinuation as a result of the Five-Year Review.

IX. Approval

Approved by:

Edwin "Chip" Poalinelli, Assistant Director Superfund & Emergency Management Division U.S. EPA, Region 9

X. Bibliography

AECOM, 2018. Annual Monitoring Report, Institutional Controls Implementation and Assurance, July 2017 – June 2018, July.

AECOM, 2019. Annual Monitoring Report, Institutional Controls Implementation and Assurance, July 2018 – June 2019, July.

AECOM, 2020. Annual Monitoring Report, Institutional Controls Implementation and Assurance, July 2019 – June 2020, July.

AECOM, 2021. Annual Monitoring Report, Institutional Controls Implementation and Assurance, July 2020 – June 2021, July.

AECOM, 2022. Annual Monitoring Report, Institutional Controls Implementation and Assurance, July 2021 – June 2022, July.

Dames & Moore, 1993. Remedial Investigation/Feasibility Study Work Plan, Del Amo Site, Volume II. February 25.

Department of Toxic Substances Control (DTSC), California Environmental Protection Agency. 2011. Letter from John Scandura, DTSC, to Michael Montgomery, EPA. September 30, 2011.

Geosyntec, 2006. Baseline Risk Assessment Report, Del Amo Superfund Site, Los Angeles, California. September 7.

NewFields, 2020. Remedial Design Work Plan for the Soil and NAPL Operable Unit, Del Amo Superfund Site, Los Angeles, California. February 5.

NewFields, 2023a. 2022 Monitoring and Aquifer Compliance Report, Montrose Chemical and Del Amo Superfund Sites, Dual Site Operable Unit, Los Angeles, California. February 28.

NewFields, 2023b. Remedial Action Report, Del Amo Superfund Site, Soil and NAPL Operable Unit (OU-1), Los Angeles, California. August 24.

United States Environmental Protection Agency (EPA), 2005. First Five-Year Review Report for Del Amo Superfund Site, Waste Pits Operable Unit, Los Angeles, California. September.

EPA, 2010. Second Five-Year Review Report for Del Amo Superfund Site, Waste Pits Operable Unit, Los Angeles, California. September.

EPA, 2013. Record of Decision, Del Amo Facility Superfund Site, Soil and NAPL Operable Unit, Los Angeles, California. September 30, 2011, Revised Per Memo to File, July 26, 2013.

EPA, 2015. Third Five-Year Review Report for Del Amo Superfund Site, Operable Unit #1 and #2, Los Angeles County, California. September.

EPA, 2020. Fourth Five-Year Review Report for Del Amo Superfund Site, Los Angeles County, California. September.

URS, 2007. Remedial Investigation Report, Soil and NAPL Operable Unit, Del Amo Superfund Site, Los Angeles, California. June 28.

URS, 2010. Soil and NAPL Feasibility Study, Del Amo Superfund Site, Los Angeles, California. January 15.

URS, 2013. Technical Memorandum, Excavation of Hydrocarbon-Impacted Soil, 19310 Pacific Gateway, Del Amo Superfund Site. June 26.