

**APPENDIX C6  
EXAMPLE FOR STATEMENT OF BASIS**

Department of Toxic Substances Control

**Statement of Basis**

**Proposed Remedy**

**Wilson Street Corporation  
1321 Wilson Street  
Los Angeles, California  
Los Angeles County**

Prepared by

Tiered Permitting Corrective Action Branch  
Hazardous Waste Management Program  
Department of Toxic Substances Control

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April 26, 2007

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## **List of Acronyms**

AOC-	Area of Concern
AST -	Aboveground Storage Tanks
bgs -	Below ground surface
CalEPA -	California Environmental Protection Agency
CHHSL -	California Human Health Screening Level
COC -	Contaminant of Concern
FCMAWP -	Final Corrective Measures Action Work Plan
DTSC -	Department of Toxic Substances Control
mg -	Milligram
PEA -	Preliminary Endangerment Assessment
RCRA -	Resource Conservation and Recovery Act
ug -	Microgram
US -	United States
USEPA -	United States Environmental Protection Agency
WSC -	Wilson Street Corporation
WY -	West Yard

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**1. Introduction**

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has prepared this Statement of Basis to discuss the remedy for the Wilson Street Corporation (WSC). The facility is on a 22,000 square foot property, which is located at 1321 Wilson Street, Los Angeles, California (See Figure 1). The facility is currently not operating, but had been operating from 1961 to 2003 to refine and recover precious metal. The subject facility was operated as a chemical warehouse by National Chemical Company from 1949 to 1961 and was a vacant property from 1938 through 1949. WSC plans to construct a concrete cap on the West Yard (WY) to allow for automobile and light truck parking. (See Figure 2).

The proposed remedy is to remove the top 12 inches of contaminated soil from the WY as well as up to 3 feet of soil in targeted excavation areas to within California Human Health Screening Levels (CHHSL's). This would further minimize potential health risk. The proposed remedy will allow for restricted use of the WY. The proposed remedy does not include the Northeast Yard which was remediated in 1995 or the laboratory and process building which were decontaminated in August, 2005.

DTSC is issuing this Statement of Basis as part of its public participation responsibilities under the California Health and Safety Code, Chapter 6.5, Hazardous Waste Control. This Statement of Basis summarizes information that can be found in greater detail in the Final Corrective Measures Action Work Plan (FCMAWP) Report, dated December 18, 2006. DTSC encourages the public to review the document in order to gain a more comprehensive understanding of the facility and corrective action activities that have been conducted there.

In addition to this Statement of Basis, DTSC has prepared a Fact Sheet that summarizes the proposed remedy and provides a notice of the public comment period. DTSC has proposed a remedy for the WY as the best possible way to reduce metal exposure to industrial use, Cal-EPA health risk screening levels. The public is encouraged to review and comment on the proposed remedy. The public can review the remedy selection process by reviewing the documents during the 30-day public comment period which begins April 26, 2007 and ends on May 28, 2007. DTSC would implement the final remedy only after the public comment period has ended and any information submitted during this time has been reviewed and considered. The WSC consultant would be required to implement the remedy under DTSC oversight. The WSC consultant will submit a report when remedy implementation is completed.

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**2. Proposed Remedy**

The WSC consultant is proposing the following remedy for contaminated soil at the WSC WY:

- Excavation of contaminated soil, temporary stockpiling for waste characterization testing, and disposal at an approved off-site facility.
  - Confirmation sampling to ensure that any contaminated soil remaining is at or below Industrial CHHSL's. If, after excavating approximately 836 tons of contaminated soil and solid debris waste, chemicals remain at concentrations greater than cleanup goals, then supplemental remedial actions will be implemented after approval by DTSC. In addition to excavation, other remedial actions will be considered.
  - Capping residual contamination, on WSC property, with deed restrictions.
- A more detailed discussion of the proposed remedy is included in **Section 6.2** of this Statement of Basis.

**3. Facility Background**

**3.1 Facility Location and Description**

WSC owns a 22,000 square foot facility located at 1321 Wilson Street in Los Angeles, Los Angeles County, California. The facility is located in an industrial area of older building design and construction. The facility is located on the western side of Wilson Street, immediately north of the intersection of East 10<sup>th</sup> Street, and adjacent to the Santa Monica Freeway (Interstate 10).

The principle process operations were associated with precious metal recovery activities from 1961 to 2003 by the former Martin Metals, Incorporated. During the period from 1949 through 1961, National Chemical Company operated the facility as a warehouse for various types of chemicals. The type of chemicals stored at the site during this period is unknown.

The facility was a Tiered Permitting Onsite Hazardous Waste Treatment facility and had authorization to operate under the Conditional Authorization Tier on August 12, 1993. WSC is in the process of converting the former precious metal recycling facility to a storage facility and a parking area for workers in the vicinity of 1321 Wilson Street. All of the WY will be remediated and capped for restricted land use. The work will be conducted under DTSC Oversight.

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**3.2. Environmental Conditions and Land Use**

**3.2.1. Environmental Conditions**

The site is located in the Central Basin Area of the Coastal Plain of Los Angeles County. The Coastal Plain of Los Angeles County is located in the northwest portion of the Peninsular Range geomorphic province. This province extends southward into Baja California and consists of a north-northwesterly trending mountain range and associated valleys. The Coastal Plain of Los Angeles County is bounded by the Santa Monica Mountains on the north, the Elysian, Repetto, Merced, and Puente Hills to the northeast, the Los Angeles-Orange County line on the southeast, and the Pacific Ocean on the south and west.

The Central Basin extends over most of the Coastal Plain of Los Angeles County east and northeast of the Newport-Inglewood uplift zone. It is bound on the north by the Hollywood Basin and a series of low rolling hills extending from the Elysian Hills on the northwest to the Puente Hills on the southeast. The Central Basin is bounded on the west and south by Newport-Inglewood uplift and on the southeast by the Los Angeles County Line. The Central Basin is divided internally into three physiographic regions: the Central Basin Pressure Area, and the Los Angeles and Montebello Forebay Areas.

Regional formations beneath the Site include the Lakewood Formation from surface grade to approximately 150 feet below ground surface (bgs) and the San Pedro Formation to approximately 625 feet bgs. Materials composing the Lakewood and San Pedro Formations consist primarily of sand and gravel with small amounts of clay and interbedded layers of silt and clay. The site is located on the south-dipping limb of the Paramount Syncline and members of the underlying formations subsequently dip slightly to the west-southwest.

In order of decreasing depth, the Site is underlain by water bearing deposits composed of the Lakewood and San Pedro Formations. The Lakewood formation of the late Pleistocene age, includes the Gaspur, Exposition, Gage, and Gardena Aquifers. The base of the of the Lakewood Formation (240 feet bgs) is marked by the Gardena Aquifer at a depth of approximately 150 feet bgs. The underlying San Pedro Formation contains water bearing sediment groups of the Hollydale, Jefferson, Silverado, and Sunnyside Aquifers. Depth to groundwater below the site is approximately 60 feet.

**4. Facility Investigations**

The WY was cleared of all materials, metal scrap, process equipment and containers by the property owner. The WY at this time is a vacant property with an asphalt cover and several concrete bermed areas. In June 2001, ENCON conducted a Limited Environmental Subsurface Site Assessment of the WY that revealed elevated levels of lead, cadmium, and mercury metals. In order to update this environmental data, an investigation was performed in June, 2006 by ENCON to establish the current

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baseline conditions of the WY. The lateral and vertical extent of the contamination was defined in the site assessment investigation and the results are presented in ENCON's "Subject Property West Yard Baseline Site Assessment Investigation", dated June 20, 2006.

With regards to the present DTSC site assessment requirements leading to the remediation of the WY, the subsurface findings and soil data provided a preliminary base line of soil information on the conditions of the WY. To define the present soil conditions, however, an additional investigation, the Baseline Subsurface Soil Investigation was required by the CalEPA DTSC in order to update this data with recent data that is indicative of present environmental conditions. The objective of the investigation was to determine the vertical and lateral extent of metal impacts over the entire WY. The WY was segmented into various grids based on the type of process formerly conducted in those locations and soil samples were collected at various depths. The purpose of the investigation was to initially evaluate subsurface soil conditions to a depth of 1.5 feet bgs over the entire WY as well as identified areas of elevated contaminant concentrations (also referred to as hot spots). The soil analytical data was compared to Cal-EPA CHHSL's preliminary screening health risk concentrations to locate "hot spots" and to define additional sampling required to determine the vertical extent of the contamination in the "hot spot" areas.

The 8,100 square foot west rear yard was segmented into three "hot spot" areas for further subsurface shallow soil testing, AOC-1, AOC-2, and AOC-B. These areas of concern (AOC) include the former Martin Metals wet process area located on the north side of the yard (AOC-2), former waste solution treatment area located adjacent to the rear building wall (AOC-1), and the balance of the WY (AOC-B). The sampling incorporated a 10 foot sampling grid in AOC-1 and AOC-2 and a 20 foot sampling grid in AOC-B.

A total of 48 borings were drilled in the WY that included 12 borings in AOC-1, 16 borings in AOC-2 and 20 borings in AOC-B. Additional borings were advanced in the AOC-2 area to test for ammonia, mercury and pH. Soil samples were initially collected at 1.5 feet, and 3.0 feet bgs. The soil samples were collected in acetate plastic tubes, capped on both ends, labeled and recorded on a chain-of-custody document. The samples were transported to a State-Certified hazardous chemical material laboratory, C&E Laboratories, Santa Fe Springs, California for analysis.

The soil samples were analyzed for Title 22 CAM Metals, mercury, PCB, pH, and cyanide with selected borings for ammonia and TRPH. All the 1.5 foot samples were analyzed for these constituents and the 3.0 foot samples were placed on hold to be analyzed for elevated constituents in borings that showed elevated levels found in the 1.5 foot samples. Further selected delineation of the vertical extent was performed at 5.0 feet and 10 feet bgs. A summary of soil test findings and conclusions are presented below for various depths.

The metals cadmium, lead, and mercury were detected above their respective Cal-EPA screening levels, CHHSL's. Laboratory analysis indicated that lead exceeded its CHHSL of 130 mg/kg in

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AOC-1 at four locations (concentrations ranging from 189 mg/kg to 512 mg/kg) and at three locations in Area-B (concentrations ranging from 1,027 mg/kg to 2,525 mg/kg). Mercury exceeded its CHHSL of 1.8 in AOC-1 at 6 locations (concentrations ranging from 2.98 mg/kg to 13.13 mg/kg), in AOC-2 at five locations (concentrations ranging from 1.82 mg/kg to 7.61 mg/kg), and in Area-B at one location (concentration of 2.04 mg/kg). Cadmium exceeded its CHHSL of 1.7 mg/kg in Area-B at three locations (concentrations ranging from 9.1 mg/kg to 33.4 mg/kg). Arsenic was not detected above the reporting limit in any of the soil samples collected.

The soil samples from 3 feet bgs in these hot spot areas were also analyzed, resulting in three areas (AOC-A, AOC-B, and AOC-C) where either cadmium (AOC-C), lead (AOC-A and B), or mercury (AOC-A and AOC-B) exceeded their respective CHHSL's.

In June, 2006, ENCON drilled an additional six boreholes in these areas in order to determine the vertical extent of contamination. Laboratory analysis of the soil samples collected at these locations from depths of 5', 10', and 15' bgs indicated that none of the CHHSL's for Title 22 metals or mercury are exceeded in soil at the site beyond the depth of 3 feet bgs. The metals contamination is insoluble and not mobile.

## **5. Summary of Facility Risk And Clean Up Standards**

Cleanup standards for this site are established to protect human health and the environment. The cleanup standards are based on site-specific media of concern, identified Contaminant of Concern (COC's), exposure routes and receptors, and identification of acceptable concentrations or range of concentrations for each exposure route. The media of concern for this site is limited to soil. The primary COC's for this site are metals (cadmium, lead, mercury).

Discussion of migration and exposure pathways of metals and pH follow. Release mechanisms, exposure pathways and exposure routes are also discussed in this section. The WY was used for scrap material storage and sludge recovery from the chemical digestion process performed inside the 2-story building employing solution settling and filtration equipment in addition to AST's (Aboveground Storage Tanks). The settling and filtration AST's were operated inside a bermed area on the north portion of the WY. The scrap metal was processed by acid digestion using acids in retort above ground vessels. The digested material is precipitated and filtered to collect various precious metals in sludge composition.

The digestion metal containing solutions are typically transferred and stored in drums and/or AST's used as settling tanks. Acids and bases were typically stored in drums or used in tanks. The primary release mechanism for metal containing solutions or acids and bases are, therefore, spills and/or leaks. The ground surface in the WY area is paved with asphalt or concrete although the surfaces are in poor condition showing many cracks and separations. Releases in this area are likely to flow either to the drainage surfaces situated in the center of the WY and then flow westward towards

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Elwood Avenue, or collect in various surface pockets or in the bermed containment areas resulting in an accumulation of chemical residual material be evaporated.

Strong acids and bases can also dissolve the concrete, and eventually penetrate into the soil. These poor surface conditions were observed in the WY as well as along the 2-story building where the concrete pads were in very poor condition due to acid etching exposing the subsurface natural soil. The process and used parts storage areas asphalt surfaces were also in poor condition, and therefore, a release in this area likely penetrated into the soil. Once in the soil, acids can mobilize metals typically found in soil, to migrate downward.

Exposure pathways include ingestion and absorption. In addition, inhalation exposure is possible since the settling tanks and solution drum storage were open containers which were handled manually. Cyanide compounds are typically complexed as salts which are transferred manually from the shed storage area to the process area.

Based on the WY remedial investigation, the proposed corrective action was developed to reduce metal exposure for industrial use CalEPA health risk screening levels by removing 12-inches of top soil from the WY area as well as up to 3-feet of soil in targeted excavations of selected areas (#1 through #5) to within CHHSL's concentrations and further minimize potential health risk. The remedial investigation soil data in conjunction with CalEPA DTSC acceptable CHHSL's were used to develop the Final Corrective Measures Action Work Plan (FCMAWP) as well as defined the targeted "hot spot" AOC areas. This section presents the scope and procedures to remediate the WY portion of the subject site to within CHHSL's acceptable concentrations.

## **6. Scope of Corrective Action**

### **6.1 Selected Remedy:**

The proposed remedy consists of removing contaminated soil in two (2) stages. The first stage of the remedial excavation will be with the marking of the perimeter of the five targeted excavation AOC areas in proper relationship to the marked "Baseline Site Assessment" exploratory boring locations. These exploratory boring locations are currently marked in place at this time and were drilled and properly marked during the Baseline Remedial Investigation with wood stakes. After targeted area perimeters are marked, the areas will be saw cut and the cap removed with a backhoe to expose the subsurface soil. The cap debris will be stockpiled adjacent to the excavation in order to minimize handling. The soil will then be initially excavated and removed to a depth of 3-feet below grade in targeted areas #01, #03, and #05 and 2-feet in targeted areas #02, and #04. Further remedial excavation may be required in various AOC's based on sidewall and basal soil confirmatory

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sample data and those targeted areas or portions thereof that exhibit elevated CHHSL's will be further excavated to achieve acceptable CHHSL soil concentrations or non-detect. The excavation will not be extended to chase elevated pH that does not exhibit elevated levels of metals or beneath the building structures on the east portion of the site or on to adjacent properties.

The excavation areas and backhoe soil handling buckets will be sprayed frequently with water to prevent worker air dust exposure or impacting off-site adjacent properties. The excavated soil will be stockpiled pending further profiling and disposal or transferred directly into dump trucks for off-site disposal. Soil from the excavation will be staged adjacent to the excavation area leaving sufficient space for truck access, loading and unloading, and decontamination. The contaminated soil will be removed using a backhoe with a 1.5 cubic yard bucket. The soil will be loaded into the end dumps with a 3 cubic yard bucket loader. Dust control measures will be used during loading. All of the asphalt and concrete debris plus all of the excavated soil will be hauled to a Treatment Disposal Center facility, La Paz County Landfill, Parker, Arizona.

After completing the remedial excavation of the five targeted areas described above, confirmatory basal and sidewall soil samples will be collected by ENCON under the direction of a Professional Geologist in the first natural and undisturbed top zone soil, estimated to be within 4-6 inches below bottom surfaces and approximately 6-inches into the sidewall. The basal soil samples will be collected from the bottom of the excavation using a representative uniform grid sampling plan. The sidewall soil samples will be collected at one sample per sidewall at approximately 2/3rds depth bgs. The soil samples will be removed using a hand auger and collected in stainless steel sampling tubes that are capped at both ends with Teflon sheet and plastic end caps.

The soil samples will be properly labeled, stored in an ice cooler and subsequently transferred to a State-Certified chemical laboratory for analysis. All of the soil samples will be analyzed for the following constituents:

- \*Title 22 Metals by EPA method 6010
- \*Mercury by EPA method 7471
- \*Hexavalent Chrome by EPA method 7199
- \*Cyanide by EPA method 9010c
- \*Ammonia by EPA method 350.2
- \*pH by EPA method 9045.

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(It is understood by DTSC and the property owner, confirmatory soil samples are to be used to calculate health risk levels and to delineate the vertical or lateral extent of impacts, present, above the CHHSL's in the subsurface soil requiring additional remedial excavation to achieve acceptable CHHSL's).

All of the hazardous waste soil cuttings from the auger sampler will be stockpiled and retained at the sampling point inside the excavation for subsequent removal, if determined to be above acceptable screening levels. The sampling material hazardous waste will be manifested as non-RCRA hazardous solid waste and transported and disposed at an off-site TSD facility.

The five excavations will be backfilled with clean imported CMB (Crushed Miscellaneous Base) aggregate to 12-inches bgs under supervision of a professional geologist. No excavated soil will be used for backfill and all stockpiled soil removed and disposed off-site will be manifested to ensure proper disposal facility destination. CMB backfill material will be placed on the base of the excavation and backfill material will be placed in 18" lifts and compacted to a minimum of 90%.

The second stage of the remedial excavation will begin after the five targeted excavation areas have been successfully remediated and backfilled to 12 inches bgs. The second stage portion of the asphalt and concrete cap of the balance of the WY will be removed with a backhoe to expose the subsurface soil. The cap debris will be stockpiled in the yard to minimize overhandling. The second stage soil will then be excavated and removed to a depth of 12 inches bgs. The excavation areas and backhoe soil handling buckets will be sprayed frequently with water too prevent worker air dust exposure or impacting off-site adjacent properties. The excavated soil will be stockpiled pending further profiling and disposal or transferred directly into dump trucks for off-site disposal. Soil from the excavation will be staged adjacent to the excavation area leaving sufficient area for work access, loading, unloading and decontamination. The contaminated soil will be removed using a backhoe equipped with a 1.5 cubic yard bucket.

The soil will be unloaded into the end dumps with a 3 cubic yard bucket loader. Dust control measures will be used during loading. All of the asphalt and concrete debris, plus all of the contaminated soil will be removed and manifested to a treatment disposal center, La Paz County Landfill, Parker, Arizona.

After completion of the remedial excavation of the balance of the WY as described above, confirmatory basal soil samples will be collected by ENCON under the direction of a Professional Geologist in the first natural undisturbed top zone soil, estimated to be within 4 to 6 inches below bottom and side wall surfaces. The soil samples will be collected from the excavated surfaces using a representative sampling plan. The soil samples will be removed using a hand auger and collected in stainless steel sampling tubes that are capped at both ends with Teflon sheet and plastic end caps.

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The soil samples will be properly labeled, stored in an ice cooler and subsequently transferred to a State-Certified chemical laboratory for analysis. All of the soil samples will be analyzed for the following constituents:

- \*Title 22 Metals by EPA method 6010
- \*Mercury by EPA method 7471
- \*Hexavalent Chrome by EPA method 7199
- \*Cyanide by EPA method 9010c
- \*Ammonia by EPA method 350.2
- \*pH by EPA method 9045.

(It is understood by DTSC and the property owner, confirmatory soil samples are to be used to calculate health risk levels and to delineate the vertical or lateral extent of impacts, present, above the CHHSL's in the subsurface soil requiring additional remedial excavation to achieve acceptable CHHSL's).

After completion of the second stage remedial excavation, the entire WY will be 12 inches bgs. The entire WY will be backfilled with clean imported CMB aggregate to 6 inches bgs under the supervision of a professional geologist. A total of 8 trucks per day for 7 days are needed to bring the CMB aggregate onsite. The final stage of the corrective action plan is to form and pour a 6 inch thick rebar reinforced concrete cap with storm water containment (4 inch curbs) to cover 100% of the WY. CMB backfill material will be placed in the base of the excavation and backfill material will be compacted to a minimum of 90%.

## **6.2 Remedial Actions:**

### **Capping with Deed-Restrictions**

Upon completing the remedial excavation, backfilling of the site excavated areas, and performing the basal and sidewall confirmatory soil sampling, a Preliminary Endangerment Assessment (PEA) health risk assessment will be conducted to determine the collective health risk exposure combining all of the elevated metal constituents as associated with the subject WY property without a concrete cap and with a concrete cap. The site removal action requires a concrete cap and an industrial use deed restriction as conditions of the FCMAWP.

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The planned cap will include:

- \*Backfilling all excavated areas with clean import backfill material to 10-inches of grade surface
- \*Install 4-inches of crushed miscellaneous base, CMB material
- \*Forming and installing 6-inch thick rebar reinforced concrete cap to the top of the grade surface.

**7. Public Participation**

DTSC is now formally soliciting public comments on this document during a 30-day comment period. If DTSC approves the FCMAWP, Wilson Street Corporation will be authorized to implement the remedies recommended in the document and summarized in this Statement of Basis.

The public comment period begins April 26, 2007, and ends May 28, 2007.

DTSC will consider all public comments received before issuing the final remedy selection decision. The final remedies selected could be different from those that have been proposed, depending on the information that is received through the public participation process.

The FCMAWP and other project documents are available for review at:

Vernon Public Library  
4504 S. Santa Fe Avenue  
Los Angeles, CA 90058

(323) 583-8811

The full administrative record will be available for public review at:

Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, CA 90630

(714) 484-5300 Call for appointment

In addition, this Statement of Basis and the project fact sheet will be available on the

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DTSC website at: <http://www.dtsc.ca.gov>

All written comments on the proposed remedy selection should be postmarked or e-mailed by midnight on May 28, 2007, to the following address:

Mr. Raymond J. Campbell  
Hazardous Substances Scientist  
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Department of Toxic Substances Control  
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To obtain additional information or if you have questions regarding Wilson Street Corporation, please contact Mr. Raymond J. Campbell at (714) 484-5384 or [rcampbel@dtsc.ca.gov](mailto:rcampbel@dtsc.ca.gov).

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**10. Key References**

1) ENCON Technologies, Incorporated. *Final Corrective Measures Action Work plan at 1321 Wilson Street, Los Angeles, California.* December 18, 2006.



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