CCAEJ

Riverside's Dirty Little Secret

Agricultural Park

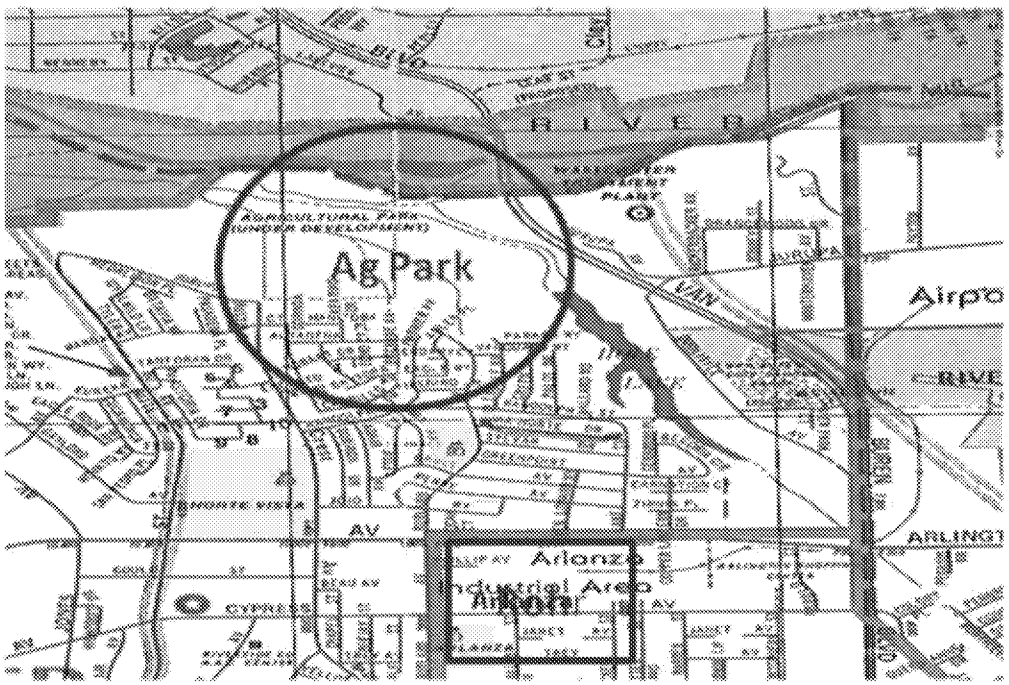
(aka Ag Park or Arroyo Park)

For far too long, the truth about the Ag Park—it's history, extent of contamination and extent of influence peddling by officials, developers, and the powerful has been hidden. The approval to build homes on this property has raised the urgency for the truth to come out. Given the past history of deception by those involved, local residents are asking that independent testing be conducted before homes are built and families move in.

For far too long, the Ag Park site contamination has been swept under the rug. Its time to pull back the cover and tell the truth!

The land located on the south side of the Santa Ana river, west of Van Buren and where the new extension of Jurupa Ave goes, is part of what has come to be called "Agricultural Park" (Ag Park). Recently the name has changed to Arroyo Park as the developer moves toward **building homes** on the site.

While the issues are complicated, the results are critical. Given the past history of the City and the Developer at this site, one can not trust that the clean up has been done correctly. The stakes are too great (health of new families moving in) to leave it to their word. For More information.



On June 17, 2003 the contractor for the developer began illegal grading. In attempting to demolish an old digester, they ruptured the tank releasing a 10,000 gallon spill of toxic PCB sludge.

To try to cover the release he got the City of Riverside to use city workers—without protective clothing to clean it up ; exposing them to dangerous levels of toxic chemicals.

During the ongoing construction residents have also been exposed through dust, rain water run-off and direct contact. After demanding testing, test results show high levels of PCB contamination.

In the fall of 2015, Ag Park Families were able to get confirmation testing to prove that the site is really cleaned up. We demanded that the U.S EPA be involved and oversee DTSC work due to their previous incompetence's. The first round of testing showed significant discrepancy between DTSC's tests and EPA's. EPA's levels were twice that of DTSCs. That prompted another expanded round of testing.

The results have just come out. **There is widespread PCB contamination throughout the site** but particularly in in the east and west gullies.– areas that feed into the Santa Ana River.

The "safe" level according to DTSC is .22mg/kg . The new test results show levels at high as 131 mg/kg—nearly 600 times higher than what is deemed safe. Out of the 144 test samples taken **88 are above** the "safe" level.

The residents have been right all along. DTSC is still refusing to pull their Letter of No Further Action" which certifies the site as cleaned and allows the developer to proceed in building homes on top of this contaminated ground.

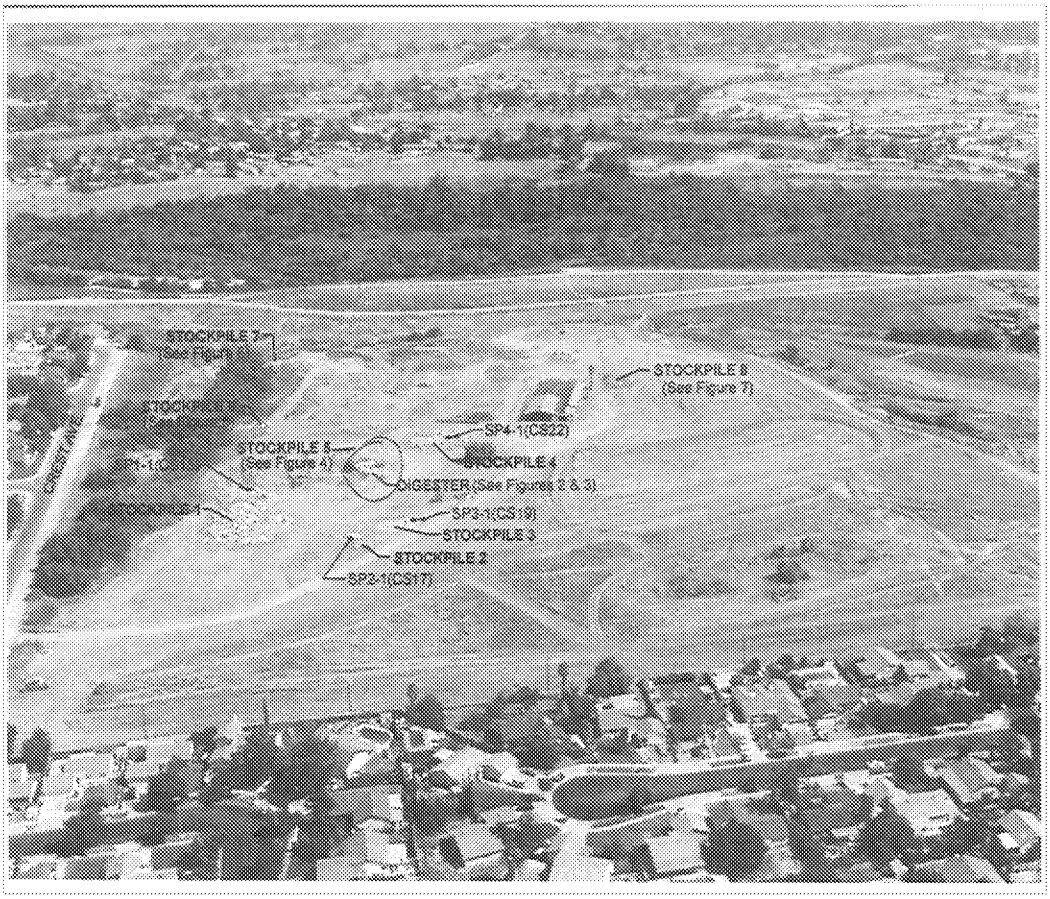
The community demands:

- Rescind the NFA Letter and stop all development
- Expand the testing to include the residents' homes and yards and provide remediation to their homes.
- Start a criminal investigation into all parties involved in this tragedy

What you can do:

- Share information with friends and family
- Join the residents at the City Council meeting on Tuesday, January 26th at 6:00 Riverside City Hall
- Share information and attend a Community Meeting on Feb. 18 at 6:30 at the

Ag Park History



Department of Defense Site.

The property has a long dark history starting as Camp Anza, a World War II era training and staging ground for army troops. The Army built and operated a sewage treatment plant on the site. Recognized as a FUDS—***Formerly Used Defense Site*** it has the potential for explosives, ordinance and chemical warfare material contamination but has not been fully investigated or characterized by the Camp Anza lead agencies.

The Rohr Years

After World War II the ownership of the plant was taken over by several now-defunct community district organizations and the service area for the Plant expanded to include Rohr Industries, a DOD contractor and industrial user as well as other commercial and residential customers located near the site.

Research has shown that in 1952, ROHR purchased a separate 80-acre portion of the former Camp Anza (Rohr Site) that was used for its aircraft component manufacturing operations since that time. Public records documents indicate the following:

1) Rohr historically used the PCB (Aroclor 1248) in its ROHR Site operations;
2) Rohr has been cited by the Santa Ana Regional Water Quality Control Board for PCB contamination including Aroclor 1248 in soil and in underground utility and other pipelines located on its Rohr Site property and groundwater;
3) Rohr periodically flushed out PCBs including Aroclor 1248 from its autoclave systems on site and disposed of it on the Rohr site. Rohr also has admitted its past use of Aroclor 1248 in its Rohr operations.

The City's Role

The City took ownership of the site in 1962 and closed the plant in 1965. The City of Riverside owned the site from 1962-2006. The city enters into negotiations to redevelop the abandoned treatment plant known as the Ag Park in 1990. In 2003 ,the City of Riverside and Friends of Riverside Airport LLC swapped the Ag Park site for land near the Riverside Airport, which can't be developed because it is the "crash zone" for the airport.

Enter FRA—Chuck Cox

In June of 2003, FRA Proceeded to begin work even though they do not own the land yet, and do not have permits.

On June 17, 2003 the contractor for the developer began illegal grading. In attempting to demolish an old digester, they ruptured the tank releasing a 10,000 gallon spill of toxic sludge.

Who are Friends of Riverside Airport?

Friends of Riverside Airport, LLC filed as a Domestic in the State of California on Tuesday, December 10, 2002 and is approximately thirteen years old, as recorded in documents filed with California Secretary of State. The filing is currently active as of the last data refresh which occurred on Sunday, June 22, 2014.

Key people in FRA, include Henry "Chuck" Cox II, who iis the registered agent for the company. Also known as a statuary or resident agent, the registered agent is responsible for receiving legal notifications regarding court summons, lawsuits, and other legal action involving the corporate entity. Address is 8175 Limonite Ave. Suite E, Riverside, CA 92509

The spill!

A memo from Debbie Anderson, Associate Engineer for the City of Riverside summarizes the events of that time.

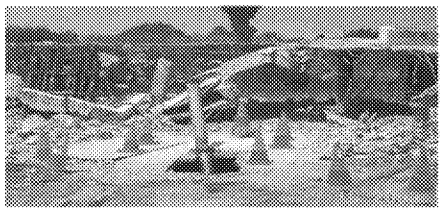
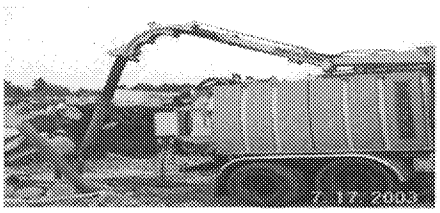
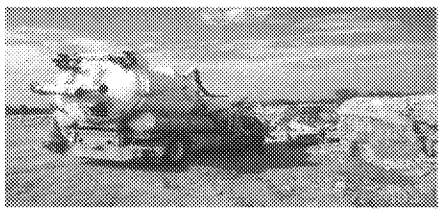
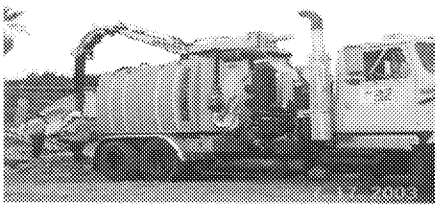
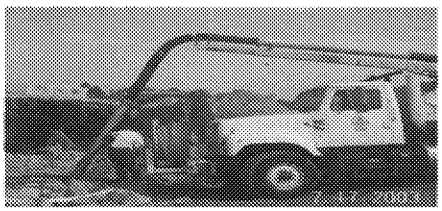
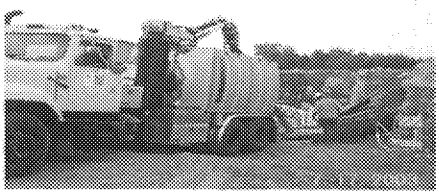
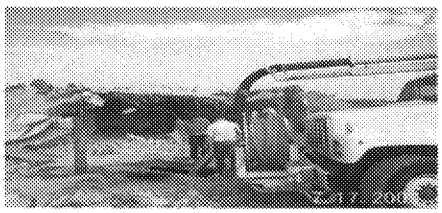
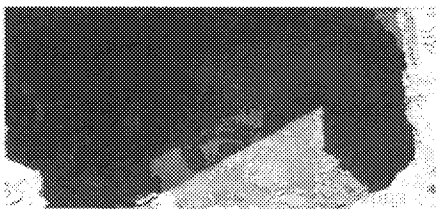
In attempting to demolish the digester—that received chemicals from Rohr and other industrial sources— the unit was breached releasing 10,000 gallons of toxic sludge.

"On the morning of July 7, 2003, Chuck Cox notified me via telephone that he had a problem at the Ag Park. He indicated that his contractor had encountered a tank full of sludge during removal of the abandoned Arlanza Treatment Plant facilities. The tank was breached resulting in a substantial sludge spill. His engineer, Bob Beers, estimated the total sludge volume (tank and spill) at around 43,000 gallons. Bob Beers indicated that the spill probably occurred on July 1 or 2 [*actually on June 17]. Prior to notifying the City, Mr. Cox unsuccessfully attempted to have the sludge pumped and removed from the site. According to Mr. Cox, the sludge could not be removed as the pumper truck operator refused to take the material to the water Quality Control Plant (truck gage indicated pH value exceeding 8.5). I notified Tom Boyd, Steve Schultz, and Eddie Diaz of the sewage spill. Tom Boyd instructed Eddie Diaz to notify Mr. Cox to stop work. Tom Boyd also directed City water Quality Control and Street Services staff to clean up the sludge spill. City staff arranged for pumping and clean of the tank and sampled the sludge for EPA Priority pollutants."*

The memo continues,

"On the morning of July 9, 2003, I meet [sic] with Eddie Diaz and Charles Sperino at the Ag Park sludge spill site. Evidence of massive grading operations far exceeding 50 cubic yards was observed. Further inspection of the site revealed that the contractor had filled in two earthen swales that drain existing Jurupa Avenue and portions of the subdivisions at Rutland. Extensive ponding with algae and grass was observed on the paved roadway. Further inspection revealed that the contractor was still working on site in an area westerly and northerly of Rutland. Recent evidence of fill was observed in the 'blue-line" stream area as designated on the USGS quad sheet and recent biotechnical reports for the project. Dead willow trees, stumps, earthen fill, and standing water were observed in the watercourse. An apparent earthen fill crossing had also been created in the drainage course. Eddie Diaz spoke with the equipment operator onsite at the time of our visit. The operator indicated that he was currently removing a spillway in a northerly portion of the drainage course. ... Further site inspection revealed additional grading in the drainage course area westerly of Rutland Avenue. The equipment operator was still working on site. Erosion control measures, water trucks, or other dust control measures were not observed on site. "

Violations

To be clear:

- Mr. Cox was conducting work on site illegally and without permits.
- He continued to grade contaminated material after being told to stop all work.
- He didn't notify the appropriate agencies—as required by law– until **August 6, 2003— 8 weeks after the toxic spill!**

Mercury, Arsenic, Chromium, Lead, PCBs, Tetrachloroethane, Toluene, Trichloroethane, Dichlorobenzene, Perchlorate, Thallium, Dioxin and Furans have been detected at the site.

City workers were sent in to clean up the spill without knowledge of what they were being exposed to and without protective clothing!

Despite objections from city workers the City ordered them to remove the toxic sludge, as seen in the pictures above. Several of the workers have suffered severe illnesses from this exposure but the City has denied any work related illnesses.

The sludge was then taken to the Acorn Street Plant (it is illegal to take hazardous materials to a sewer treatment plant) where the sludge was spread on the drying beds and mixed with dirt to create a bulk waste that could be hauled to a hazardous waste site.

In a conversation Mr. Cox explained that as liquid PCB sludge it would have to be incinerated, which is very expensive; so they mixed it with dirt to make it a bulk waste that could be deposited in a hazardous waste site at a cheaper cost.

- All of this work was done without permits or oversight or even notification to appropriate agencies.
- The workers were put in harms way—exposed to chemicals without protective equipment.
- The sewage treatment plant was not allowed to accept hazardous waste.
- There has been a great deal of retaliation against those workers that raised health and safety concerns.

The City's Knowledge of the Extent of contamination

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October 18, 2004

VIA OVERNIGHT MAIL

Mr. Bruce C. Amig
Director of Global Remediation
B.F. Goodrich Aerospace
Three Coliseum Centre
2550 West Tyvola Road
Charlotte, North Carolina 28217-3022

Re: City of Riverside – Agricultural Park ("Ag Park")
Potential Liability of B.F.Goodrich, Aerospace for former Rohr, Inc.
Riverside, California Manufacturing Plant

Dear Mr. Amig:

This firm has been retained as special litigation counsel by the City of Riverside ("City") in reference to the Agricultural Park site ("Ag Park" or "Site") located at the intersection of Crest Avenue and Rutland Avenue in the City. The Site is currently owned by the City. We are writing to provide B.F. Goodrich Aerospace ("Goodrich") with notice of its potential liability as successor in interest to Rohr, Inc. ("Rohr") with respect to this Site.

Release of Chemicals on the Site

In July, 2003, the City discovered the presence of polychlorinated biphenyls ("PCBs") in soil at the Ag Park. While grading the Ag Park property, a contractor retained by a potential developer of the site, punctured a subterranean digester that had been part of the historical sewage treatment facility at the Site. The puncture caused a substantial spillage of sewer sludge into soil at the Site. The City undertook immediate measures to remove the sludge.

Since July, 2003, the City has retained environmental engineers who, under the oversight of the Riverside County Department of Environmental Health, have been actively investigating the Site. The City has now positively identified the presence of PCBs, and specifically but without limitation, the PCB known as Aroclor 1248, in high concentrations in the vicinity of the digester sludge release, as well as at other locations throughout the Site. In accordance with the

LA [illegible] v1
8/2004

In an October 18, 2004 letter from the City's outside attorney, to B.F. Goodrich (purchased the property from Rohr) they outline the extent of the contamination and how it should be listed as a CERCLA (Superfund) site.

They notify Goodrich that they found PCB known as Aroclor 1248, *"...in high concentrations in the vicinity of the digester sludge release, as well as at other locations throughout the Site."*

The City writes, :...*Goodrich is a potentially responsible party as the successor in interest to Rohr, who was an arranger of hazardous waste disposal and therefore subject to CERCLA generator liability."* It continues, *"While the use of PCBs for most uses was not outlawed until 1979, courts have uniformly held that CERCLA liability extends to acts committed before the enactment of CERCLA in 1980."*

The City knew that the site should have been treated as a Superfund site and subject to the extensive investigation and remediation as such.

Chemical Levels found at the Ag Park Site

Highlighted numbers are levels detected through testing. Column to right are the Detection limits- below that number is acceptable.
Above that number is not!

AG PARK ANALYTES

LIST	RESULT	DLR	UNITS	DF
MERCURY -DOC#1	12.3	0.12	mg/Kg	1
MERCURY -DOC#2	2.33			
ARSENIC –DOC#1	8.74	1.00	mg/Kg	1
ARSENIC –DOC#2	1.66			
CHROMIUM –DOC#1	768	1.00	mg/Kg	1
CHROMIUM –DOC#2	146			
LEAD –DOC#1	1050	0.50	mg/Kg	1
LEAD –DOC#2	199			
SILVER –DOC#1	60.0	0.50	mg/Kg	1
SILVER –DOC#2	11.4			
PCB-1242 (AROCLOR) DOC#1	4930	50	mg/Kg	1000
PCB-1242 (AROCLOR) DOC#2	937			
TETRACHLOROETHANE-DOC#1	322.0	35.0	ug/Kg	7
TETRACHLOROETHANE-DOC#2	61.1			
TOLUENE –DOC#1	28,700	35.0	ug/Kg	7
TOLUENE –DOC#2	5,450			
TRICHLOROETHANE-DOC#1	190.0	35.0	ug/Kg	7
TRICHLOROETHANE-DOC#2	36.1			
1,2,4-TRICHLOROBENZENE DOC#1	20,000	1665.0	ug/Kg	5
1,2,4-TRICHLORBENZENE DOC#2	3,800			
1,2-Dichlorobenzene-Doc#1	35,000	1665.0	ug/Kg	5
1,2-Dichlorobenzene-Doc#2	6,650			
BIS(2-ETHYLHEXYL)PHTHALATE DOC#1	212,000	1665.0	ug/Kg	5
BIS(2-ETHYLHEXYL)PHTHALATE DOC#2	40,200			

mg/Kg = ppm (parts per million)
ug/Kg = ppb (parts per billion)
DLR- DETECTION LIMIT FOR PURPOSES OF REPORTING- BELOW THAT NUMBER IS ACCEPTABLE
DF- DILUTION FACTOR

Health Impacts from Chemicals found at Ag Park

Mercury— Exposure to mercury can be particularly hazardous for pregnant women and small children. During the first several years of life, a child's brain is still developing and rapidly absorbing nutrients. Even in low doses, mercury may affect a child's development, delaying walking and talking, shortening attention span and causing learning disabilities. Less frequent, high dose prenatal and infant exposures to mercury can cause mental retardation, cerebral palsy, deafness and blindness. In adults, mercury poisoning can adversely affect fertility and blood pressure regulation and can cause memory loss, tremors, vision loss and numbness of the fingers and toes. A growing body of evidence suggests that exposure to mercury may also lead to heart disease. (NRDC)

Chromium— When inhaled, chromium compounds are respiratory tract irritants and can cause pulmonary sensitization. Chronic inhalation of Chromium VI compounds increases the risk of lung, nasal, and sinus cancer. Severe dermatitis and usually painless skin ulcers can result from contact with these compounds. (ATSDR)

Tetrachloroethane— Chronic inhalation exposure in humans results in jaundice and an enlarged liver, headaches, tremors, dizziness, numbness, and drowsiness. The U.S. Environmental Protection Agency has classified it as a Group C possible human carcinogen. (EPA)

Health Impacts con'd

Arsenic- The International Agency for Research on Cancer (IARC) has classified arsenic as carcinogenic to humans, and has also stated that arsenic in drinking-water is carcinogenic to humans. Other adverse health effects that may be associated with long-term ingestion of inorganic arsenic include developmental effects, neurotoxicity, diabetes and cardiovascular disease. (WHO)

Lead—is a toxic metal whose widespread use has caused extensive environmental contamination and health problems in many parts of the world. It is a cumulative toxicant that affects multiple body systems, including the neurologic, hematologic, gastrointestinal, cardiovascular, and renal systems. Children are particularly vulnerable to the neurotoxic effects of lead, and even relatively low levels of exposure can cause serious and in some cases irreversible neurological damage. (WHO)

Toluene— A serious health concern is that toluene may have an effect on your brain. Toluene can cause headaches and sleepiness, and can impair your ability to think clearly. Whether or not toluene does this to you depends on the amount you take in, how long you are exposed, and your genetic susceptibility and age. Low to moderate, day-after-day exposure in your workplace can cause tiredness, confusion, weakness, drunken-type actions, memory loss, nausea, and loss of appetite. These symptoms usually disappear when exposure is stopped. You may experience some hearing and color vision loss after long-term daily exposure to toluene in the workplace. (ATSDR)

Trichloroethane—Trichloroethane may be harmful by inhalation, ingestion and skin contact. It is a respiratory and eye irritant. Although no definitive studies currently exist, Trichloroethane should be treated as a potential carcinogen since laboratory evidence suggests that low molecular weight chlorinated hydrocarbons may be carcinogenic. (MSDS)

1,2,Dichlorbenzene - **Affected Organ Systems:** Dermal (Skin), Developmental (effects during periods when organs are developing) , Hepatic (Liver), Ocular (Eyes), Renal (Urinary System or Kidneys) **Cancer Classification:** NTP: Reasonably Anticipated to be a Human Carcinogen. (ATSDR)

Perchlorates— Perchlorate interferes with the process of iodine uptake into the thyroid gland. In the human body, perchlorate affects production of thyroid hormones– a phenomenon that the EPA says can cause thyroid ailments such as Graves' disease and cancer in adults. It is listed by the federal government as a probable carcinogen and clinically linked to thyroid disorders. Symptoms include: fatigue, depression, anxiety, low sex drive, disruption of menstrual cycles, unexplained weight gain, hair loss, weakening of the immune system. In children the impacts may be even more severe.In children the impacts may be even more severe. Developing babies of pregnant women, infants and children with thyroid problems may suffer: Reduced IQs, and Mental Retardation; Loss of hearing and speech; problems with motor skills and coordination; thyroid cancer. (EPA)

Thallium— Thallium is used mostly in the manufacture of electronic devices, switches, and closures. It also has limited use in the manufacture of special glasses and for medical procedures that evaluate heart disease. Up until 1972 thallium was used as a rat poison, but was then banned because of its potential harm to man. Thallium is no longer produced in the United States. Thallium can affect your nervous system, lung, heart, liver, and kidney if large amounts are eaten or drunk for short periods of time. Temporary hair loss, vomiting, and diarrhea can also occur and death may result after exposure to large amounts of thallium for short periods. Thallium can be fatal from a dose as low as 1 gram. The significant, likely routes of exposure near hazardous waste sites are through swallowing thallium in contaminated soil or dust, drinking contaminated water, and skin contact with contaminated soil. (ATSDR)

Dioxins and Furans— Dioxins and furans is the abbreviated or short name for a family of toxic substances that all share a similar chemical structure including seven of the polychlorinated dibenzo dioxins (PCDDs), ten of the polychlorinated dibenzo furans (PCDFs) and twelve of the **polychlorinated biphenyls (PCBs).** (EPA) In 1997 the International Agency for Research on Cancer classified 2,3,7,8, TCDD, the best studied member of the dioxin family, a known human carcinogen. Dioxins and furans can enter your body through breathing contaminated air, drinking contaminated water or eating contaminated food. Dioxins and furans can build up in the fatty tissues of animals. Dioxins and furans can cause a number of health effects. People exposed to dioxins and furans have experienced changes in hormone levels. High doses of dioxin have caused a skin diseased called chloracne. Animal studies show that animals exposed to dioxins and furans experienced changes in their hormone systems, changes in the development of the fetus, decreased ability to reproduce and suppressed immune system. (EPA)

Polychlorinated Biphenyl (PCB)

PCBs belong to a broad family of man-made organic chemicals known as chlorinated hydrocarbons. PCBs were domestically manufactured from 1929 until their manufacture was banned in 1979. They have a range of toxicity and vary in consistency from thin, light-colored liquids to yellow or black waxy solids. Due to their non-flammability, chemical stability, high boiling point, and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications including electrical, heat transfer, and hydraulic equipment; as plasticizers in paints, plastics, and rubber products; in pigments, dyes, and carbonless copy paper; and many other industrial applications.

Release and Exposure of PCBs

Prior to the 1979 ban, PCBs entered the environment during their manufacture and use in the United States. Today PCBs can still be released into the environment from poorly maintained hazardous waste sites that contain PCBs; illegal or improper dumping of PCB wastes; leaks or releases from electrical transformers containing PCBs; and disposal of PCB-containing consumer products into municipal or other landfills not designed to handle hazardous waste. PCBs may also be released into the environment by the burning of some wastes in municipal and industrial incinerators.

Once in the environment, PCBs do not readily break down and therefore may remain for long periods of time cycling between air, water, and soil. PCBs can be carried long distances and have been found in snow and sea water in areas far away from where they were released into the environment. As a consequence, PCBs are found all over the world. In general, the lighter the form of PCB, the further it can be transported from the source of contamination. The maximum allowable contaminant level in drinking water in the United States is set at zero.

PCBs can accumulate in the leaves and above-ground parts of plants and food crops. They are also taken up into the bodies of small organisms and fish. As a result, people who ingest fish may be exposed to PCBs that have bioaccumulated in the fish they are ingesting.

Health Effects

PCBs have been demonstrated to cause cancer, as well as a variety of other adverse health effects on the immune system, reproductive system, nervous system, and endocrine system. Studies in animals provide conclusive evidence that PCBs cause cancer. Studies in humans raise further concerns regarding the potential carcinogenicity of PCBs. Taken together, the data strongly suggest that PCBs are probable human carcinogens. Studies of PCB workers found increases in rare liver cancers and malignant melanoma. The presence of cancer in the same target organ (liver) following exposures to PCBs both in animals and in humans and the finding of liver cancers and malignant melanomas across multiple human studies adds weight to the conclusion that PCBs are probable human carcinogens. The International Agency for Research on Cancer has declared PCBs to be probably carcinogenic to humans. The National Toxicology Program has stated that it is reasonable to conclude that PCBs are carcinogenic in humans. The National Institute for Occupational Safety and Health has determined that PCBs are a potential occupational carcinogen.

PCBs Non Cancer Health Affects

Reproductive Effects

Reproductive effects of PCBs have been studied in a variety of animal species, including Rhesus monkeys, rats, mice and mink. Rhesus monkeys are generally regarded as the best laboratory species for predicting adverse reproductive effects in humans. Potentially serious effects on the reproductive system were seen in monkeys and a number of other animal species following exposures to PCB mixtures. Most significantly, PCB exposures were found to reduce the birth weight, conception rates and live birth rates of monkeys and other species and PCB exposure reduced sperm counts in rats. Effects in monkeys were long-lasting and were observed long after the dosing with PCBs occurred.

Studies of reproductive effects have also been carried out in human populations exposed to PCBs. Children born to women who worked with PCBs in factories showed decreased birth weight and a significant decrease in gestational age with increasing exposures to PCBs. Studies in fishing populations believed to have high exposures to PCBs also suggest similar decreases. This same effect was seen in multiple species of animals exposed to PCBs, and suggests that reproductive effects may be important in humans following exposures to PCBs.

It has been shown that PCBs decrease thyroid hormone levels in rodents, and that these decreases have resulted in developmental deficits in the animals, including deficits in hearing. PCB exposures have also been associated with changes in thyroid hormone levels in infants in studies conducted in the Netherlands and Japan. Additional research will be required to determine the significance of these effects in the human population.

Neurological Effects

Proper development of the nervous system is critical for early learning and can have potentially significant implications for the health of individuals throughout their lifetimes. Effects of PCBs on nervous system development have been studied in monkeys and a variety of other animal species. Newborn monkeys exposed to PCBs showed persistent and significant deficits in neurological development, including visual recognition, short-term memory and learning. Some of these studies were conducted using the types of PCBs most commonly found in human breast milk.

Studies in humans have suggested effects similar to those observed in monkeys exposed to PCBs, including learning deficits and changes in activity associated with exposures to PCBs. The similarity in effects observed in humans and animals provide additional support for the potential neurobehavioral effects of PCBs.

Endocrine Effects

There has been significant discussion and research on the effects of environmental contaminants on the endocrine system ("endocrine disruption"). While the significance of endocrine disruption as a widespread issue in humans and animals is a subject of ongoing study, PCBs have been demonstrated to exert effects on thyroid hormone levels in animals and humans. Thyroid hormone levels are critical for normal growth and development, and alterations in thyroid hormone levels may have significant implications.

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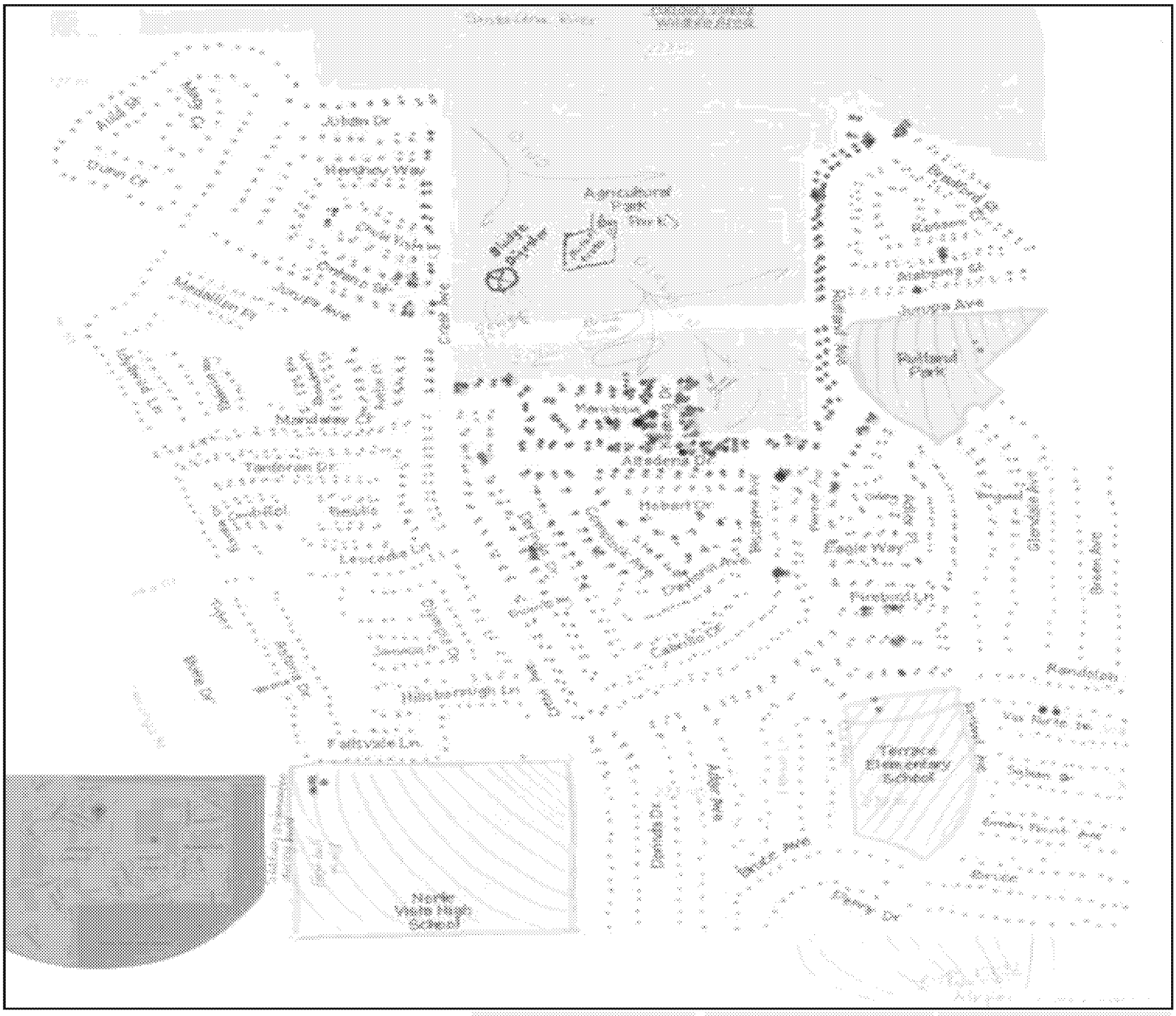
Other Non-cancer Effects

A variety of other non-cancer effects of PCBs have been reported in animals and humans, including dermal and ocular effects in monkeys and humans, and liver toxicity in rodents. Elevations in blood pressure, serum triglyceride, and serum cholesterol have also been reported with increasing serum levels of PCBs in humans.

In summary, PCBs have been demonstrated to cause a variety of serious health effects. PCBs have been shown to cause cancer and a number of serious non-cancer health effects in animals, including effects on the immune system, reproductive system, nervous system, and endocrine system. Studies in humans provide supportive.

http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/effects.htm

Health issues in the Ag Park Neighborhood



RED

Autoimmune disorders
Cardiac
Chemical sensitivity
COPD
Thoracic pain
Shortness of breath
High Blood Pressure
Kidney Edema
Thyroid
Tremors
Swollen Lymph Glands
Persistent Dermatitis

GREEN

Allergies
Headaches
Skin Dryness
Rashes
Sore Throat
Sinusitis
Asthma

BROWN

Pet Deaths
Cancer
Tumors
Cysts
Cough
Arthritis

YELLOW

Bone Pain
Joint Pain
Kidney Pain
Muscle Pain
Urinary Pain
Vision
Abdominal Pain
Wounds that won't Heal

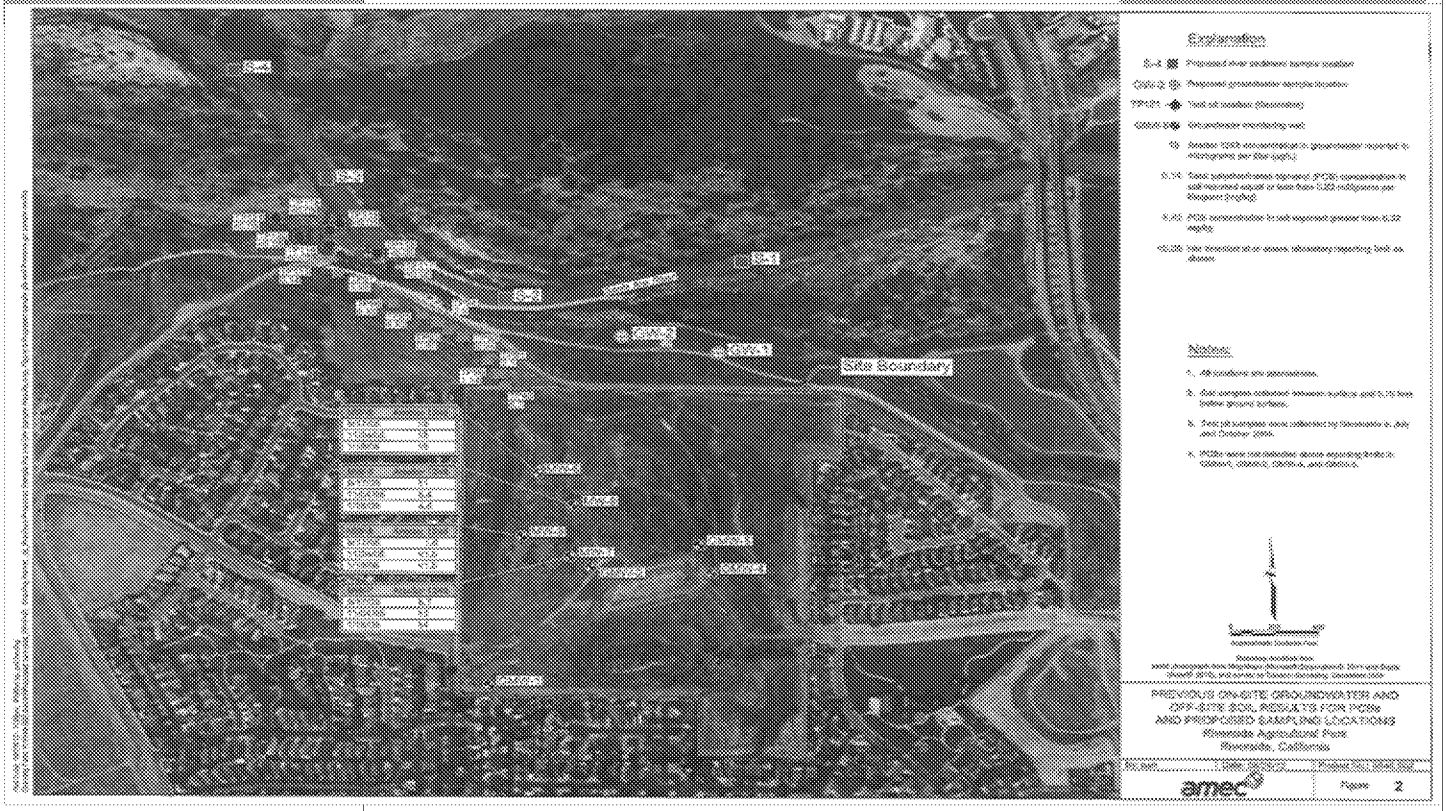
BLUE

Brain Fog
Chronic Fatigue
Depression
Dizziness
Facial Swelling
Hair Loss
Hives
Loss of Coordination
Lumps on body/neck
Memory loss
Mental disturbance (ADD)
Impaired reproduction
Muscle Twitching
Nail thinning
Nose bleeding
Impeded speech
Skin lesions
Skin blisters
Birth defects
Developmental Delay

PINK

Cancer

BLACK
Death



Off Site Contamination—but no remediation

The groundwater is contaminated with PCBs, perchlorate, total lead, thallium, dioxin and furans per consultant's report.

As the map above indicates, PCBs and other chemical contamination has moved off-site and into the Santa Ana River, a domestic drinking water source for Orange County. The groundwater is contaminated with PCBs, perchlorate, total lead, thallium, dioxin and furans per consultant's report.

"Groundwater was estimated to flow north at a rate of 0.023 feet per foot.. " The report continues, *"it should be noted that the groundwater flows directly into the Santa Ana River which is a primary source of drinking water for Orange County; this poses a real threat to degrading the river's water quality."*

But the conclusion in the reports says contaminates from the site won't migrate to the river, and does not mention that the river is a domestic drinking water source.

The river is home to several endangered species as well as a recreation area for the City and surrounding communities.

California has a non-degradation policy for water sources. This means we value our limited water sources and will not allow them to be degraded.

DTSC's "Letter of No Further Action" ignores the migration of contaminants into this drinking water source! No remediation is being required to protect our limited water resource.

Leaving PCB contamination at the .22 mg/kg level means the contaminated soil can migrate into the Santa Ana River—a domestic drinking water source. Clean up level should be non detect.

Air Exposure

DUST MONITORING LOG
COX PROPERTIES – AG PARK
RIVERSIDE, CA

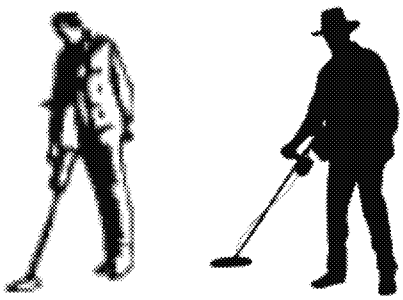
7 ug/m³ limit

DATE	Wind Direction	UPWIND (µg/m³)				DOWNWIND (µg/m³)				Δ	GilAIR
		Tag	Time	Con	Speed	Tag	Time	Con	Speed		
10/23/13	S	51	0721	338.4	1.8	73	0726	152.9	1.0	185.5	FOG
	SE	51	0820	368.8	1.4	73	0825	141.9	0.9	226.9	FOG
	SE	51	0920	302.4	0.7	73	0925	115.7	1.4	186.7	FOG
	SE	51	1020	314.7	1.4	73	1025	123.8	0.5	190.9	FOG
	SE	51	1120	290.5	4.9	73	1125	130.7	4.5	159.8	FOG
	SE	51	1220	304.1	2.7	73	1225	139.3	2.4	164.8	FOG
	SE	51	1320	357.6	1.0	73	1325	162.9	2.9	194.7	FOG
	SE	51	1420	331.2	5.2	73	1425	131.0	4.3	200.2	FOG
	SE	51	1454	345.9	4.3	73	1500	154.3	5.0	191.6	FOG
10/24/13	SE	52	0725	410.4	1.1	76	0729	184.5	1.8	225.9	0700 FOG
	SE	52	0820	374.1	1.0	76	0825	157.4	1.9	216.7	FOG
	SE	52	0920	278.4	3.4	76	0925	124.3	2.4	154.1	FOG
	SE	52	1020	277.9	3.1	76	1025	125.6	3.0	152.3	FOG
	SE	52	1120	317.5	3.3	76	1125	146.9	3.4	170.6	FOG
	SE	52	1220	329.1	1.9	76	1225	161.1	4.3	168	FOG
	SE	52	1322	366.2	2.5	76	1329	140.0	4.0	226.2	FOG
	SE	52	1420	367.5	2.9	76	1425	163.3	3.0	204.2	FOG
	SE	52	1455	355.6	3.3	76	1500	165.3	3.0	190.3	FOG 1500

The action level for dust particles during the grading and construction was set at 7micrograms per cubic meter (ug/m³). The report states, "Exceedances of this level indicated potentially elevated levels of PCVs". As you can see for more than 50 days the levels far exceeded the allowable levels yet no one stopped the work, reported the high levels or suffered any consequence for repeatedly exposing local residents to unacceptable levels of contaminated dust. Everyone sat back and allowed residents to be exposed.

Piles of dirt are stacked next to homes. The dust from construction continues today.

FUDS—Formerly Used



The Department of Defense (DOD) is responsible for environmental restoration of properties that were formerly owned by, leased to or otherwise possessed by the United States and under the jurisdiction of the Secretary of Defense. Such properties are known as Formerly Used Defense Sites (FUDS). The Army is the lead agent for the program and the U.S. Army Corps of Engineers executes the program on behalf of the Army and the Department of Defense. Environmental cleanup at FUDS properties is conducted in accordance with the Comprehensive Environmental Response, Compensation and Liability Act. (CERCLA) aka Superfund.

Camp Anza and in particular the Ag Park section are listed as a FUDS (FUDS#J09CA026700). As a Formerly Used Defense Site (FUDS) which has potential ordinance, explosives (UXO,MES) and chemical warfare material contamination; this site has not been investigated or characterized by the Camp Anza lead agency, Santa Ana Regional Water Quality Control Board, U. S. Army Corps. Of Engineers or DTSC.

DTSC Oversight

The City and the Developer have pointed to the fact that the Department of Toxic Substances Control (DTSC) is overseeing the clean up of the site. What they don't tell anyone is that DTSC is under investigation for numerous occasions of not doing its job and its cozy relationship with the industries it regulates. One report Golden Wasteland by Consumer Watchdog, documents problems with the department that have left Californians in harms way.

One example is the Exide Facility in Los Angeles which was recently shut down by the US Attorney in exchange for dropping criminal charges. For more than two decades the company operated their battery recycling operation in the midst of homes in Vernon without a permit. For two decades DTSC allowed them to operate without a permit! Only after a Federal Grand Jury stepped in did DTSC take action.

The State Legislature has had numerous hearings on the short comings of DTSC. Several bills have been introduced to reform the agency. One currently under discussion is SB 673 Sen. Lara outlines major reform measures to make DTSC do a better job. It includes an Oversight Committee to watch the agency so it fulfills its regulatory duties. The former Director has resigned; three top staff have "retired". We recently took the new Director, Barbara Lee, on a two day Toxic Tour so she could see and hear for herself the problems with the department from the residents directly impacted.

DTSC has a $33,000 contract signed on Feb. 19, 2015, directly with Friends of Riverside Airport (Mr. Cox) to provide Public relations services for him including "Supporting the Applicant, if needed, at a community meeting;"

Locally, the Autumnwood housing tract in Wildomar was a victim of DTSC's. We showed that the test results reported in their report on Wildomar left out elevated levels of dozens of chemicals and only reported two.

The new Director, Barbara Lee participated in a statewide tour of communities impacted by sites regulated by DTSC to hear first hand the problems her department has created. It raised a lot of questions with her concerning how the department is operating. At one site—Santa Susana site—she overturned the decision made by her staff and reaffirmed that the clean up standards would remain high.

But the problems remain—the staff at DTSC view the polluters as their "clients" and the system of paying DTSC for its oversight is one of the reasons. As in Ag Park, DTSC receives direct payments from the developer to "oversee" the work done. At the Ag Park, DTSC has a $33,000 contract signed on Feb. 19, 2015, directly with Friends of Riverside Airport (Mr. Cox) to provide Public relations services for him including "Supporting the Applicant, if needed, at a community meeting;" While Mr. Cox claims DTSC is separate and an objective third party, it's hard to view this as anything more than a pay off to DTSC.

With the loss of any credibility with DTSC, with the history of cover up and illegal actions on the part of the developer; with the city using its own workers to clean up hazardous materials with no protective gear; it's no wonder people are questioning the cleanup.

Two demands:

- conduct independent and appropriate testing of the site before allowing homes to be built
- Test the homes surrounding the area both inside and out to ensure residents are not being exposed to toxic chemicals.

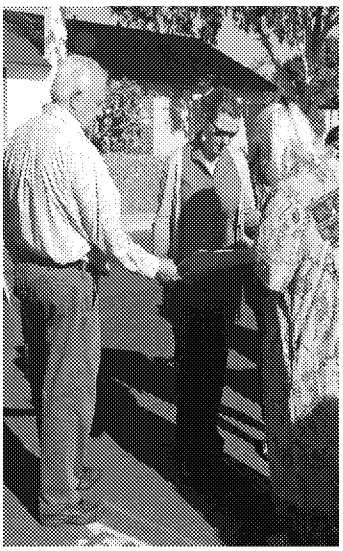
Bottom Line

Ag Park Families are not making unreasonable requests. They live next to a site that has a history of toxic chemicals (PCBs, Mercury, Arsenic, Chromium, Lead, Tetrachloroethane, Toluene, Trichloroethane, Dichlorobenzene, Perchlorate, Thallium, Dioxin and Furans). On several occasions it has been documented that illegal practices have occurred that released these toxic compounds into the environment.

City workers have been exposed to chemicals when City Management ordered them to clean up the toxic sludge spill; work was not stopped when air monitoring identified levels of dust many times higher than the allowable standard thus exposing residents to toxic dust and polluting their property.

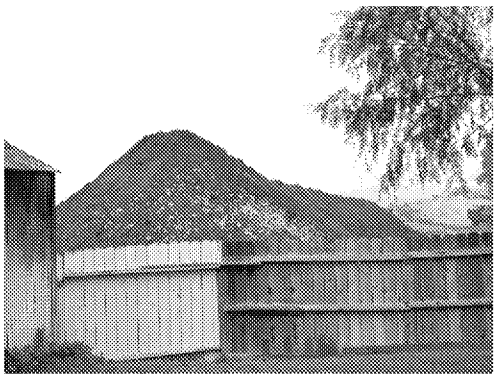
No one from the Developer, to the City, to DTSC has had the best interest of the residents at heart.

While some dismiss the concerns as "that was in the past– it's cleaned up now", our review of the documents raised serious concerns that the land has not been cleaned up.



DTSC Director, Barbara Lee, listens as residents explain their concerns.

While the clean up plans call for thousands of tons of dirt to be removed and clean fill brought in, residents report they did not see the number of trucks required to do that nor did they see trucks bringing in clean fill. What they did see were bulldozers and heavy equipment moving dirt all over the site and piling dirt with concrete from the old digester next to their homes!



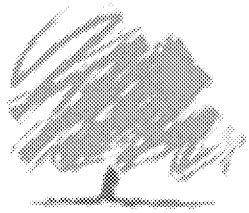
To clearly demonstrate that the site is clean, we ask that EPA be brought in to conduct independent testing to ensure the site is safe before homes are built and that the homes of current residents are free of contaminants.

You can help!

Let your councilman know that you agree with the Ag Park Families and want the site independently tested— not by the developer, not by the City, and not DTSC— to show that the site is clean.

Join residents in asking that their homes be tested — inside and out— to determine if they have been exposed to contamination from this construction/clean up by the irresponsible actions at this site.

Residents display pictures of the activities at the site for the visit of DTSC Director Lee.



C · C · A · E · J

Center for Community Action and Environmental Justice

Centro de Acción Comunitaria y Justicia Ambiental

Across our country and throughout the world, people struggle to ensure that the air they breathe, the water they drink, and the land they share, is safe, healthy and protected.
For more than 37 years, starting with the Stringfellow Acid Pits, CCAEJ has provided the support and leadership to communities in this struggle.

We are founded on a social justice framework. We recognize that the conditions under which people live are the direct result of the political and economic decision making process. Therefore to improve our living conditions we must bring equity and justice to this system so that the social and political decisions made serve everyone – especially those most vulnerable.

We are a nonprofit organization dedicated to improving both our social conditions, and the natural environment we inhabit so that everyone has a safe, healthy, toxic free place to live, work, learn, and play.

CCAEJ provides:

- *Leadership training and skills development*
- *Programs that share knowledge, build power and community capacity*
- *Projects that improve the natural environment and well being of our families*
- *Media awareness to expose environmental issues*
- *Advocacy for changes in public policy that are community-driven, protective, and that enhance local resources.*

CCAEJ's goal is to build power, unite voices in order to see our neighborhoods, families and the natural world better protected.

Contact us—we'd love to hear your feedback
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