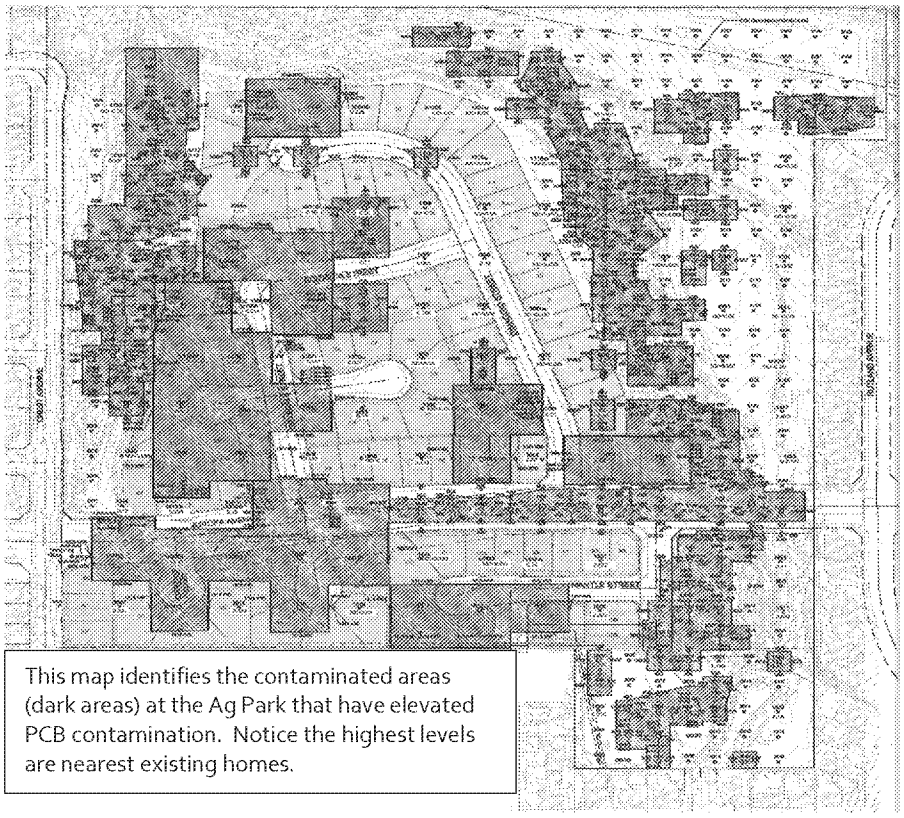


This map identifies the contaminated areas (dark areas) at the Ag Park that have elevated PCB contamination. Notice the highest levels are nearest existing homes.

Ag Park - Riverside's Dirty Little Secret.

The continuing tragic saga of DTSC's ineptitude, incompetence, and lack of concern for Ag Park Residents.

Deadly Déjà vu ... All Over Again!

by Penny Newman

IN THIS ISSUE

Dept. of Toxic Substances Control is once again preparing to oversee the cleanup of the Ag Park site. And - once again – ignoring concerns raised by residents at the fence line of this PCB-contaminated site – specifically inadequate air monitoring; inadequate clean up levels and no testing of residents' yards and homes.

Background

As you may remember DTSC tried cleaning the site twice before and finally issued a "Letter of No Further Action Required", in April of 2014. This gave the green light to Chuck Cox and Friends of Riverside's Airport to move forward with building homes on the PCB contaminated site.

For the residents living at the fence line of this property that green light meant that once again their concerns for their health and safety were ignored by the city and the agency.

The residents knew the site was not clean! They had watched for 13 years as Chuck Cox violated environmental laws, played fast and loose with the rules and cut corners whenever he could - and that DTSC let him do it. DTSC had not conducted any testing of their own. They only relied on reports presented to them by Mr. Cox.

New Testing

After more than 8 months of prodding, threatening, coaxing we were able to get DTSC to agree to conduct confirmation testing to prove the site had indeed been cleaned up and all the PCBs removed.

With the poor history from the developer and DTSC staff, we insisted they include "split samples" for EPA. This is where another party gets half the samples to test on their own in another lab to confirm the testing was accurate. After conducting the tests, DTSC said everything was fine – but EPA's testing showed elevated levels of PCBs.

This prompted another round of testing and lo and behold, PCB contamination was found throughout the site – a site that without this testing would have had homes built, families moving in, children playing in contaminated yards! We were right – they were wrong!

AG PARK NOT CLEAN

Levels at 131 mg/kg - nearly 600 times higher than the health standard set for PCBs were found throughout the site. As one state representative said, "...it's clear he (the developer) was spreading it throughout the site and filling in the gullies with the contaminated soil...the residents were right."

Déjà vu - DTSC style

You'd think that after being proven wrong DTSC would have welcomed us to the table to help them sort out the next steps. But that's not the case!

DTSC has shut residents out, and discounted their comments and concerns. Since the fall of 2016, DTSC has been conducting testing trying to determine the extent of the contamination and how to clean it up –again. Once again - under this voluntary cleanup - Chuck Cox and his hired consultant will conduct all the work, with "oversight" from DTSC.

As you can imagine, local residents are not confident in the work done by Mr. Cox or DTSC and want to have a say in how the cleanup is designed. They want to ensure that their safety and health will be protected. So far, that assurance has not happened.

Inadequate Air Monitoring

After allowing residents to be exposed to PCBs for over 13 years, the proposed work plan provides less protection! For example in the previous air monitoring plan an action level of 7 mg/kg was set due to the PCB contamination. Even though air monitoring records had readings of 200 mg/kg the work was never stopped and water trucks sat unused. In the current air monitoring plan they plan **to raise the action level to 50 mg/kg** the site. One would think that after failing to protect residents the first time, DTSC would step up and take extra precautions to protect them now, such as additional monitors around the site.

DUST MONITORING LOG
COX PROPERTIES – AG PARK
RIVERSIDE, CA

DATE	Wind Direction	UPWIND (µg/m³) Tag	Time	Con	Speed	DOWNWIND (µg/m³) Tag	Time	Con	Speed	A	
10/23/13	S	51	0921	338.4	1.8	73	0926	152.9	1.0	185.5	
	SE	51	0929	368.8	1.4	73	0935	140.9	0.9	222.9	FOG
	SE	51	0920	382.4	0.7	73	0925	157.7	1.4	186.7	FOG
	SE	51	1020	349.7	1.4	73	1025	123.8	0.5	190.9	FOG
	SE	51	1120	276.5	4.9	73	1125	120.7	4.5	159.8	FOG
	SE	51	1220	394.1	2.7	73	1225	178.3	2.9	164.8	FOG
	SE	51	1320	357.6	1.0	73	1325	168.9	2.9	194.7	FOG
	SE	51	1420	331.2	5.2	73	1425	111.0	4.3	200.2	FOG
	SE	51	1459	345.9	4.3	73	1500	154.3	5.0	191.6	FOG
10/24/13	SE	52	0725	400.4	1.1	76	0729	194.5	1.8	220.9	FOG
	SE	52	0820	374.1	1.0	76	0825	157.9	1.9	216.7	FOG
	SE	52	0920	238.4	3.4	76	0925	124.3	2.4	154.1	FOG
	SE	52	1020	277.9	3.1	76	1025	135.6	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	164.1	4.3	168	FOG
	SE	52	1322	361.2	2.5	76	1327	140.0	4.0	226.2	FOG
	SE	52	1420	1625	2.9	76	1425	1633	3.0	209.2	FOG

226.9

Highlighted readings are above the 7 mg/kg set as an action level where all work would stop. More than 52 days went by above this safe reading.

Protective Clean Up Levels

DTSC is constantly telling residents that they are not a health agency – they can't explain the health issues. But they are setting the cleanup levels based upon health risk. We want DTSC to consult with health agencies such as Office of Environmental Health Hazard Assessment (OEHHA). A sister agency to DTSC within California EPA, *"provides toxicological consultation to state and local government on possible human health and ecological risks associated with exposures to environment contaminants at sites undergoing regulatory or voluntary cleanup."*

Under OEHHA the California Human Health Screening Levels (CHHSLs) have been set for soil and soil gas levels. CHHSLs are concentrations of chemicals in soil or soil gas below thresholds of concern for risk to human health –that is, an excess lifetime cancer risk of one-in-a-million (10^{-6}) and a hazard quotient of 1 for non-cancer health effects.

OEHHA has set a CHHSL for PCBs at 0.089 mg/kg more than 2 ½ times lower than the .22 mg/kg proposed by DTSC for the Ag Park Cleanup. If DTSC is not a health agency – then listen to one that is! Homes will be built upon this land. The history of this site demonstrates that we can't count on DTSC, the developer or the city.

Tables of OEHHA Soil and Soil-Gas Screening Numbers

Table 1. Soil-and-Soil-Gas-Screening Numbers (mg/kg soil) for Nonvolatile Chemicals Based on Total Exposure to Contaminated Soil: Inhalation, Ingestion and Dermal Absorption

Chemical	Soil Screening Number (mg per kg of dry soil)	
	Residential Scenario	Commercial/Industrial Scenario
PCBs	8.0 E-02 0.089 mg/kg	3 OE-01

DTSC proposes .22mg/kg clean up level

OEHHA recommends 0.089 mg/kg - 2 1/2 times lower

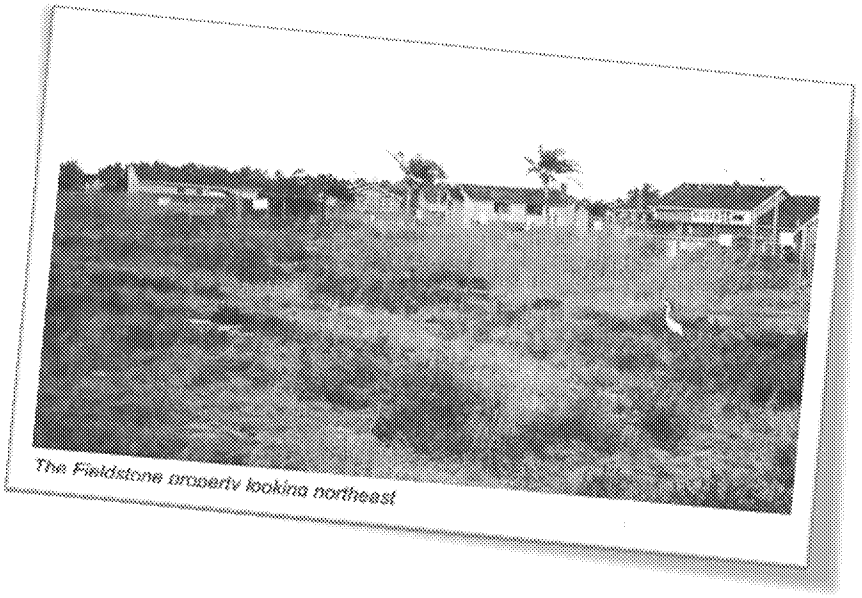
Testing and Clean-up of Homes

Ag Park Families have long requested that their homes be tested – yards and attics – to ensure they have not been contaminated with the PCBs and other chemicals of concern from the activities carried out by the developer and DTSC.

For at least 3 years residents have repeatedly requested this be done only to be met with one excuse after another.

While at other sites testing of homes was completed quickly. For example, the Fieldstone Property next to Huntington Beach. The 42-acre site is contaminated with PCBs. It was discovered in June of 2002, and testing of homes began in July of 2002. Why the difference.

This is the Fieldstone Property where land was contaminated with PCBs like Ag Park. But unlike Ag Park it only took DTSC 1 month to test homes.

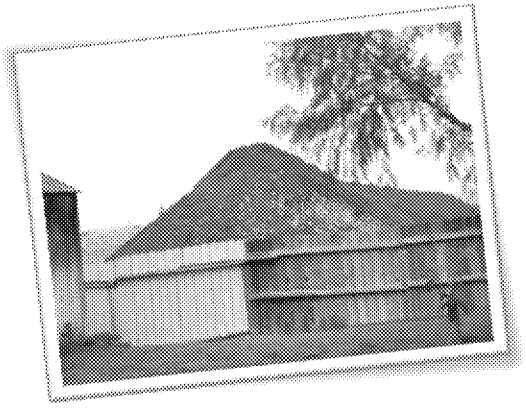


The Fieldstone property looking northeast

Comparisons between

Fieldstone Property and Ag Park

SITE	SIZE	CHEMICAL OF CONCERN	HOMES NEAR SITE	YEAR OF DISCOVERY OF SITE	TIME TO TEST HOMES	HIGHEST READINGS	MEDIAN HOUSEHOLD INCOME	ETHNICITY
FIELDSTONE PROPERTY	42 acres	PCBs	One side	June, 2002	1 month	3.220 ppm	$81,389	78% white
AG PARK	62 acres	PCBs	Three sides	June, 2003	13 years - Still no testing	4,930 ppm	$47,476	75% Latino



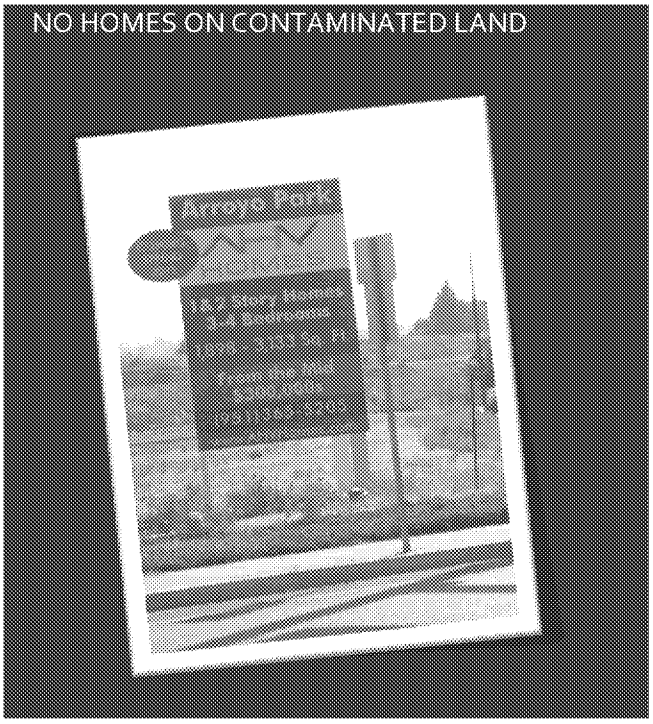
PCB contaminated soil stockpiled next to Homes at Ag Park.

FAST FACTS

- PCBs are polychlorinated biphenyls (polly-KLOR-a-nay-ted by-FEEN-ills). They are a group of chemicals used in electrical transformers and hydraulic fluids.
- PCBs are manmade and are not naturally occurring in the environment.
- PCBs bioaccumulated
- PCBs are persistent compounds they don't degrade easily.
- PCBs were banned in the 1980s and are considered dangerous enough to be listed specifically in TOSCA law.

- Health Effects:
  - ✓ They can cause cancer (Prop. 65 chemical)
  - ✓ Skin rash
  - ✓ Effect the nervous system Causing behavior
  - ✓ Immune system disorder
  - ✓ Reproductive system disorders.
  - ✓ Thyroid function

- Exposure comes from:
  - ✓ **Dermal contact** - getting soil on your skin
  - ✓ **Inhalation** - breathing dust from the soil
  - ✓ **Ingesting** - eating the soil. This can happen by getting soil on your hands and then handling food, or by putting the dirt in your mouth as some children do.



FOR MORE INFORMATION

Call CCAEJ at 951-360-8451

Attend the Community Work Group meetings

Tell you elected officials you want a safe, real clean-up of this site.