Department of Toxic Substances Control

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Secretary for
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Edmund G. Brown Jr.
Governor

SENT VIA ELECTRONIC MAIL AND HARD COPY

July 23, 2015

Mr. Enrique Manzanilla, Director
Superfund Division
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105

REQUEST FOR ASSISTANCE IN REVIEWING PRIOR SITE REMEDIATION ACTIVITIES

Dear Mr. Manzanilla:

I write to request the U.S. Environmental Protection Agency's (U.S. EPA) assistance in conducting a review of the clean-up activities conducted at the Riverside Agricultural Park site (Site), in the City of Riverside. The Department of Toxic Substances Control (Department) initiated this review following the receipt of a letter dated March 5, 2015 from the Center for Community Action and Environmental Justice (CCAEJ) to give careful consideration to their concerns. In this letter, CCAEJ alleged that serious problems occurred before and during cleanup activities at the Site, and that nearby residents were potentially exposed to toxic substances. This letter also requested that the Department and other environmental agencies review the adequacy of clean-up activities at the Site.

The Department provided oversight on the characterization and cleanup of PCB-contaminated soil at the property. The Department and the City of Riverside entered into a Voluntary Cleanup Agreement in 2005 to begin the remediation. In 2006, this transitioned into a California Land Reuse and Revitalization Agreement with a developer, Friends of Riverside Airport (FRA). The Department issued a certificate of completion for the Site on April 1, 2014.

I believe U.S. EPA is familiar with the Site's soil remediation as a result of your 2011 review of these activities at the Department's request. We are happy to provide you with copies of any records we have for the Site; the work performed under the cleanup agreements; the Department's draft assessment of some of the allegations contained in the letter; materials provided to us over the last few months by CCAEJ, FRA, the South

Coast Air Quality Management District, and the Santa Ana Regional Water Quality Control Board; and information on other issues related to the site and its history that the Department is reviewing. I'd be happy to discuss any of these topics with you. The main issues of the review that we are seeking your input on include the following:

- Whether any additional soil sampling is warranted onsite or offsite;
- Whether any additional groundwater monitoring is warranted onsite or offsite; and
- Whether EPA can provide any assistance to the Department in assessing the health-related concerns reported by some members of the community around the Site.

We understand that the developer, the City of Riverside, and members of the community around the Site are anxious to have this review completed as quickly as possible. In order to provide a complete review in the shortest time, we are seeking your assistance.

Please let me know at your earliest convenience if U.S. EPA will be able to assist the Department in conducting this review, and what materials, if any, you would like us to make available. We will be sending you shortly a draft sampling plan that we are considering for possible additional groundwater monitoring and would appreciate your comments on the plan.

I would also like to arrange an opportunity to have your senior team and the management team for the Cleanup Program at the Department discuss some ideas that I have to enhance the Department's approaches to site remediation and community engagement around cleanups. Again, thank you for your support and assistance. Please do not hesitate to call me if you have any questions.

Best regards,

Barbara A. Lee
Director