Not Just Dirt

DTSC's Mission Statement and Strategic Plan

The mission of DTSC is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products.

Our Vision

Californians enjoy a clean and healthy environment, and as a result of our efforts:

- Communities are confident that we protect them from toxic harm
- Businesses are confident that we engage them with consistency and integrity
- Consumers are confident that we stimulate innovation in the development of safer products

DTSC: Who We Are and What We Do

DTSC uses CalEnviroScreen

Identifying and Helping Impacted Communities - DTSC uses CalEnviroScreen, a first-in-the-nation environmental health screening tool developed by CalEPA, to identify communities in California that are disproportionately burdened by multiple sources of pollution. This information allows DTSC to prioritize its enforcement, complaints, and groundwater investigations

- More than 40% of all inspections, complaint investigations and enforcement actions take place in areas most burdened by multiple pollution sources. DTSC's Environmental Justice Plan makes protecting, safeguarding, and restoring these communities a tenet of its work.

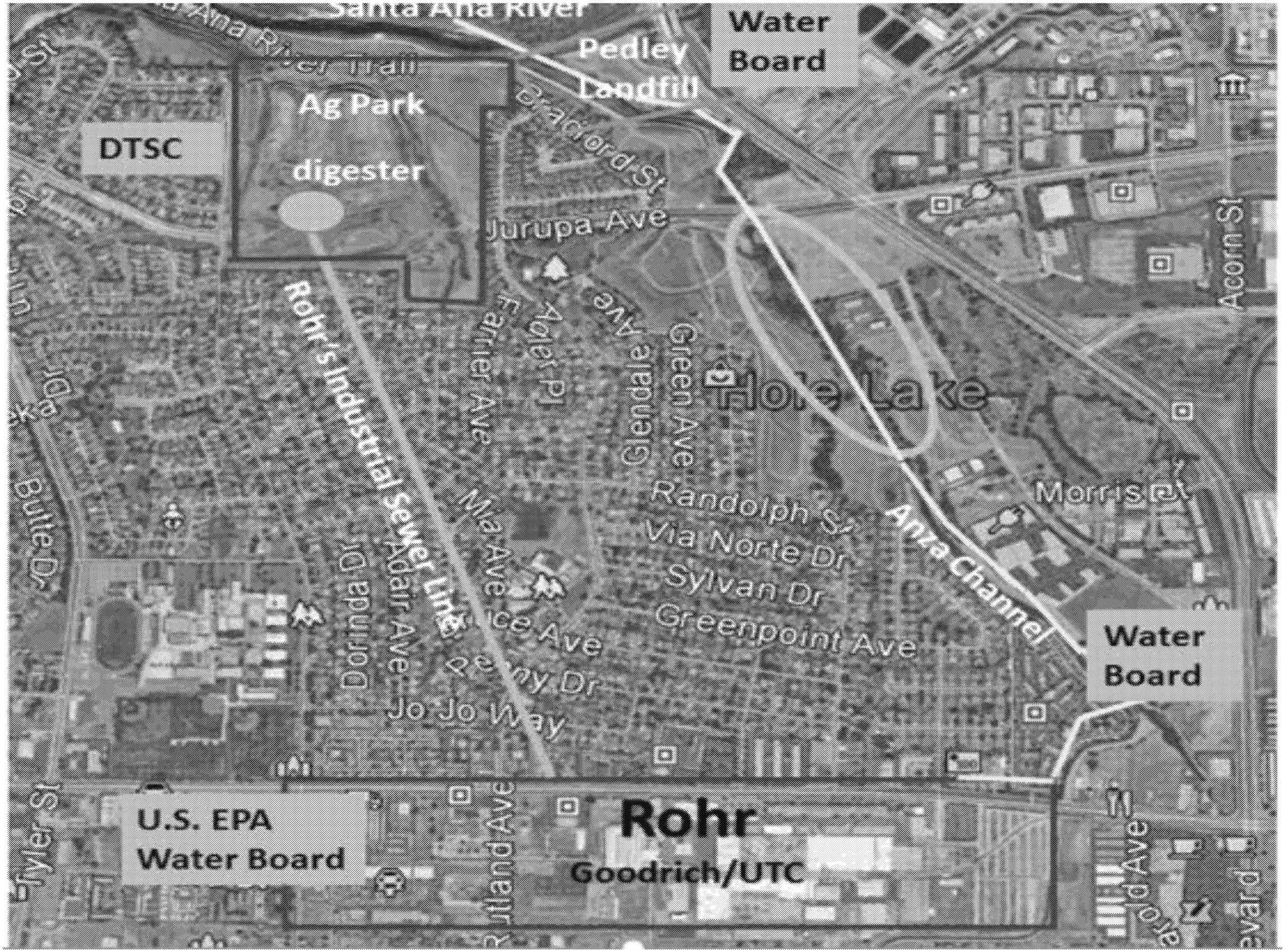
Not Just Dirt

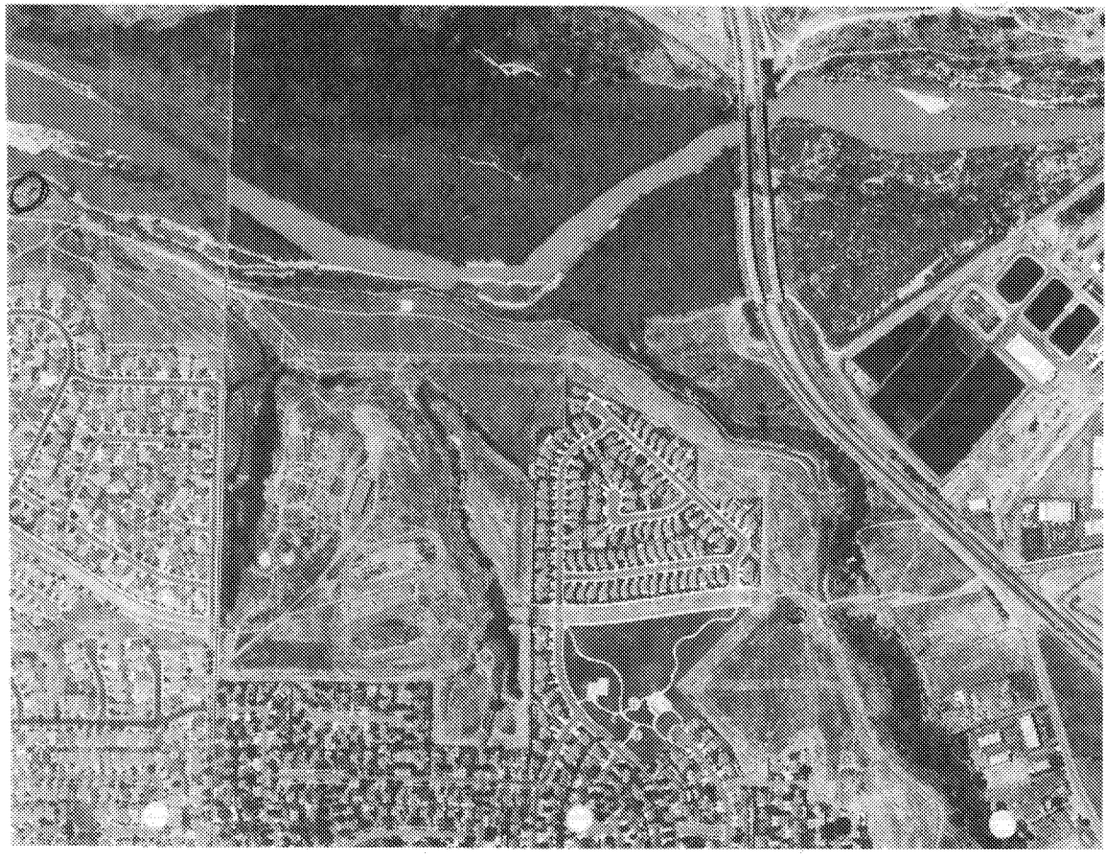
Human and Ecological Risk Office

Evaluation of Contaminant Health Risks at School, Residential, Industrial and Recreational/Open Space Sites in California

The Northern California, Central California and Southern California Sections of HERO provide site characterization, fate and transport modeling, as well as, site-specific exposure and health risk assessments for school, residential, industrial, recreational and open space sites in California. HERO's objective is to ensure that contaminants are accurately characterized, health risks are accurately estimated, and any residual contamination does not pose a risk to human and ecological health.

HERO provides site-specific exposure and health risk assessments at proposed and existing schools in California to ensure protection of some of the state's most sensitive populations. HERO toxicologists provide assistance to DTSC School Evaluation Units on the development of guidance and scientific procedures for assessing the health risks of contaminants at school properties. HERO toxicologists communicate their findings on the health risks of contaminants at school sites and at school site cleanups to DTSC School Evaluation Units, as well as directly to the public, both in written materials and at community meetings.


Santa Ana River
Pedley Landfill
Water Board
Ag Park digester
DTSC
Bradford St
Jurupa Ave
Acorn St
Rohr's Industrial Sewer Line
Farrier Ave
Agler Pl
Glendale Ave
Green Ave
Hole Lake
Randolph St
Via Norte Dr
Sylvan Dr
Greenpoint Ave
Anza Channel
Morris St
Mia Ave
Adair Ave
Dorinda Dr
Jo Jo Way
Water Board
U.S. EPA Water Board
Rohr
Goodrich/UTC
Tyler St
Rutland Ave



- U.S. Army Constructed Camp Anza, 1942 (1,200 Acre)
- Built a Industrial sewage treatment plant on site
- Listed as Formerly Used Defense Site
- Never been characterized by lead agencies

History

- 1942 - US Army builds Camp Anza with sewage plant on current Ag Park site
- 1947 – 1954 plant accepted waste from ROHR, commercial and residents
- 1962-1965 – City of Riverside operates the plant
- 1965 –sewer plant decommissioned
- December 11, 1980 the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was enacted by Congress in response to toxic activity in the USA

History Continued

- 1962-2006 - City of Riverside owned the current site
- 1993 – California creates Brownfields voluntary cleanup program
- June 17, 2003 - FRA contractor broke open digester spilling 43,000 gallons of highly toxic PCBs onto the site. This was not reported to the city until July 7th 2003. According to a city memo, this was spread throughout the site through grading
- 2003 – City hires outside attorney to study site and make recommendations on how the City should proceed.

History Continued

- 2003-2005 - City of Riverside asks County for help and County wants to clean up at non-detect City rejects due to cost. Meanwhile local homeowners are exposed to dust containing PCBs at levels 43,863 times the current cleanup level of .22 mg/kg

- 2004 Outside Attorney hired by City to investigate the site sends letter to Goodrich for recovery of remediation cost under CERCLA

- 2004 California passes the Land Reuse and Revitalization Act which provides immunity for innocent land owners from response costs or damage claims.

- 2004 – City Council votes to leave contaminated material on site in order to not bother the neighborhood with traffic and noise.

History Continued

- 2005, April, City signs Brownfields Voluntary cleanup program with DTSC with .22 cleanup level and initial cost not to exceed $100,000

- 2006 – City sells property to FRA who inherits the immunity from the Land Reuse and Revitalization Act

- 2006 – FRA signs amended agreement with DTSC for cleanup of site for initial $300,000 and .22 mg/kg cleanup level and dust levels of 7ug/m3

- 2009 April -2009 July – FRA starts Phase 1 of cleanup to remove all dirt with levels over .50mg/kg with TRC oversight 8,666 tons of dirt remove to Kettleman toxic site.

History Continued

- 2013 July to 2014 January – FRA removes does final cleanup with TRC oversight. 165,226 tons of soil taken to Azusa Land Reclamation Facility for recycling
- 2014 April – DTSC issues certificate of completion to FRA
- 2014 April – City asks for $ 1,500,000 held in escrow from agreement with ROHR.
- April 2014 – City Manager sends letter to residents declaring no health hazard.

History Continued

- 2015 June New DTSC Director send letter to City to refrain from further approvals for the site due to resident and CCAEJ concerns
- 2015 June – City issues stop work order to FRA
- 2015 November – DTSC and EPA take samples
- 2016 February – DTSC Director issues Notification of Need for Additional Remediation at the Riverside Agricultural Park.
- 2016 – September – FRA starts Phase 3 of cleanup

CERCLA Certification

Notice to Goodrich as Successor to Rohr of Potential Liability Under CERCLA

The City has undertaken a complete Site investigation and characterization to identify the extent of the plume of PCB contamination in soil. The City has incurred and will continue to incur substantial response costs, including but not limited to: (1) hiring environmental engineers to work with the County of Riverside to sample throughout the Site at various depths for presence of not only PCBs, but also other chemicals which could have been disposed by Rohr in the sewer systems; (2) obtaining laboratory testing results for the sampling; (3) retaining various subcontractors to dismantle the remainder of the concrete from the digester and other structures contaminated with PCBs in order to sample soil beneath these structures; (4) retaining contractors to remove, transport and dispose of PCB contaminated soils and other materials; and (5) retaining legal counsel to pursue potentially responsible parties.

The City is committed to remediation of the Site, and is working cooperatively with the County of Riverside who has been designated by the California Environmental Protection

CERCLA Certification

Agency Department of Toxic Substances Control as the Lead Agency to oversee this process. The City will be seeking to recover its costs from PRPs, as defined in 42 U.S.C. 9607 (a), through the mechanisms afforded under Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") for cost recovery and/or contribution.[1] To establish liability under CERCLA, four elements are needed, all of which are met with respect to Goodrich: (1) the site upon which hazardous substances are contained is a "facility;" (2) a release or threatened release of any hazardous substances from the facility has occurred; (3) such release or threatened release has caused the claimant to incur response costs that were necessary; and (4) the potentially responsible party is one of the four classes of person subject to CERCLA liability – namely, present owner or operator, past owner or operator, arranger of hazardous waste disposal and transporters of such waste.[2]

The evidence and investigation to date establish that: (1) the Ag Park is a facility; (2) the PCBs are a hazardous substance which has been released; (3) the City has in the past, and continues to incur response costs that are necessary; and (4) 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.

CERCLA Certification

Site History and Potential Liability of Goodrich as Successor in Interest to Rohr for Liability at the Site

Based on the investigation and research undertaken to date, the City has concluded that Goodrich, as successor in interest to Rohr, is a major potentially responsible party ("PRP") for the PCB contamination at the Site.

The City has reached this conclusion after careful review of all the available evidence regarding the past history of the Site to determine how PCBs came to be disposed of in the sewage treatment system. This research has entailed: (1) reviewing historic aerial photographs; (2) reviewing City and County of Riverside records relating to the activities, permits and customers of the prior sewage treatment plant; (3) reviewing records from the Santa Ana Regional Water Quality Control Board regarding industrial activities in the vicinity of the Site, including activities of Rohr; (4) conducting a comprehensive EDR search; and (5) obtaining through the Freedom of Information Act ("FOIA") records from the U.S. Army regarding the former Army activities on the Site.

The Ag Park Site was formerly part of Camp Anza, a World War II-era staging ground for Army troops. Sometime during World War II, the U.S. Army constructed and operated a sewage treatment plant ("Plant") on the Site. Following the end of World War II, 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 as an industrial user and commercial and residential customers located in the vicinity of the Site. The City took over ownership of the Site in 1962 and closed the plant in 1965.

NCP (National Contingency Plan

Hazardous Substance Removals

§300.415(b)

Authorizes the lead agency to initiate appropriate removal action in the event of a hazardous substance release. Decisions of action will be based on:

- Threats to human or animal populations;
- Contamination of drinking water supplies or sensitive ecosystems;
- High levels of hazardous substances in soils;
- Weather conditions that may cause migration or release of hazardous substances;
- Threat of fire or explosion; or
- Other significant factors effecting public health or the environment.

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

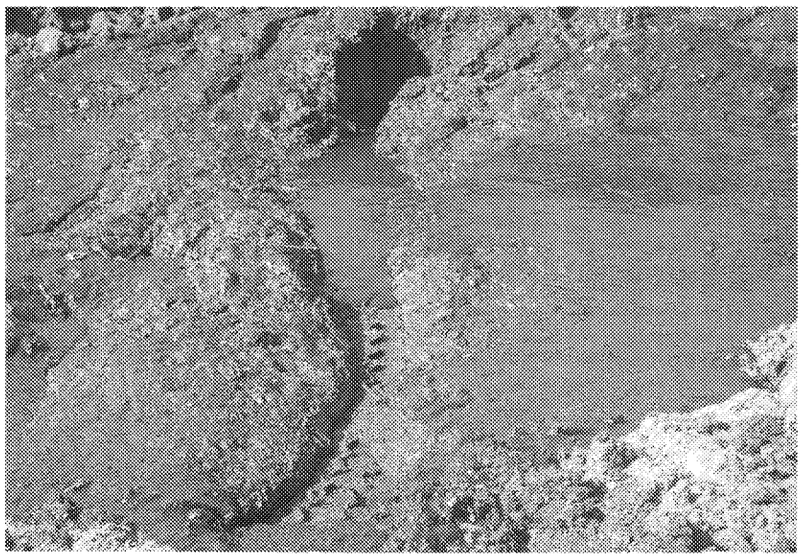
This report is from 2003. It shows High levels of toxic chemicals in the ground.

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#	322.0	35.0	ug/Kg	7
TETRACHLOROETHANE-DOC#	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	g/Kg	5
1,2-Dichlorobenzene-Doc#2	6,650			
BIS(2-ETHYLHEXYL)PHTHALAT DOC#1	212,000	1665.0	ug/Kg	5
BIS(2-ETHYLHEXYL)PHTHALAT 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

DTSC is not even testing for these highly toxic substances during this lengthy process



approximately 8,666 tons of soil were removed during Phase 1 activities. Additional items removed from the Site included vegetation (green waste), PCB contaminated concrete, sewer pipe, and utility poles (TRC, 2010).

A total of 31 soil samples were analyzed for dioxin/furan congeners. Of the samples analyzed, 13 contained 2,3,7,8-TCDD Equivalent (Eq.) concentrations in excess of the health-based screening level for residential land-use (i.e., 4.5 pg/g or 4.5E-6 mg/kg). This health-based screening level represents the USEPA residential RSL (USEPA, 2013). The samples that contained the highest concentrations of 2,3,7,8-TCDD Eq. were TP-30E (4,817.7), TP-30S (8,372.8), and TP-30W (300.7). These three samples were co-located with PCB-impacted soil and six additional samples exceeded the health-based screening level (B-67, TP-29, S-22+20E, TP-30N, TP-30B, and TP-103). These nine samples were co-located with PCB-impacted areas and were planned for removal during Phase 2 mass grading activities.

3.0 REMEDIAL EXCAVATION OBJECTIVES

3.1 REMEDIAL EXCAVATION SCOPE

The purpose of the remedial excavation activities summarized herein was to prepare the Site for single-family residential development by excavating, removing, and properly disposing of soils containing PCB concentrations in excess of the USEPA residential RSL of 0.22 mg/kg from locations identified during previous Site investigation efforts. In addition, soil samples were collected from select locations and analyzed for dioxins, furans, and metals. This work was performed in accordance with Section 7.10 (Excavation of Soil Containing Less Than 50 mg/kg of PCBs) of the *Revised Response Plan, Excavation of Soils Containing PCBs* (FREY, 2006a).

3.2 REMEDIAL EXCAVATION GOALS

The RSL combines current human health toxicity values with standard exposure factors to estimate contaminant concentrations in soil, air and water that are considered by the EPA to be protective of human health over a lifetime (USEPA, 2013). The use of the RSL as a cleanup goal for PCBs (0.22 mg/kg) is conservative given the realities of demographic residential patterns. To ensure that the goal is acceptable, a post-remediation human health risk assessment (HHRA) using the confirmation sampling results obtained during Phase 2 of the project was developed. A summary of this HHRA is presented in Section 7.0.

Based on sample results for metals from the Phase 1 work activities, confirmation soil samples will be collected from the B-1 area and analyzed for hexavalent chromium.

Soil containing dioxins and furans will be removed from the Site until the TCDD Eq. is below the health-based screening level for residential use (i.e., 4.5 pg/g or 4.5E-6 mg/kg).

9560 mg/kg is

43,863.64

More Deadly

Than the .22 level the DTSC says is acceptable on this site.

PCBs only if the shallower soil samples contained PCBs. Selected soil samples were also analyzed for polynuclear aromatic compounds (PAHs), arsenic, organophosphorous pesticides, and herbicides.

Concentrations of organophosphorous pesticides and herbicides were not detected. PAHs were either not detected or were detected at concentrations below their respective residential PRGs (USEPA, 2004), with the exception of two soil samples that contained concentrations of dibenzo(a,h)anthracene that slightly exceeded the residential PRG.

Arsenic was detected in soil at similar concentrations to those detected during the Earthsafe investigation in August 2003.

PCBs were detected in the majority of the 251 soil samples collected during the investigation (up to a maximum concentration of 9,560 mg/kg). The highest concentrations of PCBs were detected in soil samples collected from 0.75 fbg from the former sludge bed areas. PCBs in excess of 50 mg/kg were not detected in soil samples collected from outside the former sewage plant or sludge bed area, with the exception of two soil samples collected from the western end of the southern brine basin. Aroclor 1248 and Aroclor 1254 were the main congeners detected in the 251 soil samples, and Aroclor 1016 was detected in one soil sample.

Four soil samples with detectable PCB concentrations from the sludge bed areas were collected at approximately 3 fbg, composited into a single sample, and analyzed for dioxins and furans. The composite sample result indicated that 2,3,7,8-tetrachlorodibenzo-*p*-dioxin (TCDD; the most toxic dioxin) was not present above the method detection limit of 0.234 picograms per gram (pg/g). A toxic equivalency quotient (TEQ) of 0.385 micrograms per kilogram (µg/kg) was calculated for the composite sample.

2.3.3.3 Soil Vapor Sampling

Soil vapor sampling was conducted via 24 soil vapor probes installed to depths of approximately 5 fbg to evaluate subsurface conditions across the Site. The vapor probes were located as follows: 11 of the 24 soil vapor probes were advanced and sampled within the area of the former sewage treatment plant and the sludge beds, and the remaining 13 soil vapor probes were advanced in various locations across the Site. Soil vapor samples were collected at each location and analyzed for VOCs. No VOCs were detected above laboratory reporting limits in any of the 24 soil vapor samples.

2.3.4 Geomatrix – 2004

2.3.4.1 Concrete Sampling

In March 2004, Geomatrix collected 77 samples of concrete and rock from eight stockpiles and the remnants of the former digester for PCB analysis. A total of 41 concrete samples were collected from the digester, one sample from each of the four stockpiles sampled by FREY, and 32 samples from the previously un-sampled four concrete stockpiles. The concrete samples did

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

N
Julian Dr
Hershey Way
Agricultural Park
Jurupa Ave
Rutland Park
Mandalay Ct
Tanforan Dr
Altadena Dr
Hobart Dr
Eagle Way
Firebird Ln
Leucadia Ln
Hillsborough Ln
Fallsvale Ln
Terrace Elementary School
Norte Vista High School
Randolph
Bruce
Bruce Ave
Green Point Ave
Glendale Ave
Green Ave
Rutland Ave
Alabama St
Rossmore
Bradford St
Dunn Ct
Auld St
Medallion Pl
Ontario St
Cedar Ave
Donnda Dr
Adair Ave
Perry Dr
Via Norte Dr
Sylvan Dr
Cabrillo Dr
Daytona Ave
Biscayne Ave
Ferrer Ave
Oxley Ave
Vanguard Ave
Butte Dr
Jamaica Dr
Olympia Dr
Adams Dr
Lakeland Ln
Cordi Rd
Beddie
Ontario Ave
Sludge Dryer

Results from the second testing:

- 159 samples were taken, each sample had some level of PCBs.
- Out of the 159 samples 89 indicated PCB levels above the .22 (which is purportedly to be safe around humans)
- Out of the 89 samples – 33 indicated levels between 1.0 – 131 (extreme high levels of PCBs)

Table 1
RESULTS OF LABORATORY ANALYSIS OF SOIL SAMPLES
POLYCHLORINATED BIPHENYLS
SOXHLET EXTRACTION METHOD
Former Agricultural Park, Riverside, California

Sample ID	Sample Depth (ftbg)	Date Collected	Soxhlet Extraction Method Aroclor 1248 (mg/kg)	Aroclor 1254 (mg/kg)	Aroclor 1260 (mg/kg)	Total PCBs (mg/kg)	Notes
F8-1606	0.25	11/3/2015				0.189	congener analysis
G7-1616	0.25	11/3/2015				0.315	congener analyses
E6-1663	0.25	11/3/2015				0.404	congener analyses
C5-1666	0.25	11/3/2015				0.309	congener analyses
D4-1687	0.25	11/3/2015				0.288	congener analysis
FG8-1601	0.25	11/3/2015	0.23	0.14	0.015	0.385	
GH8-1603	0.25	11/3/2015	0.043	ND<0.0094	0.014	0.057	
F7.5-1607	0.25	11/3/2015	0.15	0.11	0.014	0.275	
FG7.5-1606	0.25	11/3/2015	0.16	0.14	0.019	0.319	
GH7-1611	0.25	11/3/2015	0.053	0.041	ND<0.0098	0.094	
GH6-1635	0.25	11/3/2015	0.20	0.11	0.012	0.32	
GH5.5-1636	0.25	11/3/2015	0.11	0.068	ND<0.0097	0.178	
G7.5-1605	0.25	11/3/2015	0.11	0.089	ND<0.0098	0.199	
GH7.5-1604	0.25	11/3/2015	0.23	0.20	0.023	0.453	
GH6.5-1638	0.25	11/3/2015	0.12	0.061	ND<0.0099	0.181	duplicate
GH6.5-1634	0.25	11/3/2015	0.078	0.032	ND<0.0098	0.11	
GH4-1686	0.25	11/3/2015	ND<0.0098	ND<0.0098	ND<0.0098	ND<0.0098	
GH3.5-1701	0.25	11/3/2015	0.081	0.044	0.0099	0.1349	
GH5-1657	0.25	11/3/2015	0.043	0.035	ND<0.0098	0.078	
GH4.5-1679	0.25	11/3/2015	ND<0.0098	ND<0.0098	ND<0.0098	ND<0.0098	
GH3-1702	0.25	11/3/2015	ND<0.0098	ND<0.0098	ND<0.0098	ND<0.0098	
GH2.5-1722	0.25	11/3/2015	ND<0.0099	ND<0.0099	ND<0.0099	ND<0.0099	
GH2-1723	0.25	11/3/2015	0.84	0.55	ND<0.066	1.39	
H5-1662	0.25	11/3/2015	1.1	0.41	ND<0.066	1.51	
H2b-1602	0.25	11/3/2015	0.99	0.31	ND<0.066	1.30	duplicate
G2.5-1721	0.25	11/3/2015	0.097	0.042	ND<0.0098	0.139	
G3.5-1700	0.25	11/3/2015	0.20	0.089	ND<0.066	0.289	
G4.5-1678	0.25	11/3/2015	ND<0.067	ND<0.067	ND<0.067	ND<0.067	
G5.5-1655	0.25	11/3/2015	5.2	3.0	0.16	8.36	
G6.5-1633	0.25	11/3/2015	0.28	ND<0.067	ND<0.067	0.28	
GH6.5-1633	0.25	11/3/2015	0.29	0.12	ND<0.065	0.41	duplicate
FG7-1609	0.25	11/3/2015	0.13	0.069	ND<0.065	0.199	
FG6.5-1632	0.25	11/3/2015	0.087	ND<0.067	ND<0.067	0.087	
FG6-1637	0.25	11/3/2015	0.35	0.13	ND<0.067	0.48	
FG5.5-1654	0.25	11/3/2015	ND<0.067	ND<0.067	ND<0.067	ND<0.067	
FG5-1659	0.25	11/3/2015	0.86	0.42	ND<0.067	1.28	
FG4.5-1677	0.25	11/3/2015	5.4	4.2	0.55	10.15	
FG4-1682	0.25	11/3/2015	3.2	1.4	0.18	4.78	
FG3.5-1699	0.25	11/3/2015	ND<0.068	ND<0.068	ND<0.068	ND<0.068	
FG3-1704	0.25	11/3/2015	ND<0.068	ND<0.068	ND<0.068	ND<0.068	
FG2b3-1704	0.25	11/3/2015	ND<0.069	ND<0.069	ND<0.069	ND<0.069	duplicate
FG2.5-1726	0.25	11/3/2015	0.085	0.072	ND<0.068	0.157	
FG2-1724	0.25	11/3/2015	0.15	0.12	ND<0.067	0.27	
F2.5-1719	0.25	11/3/2015	2.2	1.1	0.11	3.41	
F3.5-1698	0.25	11/3/2015	2.0	1.2	0.11	3.31	
F4.5-1676	0.25	11/3/2015	0.16	0.14	ND<0.067	0.30	
F5.5-1653	0.25	11/3/2015	0.15	0.10	ND<0.068	0.25	
F6.5-1631	0.25	11/3/2015	ND<0.069	ND<0.069	ND<0.069	ND<0.069	
EF6.5-1630	0.25	11/3/2015	0.14	ND<0.067	ND<0.067	0.14	
EF6-1639	0.25	11/3/2015	0.40	0.16	ND<0.067	0.56	
EF7-1612	0.25	11/3/2015	0.25	0.14	ND<0.068	0.39	
EF5.5-1652	0.25	11/3/2015	0.10	0.082	ND<0.067	0.182	
EF6.5-1652	0.25	11/3/2015	0.10	0.067	ND<0.069	0.167	duplicate
EF5-1661	0.25	11/3/2015	ND<0.069	ND<0.069	ND<0.069	ND<0.069	
EF4.5-1675	0.25	11/3/2015	ND<0.068	ND<0.068	ND<0.068	ND<0.068	
EF4-1684	0.25	11/3/2015	ND<0.067	ND<0.067	ND<0.067	ND<0.067	

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F7-1608	0.25	11/2/2015	0.074	ND<0.012	ND<0.012	0.074	
G8-1602	0.25	11/2/2015	0.17	0.17	0.030	0.37	
E7-1613	0.25	11/2/2015	0.21	0.11	ND<0.012	0.32	
D7-1615	0.25	11/2/2015	ND<0.012	ND<0.012	ND<0.012	ND<0.012	
C7-1618	0.25	11/2/2015	0.056	ND<0.012	ND<0.012	0.056	
B7-1620	0.25	11/2/2015	0.043	ND<0.012	ND<0.012	0.043	
B6-1644	0.25	11/2/2015	0.096	ND<0.012	ND<0.012	0.096	
C6-1642	0.25	11/2/2015	0.089	ND<0.012	ND<0.012	0.089	
D6-1604	0.25	11/2/2015	0.35	0.19	ND<0.012	0.54	
F6-1638	0.25	11/2/2015	0.22	0.14	ND<0.012	0.36	
C6b-1636	0.25	11/2/2015	0.11	ND<0.012	ND<0.012	0.11	duplicate
C6-1636	0.25	11/2/2015	0.16	0.096	ND<0.012	0.256	
C5-1658	0.25	11/2/2015	0.077	0.036	ND<0.012	0.113	
F5-1660	0.25	11/2/2015	0.24	0.12	ND<0.012	0.36	
E5-1662	0.25	11/2/2015	0.28	0.089	0.014	0.383	
D5-1664	0.25	11/2/2015	0.075	0.071	ND<0.012	0.146	
B5-1668	0.25	11/2/2015	0.26	0.11	0.014	0.384	
C4-1689	0.25	11/2/2015	0.053	ND<0.012	ND<0.012	0.053	
F4-1683	0.25	11/2/2015	0.19	ND<0.012	ND<0.012	0.19	
E4-1685	0.25	11/2/2015	ND<0.012	ND<0.012	ND<0.012	ND<0.012	
E4b-1685	0.25	11/2/2015	ND<0.017	ND<0.017	ND<0.017	ND<0.017	duplicate
E3-1707	0.25	11/2/2015	ND<0.017	ND<0.017	ND<0.017	ND<0.017	
D3-1709	0.25	11/2/2015	0.15	ND<0.017	ND<0.017	0.15	
C3-1708	0.25	11/2/2015	0.025	ND<0.017	ND<0.017	0.025	
C2-1706	0.25	11/2/2015	ND<0.017	ND<0.017	ND<0.017	ND<0.017	
D2-1729	0.25	11/2/2015	ND<0.017	ND<0.017	ND<0.017	ND<0.017	
E3-1727	0.25	11/2/2015	ND<0.017	ND<0.017	ND<0.017	ND<0.017	
G4-1681	0.25	11/2/2015	ND<0.016	ND<0.016	ND<0.016	ND<0.016	
G3-1703	0.25	11/2/2015	0.14	ND<0.017	ND<0.017	0.14	
G2-1701	0.25	11/2/2015	0.30	ND<0.017	ND<0.017	0.30	
G2b-1701	0.25	11/2/2015	0.44	ND<0.017	ND<0.017	0.44	duplicate
F2-1725	0.25	11/2/2015	ND<0.017	ND<0.017	ND<0.017	ND<0.017	
B3-1734	0.25	11/2/2015	0.088	ND<0.017	ND<0.017	0.088	
B2-1732	0.25	11/2/2015	ND<0.017	ND<0.017	ND<0.017	ND<0.017	
B4-1736@4'	4	11/2/2015	0.18	ND<0.017	ND<0.017	0.18	
B4-1736 N10'	0.25	11/2/2015	17	12	1.0	30	
B4-1736 N20'	0.25	11/2/2015	31	20	1.3	52.3	
B4-1736 S10'	0.25	11/2/2015	47	28	1.8	76.8	
B4-1736 S20'	0.25	11/2/2015	21	15	1.2	37.2	
B4b-1736 S20'	0.25	11/2/2015	20	13	0.97	33.97	duplicate
B4-1736 E10'	0.25	11/2/2015	92	39	ND<6.7	131	
B4-1736 E20'	0.25	11/2/2015	0.51	0.38	0.031	0.921	
B4-1736 W10'	0.25	11/2/2015	8.8	4.6	0.36	13.76	
B4-1736 W20'	0.25	11/2/2015	11	7.9	0.69	19.59	
F3-1705@4'	4	11/2/2015	0.42	0.16	0.0097	0.590	
F3b-1705@4'	4	11/2/2015	0.46	ND<0.0094	0.012	0.472	duplicate
F3-1705 N10'	0.25	11/2/2015	2.6	1.4	0.15	2.75	
F3-1705 N20'	0.25	11/2/2015	1.1	0.39	ND<0.069	1.49	
F3-1705 S10'	0.25	11/2/2015	3.8	2.1	0.19	6.09	
F3-1705 S20'	0.25	11/2/2015	0.66	0.37	ND<0.068	1.03	
F3-1705 E10'	0.25	11/2/2015	7.9	3.9	0.39	11.79	
F3-1705 E20'	0.25	11/2/2015	0.49	0.28	ND<0.066	0.77	
F3-1705 W10'	0.25	11/2/2015	1.9	1.2	0.14	3.24	
F3-1705 W20'	0.25	11/2/2015	1.6	0.87	ND<0.14	2.47	
F3-1705	0.25	11/2/2015	2.3	1.2	0.13	3.63	
B4-1736	0.25	11/2/2015	69	43	ND<6.9	112	

Table 1
RESULTS OF LABORATORY ANALYSIS OF SOIL SAMPLES
POLYCHLORINATED BIPHENYLS
SOXHLET EXTRACTION METHOD
Former Agricultural Park, Riverside, California

Sample ID	Sample Depth (ftg)	Date Collected	Soxhlet Extraction Method Aroclor 1248 (mg/kg)	Aroclor 1254 (mg/kg)	Aroclor 1260 (mg/kg)	Total PCBs (mg/kg)	Notes
B6.5-1623	0.25	11/4/2015	0.24	0.11	ND<0.066	0.35	
B36.5-1623	0.25	11/4/2015	1.1	0.54	ND<0.067	1.64	duplicate
B5.5-1645	0.25	11/4/2015	ND<0.066	ND<0.066	ND<0.066	ND<0.066	
B4.5-1737	0.25	11/4/2015	0.25	0.14	ND<0.068	0.48	
B3.5-1735	0.25	11/4/2015	24	11	0.72	35.72	
B2.5-1733	0.25	11/4/2015	ND<0.069	ND<0.069	ND<0.069	ND<0.069	
B62.5-1733	0.25	11/4/2015	ND<0.0096	ND<0.0096	ND<0.0096	ND<0.0096	duplicate
PCB Cleanup Goal						0.25	

Notes:
mg/kg = milligrams per kilogram
ftg = feet below grade
Highlighted value exceeds PCB cleanup goal.

Table 1
RESULTS OF LABORATORY ANALYSIS OF SOIL SAMPLES
POLYCHLORINATED BIPHENYLS
SOXHLET EXTRACTION METHOD
Former Agricultural Park, Riverside, California

Sample ID	Sample Depth (ftg)	Date Collected	Soxhlet Extraction Method Aroclor 1248 (mg/kg)	Aroclor 1254 (mg/kg)	Aroclor 1260 (mg/kg)	Total PCBs (mg/kg)	Notes
E/F3.5-1697	0.25	11/3/2015	ND<0.068	ND<0.068	ND<0.068	ND<0.068	
E/F3-1706	0.25	11/3/2015	ND<0.068	ND<0.068	ND<0.068	ND<0.068	
E/F2.5-1718	0.25	11/3/2015	ND<0.066	ND<0.066	ND<0.066	ND<0.066	
D/E2-1726	0.25	11/3/2015	1.0	0.48	ND<0.068	1.48	
E2.5-1737	0.25	11/3/2015	ND<0.067	ND<0.067	ND<0.067	ND<0.067	
E3.5-1696	0.25	11/3/2015	ND<0.066	ND<0.066	ND<0.066	ND<0.066	
E4.5-1674	0.25	11/3/2015	0.51	0.12	ND<0.065	0.63	
E5.5-1651	0.25	11/3/2015	4.5	1.3	ND<0.065	5.8	
D/E7-1634	0.25	11/3/2015	0.18	0.12	ND<0.066	0.30	
D/E6.5-1628	0.25	11/3/2015	ND<0.066	ND<0.066	ND<0.066	ND<0.066	
E36.5-1628	0.25	11/3/2015	ND<0.067	ND<0.067	ND<0.067	ND<0.067	duplicate
E6.5-1629	0.25	11/3/2015	ND<0.065	ND<0.065	ND<0.065	ND<0.065	
D/E6-1660	0.25	11/3/2015	0.43	0.24	ND<0.065	0.67	
D/E5.5-1650	0.25	11/4/2015	0.12	0.094	ND<0.0097	0.214	
D/E5-1663	0.25	11/4/2015	ND<0.0095	ND<0.0095	ND<0.0095	ND<0.0095	
D/E4.5-1673	0.25	11/4/2015	ND<0.0095	ND<0.0095	ND<0.0095	ND<0.0095	
D/E4-1686	0.25	11/4/2015	0.064	0.061	0.0097	0.1347	
D/E3.5-1695	0.25	11/4/2015	0.041	ND<0.0094	ND<0.0094	0.041	
D/E3-1708	0.25	11/4/2015	ND<0.0097	ND<0.0097	ND<0.0097	ND<0.0097	
D/E2.5-1716	0.25	11/4/2015	0.17	0.10	0.014	0.284	
D/E2-1728	0.25	11/4/2015	ND<0.0094	ND<0.0094	ND<0.0094	ND<0.0094	
D2.5-1715	0.25	11/4/2015	0.010	ND<0.0095	ND<0.0095	0.010	
D3.5-1694	0.25	11/4/2015	0.026	ND<0.0095	ND<0.0095	0.026	
D33.5-1694	0.25	11/4/2015	0.031	0.026	ND<0.0096	0.057	duplicate
D4.5-1672	0.25	11/4/2015	0.016	0.011	ND<0.0095	0.027	
D5.5-1649	0.25	11/4/2015	ND<0.0096	ND<0.0096	ND<0.0096	ND<0.0096	
D6.5-1627	0.25	11/4/2015	0.22	0.10	0.011	0.331	
D66.5-1627	0.25	11/4/2015	0.30	0.11	0.013	0.423	duplicate
CD7-1616	0.25	11/4/2015	0.13	0.059	ND<0.0096	0.189	
CD6.5-1626	0.25	11/4/2015	0.39	0.21	0.017	0.617	
CD6-1641	0.25	11/4/2015	0.31	0.17	0.015	0.495	
CD5.5-1648	0.25	11/4/2015	0.067	0.030	ND<0.0095	0.097	
CD5-1665	0.25	11/4/2015	0.16	0.063	0.0099	0.2529	
CD4.5-1671	0.25	11/4/2015	0.086	0.051	0.010	0.147	
CD4-1688	0.25	11/4/2015	0.14	0.084	0.014	0.238	
CD3.5-1693	0.25	11/4/2015	0.20	0.080	ND<0.0097	0.28	
CD3-1710	0.25	11/4/2015	0.096	0.051	ND<0.0097	0.147	
CD2.5-1714	0.25	11/4/2015	0.14	0.097	0.011	0.248	
CD2-1730	0.25	11/4/2015	0.16	0.097	ND<0.0096	0.257	
C2.5-1713	0.25	11/4/2015	0.22	0.12	0.011	0.351	
C3.5-1692	0.25	11/4/2015	0.15	0.11	ND<0.0095	0.26	
C4.5-1670	0.25	11/4/2015	0.48	0.23	0.019	0.729	
C5.5-1647	0.25	11/4/2015	0.22	0.083	0.010	0.313	
C6.5-1625	0.25	11/4/2015	1.5	0.83	ND<0.067	2.33	
C36.5-1625	0.25	11/4/2015	10	5.7	0.83	16.53	duplicate
B/C7-1639	0.25	11/4/2015	2.4	1.4	0.21	3.81	
B/C6.5-1624	0.25	11/4/2015	ND<0.068	ND<0.068	ND<0.068	ND<0.068	
B/C6-1643	0.25	11/4/2015	ND<0.069	ND<0.069	ND<0.069	ND<0.069	
B/C5.5-1646	0.25	11/4/2015	ND<0.069	ND<0.069	ND<0.069	ND<0.069	
B/C5-1667	0.25	11/4/2015	0.12	0.092	ND<0.069	0.212	
B/C4.5-1669	0.25	11/4/2015	0.16	0.12	ND<0.069	0.28	
B/C4-1690	0.25	11/4/2015	2.6	0.59	0.093	2.283	
B/C3.5-1691	0.25	11/4/2015	1.9	1.2	0.10	3.2	
B/C3-1711	0.25	11/4/2015	0.13	0.14	ND<0.069	0.27	
B/C2.5-1712	0.25	11/4/2015	0.18	ND<0.068	ND<0.068	0.18	
B/C2-1731	0.25	11/4/2015	ND<0.068	ND<0.068	ND<0.068	ND<0.068	
B/C62-1731	0.25	11/4/2015	0.18	0.12	ND<0.068	0.30	duplicate

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

DUST MONITORING LOG
COX PROPERTIES – AG PARK
RIVERSIDE, CA

7 ug/m³ limit

DATE	Wind Direction	UPWIND (µg/m³)				DOWNWIND (µg/m³)				Δ	GHAIR
		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	268.8	1.4	73	0825	141.9	0.9	226.9	FOG.
	SE	51	0920	382.4	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.

Rule 403 Fugitive Dust

RULE 403
Fugitive Dust

(A) General

(1) Purpose

(a) The purpose of this rule is to reduce the amount of Particulate Matter entrained in the ambient air as a result of anthropogenic (man-made) Fugitive Dust sources by requiring actions to prevent, reduce or mitigate Fugitive Dust emissions.

(2) Applicability

(a) The provisions of this rule shall apply to any activity or man-made condition capable of generating Fugitive Dust.

(B) Definitions

(1) "Active Operations" – Any activity capable of generating Fugitive Dust, including, but not limited to, Earth-Moving Activities, Construction/Demolition Activities, or heavy- and light-duty vehicular movement.

Rule 403 Fugitive Dust

(C) Requirements

(1) A person shall not cause or allow the emissions of Fugitive Dust from:

(a) Any Active Operation, Open Storage Pile, or Disturbed Surface Area such that the presence of such dust remains visible in the atmosphere beyond the Property Line of the emission source; or

(b) Any applicable source such that the dust causes 20 percent opacity or greater during each observation and the total duration of such observations (not necessarily consecutive) is a cumulative three minutes or more in any one hour. Only opacity readings from a single source shall be included in the cumulative total used to determine compliance.

(2) A person shall not cause or allow PM_{10} levels to exceed 50 micrograms per cubic meter when determined, by Simultaneous Sampling, as the difference between upwind and downwind samples collected on high-volume Particulate Matter samplers or other USEPA-approved equivalent method for PM_{10} monitoring. If sampling is conducted, samplers shall be:

(a) Operated, maintained, and calibrated in accordance with 40 Code of Federal Regulations (CFR), Part 50, Appendix J, or appropriate USEPA-published documents for USEPA-approved equivalent method(s) for PM_{10}.

(b) Reasonably placed upwind and downwind of key activity areas and as close to the Property Line as feasible, such that other sources of Fugitive Dust between the sampler and the Property Line are minimized.

(3) Track-out Operations

(a) A person shall not allow Track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation.

Notwithstanding the preceding, all Track-out from an active operation shall be removed at the conclusion of each workday or evening shift.

Rule 403 Fugitive Dust

(b) A person shall not conduct an Active Operation with a Disturbed Surface Area of five or more acres, or with a daily import or export of 100 cubic yards or more of Bulk Material without utilizing at least one of the measures listed in subparagraphs (C)(3)(b)(i) through (C)(3)(b)(v) at each vehicle egress from the site to a paved public road.

(i) Install a pad consisting of washed gravel (minimum-size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long;

(ii) Pave or apply chemical stabilization at sufficient concentration and frequency to maintain a Stabilized Surface starting from the point of intersection with the public paved surface, and extending at least 100 feet and at least 20 feet wide;

(iii) Utilize a wheel shaker/wheel spreading device consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and ten feet wide to remove Bulk Material from tires and vehicle undercarriages before vehicles exit the site;

(iv) Install and utilize a wheel washing system to remove Bulk Material from tires and vehicle undercarriages before vehicles exit the site; or

(v) Any other control measure approved by the APCO and the USEPA as equivalent to the methods specified in subparagraphs (C)(3)(b)(i) through (C)(3)(b)(iv).

Rule 403 Fugitive Dust

(ii) Storage of Bulk Materials:

a. When storing Bulk Materials, comply with the conditions for a Stabilized Surface;

b. Cover Bulk Materials stored outdoors with tarps, plastic, or other suitable material and anchor in such a manner that prevents the cover from being removed by wind action;

c. Construct and maintain wind barriers sufficient to limit VDE to 20 percent opacity and with less than 50 percent porosity. If utilizing fences or wind barriers, apply water or chemical/organic stabilizers/suppressants to limit VDE to 20 percent opacity;

d. Utilize a three-sided structure with a height at least equal to the height of the storage pile and with less than 50 percent porosity; or

e. Installation of wind breaks of such design so as to reduce maximum Wind Gusts to less than 25 miles per hour in the area of the Bulk Material deposits.

Rule 403 Fugitive Dust

(7) Disturbed Open Area of Three or More Acres

(a) An owner/operator of an open area with a Disturbed Surface of three or more acres that has remained undeveloped, unoccupied, unused, or vacant for more than seven days shall do at least one of the following:

(i) Apply and maintain water or Dust Suppressant(s) to all unvegetated areas sufficient to limit VDE to 20 percent opacity;

(ii) Establish vegetation on all previously disturbed areas sufficient to limit VDE to 20 percent opacity;

(iii) Pave, apply and maintain gravel, or apply and maintain chemical/organic stabilizers/suppressants sufficient to limit VDE to 20 percent opacity;

(iv) Upon evidence of trespass, prevent unauthorized vehicle access by posting "No Trespassing" signs or installing physical barriers such as fences, gates, posts, and/or other appropriate barriers to effectively prevent access to the area; or

(v) Any other control measures approved by the APCO and the USEPA as equivalent to the methods specified in subparagraphs (C)(7)(a)(i) through(C)(7)(a)(iv).

Rule 403 Fugitive Dust

(7) Disturbed Open Area of Three or More Acres

(a) An owner/operator of an open area with a Disturbed Surface of three or more acres that has remained undeveloped, unoccupied, unused, or vacant for more than seven days shall do at least one of the following:

(i) Apply and maintain water or Dust Suppressant(s) to all unvegetated areas sufficient to limit VDE to 20 percent opacity;

(ii) Establish vegetation on all previously disturbed areas sufficient to limit VDE to 20 percent opacity;

(iii) Pave, apply and maintain gravel, or apply and maintain chemical/organic stabilizers/suppressants sufficient to limit VDE to 20 percent opacity;

(iv) Upon evidence of trespass, prevent unauthorized vehicle access by posting "No Trespassing" signs or installing physical barriers such as fences, gates, posts, and/or other appropriate barriers to effectively prevent access to the area; or

(v) Any other control measures approved by the APCO and the USEPA as equivalent to the methods specified in subparagraphs (C)(7)(a)(i) through(C)(7)(a)(iv).

Rule 403 Fugitive Dust

(viii) Identify a dust control supervisor that:

a. Is employed by or contracted with the property owner or developer;

b. Is on the site or available on-site within 30 minutes during working hours;

c. Has the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with Rule requirements; and

d. Has completed the AVAQMD Fugitive Dust Control Class and has been issued a valid Certification of Completion for the class.

Questions for DTSC

- Did you every do a characterization of the site as the City did and why was this site not made a CERCLA (Superfund) site ?

- If the reports showed such an elevated level of PCBs and knowing this was an FUD (Formerly Used Defense Site) why did no one contact any health agencies to do any studies or tests such as the Cal/EPA Office Of Environmental Health Hazard Assessment (OEHHA) ?

- Why was the NCP not followed?

- Did you ever question the City as to why they waited almost 2 years to decide to clean up the site knowing the PCB levels were so high?

Questions for DTSC

- Why did it take four years to start remediation from the start of the first agreement in 2005?
- Why did it take another 4 years to start phase 2 remediation?
- Since the last testing showed much of the site still over .50 mg/kg, what does that say about the two phase testing, and how much of the 165,000 tons of dirt taken to Azusa was too contaminated for the site to recycle?
- Has this toxic dirt been recycled and reused? Where?
- Why are the same people that failed twice running the third operation?

Questions for DTSC

- How tall are the dust monitors on site?
- At what wind speed is the site shut down?
- Does the site supervisor hold the proper AQMD certification as requires in rule 403 and do you have a copy with you we can have?
- Who is authorized to shut down the site if the rules are not followed?
- What gives you the right to work o the site if the City has not lifted the stop work order?
- Where is the tank for the street sweeper emptied?

Questions for DTSC

- How much dirt has been removed so far, and how many feet down have you had to go?
- It looks like the road is being built is it?
- Why were we told that FRA owns all the property behind the gate when property line records show the property line ends where the original gate was built?
- If the gate is not the property line are you not in violation of rule 403?
- Why is there still visible track out at the end of the day?