Message

From: ZIFF, SARA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1CE282EB90B04EDD932CCDCEACDE7F9A-SZIFF]
Sent: 5/5/2016 5:48:44 PM
To: Tasnif-abbasi, Maryam@DTSC [Maryam.Tasnif-abbasi@dtsc.ca.gov]
Subject: RE: CCAEJ Letter requesting Dioxin like PCB assessment

Patrick Wilson
415-972-3354
Wilson.Patrick@epa.gov

Steven S. Armann, Manager
Corrective Action Office (LND-4-1)
USEPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3352
Fax: 415-947-3533
Email: armann.steve@epa.gov

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Sara Ziff, P.E.
Project Manager
Corrective Action Section
U.S. EPA, Region 9
75 Hawthorne Street (LND-4-1)
San Francisco, CA 94105
(415) 972-3536
ziff.sara@epa.gov

From: Tasnif-abbasi, Maryam@DTSC [mailto:Maryam.Tasnif-abbasi@dtsc.ca.gov]
Sent: Wednesday, May 04, 2016 2:25 PM
To: ZIFF, SARA <ZIFF.SARA@EPA.GOV>
Subject: FW: CCAEJ Letter requesting Dioxin like PCB assessment

Sara, please send me you, Patrick and Steve's signature blocks so that I can make sure that you are copied on all Ag Park correspondence.

Thanks!

Maryam

From: Garcia, Peter@DTSC
Sent: Tuesday, May 03, 2016 4:03 PM
To: Tasnif-abbasi, Maryam@DTSC <Maryam.Tasnif-abbasi@dtsc.ca.gov>
Subject: FW: CCAEJ Letter requesting Dioxin like PCB assessment

FYI

From: Garcia, Peter@DTSC
Sent: Tuesday, May 03, 2016 4:03 PM
To: 'investhazmat@aol.com'
Cc: leonido-john.steven@epa.gov; blumenfeld.jared@epa.gov; cmacduff@PE.com; penny.newman@ccaej.org; jean.kayano@ccaej.org; msoubirous@riversideca.gov; jburnard@riversideca.gov; pdavis@riversideca.gov; liza@consumerwatchdog.org; kevindaw@aol.com; regaffairs@aol.com; Burns, Gordon@EPA; Mataka, Arsenio@EPA; Mascarenas, Ana@DTSC; Cope, Grant@EPA; Solomon, Gina@EPA; Lofstrom, Dot@DTSC; dina.janine@epa.gov; burgin.deborah@epa.gov; Solomon, Gina@EPA; Cope, Grant@EPA
Subject: RE: CCAEJ Letter requesting Dioxin like PCB assessment

Hello Bruce,

I have attached a consolidated response to your emails. If you have any further questions, or need clarification on any of the issues, we would be happy to meet with you to discuss. Thank you.

From: investhazmat@aol.com [mailto:investhazmat@aol.com]
Sent: Wednesday, April 27, 2016 10:49 PM
To: Garcia, Peter@DTSC
Cc: leonido-john.steven@epa.gov; blumenfeld.jared@epa.gov; cmacduff@PE.com; penny.newman@ccaej.org; jean.kayano@ccaej.org; msoubirous@riversideca.gov; jburnard@riversideca.gov; pdavis@riversideca.gov; liza@consumerwatchdog.org; kevindaw@aol.com; regaffairs@aol.com; Burns, Gordon@EPA; GinaSoloman@calepa.ca.gov; Mataka, Arsenio@EPA; grantcope@calepa.ca.gov; Mascarenas, Ana@DTSC; Cope, Grant@EPA; Solomon, Gina@EPA; Lofstrom, Dot@DTSC; dina.janine@epa.gov; burgin.deborah@epa.gov
Subject: Re: CCAEJ Letter requesting Dioxin like PCB assessment

Hello,

As an advisor for the Center for Community Action and Environmental Justice, I am again disappointed, that you have not provided a detailed report concerning the Total Dioxin TEQ as requested by today. How can we discuss your conclusions
if you never provide any DTSC or EPA directives, DTSC or EPA policies, or any toxicology documents which back your decisions?
When you say that Federal EPA concurs, please provide the name of those staff members and their actual statements.
What happened to transparency? What happened to environmental justice?

I am requesting an **impartial review** of the Total Dioxin TEQ by OEHHA Toxicologist and Federal EPA Headquarters OSRTI Toxicologist
Marlene Berg.

Sincerely,

Bruce Bailey
CCAEJ Member/Advisor
B.S. Civil Engineering, Env. Option
Retired Hazardous Materials Management Specialist
Retired County Haz Mat Response Team member
Former Water District Project Engineer

----Original Message-----
From: Garcia, Peter@DTSC <Peter.Garcia@dtsc.ca.gov>
To: investhazmat <investhazmat@aol.com>

Cc: cmacduff <cmacduff@PE.com>; penny.newman <penny.newman@ccaej.org>; jean.kayano <jean.kayano@ccaej.org>; msoubirous <msoubirous@riversideca.gov>; jburnard <jburnard@riversideca.gov>; pdavis <pdavis@riversideca.gov>; liza <liza@consumerwatchdog.org>; kevindaw <kevindaw@aol.com>; regaffairs <regaffairs@aol.com>; Burns, Gordon@EPA <Gordon.Burns@calepa.ca.gov>; Mataka, Arsenio@EPA <Arsenio.Mataka@calepa.ca.gov>; Mascarenas, Ana@DTSC <Ana.Mascarenas@dtsc.ca.gov>; burgin.deborah <burgin.deborah@epa.gov>; Kaufman.hugh <Kaufman.hugh@epa.gov>; Cope, Grant@EPA <Grant.Cope@calepa.ca.gov>; Solomon, Gina@EPA <Gina.Solomon@calepa.ca.gov>
Sent: Wed, Apr 27, 2016 9:23 pm
Subject: RE: CCAEJ Letter requesting Dioxin like PCB assessment

p.MsoNormal,.aolReplacedBody li.MsoNormal,.aolReplacedBody div.MsoNormal {margin:0in; margin-bottom:.0001pt; font-size:12.0pt; font-family:"Times New Roman","serif";} .aolReplacedBody p.MsoAcetate,.aolReplacedBody li.MsoAcetate,.aolReplacedBody div.MsoAcetate {mso-style-priority:99; mso-style-link:"Balloon Text Char"; margin:0in; margin-bottom:.0001pt; font-size:8.0pt; font-family:"Tahoma","sans-serif";} .aolReplacedBody p.msochpdefault,.aolReplacedBody li.msochpdefault,.aolReplacedBody div.msochpdefault {mso-style-name:msochpdefault; mso-margin-top-alt:auto; margin-right:0in; mso-margin-bottom-alt:auto; margin-left:0in; font-size:12.0pt; font-family:"Times New Roman","serif";} .aolReplacedBody span.emailstyle18 {mso-style-name:emailstyle18;} .aolReplacedBody span.EmailStyle20 {mso-style-type:personal; font-family:"Calibri","sans-serif"; color:#1F497D;} .aolReplacedBody span.BalloonTextChar {mso-style-name:"Balloon Text Char"; mso-style-priority:99; mso-style-link:"Balloon Text"; font-family:"Tahoma","sans-serif";} .aolReplacedBody span.EmailStyle23 {mso-style-type:personal-reply; font-family:"Calibri","sans-serif"; color:#1F497D;} .aolReplacedBody .MsoChpDefault {mso-style-type:export-only; font-family:"Calibri","sans-serif";} @page WordSection1 {size:8.5in 11.0in; margin:1.0in 1.0in 1.0in 1.0in;} .aolReplacedBody div.WordSection1 {page:WordSection1;}
Hello Bruce,

As described below, we are preparing a comprehensive response to your questions. With respect to the PCB congener (Dioxin TEQ) issue you have raised, DTSC has considered this, and has concluded that the sample analysis methodology that is being used is appropriate. In coming to our conclusions, we have consulted with USEPA and they are in agreement. Details will be provided in the aforementioned response that is being prepared. My staff and I will be happy to meet with you as soon as we complete the response, to discuss any outstanding questions you may have. Our goal is to provide the response to you by Monday or Tuesday of next week, and I will contact you as soon as it is ready. Thanks

From: investhazmat@aol.com [mailto:investhazmat@aol.com]
Sent: Friday, April 22, 2016 2:03 PM
To: Garcia, Peter@DTSC
Cc: cmacduff@PE.com; penny.newman@ccaej.org; jean.kayano@ccaej.org; msoubirous@riversideca.gov; jburnard@riversideca.gov; pdavis@riversideca.gov; liza@consumerwatchdog.org; kevindaw@aol.com; regaffairs@aol.com; Burns, Gordon@EPA; GinaSoloman@calepa.ca.gov; Mataka, Arsenio@EPA; grantcope@calepa.ca.gov; Mascarenas, Ana@DTSC; burgin.deborah@epa.gov; Kaufman.hugh@epa.gov
Subject: Re: CCAEJ Letter requesting Dioxin like PCB assessment

Peter,

I am extremely concerned that the soil sampling is almost finished
for the first phase and that a decision to test for the
Dioxin like compounds has not been made; once you analyze and
find the Dioxin like Compounds they cannot be ignored.
This issue will directly affect all future sampling and add
a new Total Dioxin TEQ parameter to the site cleanup requirements.
This issue should be a priority.

I will be expecting a detailed written reply to Total Dioxin TEQ issue by Wed., Aril 27,2016.
It should noted that the original letter was dated Feb. 29,2016.

I would also be expecting to meet with your staff on May 1, 2016 or May 2, 2016
at CCAEJ. It should noted that I requested to meet with your staff; those who formulated the response.

Thank you for your assistance.

Sincerely,

Bruce Bailey
CCAEJ Member/Advisor
B.S. Civil Engineering, Env. Option
Retired Hazardous Materials Management Specialist
Retired County Haz Mat Response Team member
Former Water District Project Engineer

-----Original Message-----
From: Garcia, Peter@DTSC <Peter.Garcia@dtsc.ca.gov>
To: investhazmat <investhazmat@aol.com>
Cc: cmacduff <cmacduff@PE.com>; penny.newman <penny.newman@ccaej.org>; jean.kayano <jean.kayano@ccaej.org>; msoubirous <msoubirous@riversideca.gov>; jburnard <jburnard@riversideca.gov>; pdavis <pdavis@riversideca.gov>; liza <liza@consumerwatchdog.org>; kevindaw <kevindaw@aol.com>; regaffairs <regaffairs@aol.com>; Burns, Gordon@EPA <Gordon.Burns@calepa.ca.gov>; GinaSoloman <GinaSoloman@calepa.ca.gov>; Mataka, Arsenio@EPA <Arsenio.Mataka@calepa.ca.gov>; grantcope <grantcope@calepa.ca.gov>; Mascarenas, Ana@DTSC <Ana.Mascarenas@dtsc.ca.gov>; Cope, Grant@EPA <Grant.Cope@calepa.ca.gov>; Solomon, Gina@EPA <Gina.Solomon@calepa.ca.gov>
Sent: Fri, Apr 22, 2016 1:08 pm
Subject: RE: CCAEJ Letter requesting Dioxin like PCB assessment

Bruce,

A response to these comments will be provided along with the comprehensive response we are preparing to the other emails you have provided. Unfortunately, I will be out of town next week and will be unavailable to meet with you. I suggest that we provide a written response to all your questions, give you an opportunity to review them, and then schedule a meeting to go over any questions you may have. This would facilitate our discussion at the meeting.

From: investhazmat@aol.cominvesthazmat@aol.com [mailto:investhazmat@aol.com]
Sent: Tuesday, April 19, 2016 5:39 PM
To: Garcia, Peter@DTSC
Cc: cmacduff@PE.comcmacduff@PE.com; penny.newman@ccaej.orgpenny.newman@ccaej.org; jean.kayano@ccaej.orgjean.kayano@ccaej.org; msoubirous@riversideca.govmsoubirous@riversideca.gov; jburnard@riversideca.govjburnard@riversideca.gov; pdavis@riversideca.govpdavis@riversideca.gov; liza@consumerwatchdog.orgliza@consumerwatchdog.org; kevindaw@aol.comkevindaw@aol.com; regaffairs@aol.comregaffairs@aol.com; Burns, Gordon@EPA; GinaSoloman@calepa.ca.govGinaSoloman@calepa.ca.gov; Mataka, Arsenio@EPA; grantcope@calepa.ca.govgrantcope@calepa.ca.gov; Mascarenas, Ana@DTSC
Subject: Fwd: CCAEJ Letter requesting Dioxin like PCB assessemnt

Dear Mr. Garcia,

Attached is a copy of the letter sent to Director Lee dated Feb. 29,2016.
this letter requested the toxicity of the Dioxin like PCB Congeners be computed prior to finalizing a site cleanup levels; **no one has replied to this letter**. It should be noted that each soil sample taken in Dec.,2015 that was tested for PCB Congeners contained levels of the **12 PCB Dioxin like Congeners**(PCB; 77,81,126,169,105, 114,118,123, 156, 157, 167, 189).

Federal EPA Risk Assessment for Dioxin at Superfund Sites Frequently Asked Questions and Answers web page Attachment A list the recommended Toxicity Equivalence Factors for 7 polychlorinated dipenzo-p-dioxins(PCDDs) and Dioxin like compounds(DLCs) which include10 Polychlorinated dibenzofurans(PCDFs) and 12 Polychorinated biphenyl congeners.

Each individual dioxin Toxicity Equivalence(TEQ) is additive to arrive at a Total Dioxin TEQ.
TEQ= the summation of each (individual PCDDs, PCDFs, Dioxin like PCBs sample concentration x TEF for the indiviual PCDDs, PCDFs, Dioxin like PCBs).
Federal EPA applies the TEFs in assessing for cancer and noncancer effects.

In 2013, 31 soil samples were analyzed for PCDDs and PCDFs; the calculation of

the PartialTotal Dioxin TEQ,(failed to test for Dioxin like PCBs) **identified 17 samples above the cleanup level set by the consultant and approved by DTSC staff at 4.5 ppt.**

Then in Dec, 2015, 9 soil samples were tested for the 209 PCB congeners which includes the 12 Dioxin Like PCB Congeners but **failed** to test for the PCDDs and PCDFs.
I calculated the Partial Total Dioxin TEQ for the samples, all 9 samples were above the DTSC aprroved cleanup level of 4.5 ppt.
This changes the ball game.

Also, the Consultants and DTSC staff have never acknowledged that Rohr Industries is the source of the PCB Arochor 1248 and therefore did not investigate **the contaminated groundwater plume and soil contaminants of concern which have been identified** by the Santa Ana Region WCQB since 1985. It should be noted that DTSC staff has received Riverside City documents that detail that Rohr is the source of the contamination and should have possession of Rohr Federal EPA TSCA documents that state the same conclusion. A high level contaminant found in the groundwater and soil at the Rohr property is a solvent 1,4 Dioxane which had a high probability of being discharged to the Ag Park sewer system from 1952-1963; the **Ag Park soil and groundwater has never been tested for 1,4 Dioxane**. The Ag park soil and groundwater should be tested for the same contaminants located at the Rohr property.

Also, the consultants report indicates that the groundwater flow is NE which is illogical and is contradicted by detailed Riverside County Waste Mangemewnt groundwater flow diagrams from the old Pedley Landfill adjacent and upstream of the Ag Park and the SWAT that the consultant quotes. This brings into question the chosen locations for the ground monitoring wells; it appears that contaminated gorundwater flow would have been missed.
Also, the Pedley Landfil SWAT document and the Santa Ana Region WQCB Rohr contamination documents indicate that there is
shallow groundwater and a deeper groundwater which consist of decomposed granite bedrock this contradicts the Ag Park documents.

As an advisor for Center for Community Action and Environmental Jusctice, I'm am requesting that the above items be addressed with a detailed written reply(including calculations) **prior to any excavation on the Ag Park.** I would like to meet with your staff to review these urgent issues next week at the Center. Please, contact me at 909-709-3180 so we can arrange times.
Thank you for your assistance.

Sincerely,

Bruce Bailey
CCAEJ Member/Advisor
B.S. Civil Engineering, Env. Option
Retired Hazardous Materials Management Specialist
Retired County Haz Mat Response Team member
Former Water District Project Engineer