Message

From: Baylor, Katherine (Separated 1/31/17) [Baylor.Katherine@epa.gov]
Sent: 12/22/2016 12:27:59 AM
To: Wall, Steve [Wall.Steve@epa.gov]
CC: Wilson, Patrick [Wilson.Patrick@epa.gov]; Duffy, Mark [duffy.mark@epa.gov]
Subject: RE: Laytonville Landfill Question
Attachments: USGS Background Metals.kmz

Steve -

At your request, I have reviewed the report and the email traffic below on the (closed) Laytonville Landfill. The report calls out arsenic, lead and hexavalent chromium as potential contaminants of concern. Five soil samples and three groundwater samples were collected and analyzed in 2016. Although this was a relatively small data set, the analytical results provided in the report (mostly minor hits of metals) and the site history do not support the contractor's proposed scope of work for further investigation. The contractor, Ahtna Facility Services Inc, has proposed an extensive soil and groundwater site investigation (pages 8-16) that does not appear warranted based on available data and history for the site. Moreover, Ahtna has proposed an expansive drinking water assessment of tribal homes while acknowledging that all tribal residents are connected to the Laytonville municipal drinking water system. As such, the need for this effort is unclear.

The report indicates that Laytonville Landfill was a long-term nuisance for the Cahto Tribe, which is geographically closer to the landfill than non-tribal residents of Laytonville. The landfill was closed and capped in 1997, but cap maintenance issues are on-going, including a cap/slope failure in 2016. Additional efforts may be needed to ensure that Laytonville maintains the cap integrity and monitors/mitigates the slope failure problems.

The soil arsenic concentrations, although above the residential RBSL of 0.07 mg/kg, are consistent with naturally occurring arsenic in California. I have attached the Google Earth USGS background metals data set, which shows As near Laytonville in the range of 3 to 15 mg/kg. The soil As data in the landfill report ranges from 2 to 6 mg/kg. The USGS data set is part of a much larger USGS background metals data set that includes many more metals. I've only included our common metals of interest: As, Pb, Cr, Ni, Hg, and U.

The lead (Pb) data is generally below the residential RBSL of 80 mg/kg (9.1, 12, **140,** 13, and 5.2 mg/kg). The USGS data set indicates background Pb for this area is approximately 8-15 mg/kg, so the hit of 140 mg/kg may be anthropogenic. The landfill is one possible source of this minor Pb hit, but there may be other local Pb sources as well.

The hexavalent chromium soil data (0.17J, **6.6**, 0.24J, 0.18J and **3.6** mg/kg) showed two detections above the residential RBSL of 0.3 mg/kg. The "J" qualifiers designate very low concentration samples that are analytically uncertain. Although hexavalent chromium is typically sourced to human activity, it can occur under natural conditions, particularly in areas that have high total chromium, such as California's Coast Ranges. One (of several) available research papers on natural hex chrome is here: http://www.pnas.org/content/104/16/6544.full Elevated total chromium (and nickel) are very common in California's Coast Ranges due to the serpentinite and related ultramafic rock geology.

I cc: Mark Duffy, the new geologist in LND-4-1. He will be taking over my LND technical support role after January 31st.

Please let me know if you need more information-
Kathy

Katherine Baylor, PG
U.S. Environmental Protection Agency
75 Hawthorne Street, LND-4-1
San Francisco, CA 94105
415-972-3351

From: Wall, Steve
Sent: Tuesday, December 20, 2016 5:12 PM
To: Baylor, Katherine
Cc: Wilson, Patrick
Subject: FW: Laytonville Landfill Question

Hi Kathy, here's the report with the Laytonville sampling I mentioned. They performed soil and groundwater sampling and found hexavalent chromium, arsenic and lead above the Residential Risk Based Screening Levels (RBSLs) and are very concerned. I'm checking in with you and Patrick for advice on the significance of these findings.
Thanks!
Steve

Steve Wall
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wall.steve@epa.gov

From: Heller, Zoe
Sent: Tuesday, December 13, 2016 11:04 AM
To: Wall, Steve <Wall.Steve@epa.gov>
Subject: FW: Important Discussion - Laytonville for Damian

Steve - Are you familiar with the Laytonville landfill? Thanks, Zoe

From: Ebbert, Laura
Sent: Tuesday, December 13, 2016 10:28 AM
To: Heller, Zoe <Heller.Zoe@epa.gov>; Nelson, Cheryl <Nelson.Cheryl@epa.gov>
Subject: Fwd: Important Discussion - Laytonville for Damian

Sent from my iPhone

Begin forwarded message:

> **From:** "Ebbert, Laura" <Ebbert.Laura@epa.gov>
> **To:** "Willson, Damian" <WILLSON.DAMIAN@EPA.GOV>, "Allen, HarryL" <Allen.HarryL@epa.gov>
> **Subject: FW: Important Discussion - Laytonville for Damian**
>
> Damian,
> I called Dan back at his request today. And spoke with he and Bill Cornelius, Administrator.
>
> Harry, I received a concerning verbal report from the Cahto Tribe of the Laytonville Rancheria (Mendocino County) about some testing they did recently after discovering a county-flagged "DANGER" sign on the Reservation near a now-closed, unlined landfill (links below). They engaged a third party to do a study, attached. I played phone roulette this afternoon with your team, but couldn't get anyone on

the line, so I'm sending this to you and hope you can help me either assess and potentially act on it, or route me elsewhere as appropriate.

Thank you!

Report from Bill Cornelius, Tribal Administrator:

Recently, tribe found areas of concern and did testing. Expressed concerns to BIA and called in a third party to verify. We have found high levels of hexavalent chromium and heavy metals in our soils and groundwater (in some spots hundreds of times the residential limits); we haven't tested our drinking water because it comes from Laytonville water district.

In 1972 the county opened a landfill that bordered the reservation. That landfill was for general waste and was unlined. Closed between 1994 and 1998. There have been studies - a health assessment done finished in 2005 and earlier this year while we were doing a survey for boundaries of the reservation, we found a blackberry bush flagged with a skull and crossbones red tape that said DANGER, which caused us some concern because it was on the reservation, not off the reservation. We started soil samples to see if something was in the blackberry or the ground around it that might be poison.

BIA said you need to do a scope of work with an independent third party, which we just completed and we just got the scope of work that BIA requested and they found the chromium hexavalent in the water and in the ground. They tested existing wells - closest to the landfill was higher. The other samples included as far away as we could get and both exceeded the residential limits.

How close are people? 200 acres reservation - members are all over. In Willits, Remco a Chrome Plating enterprise dumped their wastes into the creek, a 10-year-old boy died. The concern is when they were cleaning that up the only open landfill was this landfill. We know PGE dumped transformers there, but we don't know if this facility dumped there.

This Tribe sits on the aquifer that feeds all of Laytonville community. The landfill was put on top of that aquifer.

Laura Ebbert
Manager, Tribal Section
Land Division, LND-3-1
U.S. Environmental Protection Agency, Region 9
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http://www.epa.gov/region9/tribal

From: Dan [mailto:drodriguez@cahtotribe-nsn.gov]
Sent: Monday, December 12, 2016 3:50 PM
To: Ebbert, Laura <Ebbert.Laura@epa.gov>
Subject: RE: Important Discussion - Laytonville for Damian

Hello Laura, thank you for responding so quickly. I would like to have a conversation with you if that is ok. It is of vital importance to the Tribe. If you could give us a call we would greatly appreciate it.

From: Ebbert, Laura [mailto:Ebbert.Laura@epa.gov]
Sent: Monday, December 12, 2016 3:41 PM
To: Dan <drodriguez@cahtotribe-nsn.gov>
Cc: bcornelius@cahtotribe-nsn.gov; Willson, Damian <WILLSON.DAMIAN@EPA.GOV>
Subject: RE: Important Discussion - Laytonville for Damian

Dan,
I notice you misspelled Damian's email address (his first name has two a's in it); I am copying him here. He is off this afternoon, returning tomorrow. Let me know if your message is more urgent than that and I could call you shortly.

LE

Laura Ebbert
Manager, Tribal Section
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From: Dan [mailto:drodriguez@cahtotribe-nsn.gov]
Sent: Monday, December 12, 2016 3:29 PM
To: willson.damien@epa.gov
Cc: bcornelius@cahtotribe-nsn.gov; Ebbert, Laura <Ebbert.Laura@epa.gov>
Subject: Important Discussion

Hello Damien, I was hoping to catch you as soon as possible to bring some information to your attention concerning the Tribe. Hopefully you receive this before the Winter Holidays. I would like to schedule a meeting at your earliest convenience. This matter is of great importance to the Tribe. Could you please contact me as soon as possible, or direct me to someone else that is available. Thank you for your time.

Larry "Dan" Rodriguez
Cahto Tribe of Laytonville
FHWA- Transportation Coordinator
G.A.P.- Environmental Coordinator
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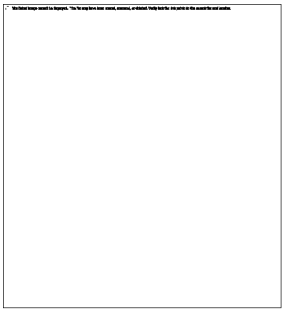

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