Laytonville Landfill – Greenaction Follow-up Briefing
September 5, 2018

At a 7/21/18 meeting with community representatives, a representative of a resident of the Round Valley Indian Reservation made several statements and two asks. This briefing provides context, background, and a discussion of each statement.

Context:
EPA seeks to quantify "safe" levels of potential contaminants, collect environmental data, compare test results to local background and the "safe" levels determined by the Agency, and take action accordingly. EPA does not evaluate public health burden through an examination of excess morbidity or mortality because disease is multifactorial: chasing concerns about disease and death produces lots of false positives.

Background:
The EPA has been engaged in analysis and evaluation of environmental data regarding the Laytonville Landfill since the early 2000's. Intermittently, community concerns are raised about past practices at the landfill, presence of hazardous wastes in the landfill, and ongoing environmental and public health risks presented by the landfill. ***To date, all data evaluated by the EPA indicates no need for action.***

Laytonville landfill operated from 1967 to 1993 and was closed with a final cover in 1997. Mendocino County has owned and operated the landfill since it opened. The landfill is a 35-acre site, of which 7 acres were used for disposal. The landfill accepted residential wastes and small percentages of commercial and demolition waste from the surrounding area. No designated or hazardous wastes (special wastes, liquids, sludges or slurries) were accepted for disposal.

Summary:

- **No Action:** All data reviewed by the EPA to date indicates chemical constituents are below the levels of concern, with one exception being a sample taken at a former burn dump on tribal lands (where we would expect elevated levels). The Laytonville Indian Reservation receives its drinking water from the Laytonville County Water District (LCWD). LCWD treats for naturally occurring arsenic in the groundwater and is in full compliance with all health-based drinking water standards, including arsenic. Individual households on domestic wells are not subject to federal requirements for testing or meeting standards.

- **Ongoing Supporting Role:**
    - We may have a role to play in ongoing investigations and analysis being conducted by CalEPA (sampling on the landfill itself) or BIA (additional sampling may be conducted and we are available to advise and review), and in explaining results to the tribal community.
    - More broadly, we have an ongoing supporting role in helping the Cahto Tribe build environmental protection programs that improve local environmental health conditions for all residents, for example in taking action to prohibit burn barrels, improve indoor air quality related to wood-fired stoves, or other practices.

- **Outside of Our Sphere:** There may be issues that others investigate that we are not involved in, for example if a deeper investigation into morbidity and mortality were conducted, or if indoor air quality issues at a single homesite were evaluated by a healthcare professional.

Major undertakings:

- 2001 Report by ATSDR (included in 2005 report)
    - Addressed Groundwater Community Questions.
- 2003 EPA Preliminary Assessment Site Investigation (Region 9 Superfund)
    - Looked at available environmental data and collected new data to evaluate whether site should be proposed for listing on the NPL. Concluded that it did not warrant listing.
- 2005 Report by ATSDR
    - Looked at 12 exposure pathways. Also examined health outcome data by the California Cancer Registry from 1974-1994. Health outcome data examination produced no significant findings. Made recommendations about ways to improve community health.
- 2016 Sampling by Cahto Tribe
    - Findings consistent with BIA sampling below, with exception of hexavalent chrome. Found free metals, arsenic, lead, hexavalent chromium minor hits, within background for the area, and above EPA's Residential Screening Level, but below Action Levels and within background.
- 2017/2018 BIA Sampling
    - Examined soil and tap water.
    - In soil: arsenic, lead present. Dioxin, furans sampled, with one location producing results just above the Action Level, at an open dump area where burning had been conducted.
    - In water: EPA reviewed the arsenic levels in 22 water samples. Sample locations could not be confirmed; none-the-less, all samples met the federal and state drinking water standard for arsenic.
- 2018 CalEPA Sampling
    - Sampled primarily at areas where there might be discharge from landfill. Sampling complete but not yet shared with the EPA.

Issues raised 7/21/18:

Issue raised	Further Information	Who
They burned trash at the landfill.	The landfill was never operated, to our knowledge, outside of permitted parameters. However, trash was burned at the landfill prior to EPA's ban on the practice, at which point it became a disposal landfill according to regulations, and was later closed according to regulations.	CalRecycle and CalEPA have more information on permitted practices at the landfill.
The landfill has contaminated the environment.	We evaluated drinking water and found it fully compliant. Residents are served with water from a local municipal water system regulated by the state. Limited soils testing conducted does not indicate contamination above background. ATSDR looked at air quality and concluded no significant impacts from landfill, but low-level VOCs may be coming from landfill but do not pose a health hazard. Report noted impacts to air quality from backyard burning of waste. CalEPA is collecting and analyzing further data in 2018.	EPA (see major undertakings), CalEPA for ongoing investigation
The water and fish are contaminated.	ATSDR examined this issue in 2005 and (FINDINGS).	CalEPA and ATSDR
Everybody has cancer.	The 2005 ATSDR investigation found that the cancer mortality rates within a 1-mile radius of the landfill were not increased over Mendocino County rates.	ATSDR, CDPH
I feel bad in my house (a visitor got dizzy within 10 minutes of being inside a home).	There are many possible causes for illness. We suggest you consult with your doctor.	

The representative made two asks:

- **We want comprehensive testing on and off the Reservation.**
    - EPA has evaluated data collected at and near the site dating from the 1970's and review of data indicates no need for further action. CalEPA is collecting data presently on the landfill, and EPA remains available to review that data and revisit our position if appropriate.
- **We want to be moved.**
    - EPA does not have data that supports a relocation recommendation by this Agency.