USEPA AMCO Superfund Site Community Advisory Group Meeting, November 3, 2009

EPA Attendees:	Leana Rosetti Rose Marie Caraway Steve Calanog
EPA Contractors:	Yash Nyznyk/CDM Frankie Burton/CH2M HILL
CAG Members:	Miguel Avalos Angie May Brent Bucknum Peter Williams Angelina Tegiera Manuel Pimentel Oscar Oscoucro Jabari Herbert John Schweizer /Technical Assistant Bradley Angel/Green Action

West Oakland Residential Lead Assessment Preliminary Report

EPA Presentation/Information

- In 2007, there was a lead investigation and removal action in yards adjacent to the AMCO NPL Site (Center and Third Streets).
- In August 2009, Congresswoman Barbara Lee's Office requested that EPA perform a lead investigation after receiving an email from the residents of the South Prescott neighborhood.
- From October 15 to October 28, EPA performed a lead sampling investigation in the South Prescott neighborhood.
- To the residential community, EPA offered to collect soil samples in residential yards and community gardens located in the following areas:
  - West of Mandela Parkway
  - North of the 880
  - East of Post Office on Peralta
  - South of 7th Street
- EPA's goal was to determine the current lead levels in residents' yards and community gardens.
- Sampling and results:
  - 54 properties sampled
  - 96 total samples collected
  - The average lead concentration in soil samples was about 900 parts per million (ppm)
- Before providing site-specific data to the entire community, EPA Emergency Response needs to speak to the residents about their individual results.

- Analytical method:
  - All samples were analyzed with X-Ray Flouresence (XRF) for total lead
  - Subset of samples are run as duplicates and triplicates
  - 20% of all field samples were submitted for lab analysis
  - The lead contamination is not exclusively a lead paint issue.
- Lead Levels
  - EPA's Preliminary Remedial Goal is 400 ppm.
  - Lead levels in Oakland soils tend to be elevated
  - Lead levels in urban areas in excess of 400 ppm is pervasive throughout the country.
  - Natural levels in Oakland range from 20 – 50 ppm.
- What can residents do now?
  - Ingestion is the greatest risk – avoid it as much as possible.
  - Wash hands frequently, especially after working in your yard.
  - Wash fruit and vegetables grown in your yard.
  - Wash toys that are taken outside.
  - Take outdoor shoes off before going inside.
  - Vacuum and clean indoor floors regularly.
- Next Steps for EPA
  - Steve Calanog must brief EPA Management in San Francisco and Washington DC.
  - The possible outcomes are listed below.
    1. Conduct removal of contaminated soils (Steve's preliminary recommendation, because of the high percentage of children in the neighborhood). Removal could consist of removal of soil to a depth of two feet.
    2. Further investigation
    3. Remediation track (through Superfund process rather than Emergency Response)
  - The timeframe for briefings and decision-making is 2 to 4 months.
- Potential Sources of Contamination
  - Lead-contaminated paint
  - Past use of lead-containing fuel for vehicles
  - Metal foundry (formerly located on corner of Center Street and 3rd Street.
  - Rail yard activities
  - Historical disposal practices of residents
  - Unknown Fill Sources -- Much of the South Prescott neighborhood is on top of fill from unknown sources.

Public/Technical Advisor Comments

- What are other agency standards for lead?
  - The California Department of Toxic Substances Control standard for lead is 200 ppm.
- EPA should provide references to scientific research when discussing standards for lead (and other chemicals of concern).
- Does the federal government offer any health consultation or assessment services?
  - **Agency for Toxic Substances and Disease Registry** (**ATSDR**) and **Centers for Disease Control and Prevention** (**CDC**) and **California Department of Health Services (DHS)** may have services.

  - EPA will ask **ATSDR** if they've done anything in the bay area.
- **Alameda County Lead Prevention Program** will provide lead kits and will perform extensive lead tests/evaluations with families in the neighborhood.
- Some property owners did not want their homes to be tested for lead, because they are required to disclose the sampling results when selling their home. Residents don't want to get stuck in the South Prescott neighborhood in case nothing is done about the lead contamination. Some residents believe that they are showing signs of lead poisoning, but no one knows what to do about it.
  - **ATSDR** will work with your doctor to guide testing for lead poisoning.
  - EPA suggests that the CAG create a list of health questions for EPA. EPA will respond to the health questions in one comprehensive document.

  - Rose Marie gave a contact for a local medical facility that specializes in environmental health concerns to a couple of the residents on 3rd Street earlier this year. The contact information for the San Francisco hospital is attached at the end of the meeting notes.
- Has EPA considered phytoremediation rather than removing the lead contaminated soil?
  - Since EPA has not used phytoremediation in past lead removal actions they probably would not recommend its use for the South Prescott neighborhood. The lead impacts are effecting surface soils and phytoremediation is not typically utilized to address surface soil impacts.
- The community needs to know what the options are before deciding how to clean up the lead contamination. They would like to be aware of alternatives to soil removal.
- The community should engage with their neighbors and health organizations/agencies to determine if people's health is affected.

Green Action Comments

- Requested that EPA bring a community member when they speak to residents that declined (~10%) lead testing on their property. Residents may feel more comfortable accepting EPA's help, knowing other residents are being successfully helped by EPA.
- Where were the highest levels of lead contamination?
- Should residents eat fruit or vegetables grown in their yards if they could be contaminated with lead?
  - Leafy vegetables and root foods (like potatoes) should not be grown in yards that may be contaminated with lead.
  - Fruits are generally safe to eat, because they haven't been shown to uptake contaminants.

EPA AMCO Well Installation and Drilling Update

EPA Presentation/Information

- Three types of wells are being installed: shallow (15 feet below ground surface [bgs]), mid deep (35 feet bgs) and deep (50 to 55 feet bgs).
- The well installation is taking longer than expected because of difficult drilling conditions.

- The sand layer extends to a greater depth than expected. The clay barrier layer is also deeper than expected.
- 10 wells were installed in the following locations:
  - 3 on the AMCO property
  - 2 in South Prescott Park
  - 4 in the driveways of 1428, 1432 and 1436 3rd St.
  - Wells have not been installed under the overpass, because of access issues with Amtrak on the UPRR property. EPA will let the CAG know via e-mail what comes of discussions between EPA and Amtrak. As of preparation of the meeting notes, EPA is still negotiating with Amtrak. It is possible that drilling will not resume until January 2010.

Public/Technical Advisor Comments

- What is the significance of the deep wells reaching the clay layer?
  - EPA wants to know whether or not contamination has penetrated the clay layer.
- In the past EPA was concerned that the lower aquifer may be unintentionally contaminated during drilling.
  - Double casing will be used when drilling to prevent contamination of the lower aquifer.
- Angie May noticed that the lids of the bins containing soil from drilling have been left open. Is that safe?
  - EPA directed the contractors to leave the bins open while the sun is out in order to help in drying the drill cuttings , but to close them at the end of the work day. If the residents notice that the bin lids are left open at night they should call or e-mail Rose Marie. They do not pose a risk unless someone were to climb into them.
- Manuel asked if the drilling could cause residents to get a rash, because his daughter has a rash that just started two days ago.
  - EPA does not know of anything that could cause a rash. The samples taken during drilling have not shown high levels of contamination. EPA can take a reading inside his house the following day to verify there are no high levels of contamination.

Indoor Air Sampling Results

EPA Presentation/Information

- Soil vapors have entered the crawlspace of some residents' homes.
- EPA's emergency response department is investigating the five homes with the highest levels of crawlspace contamination.
- As of the November 3rd CAG meeting, EPA has talked to two home owners so far.
- The chemicals found in the crawlspace are also being seen inside the homes.
- EPA is still finalizing the AMCO Superfund Site Indoor Air Technical Memo, which will answer many questions.

Public/Technical Advisor Comments

- Is the long term health risk evaluated for children, adults, or both?
  - Both. To assess risk for residents exposed to volatile compounds in indoor air through the inhalation pathway, EPA considers a chemical is hundred or thousand times more toxic than studies have shown it to be. The inhalation toxicity information accommodates age related differences (lower body weight or inhalation rate of a child) and targets the most sensitive population which may or may not be children.

  This is different than how risk is assessed for ingestion of soil. The soil assessment is dose-based which does account for the body weight, ingestion rate for a child. For example risks during the first 30 years of life (6 years as a child and 24 years as an adult) were calculated using age-adjusted factors. Use of age-adjusted factors are especially important for soil ingestion exposures, which are higher during childhood and decrease with age. The focus on children is considered protective of the higher daily intake rates of soil by children and their lower body weight. Child soil ingestion rate 200 mg/day: Adult soil ingestion rate 100 mg/day.Some residents have lived in the South Prescott neighborhood for nearly a lifetime, which puts them at greater risk than other residents.

- Does EPA take time spent near the AMCO Superfund Site into consideration?
  - EPA does take that into consideration.
- Will EPA perform follow up sampling after the vapor intrusion remedy is implemented?
  - Yes, but we may not see drastic changes, because of West Oakland's poor air quality.
- It is important to communicate to the residents that the AMCO risk assessments have a narrow focus and do not take into consideration additional risks associated with living in the South Prescott neighborhood. The community should err on the side of caution and get input from technical experts regarding cumulative impacts.
  - Risk to human health comes about as a result of exposure pathways. Vapor intrusion is one of many risk pathways/elements that contribute to cumulative risk. Successfully eliminating the vapor intrusion pathway will eliminate one risk element, which will contribute to a reduction in the overall cumulative risk.
- Comments from participants included that EPA go above and beyond the status quo and provide assistance to the community in simple ways, such as purchasing house plants for the South Prescott residents.
  - EPA has established national workgroups to discuss the issue of cumulative risks that are being raised by community groups across the country. However, there isn't an established scientific method for studying cumulative risk from all environmental sources, which is why EPA can not evaluate cumulative risks for the Amco Site. EPA is attempting to make up for not knowing cumulative risk by eliminating any risk elements due to the Superfund site contamination (such as vapor intrusion). In addition, EPA can implement various engineering controls when implementing a remedy to try and address cumulative risks that may be identified.
- A CAG member suggested that residents purchase house plants that will help clean the indoor air (see How to Grow Fresh Air by Dr. B. C. Wolverton).

Green Action Comments

- How is the risk determined? In the past EPA has said that there is no risk inside the home, which the indoor air sampling has shown not to be true. The residents are exposed to many chemicals in their neighborhood, in addition to chemicals not originating from the AMCO Site. Green Action believes that the EPA risk assessment approach does not take the other elements of risk into consideration . Requests that EPA considers emergency relocation for residents with high levels of indoor air contamination, because there may be a short term risk when combined with other risk factors.
  - EPA 's sampling process may detect other chemicals that may be present in the air surrounding the site, and will detect chemicals that may be present in the soil and groundwater since the sampling process is fairly complex. However, EPA can only propose a remedy that addresses the risk posed by the AMCO site. EPA has addressed the vapor intrusion issue by placing the mitigation system on the homes located on 3rd Street and 320 Center Street last month. EPA has not seen acute levels of contamination inside the homes that are immediately dangerous to health, which would justify an emergency response. EPA sampled ambient and background air at the same time as they sampled inside the homes. The best way to address the risk for the site is to move ahead with the Feasibility Study process and chose a remedy. After the remedy is in place, the risk posed by the site will be addressed.
- Requests that the residents receive education in cumulative impacts/risk from an expert outside of EPA.
  - The residents asked Green Action to identify said experts.
- Mitigation measures and other solutions need to take into account the cumulative risk factor.
- EPA is currently working on the national level to understand and address cumulative risk. For example, not permitting new industrial sites to be built in neighborhoods with contaminated sites. EPA does not have a standard method of assessing cumulative risk at this time.

Feedback on AMCO Open House

Public/Technical Advisor Comments

- The AMCO Open House went well, but the turnout was poor. Flyers were mailed out to the 3000 or more people on the mailing list. An ad was also placed in two local Oakland papers.
- Outreach to the community could have been better, which both EPA and the CAG should address for future meetings.
- Brian suggested that each CAG member commit to bring one neighbor to future AMCO meetings.
- Manuel suggested putting up a large poster (in Spanish, English and Chinese) in South Prescott Park a few weeks prior to the Open House to advertise the meeting.
- Several residents suggested moving the AMCO bulletin board to a more trafficked area.

Community Advisory Group – December 8 Agenda

- West Oakland Residential Lead Assessment Preliminary Report update

- Remedial Alternatives 3 and 4
- CERCLA evaluation criteria
- Site activity timeline
- Green Action received a $900 grant to provide food at CAG meetings. Green Action will coordinate with the residents to reimburse them for food.

Here is an updated brochure to contact the AOEC clinic in San Francisco. You may be able to use this for the AMCO Site at the public meeting or toi give to individual residents.

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Attached (and below) is a new description of the services offered by the Multidisciplinary Clinic, along with the updated clinic location and contact information. Please distribute to interested individuals and inquiries regarding the clinic. Thank you.

Occupational and Environmental Medicine Clinic
University of California at San Francisco

The UCSF Occupational and Environmental Medicine Clinic provides specialty consultations for patients with health concerns related to their workplace, community, or home. The clinic includes a faculty practice that provides diagnosis and treatment of work-related injury and illness, and a multidisciplinary clinic that provides in-depth evaluations of exposure and disease. The in-depth multidisciplinary clinic evaluation includes a review of the scientific literature, investigation of records, site-visits and testing to fully evaluate patients' health issues.

Areas of expertise:

- Toxicology – acute and chronic poisoning
- Occupational or environmental respiratory disease
- Reproductive toxicants
- Lead, mercury and other heavy metal exposures
- Indoor air quality
- Work-related repetitive injuries
- Pesticide, solvent or other chemical exposures
- Drinking water contamination
- Pediatric environmental health

For Appointments, Contact:

UCSF Occupational and Environmental Medicine Clinic
Tel.: 415-885-7580 Fax: 415-771-4472
Email: OEMclinic@ucsf.edu

Clinic Location

2330 Post Street, Suite 460
San Francisco, CA 94115

Public parking is available on Sutter Street between Broderick and Divisadero. The clinic is accessible via the following San Francisco Municipal Railway (MUNI) bus routes: Route 2 (Clement), Route 24 (Divisadero), Route 38 (Geary), Route 4 (Sutter).

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