

USEPA AMCO Superfund Site CAG Meeting, December 8, 2009

EPA Attendees: Leana Rosetti
Rose Marie Caraway
Steve Calanog
Luis Garcia-Bakarich
Nick Vidargas

EPA Contractors: Yash Nyznyk/CDM
Kent Baugh/ITSI
Frankie Burton/CH2M HILL

CAG Members: Brian Beveridge
Angie May
Lorena Mendoza
John Schweizer /Technical Assistant

West Oakland Residential Lead Assessment Update

EPA Presentation/Information

- In October, 54 yards (residential properties) were sampled and over 100 samples were collected.
- The average level of lead contamination found in the yards sampled was 850 – 900 ppm, which is above EPA's screening level (what is considered safe) of 400 ppm.
- If soil from 150 residential yards was to be excavated and replaced, EPA estimates that it would take approximately two years (more than \$6 million). EPA suspects that there are multiple sources of lead contamination (including lead paint, lead-containing fuel for vehicles, metal foundry formerly located on corner of Center Street and 3rd Street, rail yard activities, historical disposal practices, and fill materials from unknown sources. EPA requested input from residents to identify any other potential sources of lead contamination, because EPA management wants to know that a thorough investigation has been performed prior to granting funds for the cleanup.
- All residents will receive a letter from EPA with the analytical results from their individual yards.
- Overall, lead contamination in soils is a pervasive problem in the neighborhood.
- What can you do now to protect yourself and your family?
 - 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.
- EPA will hold a lead assessment community meeting from **6:30 to 8:30 on Wednesday, December 16 at the Mandela Gateway Apartments**. EPA will not have more information about the cleanup, but they will have a question and answer session.

Public/Technical Advisor Comments

- What is the point of locating specific sources of lead contamination in the South Prescott neighborhood? Shouldn't that effort go into cleaning up the soil?
 - EPA's management wants to make sure EPA has done their research.
 - EPA has the power to make responsible parties pay for the cleanup of contamination they caused.
- Could EPA determine where the lead came from through chemical characterization?

- EPA could chemically characterize the lead, but it wouldn't answer all of EPA's questions regarding the sources of contamination.
- Steve is also concerned that EPA would waste time and money chemically characterizing lead that could have been spent cleaning up yards.

Technical Assistant Grant (TAG) Update

EPA Presentation/Information

- Leana Rosetti spoke to Bruce Cox, Executive Director for the Alliance for West Oakland Development, about their lack of payment for John Schweizer's services. He is working with the accountant to resolve the issue.
- EPA plans to terminate the grant, because it is not benefitting the community and Alliance for West Oakland Development does not have time to manage this grant.
- EPA will work with Alliance for West Oakland Development to voluntarily terminate the grant after John is paid his outstanding balance. If Alliance for West Oakland Development does not submit the required paperwork, EPA will have to enforce termination of the grant.
- While EPA deals with terminating the TAG, the Technical Assistance Services for Communities (TASC) Program could be used to assist the South Prescott neighborhood.
 - Under the TASC Program, EPA hires E2 as a contractor to provide technical assistant(s) to serve the South Prescott residents.
 - EPA and the community would set particular goals for E2 to meet.
 - It is possible for E2 to hire John Schweizer as a subcontractor in the interim, while the TAG is being sorted out.
- **Next Steps**
 - Continue pressing the Alliance to pay John Schweizer for all outstanding invoices and show supporting documentation.
 - Terminate the grant with the Alliance for West Oakland Development.
 - Identify a different non-profit to take on the grant.
 - EPA to look into TASC Program for the South Prescott neighborhood. Brian will send EPA a written request for ideas for TASC services.
 - EPA will be prepared to discuss the TASC and TAG at the next meeting.
 - EPA requested that the residents think about and suggest any possible non-profit organizations that might be willing to take on the task of managing a TAG.

Public/Technical Advisor Comments

- Could the TASC Program work in concert with other West Oakland redevelopment work being performed by E2?
 - They can work in concert.
 - EPA considers the TASC Program to be a responsive program.
 - TASC could perform a technical assistance needs assessment to help the community apply for next TAG.
- **Details of the TAG Grant:**
 - Set up specifically for National Priority List/Superfund sites.
 - It's a program where EPA provides funds for the community to hire their own technical advisor.
 - This program enables the community to hire an expert that is independent of EPA.
 - The TAG is set up through a non-profit, ensuring that the TA is responsible to the non-profit, not to EPA.
- The residents would like EPA to look into the TASC Program.
 - E2 could share examples of what other NPL site communities are doing, which may help residents better define their goals.
 - The residents can talk to Leana or E2 about the responsibilities of taking on the TAG.

- The residents could start putting together a list of non-profits in the area that may be willing to take on the TAG.

Upcoming Technology for Indoor Air Sampling

- EPA described a new, indoor air quality testing device that is currently under development. There is a need for testing of the device to allow comparison to current methods of indoor air quality testing (e.g., SUMMA canister). The new device is very small as compared to a SUMMA canister.
- EPA inquired whether any residents would be willing to have the new air sampling device be tested in their home for a period of up to 14 days?
- The new device needs be placed in a home for 14 days along with the old air sampling device (SUMMA air canister) for purposes of comparison testing.
- EPA will review the technical information and will send it to the residents that are interested in testing the new device.

Remedial Alternatives

EPA Discussion

- Remedial alternative 2 and 3 are EPA's potential preferred remedies.

The Treatability Study

- Objective is to evaluate bioremediation under various conditions using site-specific soil and groundwater. The Treatability Study would provide EPA valuable information about how the full-scale remedy should be implemented.
- Soil and groundwater samples would be collected from the AMCO site and sent to the testing laboratory. The testing would involve testing under various conditions and using various reagents.
- Treatability study data would be used to identify the conditions which most effectively treat the onsite contamination.
- EPA is leaning toward performing a Treatability Study, but they're not sure when.
- Under certain conditions, information gained in the laboratory cannot easily be duplicated in the field. So, an alternative to the laboratory treatability study testing is to implement a pilot-scale test at the AMCO site. A disadvantage of a pilot-scale field test is cost (i.e., more expensive than laboratory treatability study testing).
- EPA's consultants (ITSI/CDM) will prepare a technical memorandum with justification for moving forward with the treatability study testing. EPA will make a decision on whether to perform the treatability study testing based on this technical memorandum.

Record of Decision

- The Record of Decision (ROD) is a public document that describes the selected cleanup alternative for a Superfund Site and provides the basis for the decision.
- EPA has a few options when preparing the Record of Decision (ROD).
 - ROD could define implementation of a single remedial alternative (e.g., either Remedial Alternative 2 or Remedial Alternative 3).

OR

- ROD could identify multiple remedial alternatives (e.g., Remedial Alternative 2 and Remedial Alternative 3). This is referred to as a Provisional ROD. A Provisional ROD allows EPA some flexibility in terms of modifying the selected remedy based on data generated during early phases of a remedial action.

Flexibility During Implementation of Remedial Action

- A common element in all of the remedial alternatives is **Limited Excavation**, which consists of the removal of approximately 5 feet of concrete and excavation of soils to a depth of 5 feet (below the bottom of the concrete).
- A benefit of limited excavation is that it will provide a significant amount of information about the extent of contamination that is not currently available.
- After excavation to a depth of 5 feet, EPA may decide to excavate to a greater depth in a localized area where a large pocket of NAPL is observed.

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Public/Technical Advisor Comments

- Is there a risk of contaminated gases escaping if deep excavation is performed?
 - Yes, but there are ways to manage the gas release from an excavation (e.g., tenting, use of foam, use of dual-phase extraction prior to and during excavation activities, etc.)
- How long does bioremediation take?
 - Varies depending on site-specific conditions; however, it is expected that bioremediation at the AMCO site will be implemented over a period of 2 to 5 years.
 - EPA will attempt to maximize the Site's existing (naturally occurring) microbes.
- If microbes are injected into the subsurface, will they propagate on their own, or will EPA have to continually inject them into the soils?
 - Microbes are able to reproduce on their own under the right environmental conditions. One of the objectives of the remedial action would be to create and maintain conditions which are conducive to microbial reproduction. For example, heating generally promotes reproduction of microbes.
- Will more than one round of injection of bioremediation reagents be necessary?
 - In general, more than one injection of bioremediation reagents will be necessary. Reinjection could occur after six months to a year, but it will depend site-specific conditions. Ongoing monitoring of site conditions will be implemented as part of the remedial action.
- What are the benefits of heating?
 1. Heated water moves downgradient and deeper than the targeted area. This results in a larger area of treatment.
 2. Heating can promote microbial reproduction. Microbes have specific temperatures that are optimum for reproduction.
- After the site is cleaned up will EPA place soil or concrete on top?
 - It depends on the site's future use designation.
 - EPA could work with future owners to determine what would be best for future development.
 - Under Superfund, EPA is not allowed to "improve" the site. They are allowed to work with other agencies/owners and take actions that would benefit both the remedial action and future land use.
 - The intent at this time is to put soil on top, but that could change over time.
- The community would have opinions about future use of the site and would like to provide input prior to finalizing decisions.
 - There will be a document discussing the City of Oakland's plan for the neighborhood, which the public will see. The document being generated by E2 will also ask for input from residents living in the neighborhood.
- How likely will monitoring/cleanup will be ongoing for many years?
 - It is very likely, because of the groundwater contamination.
 - If EPA knows what the future use may be they can place the treatment facilities in a location that will not interfere with the planned future use.
- Has EPA moved away from remedial alternative 4 (including Deep Excavation)?
 - No, it is still one of the alternatives that will be evaluated against the 9 criteria. If the limited excavation at 5 feet shows product EPA could also extend the excavation to deeper depths

- which means the Agency could still end up with excavation depths deeper than what is proposed.
- At 15 feet EPA will reach water, which could be difficult to deal with.
 - What does EPA plan to do with the two houses that sit above the plume?
 - Temporary or permanent relocation is being considered, depending on what EPA finds during remediation implementation.
 - Temporary relocation is highly likely, because of construction impacts.
 - Once construction is completed the temporarily relocated residents would move back into their homes.
 - Permanent relocation means EPA would purchase a home from the owner. If there are current renters, a relocation package (money) to the renters.
 - Are the homes with yards above the plume at risk for relocation?
 - Temporary would be necessary, because of construction impacts.
 - EPA is attempting to account for all the possibilities regarding relocation in the Feasibility Study, because that will determine what options EPA has during the design phase.
 - Requested that EPA send information about what happens when a resident is temporarily relocated.
 - Rose Marie to send the community temporary relocation information. New Information: Rose Marie directed the contractors to add a section to the FS that discusses conditions under which EPA would recommend both temporary and permanent relocation. When that section of the report is written, EPA will pass it along to the members of the CAG for further development and discussion. We will update you on the timing of that section during January.
 - Will EPA take steps to prevent emissions from harming the residents?
 - No matter what remedial alternatives are selected EPA will do their best to prevent emissions from harming the residents and workers. One of the criteria in evaluating a remedy is to look at short term impacts. The handling of emissions from the excavation will be discussed in detail in the design reports which are written after EPA completes the Record of Decision process.
 - Has EPA installed wells on Mandela Parkway/under the freeway?
 - No the wells have not been installed on Mandela Parkway/under the freeway. EPA was only able to install 10 of 19 (total) planned wells because of access issues. United Pacific Railroad, the property owner, provided access to EPA for sampling, but Amtrak, the current leasee, has not provided access approval. EPA is currently working to address this issue.

Community Advisory Group – January 11 Agenda

1. Lead investigation update.
2. More details from EPA on how they will prevent emissions from harming residents and workers once excavation exposes contamination.
3. EPA's Temporary relocation guidance, as well as discussion regarding temporary relocation for houses adjacent to the site on the eastern side of Center such as Ange's.
4. TASC and TAG updates and additional information.