



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

November 9, 2006

Thomas Martin, Mayor
Felipe Aguirre, Mayor Pro-tem
Sam A. Pena, Councilmember
George Martinez, Councilmember
Sergio Calderon, Councilmember
City of Maywood
4319 E. Slauson Boulevard
Maywood, CA 90270

RE: Pemaco Superfund Site Status and Safety Questions

The purpose of this letter is to update the City of Maywood on the status of the Pemaco Superfund site construction activity and to discuss questions posed recently by the City Council and community members regarding the safety of the Maywood Riverfront Park.

SAFETY OF THE MAYWOOD RIVERFRONT PARK

During October 2002, I requested that the EPA toxicologist respond to the draft Environmental Impact Report (EIR) for the Maywood Riverfront Park based upon a request made by the City Planner at that time, Julia Gonzalez. Dr. Gerald Hiatt sent in a 5 page memo that evaluated the installation of the Park from a human health risk prospective. In his memo, Dr. Hiatt concluded that the "residual chemical contamination present at the Pemaco Site, which is confined to sub-surface soils and groundwater, will not create a potential health risk for people, including children, using the park. Nor will construction of the park create additional exposure to residual contamination that could adversely affect the health of park users, nearby residents or school children in the area."

Since October 2002, EPA has completed the Human Health Risk Assessment for the Pemaco Superfund site and the Agency for Toxic Substances and Disease Registry has completed its Health Reports for the Pemaco Site⁽¹⁾. EPA also coordinated a meeting between ATSDR/Cal Health Dept and PUMA representatives on May 25, 2004 to discuss any health related questions regarding the Pemaco Site. Mr. Aguirre was a PUMA member at the time. During October 2004, PUMA representatives were invited to attend a NACCHO meeting which included members from all the appropriate health agencies to discuss health questions regarding the Pemaco Site and WW Henry. Mr. Aguirre sent a representative to the October 25th meeting. This sub-group consisting of the various health professionals and PUMA representatives held a series of meetings throughout 2005 to discuss all health related questions. The small group requested that LA County Health Department evaluate whether or not there were increased cancers in the Maywood area. As a result of those meetings, Dr. Cyrus Reagan of LA County Department issued two separate reports that summarized his

findings regarding increased cancers in the Maywood area. The studies showed that there were not any increased cancers in the Maywood area that could be attributed to the contaminants present at the Pemaco site or WW Henry site.

In the meantime, EPA continued to install the underground piping from the Pemaco site to the newly cited treatment plant area and the City worked on park construction. EPA and the City of Maywood worked collaboratively to ensure that installation of the Park occurred on-time which was requested by the various sponsors of the park. Park construction was completed during June 2006, which satisfied the requirements of the funding agencies of the park.

During 2005 the City of Maywood staff worked collaboratively with the Regional Water Quality Control Board to test the clean soil that was being placed on all park properties. The soil was tested by the City of Maywood, and the test results were evaluated by the Regional Water Quality Control Board and EPA staff and contractors. The soil met all State requirements for placement of clean fill on a site. The liner was placed on Pemaco and other park locations. In addition, contaminated soil was removed from various properties and sent to the appropriate landfill locations. EPA believes that the City has performed all necessary activities to ensure that the park soils are safe.

EPA is required under the Superfund law to protect residents living near a site from health related effects during the implementation and on-going operation of a treatment system. During construction of the Park, EPA provided daily air monitoring to ensure that no contaminated dust was being released that could cause harmful effects to any community members. Our test results show that the air quality in the area was not negatively impacted by activities going on during construction. EPA will continue a safe monitoring program during installation and operation of the treatment system. We will conduct additional sampling prior to start of the treatment plant. We will conduct stack testing of the Flameless Thermal Oxidation System at the time of start-up. Stack testing consists of 7 to 10 days of extensive sampling to ensure that the system is operating properly. EPA will also collect vapor samples from the FTO unit while it's operational. This sampling will include testing for dioxins and furans, as well as the volatile organic compounds (VOCs) currently expected to be in the waste stream. As a result of comments raised by community members, EPA has also retro-fitted the FTO unit so that air that is normally released into the air will enter a secondary treatment process. The air will be cooled down again and sent through a final carbon polishing vessel to catch any remaining contaminants prior to being released. EPA will be testing this air as it goes into the FTO unit (pre-FTO), as it comes out of the FTO unit (post-FTO), and again as it comes out of the primary carbon vessel. EPA will also be conducting extensive testing of other areas of the overall treatment system during operations.

EPA will install semi-permanent vapor monitoring stations on 59th Street and Walker Avenue. These stations will be installed so that the agency can monitor vapors in the sub-surface within the 5 feet to 15 feet below ground surface zones. EPA will monitor these locations using field instruments and also collect analytical vapor samples from these locations.

TCE Criteria

In 2003, there was a draft provisional TCE number released for use in evaluating risk at a site. Since EPA was completing the Feasibility Study for the Pemaco site at that time, EPA conducted additional indoor air samples in the neighbourhood surrounding the Pemaco site. During this process the lab was directed to lower the detection limits so that EPA could evaluate

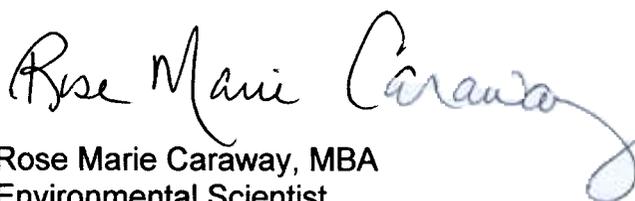
whether or not there were any health related problems based on the draft provisional number that was lower than the existing TCE number at that time. During late 2003 and early 2004, EPA regional staff requested that EPA staff from the EPA ORD lab review the entire indoor air database, and determine whether or not EPA should install additional treatment on the residential houses located on 59th Street, Walker Avenue, or 60th Street. This experienced staff evaluated the data collected on a house by house basis to make sure that we did not have any vapor concentrations that exceeded the provisional TCE number or other chemicals of concern and the staff evaluated whether any of the houses required installation of a separate treatment system to ensure that residents were safe. It was determined that indoor air was not being negatively impacted by the Pemaco Site, and that separate treatment was not required on any of the homes, but it was important that EPA implement the site clean up plan to avoid further migration of the contamination.

EPA is aware of the newly released National Academy of Science TCE toxicity report, but the report does not change the criteria we used to evaluate the risk at the site because we had already used the draft provisional number. EPA has evaluated indoor air data against the provisional TCE number and determined that additional work on residential houses in the area was not necessary. If the concentration for any Pemaco contaminant changes in the future, EPA will evaluate whether or not a change in the remediation goals at Pemaco are appropriate at that time.

STATUS OF THE PEMACO CONSTRUCTION

EPA and the contractors continue with progress on the implementation of the Pemaco treatment plant. Construction of the treatment plant building will be completed by the end of November. Drilling of the temperature monitoring wells and the electrodes for the electrical resistive heating process has begun and will continue over the next three and half months. If you have any questions please call me at 415 972 3158. I am also on the construction site on various days during the week.

Sincerely,



Rose Marie Caraway, MBA
Environmental Scientist
Remedial Project Manager

1. (http://www.atsdr.cdc.gov/HAC/PHA/pemaco/pem_toc.html)

cf. City Safety Letter