AMCO CHEMICAL SITE

Community Involvement Plan

May 2004

EPA Seeks Community Input

The United States Environmental Protection Agency (EPA) is working to investigate and **remediate** the AMCO Chemical Site (Site), formerly known as DC Metals, in Oakland, California. Formerly a chemical distribution facility, this 0.9-acre site is surrounded by an active, diverse West Oakland neighborhood known as South Prescott. Past activities at the Site have created contamination that concerns residents and threatens local economic revitalization. In order to successfully address the Site we must understand and, when possible, respond to the needs, concerns, and priorities of local residents.

This **Community Involvement Plan (CIP)** summarizes the feedback we have received regarding our work at the Site, and describes how we will involve community members in upcoming work. We held public meetings regarding the Site in 1998, 2002, and 2003, and we plan to intensify community involvement activities as the project progresses. We have developed a plan to engage the community based on the feedback we received from neighborhood residents, community members, and active community organizations. This CIP also describes how we will continue to solicit and understand community concerns and priorities. What we hear from the community will ultimately affect the cleanup activities and potential future uses of the Site.

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For your convenience, definitions of words highlighted in BOLD are provided within the text. See also Appendix I - Glossary and Acronym List.

Community Involvement Plan (CIP): As a requirement of the Superfund process, Federal Law requires that EPA write a CIP prior to the Remedial Investigation to determine the best ways to communicate with the affected community.

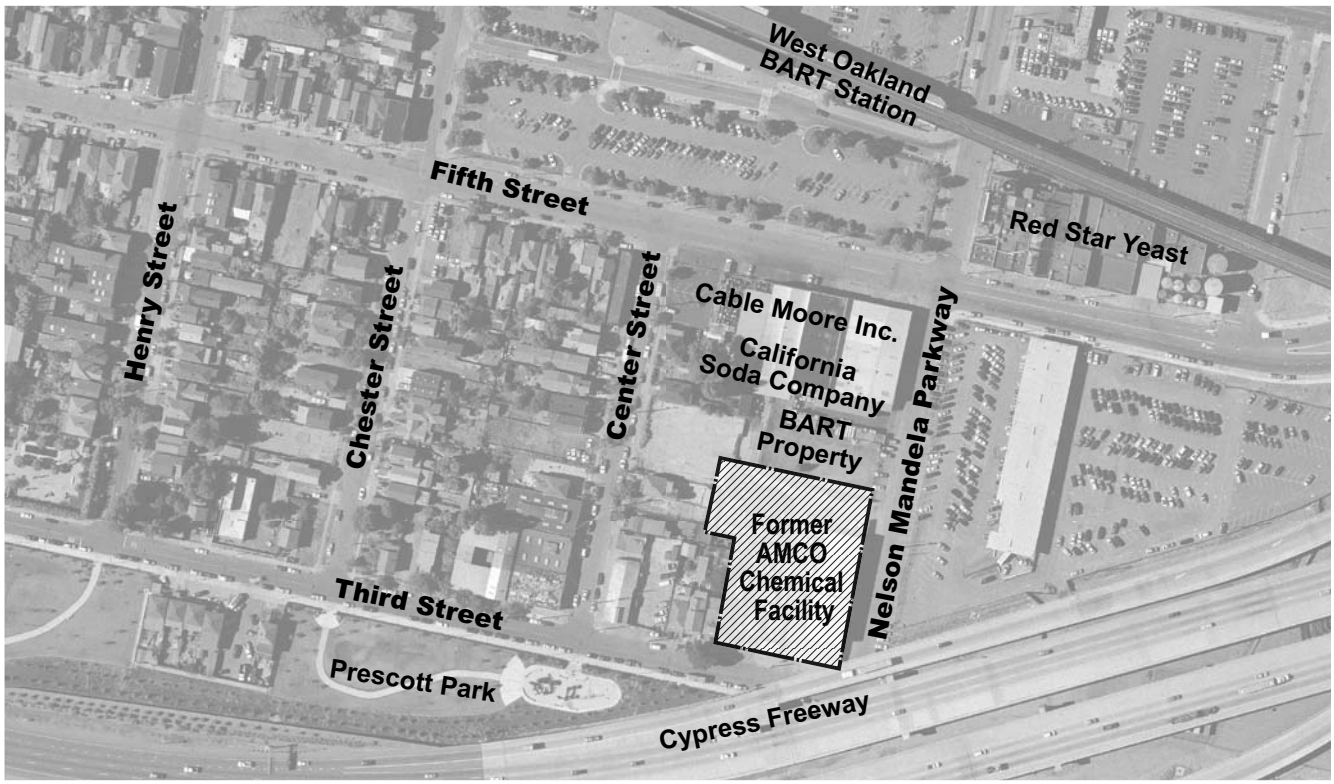
Remediate: To remove or contain contaminated materials in soil, groundwater, and soil gas.

What's the Issue?

In 1995, Pacific Gas and Electric Company (PG&E) workers installing a utility trench along Center Street expressed concern over possible chemical exposure. The utility work was being performed in preparation for the construction of the Cypress (I-880) Freeway. In 1996, investigations performed on behalf of PG&E and the California Department of Transportation documented the presence of **chlorinated solvents** and other contaminants such as **vinyl chloride** along 3rd Street, south of the Site. Subsequent investigations confirmed the presence of chlorinated solvents and other contaminants, including vinyl chloride, in soil, **soil gas**, and **groundwater** on or near the Site. Sampling has indicated that the Site poses no immediate threat to residents; however, there is concern that contaminants from the Site may pose a potential threat if nothing is done. It is important to note that the groundwater beneath the Site is not being used by the community as a drinking water source. *A more detailed Site history is included in Appendix C - Site Background.*

EPA Region 9 proposed the Site be added to the **National Priorities List (NPL)** of **Superfund** sites. The Site was proposed for listing in the **Federal Register** on April 30, 2003, and officially added to the NPL on September 29, 2003. NPL listing made the Site eligible for federal funds under the **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**, also known as Superfund. These funds should allow us to conduct additional investigations in a phase known as **Remedial Investigation (RI)**, to assess feasible **remediation** options (known as the **Feasibility Study (FS)**), and to make the community eligible for $50,000 in federal assistance under a **Technical Assistance Grant (TAG)**.

During the RI (which includes a risk evaluation), the nature and extent of,



Aerial photograph of the Former AMCO Chemical Facility

Definitions - Pages 2-3

- **Chlorinated Solvents:** Organic solvents containing chlorine atoms (for example, vinyl chloride and trichloroethylene are chemicals that contain chlorine). Uses of chlorinated solvents include aerosol spray containers, certain paints, and dry cleaning fluids.
- **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA):** A Federal act (Public Law 96-510; December 11, 1980) that provides for liability, cleanup, and emergency response for hazardous substances released into the environment and the cleanup of inactive waste disposal sites.
- **Feasibility Study (FS):** A document that provides an assessment of remedial alternatives (including taking no action), their relative strengths and weaknesses, and the trade-offs in selecting one alternative over another.
- **Federal Register:** The official daily publication for rules, proposed rules, and notices of Federal agencies and organizations, as well as executive orders and other presidential documents. Visit http://www.gpoaccess.gov/fr/
- **Groundwater:** The supply of fresh water trapped beneath the Earth's surface. Groundwater from wells and springs can be a major source of drinking water.
- **National Priorities List (NPL):** A published list of hazardous waste sites in the country that are eligible for funding to carry out extensive, long-term cleanup under the Superfund program.
- **Proposed Plan:** A plan that proposes a particular remedy for site cleanup after completion of the RI/FS.
- **Remedial Investigation (RI):** Actions undertaken to characterize the full nature and extent of contamination, including characterization of hazardous substances, characterization of the facility, evaluation of human health and ecological risks, and collection and evaluation of information relevant to the identification of hot spots of contamination.
- **Remediation:** Cleanup or other methods used to remove or contain a toxic spill or hazardous material at a contaminated site.
- **Soil Gas:** Gaseous elements and compounds in the small spaces between particles of soil. Such gases can be moved or driven out under pressure.
- **Superfund:** The program operated under the legislative authority of CERCLA that funds and carries out EPA solid waste emergency and long-term removal as well as remedial activities. These activities include establishing the National Priorities List, investigating sites for inclusion on the list, determining their priority, and conducting and/or supervising cleanup and other remedial actions.
- **Technical Assistance Grant (TAG):** Funds provided by EPA for communities affected by Superfund sites to hire an independent technical advisor to help interpret and comment on site-related information.
- **Vinyl Chloride:** A chemical compound, used in producing some plastics, that is known to be a cancer-causing agent.

as well as risks due to, Site contamination are defined by EPA investigation and analysis. After the RI is completed, EPA performs a formal evaluation of alternative methods for managing the contamination. If it appears that conditions at the Site present unacceptable risks to human health and/or the environment, EPA will identify a cleanup approach as the preferred alternative. However, in some cases, site conditions may not warrant cleanup and EPA will propose no action. The alternatives considered, as well as the preferred alternative, are reported in the FS. Once the preferred alternative is identified, a **Proposed Plan** is prepared. The Proposed Plan includes a detailed description of the preferred alternative. *For a more detailed description of the Superfund process and steps under CERCLA, see Appendix B - Superfund Process.*

South Prescott and the AMCO Chemical Site

The AMCO Chemical Site is located in West Oakland on the eastern boundary of the South Prescott neighborhood. West Oakland is a section within the City of Oakland (City) that includes the Port of Oakland and numerous businesses, as well as residential neighborhoods. The South Prescott neighborhood is an approximately 8-block area bounded by 7th Street to the north, Peralta Street to the west, Nelson Mandela Parkway (or Mandela, formerly Cypress Street) to the east, and 3rd Street to the south.

South Prescott is a historically significant resource and is one of the few neighborhoods in West Oakland that retains homes built prior to the turn of the 20th century. The majority of South Prescott's

Construction of the 3rd Street Extension Project

nearly 200 homes were built during a period of rapid growth in the late 1800s as the neighborhood grew with the arrival of the transcontinental railroad to West Oakland. South Prescott's early development was rooted in a mixture of cultures and ethnicities. South Prescott's founding residents included Irish, Portuguese, African-American, and other ethnic immigrants who worked as shopkeepers, merchants, carpenters, and railroad workers. Although the mix of cultures has changed somewhat, diversity continues to be one of South Prescott's assets. Neighborhood residents are approximately one-third African-American, one-third Latino, and one-fifth Caucasian, with a small number of Chinese-speaking families. *A more detailed cultural and economic history of South Prescott can be found in Appendix A - Community Profile.*

Once a thriving railroad-centered community, South Prescott remains a hub of activity. The surrounding neighborhood is home to many community-based organizations and places of worship. There are at least three schools and eight churches within walking distance of the Site. South Prescott also hosts activities and community-based projects and services provided by non-profit organizations and agencies.

Although South Prescott has suffered from the overall economic decline that impacted much of West Oakland post-1960, South Prescott's proximity to San Francisco Bay and downtown Oakland make it a very desirable neighborhood for redevelopment. The neighborhood includes a current transit hub, the West Oakland Bay Area Rapid Transit (BART) station, and is easily accessible to the Cypress (I-880) Freeway. It is also just one-quarter mile north and three-quarters of a mile east of the Port of Oakland marine terminals. South Prescott community groups are working independently and in conjunction with the City of Oakland and revitalization groups to create a vibrant mixed-use commercial and residential community that would offer local residents improved commercial and housing options.

Located within the South Prescott neighborhood and amidst planned and ongoing revitalization projects, the AMCO Chemical Site plays a key role in redevelopment efforts in the neighborhood. The Site is situated only four blocks from the City's proposed West Oakland Transit Village at 7th Street and Union, and lies directly across the street from a planned 110-unit condominium community, called Mandela Village, to be built at 5th and Mandela. Other planned redevelopment projects in the South Prescott area include the Mandela Parkway Extension to 3rd Street, paving of the 7th Street corridor from Mandela to Market, and the 7th Street McClymonds Initiative at 7th and Mandela, to name just a few.

We will be working throughout the project to keep a two-way flow of communication with South Prescott residents, community leaders, and nonprofit organizations, as well as appropriate government agencies.

Courtesy of Alliance for West Oakland Development
Muralist: Christine Wong

Why have a CIP?

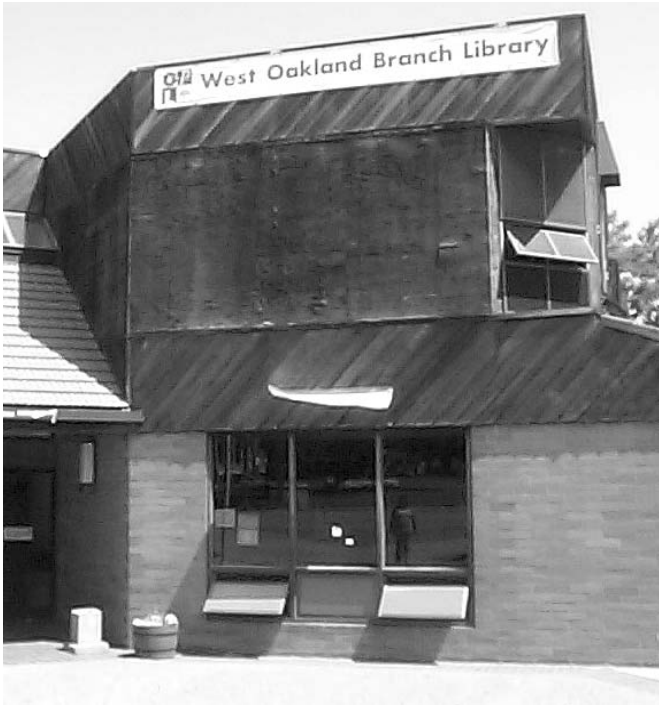
The Community Involvement Plan is the foundation for community outreach at EPA. The CIP specifies community involvement activities that we have identified in response to community concerns and expectations. In addition to the community feedback we receive through public meetings, workshops, and/or discussions with community organizations, we have conducted interviews with community members and leaders, local businesses, local elected officials, and others affected by the Site. All interviews are confidential, except those with government officials.

The purpose of this Community Involvement Plan is to:

- Document community concerns and priorities. To ensure honest and candid expression of concerns, we solicited community feedback during one-on-one community interviews.
- Establish a plan of action to engage the community in the AMCO Chemical Site Superfund process. In response to community concerns, we identified specific community involvement opportunities and activities, and developed a timeline for those activities.
- Provide a public record of our community involvement commitments.

The CIP is intended to be a living, working document that is flexible and responsive to community concerns and needs. It reflects our current knowledge about community concerns, but will need to be revised as community concerns change or emerge and new information becomes available.

We will place a copy of this CIP in the local repository at the Oakland Public Library, West Oakland Branch and will also send copies to local community-based organizations prior to conducting the Remedial Investigation. CERCLA requires a CIP be prepared and placed in the repositories prior to beginning the RI phase of the Superfund process. *For repository contact information please refer to Appendix G - Community Resources.*



West Oakland Branch Library, 18th and Adeline

What We Heard

In addition to the comments we received during past public meetings and workshops, we held interviews during April and May 2003 with people who live in, work in, or work with the South Prescott neighborhood. The majority of the interviewees were from South Prescott and included residents, Site neighbors, youth, elders, community leaders, a neighborhood religious organization, and businesses. In addition, to get a broader perspective, we talked with people from the greater West Oakland community including community leaders, local agency and government officials, and two nonprofit environmental organizations. Since we could not interview the entire population affected by the Site, we tried to capture as many different perspectives as possible. In two months, we scheduled and held 20 inter-

Where do I look if I want learn....

views in people's homes or places of business. *Interviewees were asked a standard list of questions which are provided in Appendix H - List of Interview Questions.*

After the interviews were completed, we compiled all the responses and grouped them into common themes. There are five themes, which are divided into subthemes to illustrate the specific concerns we heard. Paraphrased or quoted concerns of the community are voiced in *italics*, and our response is provided in regular text.

We have responded to each concern with a written response, a commitment to action, or both. A summary of actions to which EPA has committed is provided on pages 30-32.

What Does the Community Think About EPA's Performance?

While a quarter of interviewees believe that our performance thus far has been "ok," "good," or as one Site neighbor commented, "I like the way EPA works," most interviewees had suggestions for improvement. We asked community members to speak candidly about their feelings on our performance, and we have listed their collective concerns below.

Does the community trust EPA?

A few interviewees expressed strong opinions about how EPA has communicated with the community in the past. One individual brought up an incident at a public meeting where "an EPA official was telling the community something as if it were a fact, but EPA couldn't prove it. You can't speak to the community like that without proof." Another interviewee says there is a "lack of trust and honesty with all public agencies" in general. As a suggestion to renew trust, one community member told us that "it's important for us to have our own people to tell us what you say is true. Help us to have the same resources so we can satisfy our minds when EPA is out there doing something."

Most interviewees generally trust that we are trying to do our best for the community. "I feel pretty good about EPA," one Site neighbor commented. We heard repeatedly that people want to believe that EPA is taking care of them. One Site neighbor went so far as to express annoyance with others in the community by saying, "when EPA came in with a solution the community complained. The community comes against the solution."

The largest source of contention we heard surrounds the shutdown of the first ***treatment system****. Some community leaders recalled past public meetings and pointed out that "waffling makes you sound like you're incompetent. You're not willing to stand behind your standards. Bring in an absolute expert that can defend EPA's reasoning to the community." Other neighbors had suggestions for how we could have better handled perceived lies by saying, "in the beginning it would have been better for EPA to explain to the community that* ***thermal oxidation*** *equaled incineration." In summary, we learned that though many interviewees trust the EPA, they would like to have our decisions and actions more clearly explained.*

We realize that our communication regarding the treatment system has caused some distrust. When the Site was first recognized as a threat, our **Emergency Response Program (ERP)** moved in quickly to set up a system to remove contaminants from groundwater and soil gas (vapors in the soil). ERP staff installed a dual-phase groundwater and vapor extraction system with a thermal oxidation treatment unit. Operation of the treatment unit was a source of controversy within the community. Some community members were concerned about potential exposure to dioxins from the treatment unit's exhaust stack and demanded that the system be shut down. Other community members wanted the treatment system to continue

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- **Emergency Response Program (ERP):** The Emergency Response Program is a coordinated effort among five key EPA organizations and EPA's 10 Superfund Divisions. The mission of the ERP is to prevent, plan for, and respond to emergencies. The ERP's emergency response activities are short-term actions designed to protect the public from immediate threats to human health and the environment.
- **Thermal Oxidation:** Use of heated temperatures to eliminate hazardous wastes.
- **Treatment System:** A system designed to remove solids and/or pollutants from solid waste, waste-streams, effluents, and air emissions.

What is "Emergency Response?"

EPA defines emergency response as a short-term action designed to protect the public from threats to human health and the environment. These actions vary in urgency based on the potential threat to the public. There are three categories of emergency response, including:

- **Emergency:** Action is required within hours. *Example - explosion or chemical spill*
- **Time Critical:** Action must begin within six months (based on a site evaluation). *Example - abandoned drums in an area not accessible to the public*
- **Non-time Critical:** A six-month planning period is available before activities must begin at the site (based on a site evaluation). *Example - underground storage tanks not impacting a drinking water supply*

operating. EPA sampled the emissions from the treatment unit and trace dioxins were detected. However, because trace amounts of dioxin were also found in a "blank" (a sample not exposed to contamination) at higher levels than in the treatment system samples, the sample results were considered inconclusive. It was unclear if the contaminants were in the air, the filter, or the chemicals used at the laboratory during analysis. To be responsive to the community's concerns, EPA decided to shut down the treatment system.

During the installation and operation of the treatment system, we were able to gain additional information about the source and nature of the contamination. Based on this information, we determined that the Site did not pose an immediate threat to the public, but did pose a potential long-term risk. Therefore, the Site was removed from the ERP, and the process of evaluating a long-term solution through the Superfund process was begun. During this process, we will make every effort to be clear, concise, and honest in all communications.

Progress on the Site is slow.

About a third of interviewees expressed concern about the length of time it has taken to clean up the Site. Interviewees wanted to know "why has it taken so long to clean up?" City officials "would like to see more aggressive investigation activity" and commented that "EPA is slow at dealing with the contamination." One interviewee said that although she wants the contamination to go away immediately, she realizes that "everything is very slow with the government."

As a federal agency with responsibility to address environmental issues for the entire United States, it is sometimes difficult to respond to community needs with the speed the community demands. We agree that the Superfund process can take a long time. We are committed to moving forward as fast as we can within the requirements of the Superfund process. Now that the Site is listed on the NPL, we are working to accelerate the project timeline. On average, it takes six to ten years to complete the Remedial Investigation/Feasibility Study (RI/FS) process. However, we are hoping to complete the RI/FS for the Site within three to five years. We realize that even three to five years seems like a long time, but advance planning and careful analyses are required to ensure that we understand the nature and extent of the contamination. *See also Theme 1.3. For more information about the Superfund process see Appendix B.*

EPA works in bursts of activity, rather than a continuum of activity.

Several interviewees felt abandoned or aggravated by the appearance, disappearance, and then reappearance of EPA.

Contact Information

EPA welcomes your comments on EPA's performance, this CIP, or anything else you'd like to share with us about the Site. Please contact:

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1-800-231-3075
wilson.wenona@epa.gov

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Remedy: Removal or containment of contaminated materials in soil, groundwater, and soil gas.

As a result, we heard a lot of confusion by interviewees as to what we are doing at the Site. One Site neighbor put it this way: "What are you doing on the Site now? Why are you doing this again?" Another community leader commented that "we need a continuum of activity from you, not this stops and spurts stuff."

The first EPA program to respond when the vinyl chloride problem was discovered was the Emergency Response Program. The Site was evaluated and determined to be a threat to the public that required immediate action. A treatment system was set up as quickly as possible. We have since changed our focus at the Site from short-term interim activity (EPA Emergency Response) to a longer-term **remedy**. As noted in response to Theme 1.1, the decision to move from short-term action to a long-term remedy was based on both community concerns and additional information obtained during the construction and operation of the treatment system. Because the Superfund process is focused on a comprehensive, long-term remedy, it is, by nature, slower than Emergency Response. However, the advantages to Superfund are increased funding, more time to investigate and thoroughly characterize the Site, more deliberate evaluation of alternative treatment technologies, and the opportunity for community input into the selected remedy.

As some community members noted, there appeared to be a period of inactivity at the Site. However, during that time, EPA Region 9 was advocating to EPA Headquarters that the Site be included on the NPL and receive additional federal funding. Now that the Site has been listed, activities at the Site will increase and be more continuous.

It is important to note that though the steps in the Superfund process are spread over several years, we will continue to meet with the community regardless of the amount of new information to report. We will make every effort to ensure that the community is aware of all Site activities, as well as the overall status of the project.

1.4 EPA should have a West Oakland representative to oversee all sites and community issues.

Several people strongly recommended that we "assign a person to the area who has an office in the area - someone who is a liaison to the organizations."

Community members want to be able to get to know their liaison, and would like the liaison to get to know them. Another community leader requested a liaison "so they can be a technical advisor to us." It was also recommended that the liaison be bilingual in Spanish, and "someone consistent" with the neighborhood. Overall, interviewees recognized a lack of continuity in our representatives, as well as a need for someone familiar with all the issues in the area, not just the Site.

At this time we do not have the resources to assign a liaison who could oversee all community issues and sites in West Oakland. However, EPA's Region 9 is headquartered in San Francisco. Because of this close proximity, both the project manager and community involvement coordinator can be available on short notice. For the AMCO Chemical Site, the designated Superfund liaison is Wenona Wilson, who specializes in community involvement for Superfund sites. The Project Manager is Bruni Dávila. If you have questions about other West Oakland sites, please ask Wenona and she will be

What are Milestone Documents?

Throughout the CIP we refer to "milestone" documents. These documents occur during major points in the Superfund Process and are listed below:

- Preliminary Assessment/ Site Investigation
- Remedial Investigation
- Feasibility Study
- Proposed Plan
- Record of Decision
- Remedial Design

See Action 1.5-B

happy to direct you to the person who can best answer your question.

Does the community receive information in a timely manner?

The majority of community group leaders would like to see us provide materials to the community in a more timely fashion and provide more notice of upcoming activities. Community group leaders would like to have time to discuss our materials with their group, do further research or investigation, and then have time to respond either in writing or at a public meeting. In contrast, the unaffiliated South Prescott residents interviewed were more interested in being able to understand the information (see Theme 2.1).

As part of our efforts to improve communications with the community, we will increase the length of time between event notices and the events themselves. In addition, we will provide timely access to new documents. We hope to provide community members and leaders ample time to prepare for public meetings, workshops, and other events we will host.

Action 1.5-A EPA will provide community members and leaders at least two weeks' notice prior to events hosted by EPA.

Action 1.5-B EPA will provide two weeks between the publication of a milestone document and any public meeting to present the document and describe the public comment process. The public will then have 30 days to comment on the document.

Action 1.5-C EPA will allow at least two weeks between publishing a milestone document and holding a study group to allow the community a chance to develop questions.

Action 1.5-D EPA will place milestone documents in the repositories promptly after publication, and will provide notice of placement to the Site mailing list.

Schedule of Events for Milestone Documents

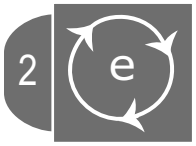
- Publish document, place in repository
- Notify mailing list of availability and upcoming public meeting

2 weeks

- Public meeting to present documents and describe public comment period process
- Start of public comment period

30 days

- End of public comment period



Engage vs. Inform

We heard repeatedly from the community a request to be engaged in the entire process, not just to be informed of Site activities. The community affected by the AMCO Chemical Site has shown a high level of involvement. We are pleased to see that this community is eager and willing to be involved in the process and we are working hard to provide as many opportunities for engagement as feasibly possible. Listed below are some concerns regarding our current method of informing the community, as well as suggestions for how the community could become involved during the decision-making process.

The community wants ownership of this project.

While two-thirds of the interviewees seemed pleased that we have undertaken full responsibility for the Site, several others expressed a desire for the community to share responsibility for the Site with us. The responses ranged from total community control ("the land should be given over to the community") to utilizing the community to help us communicate (three people suggested using community groups, youth, or elderly residents to disperse flyers and public notices). One agency representative recommended that we "involve the community when there are decision points." We also heard that the CIP process should have involved community members from the start. "We should have been the ones interviewing," one community leader commented. "EPA never adopted a way to utilize the community in doing this work."

Suggestions for how we can help build community ownership included developing a West Oakland environmental resources library, creating a technical institution to give residents the ability to conduct technical research, and using community building tools similar to models approved by the Oakland-based National Community Building Network.

During interviews, we asked whether or not the creation of a ***Community Advisory Group (CAG)*** *would be a useful tool for the community. A CAG is a group that is created and maintained by the community that we support with facilitative and administrative resources. The majority of interviewees felt that the community would be interested in creating a CAG. However, very few of those that responded in favor of a CAG indicated they would have time to participate personally.*

We would also like to see more opportunities for the community to be engaged. Our challenge is to make the best use of what resources have been allocated for this Site. One community member recommended that we use community building tools. Community building tools can be used in public meetings, educational workshops, decision-making processes, or any other events where the community is brought together. Community building tools provide methods to facilitate meetings and increase collaboration among community members. The purpose of the tools is to help residents learn to build their community from within – by listening to each other, understanding the various perspectives each individual presents, and allowing a sense of solidarity to develop. We hope to use as many community

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Community Advisory Group (CAG): A self-sustaining group that receives administrative and facilitative support from EPA. Forming a CAG is one of the opportunities EPA provides to the community during the Superfund process to receive advice from the public.

building tools as are appropriate for this project and as resources permit.

While we are ultimately responsible for the project, community input is extremely valuable in determining the best remedy for the Site. Because the Site strongly impacts the community, it is important that the selected remedy be one that the community generally supports. We are committed to encouraging community ownership as much as possible. *See also Theme 3: Community Influence in Decision-Making.*

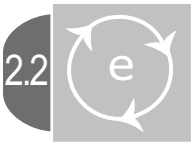
Action 2.1-A EPA will hold meetings to gather input from the community during major decision points in the Superfund process. The outcome of these meetings will be valuable to us when making a final decision.

Action 2.1-B EPA will provide educational information by attending meetings of existing neighborhood groups and organizations periodically upon request.

Action 2.1-C EPA will host at least one educational workshop each year. The topic will be determined by the community at project update meetings.

Action 2.1-D EPA will provide the resources and administrative support for the community to create a Community Advisory Group if community members are available and willing to participate.

Action 2.1-E EPA will offer a Technical Assistance Grant to the community to fund an independent technical advisor. TAG funds must be applied for and will be awarded based on qualifications indicated in the application.



Why doesn't EPA contract the community to do work?

Several community leaders and residents raised concerns that EPA is not supporting the community by funding neighborhood contractors. Community members were upset that we have a standing contract with an Oakland-based environmental engineering consulting firm, CH2M HILL. "EPA should use community people for notetaking and other non-technical work," commented one community leader. "It's an insult to the community that EPA is paying a hired contractor to do something we can do and should do for ourselves," said another.

EPA must follow strict federal guidelines for contracting. Each region uses a competitive, qualification-based process to determine the prime contractor. The selected contractor must be qualified to work on Superfund sites and must comply with general federal regulations, as well as specific Superfund regulations. These regulations include insurance requirements and use of certified health-and safety-trained personnel. Federal contracting is a long process designed to ensure the efficient and appropriate use of federal taxpayer dollars.

For EPA Region 9, the selected contractor is an Oakland-based environmental engineering consulting firm – CH2M HILL. As our prime contractor, they have a 10-year contract with EPA to provide primary support on Superfund sites within Region 9. CH2M HILL activities include developing and performing remedial investigations and risk assessments, evaluating remedial technologies, performing construction, and providing community outreach support.

CH2M HILL does hire specialty subcontractors to help perform their work and actively encourages small businesses, small-disadvantaged businesses, and

women-owned small businesses to participate in competitive procurement opportunities. For information on subcontract work, please contact CH2M HILL's Program Manager, Udai Singh. Udai can be reached at 510-587-7555 or email usingh@ch2m.com.

To better serve the communities with which we work, EPA developed a partnership with the National Institute of Environmental Health Sciences (NIEHS) to create a program called the Superfund Job Training Initiative. This partnership supports job training programs in communities affected by Superfund sites and encourages the employment of those who live near local site cleanups. NIEHS and EPA have the resources to train community members to be viable workers during site cleanup. These skills can then be used to gain employment at other related facilities. A community that is interested in becoming a nominee should have a partnership with a community-based organization that has the capabilities to provide recruitment and job placement for potential trainees.

To be nominated for the Superfund Job Training Program, the community must inform EPA's Community Involvement Coordinator (Wenona Wilson) of its interest. The Site's Community Involvement Coordinator then nominates the community to EPA National Headquarters. If the application is approved by EPA Headquarters, the nomination is sent to NIEHS for the final selection process. For more information on this Superfund training program, which was designed specifically to provide job training in affected communities, please contact Wenona Wilson at EPA. You can also visit the EPA website at http://www.epa.gov/superfund/tools/sfjti/index.htm, or the NIEHS website at http://www.niehs.nih.gov/wetp/program/minority.htm.

EPA's Requirements Under Superfund

The commitments listed at the end of this section primarily contain actions that EPA will take *in addition* to the legal requirements under Superfund Law. *For a complete list of required actions, please see Appendix B - Superfund Process.*

EPA needs to have more of a presence in the community.

Almost two-thirds of the interviewees had suggestions for us that ultimately indicated a desire for our increased presence in the community. Several interviewees commented that they would like to see an EPA liaison that "really went into the area and really knew people" and "has an office in this area." (See also Theme 1.4.) One community leader told us that we need "greater outreach to residents and community members. You need to have more of a presence, do monthly or quarterly updates or a newsletter to residents, increase money for environmental education, increase grants for activities around the environment, increase proactive and preventative techniques...." Another suggestion made by a community leader was for us to attend "community planning meetings and other community group meetings so [we] could have more of a local presence."

We heard a variety of suggestions for how often to meet with the community, as well as the types of meetings people would like. Two people would like to see workshops or some sort of study group be held whenever technical documents are released to the public (see Action 2.1-C). Four people recommended that we host neighborhood meetings with a frequency

ranging from every week to every two weeks. Nearly half of all interviewees said they would like to have a full public meeting at least once every three months. Some suggested even more frequent (monthly, bimonthly) meetings to "give an update, even if nothing is happening," or to "be constantly aware of hazards, status, and what is currently going on (with the Site)." One Site neighbor stated a desire for us to step in with all "other issues in the community that are too small for EPA or not EPA's responsibility." Whether their hope was for an onsite EPA representative, a steady flow of information, or increased educational opportunities, interviewees were clear that our presence in the community is highly desired and should be increased.

As indicated above, it is clear to us that the community would like more involvement from us than has occurred in the past, and more than is required by Superfund law. With the upcoming Remedial Investigation, we will be much more involved in the community than in the past. We have considered our resources and commit, at a minimum, to implementing several actions listed below.

Action 2.3-A The Project Manager (Bruni Dávila) will continue to meet regularly with government and city officials to coordinate activities among West Oakland sites.

Action 2.3-B EPA will contact congressional liaisons, city officials, and key community stakeholders at all project milestones.

Action 2.3-C EPA will host periodic project update meetings to inform the entire community of the Superfund process. Prior to the meeting, a notice will be sent to the Site mailing list, public notices will be posted, and key community stakeholders will be telephoned.

Action 2.3-D EPA will mail at least one project fact sheet each year to the Site mailing list.

The community should be able to understand the documents that EPA publishes about the Site.

The interviews made it clear to us that many members of the community find our documents difficult to understand. One person wanted to better understand so that he could trust us, three people wanted to clearly understand how the Site would affect their health, two people wanted to know exactly what the risks were and were not, and two others just wanted increased understanding for their peace of mind. Two community leaders emphasized that easily-read documents empower the community to make its own decisions. "We need ownership. We need technical minds [in the community] to evaluate your reports," commented a community leader.

Suggestions for how community members could be more informed in technical areas included creating an environmental resource committee and neighborhood environmental library, as well as organizing study groups to look over our documents. Another community leader suggested "reading the technical information together in a study group" as a way to improve community understanding. In summary, there are many reasons why it is important for community members to be provided with technical documents understandable to the general public.

As the purpose of the interviews was to understand how we can better communicate to the public about the Site, we

were very interested to hear suggestions of how documents could be made more accessible and easy to understand. To help educate the public, Superfund law established the opportunity for a Technical Assistance Grant to be made available to the affected community. One TAG is available per Superfund site. The TAG is primarily used for payment of a technical specialist hired by a community group to provide expert advice and explanation on our activities. The group that applies for this grant must be approved by EPA through an application process. For more information on the TAG, *see Action 2.1-E*. In addition to the TAG, we are committed to the following actions to help the community understand the technical documents we write as part of the Superfund process.

Action 2.4-A EPA will make every effort to attach a document description (1-2 paragraphs describing purpose and content) in laymen's terms to all public technical documents.

Action 2.4-B EPA will hold study groups after releasing milestone technical documents, as necessary.

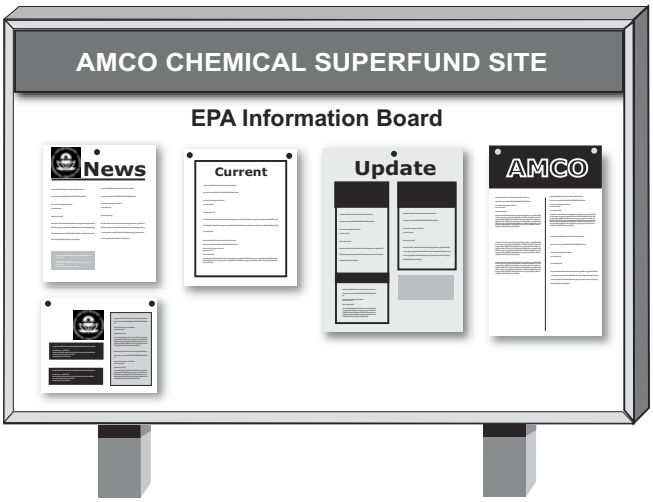
The community needs better access to Site-related information.

Nearly all interviewees supported posting Site-related information at the West Oakland Branch Library. Several alternatives were raised, including creating an environmental library specific to West Oakland, providing an identifying sign onsite, and posting information on an onsite bulletin board. Three interviewees mentioned that though the West Oakland Branch Library is the best place to post documents, the documents are disorganized and difficult to find. In addition, because the documents are often technical, community members are sometimes confused about what they are reading.

Since the current local repository, the West Oakland Branch Library, works best for most people, we will continue to use that location; however, we would like to improve the current system to allow better understanding of stored documents. In addition, we would like to provide general material onsite to give the local community a place to view project-related flyers, newsletters, and other public notices.

Action 2.5-A The Site's West Oakland Branch Library information repository will be more clearly identified. A repository index binder will be located with the documents to help guide the public. The index will include a list of documents available, identify the document purposes, and define key terminology using a descriptive glossary. *(See Action 1.5-D)*

Action 2.5-B EPA will construct an AMCO Site bulletin board/sign near the Site to update local residents. The primary purpose of the board is to designate the Site as a Superfund site, but it will also provide ongoing Site-related information to the neighborhood during field investigation activities. The bulletin board will contain information pertinent to Site safety, contact information, upcoming events, and other Site-related information.



There is a need in the community for Spanish interpretation at meetings and Spanish translations of community involvement documents.

Nearly half of all interviewees recommended that we make sure to include Spanish-speaking neighborhood residents in our outreach efforts. Comments included, "Be sure to have Spanish interpreters and Spanish translation on the flyers" and also "Latinos won't go to a meeting if there isn't an interpreter." One Latino interviewee emphasized the potential need to visit Latino homes directly because "they're too busy with work" to attend meetings for information. Overall, interviewees strongly recommended that we appeal to the Latinos in the community by translating all community involvement documents and activities into Spanish.

CIP en Español

Si gusta una copia del Plan de Involucración Comunitaria, por favor llame a Héctor Aguirre al 415-972-3238.

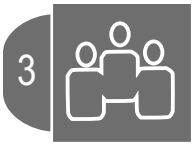
If you would like a copy of this CIP in Spanish, please call Héctor Aguirre at 415-972-3238 or 1-800-231-3075.

It is very important that we are able to communicate with the whole community. As indicated in *Appendix A: Community Profile*, approximately half of the adults in the South Prescott neighborhood speak Spanish at home. Based on our demographic information, Spanish is the only language other than English that a significant number (greater than 10 percent) of community members speak at home. However, if translation into other languages is needed, please let the Community Involvement Coordinator (Wenona Wilson) know so she can make appropriate accommodations. We are committed to taking the following actions to address the concerns indicated in this theme:

Action 2.6-A EPA will translate all future documents related to community outreach into Spanish. These documents include, but are not limited to, this CIP and fact sheets containing technical information.

Action 2.6-B EPA will provide a Spanish interpreter at public meetings. Any boards/diagrams used at public meetings will be translated into Spanish.

Action 2.6-C EPA will host Spanish-only study groups, as needed.



Community Influence in Decision-Making

We know from our experience that the South Prescott and greater West Oakland communities are very active and interested in the AMCO Chemical Site. With the high level of interest and activism come strong and sometimes opposing opinions on how the Site should be handled. For this reason, we interviewed representatives of as many different viewpoints as possible. One of the major themes we heard from leaders of community organizations and some agency officials was the desire of the community to have a stronger influence on decisions regarding the Site. The interviewees' concerns appeared centered around several key topics, which are discussed below.

3.1 Decision-makers need to be living in the South Prescott community.

Most South Prescott residents were very clear about not wanting any outside parties or interest groups, including other West Oakland residents, to have any weight in decision-making for the Site. Of the South Prescott residents that we interviewed, all of them emphasized that only people in the South Prescott neighborhood should be involved in decision-making with us. When asked to name other individuals or organizations we should contact for interviews, one Site neighbor answered, "Nobody. This affects South Prescott only." When asked about starting a Community Advisory Group, one Site neighbor responded "I think a CAG would be helpful, but only people in the neighborhood – not anybody else that comes in here that doesn't live in the South Prescott neighborhood."

While we ultimately have the responsibility to make final decisions on the Site, the input of the community is extremely valuable when determining which remedial alternative makes the most sense for the community. We recognize the desire of Site neighbors and South Prescott residents to have the most influence in our decision-making process, since they are the most strongly affected. We will ensure the involvement of Site neighbors and South Prescott residents through use of outreach tools such as personal calls, visits, and meetings.

However, because we are a public agency we will consider the input of all concerned residents.

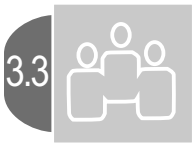
3.2 People do not raise their opinions at public meetings in a manner respectful of others.

This concern was raised only by Site neighbors (not other South Prescott residents, West Oakland residents, or agency officials) who have stopped attending meetings to avoid community groups who were perceived to be "after money alone," community leaders who "believe that their opinion is the only reasonable one," and hearing people argue. The Site neighbors who have expressed this concern are the most affected by Site activity, yet they are the most reluctant to attend and contribute at public meetings. "I was very involved at first, but stopped because people started arguing and being disrespectful toward each other at meetings," one Site neighbor told us. Another Site neighbor was concerned that some people were not seeking the best interests of the neighborhood: "Sometimes the community leaders take advantage of what's going on for other reasons. They want this or that instead of what's good for us."

It is important to us that all members of the public feel that they have the opportunity to voice their opinions and concerns. Because not all people are comfortable in large group settings such as public meetings, we hope to encourage participation in smaller study groups and workshops *(see Actions in Theme 2.1)*. Also, to make public meetings more productive for those participating, we will implement the following:

Action 3.2-A During the Superfund process, there will be times that we would like to obtain a consensus from the community regarding specific issues. During public meetings where

community consensus is desired, we will alter the format of the meeting to incorporate community-building tools facilitated by EPA. The use of community-building tools allows equal footing for all participants. The goal is to encourage participation by all attendees by creating a friendly environment in which everyone can feel comfortable expressing their opinions.



How are decisions made?

During the interviews, we noticed that there is some confusion about how our decisions are made, as well as how the community can effectively influence those decisions. The concern reached beyond the community having an opportunity to provide comment and really focused on the community's desire to significantly influence or direct the decisions being made about the Site. As one interviewee said, "We need to be the ones deciding."

We make decisions during the Superfund process in many different ways, depending on the implications of the decision. Day-to-day decisions are made by the project team (project manager, community involvement coordinator, toxicologist, site attorney, etc.). Day-to-day decisions include activities like community outreach, scoping the Remedial Investigation, and coordinating with local agencies. Longer-term decisions or decisions with broader impact may require approval of several levels of management, or even our national headquarters in Washington, DC. These broader decisions might include listing of the Site, the Proposed Plan, **Record of Decision (ROD)**, and other funding decisions or major milestones. We encourage participation by the community during our decision-making process, and provide many opportunities for involvement throughout the Superfund process. *See also Appendix B – Superfund Process*.

How Can the Site Affect My Health?

The question we heard most often from interviewees is how the Site could affect their health. Questions ranged from specifics about vinyl chloride, to what to do in the event of an emergency or earthquake. We have tried to address all the individual questions collected during various interviews, conversations, letters, and public meetings. If you have additional questions beyond what are listed below, please call Wenona Wilson, Community Involvement Coordinator, at 415-972-3239.

What kinds of contaminants are at the Site?

In order to determine how the Site could affect the community's health, most interviewees wanted to know what contaminants are at the Site. Interviewees not only wanted to know what is present at the Site, but were interested in learning about the amount, location, movement, and hazardous nature of vinyl chloride.

A variety of contaminants, including solvents, solvent by-products, and metals have been found at the Site to date. A number of contaminants have been found at levels higher than EPA's health-based screening levels. These substances include: benzene, toluene, xylenes, trichloroethene, 1,4-dichlorobenzene, 1,1-dichloroethene, cis-1,2-dicholoroethene, and vinyl chloride. Of these substances, vinyl chloride is the most toxic to human health, which makes it the primary contaminant of concern. For this reason, the CIP focuses primarily on the effects and location of vinyl chloride at the Site.

Vinyl Chloride

For more information on Vinyl Chloride, you can:

- Search online at the U.S. Department of Health and Human Services website:
http://ehp.niehs.nih.gov/roc/toc10.html
- Read "Toxicological Profile for Vinyl Chloride" by ATSDR which can be found on file at the West Oakland Public Library at 1801 Adeline Street.
- Call the Cancer Information Service at 1-800-422-6237 and talk with a live specialist or order a publication from the National Cancer Institute.

Vinyl chloride is a colorless, flammable gas with a faintly sweet odor. It is now one of the most widely produced chemicals in the United States. It is used almost exclusively by the plastics industry. For more information on vinyl chloride, its properties, federal regulations, etc., see the locations provided in the box above titled "Vinyl Chloride." *See also Appendix E - Vinyl Chloride and ATSDR.*

The U.S. Department of Health and Human Services, along with numerous private organizations and physicians, have determined that vinyl chloride is a known **human carcinogen**, i.e., a substance that causes cancer in humans.

Vinyl chloride is known to be present in high concentrations in the groundwater at the Site. Vinyl chloride contamination has been detected in the groundwater offsite at levels above both the Federal and California **Maximum Contaminant Levels (MCLs)** for drinking water, but significantly below the levels found onsite. It is important to note that though the groundwater is contaminated, the drinking water for the entire West Oakland community comes from the Sierra Nevada Mountain Range. Water beneath the Site is not used as a drinking water source. For more information on where West Oakland gets its drinking water, *see Appendix D – Drinking Water Sources for West Oakland.*

Although we know groundwater contamination is present both onsite and offsite, the full extent of groundwater contamination has not yet been clearly defined. One purpose of the upcoming Remedial Investigation is to determine the boundaries of the contaminant **plume** (area of contamination).

In addition to being present in groundwater, vinyl chloride is also known to be present at high concentrations in soil and soil gas. In the September 1999 sampling, very low levels of vinyl chloride were found in crawlspace air at homes on the same block as the Site, and in soil gas at one home adjacent to the Site. However, vinyl chloride was not found in the crawlspace air or soil gas of those homes during previous or later sampling.

We will continue to monitor both soil gas and crawlspace air throughout the project. For more information, please refer to the "Data Evaluation Report, Routine Site Monitoring Event, August 2002," which is located in the Site repositories. *See also Appendix C - Site Background.*

Definitions - Pages 18-19

- **Human Carcinogen:** A compound that causes cancer in humans.
- **Maximum Contaminant Level (MCL):** The highest level of a contaminant that is allowed in drinking water.
- **Plume:** The area covered by contamination that can be visible in the air (a plume of smoke) or invisible and only detected with testing (contaminants moving through groundwater).
- **Record of Decision (ROD):** A document that details the factors that shaped the decision to select the proposed remedial alternative over all other alternatives.

How can vinyl chloride affect my health?

The question we heard most often from interviewees was how vinyl chloride affects health. Whether it was through a direct comment like "We don't know what vinyl chloride does" or through an indirect question like "How dangerous is it?" interviewees were concerned with the effect it could have on their health. One Site neighbor commented, "EPA says it's okay [not toxic to human health] but I want to know exactly what the danger is. I want clearer information." Another interviewee responded saying, "Utility workers need to be aware, citizens need to know what's going on and what is and is not a risk to them." To suggest methods of informing the public, one community leader remarked, "You need to be posting signs in the community at schools, daycare, stores, or go door-to-door. People need to be aware and not frightened."

Interviewees were concerned about the relationship between vinyl chloride and cancer. Several interviewees mentioned that they were "noticing a lot of kids getting sick and a lot of people dying, especially of cancer." Concerns about miscarriages and cancers in the neighborhood, at what were perceived to be higher rates than normal, made interviewees wonder what kinds of chemicals were involved. Interviewees wanted to know the immediate health risks associated with vinyl chloride, as well as any long-term health effects. As one former Site neighbor expressed, "I don't want to find out in 10 or 15 years that I have some type of cancer." Questions regarding the health effects of vinyl chloride often led to questions about what kinds of studies have been done in the past (See also Theme 4.4 below).

The Site can affect your health if you experience an **acute** (short-term, high intensity) or **chronic** (long-term, usually low intensity) exposure to vinyl chloride or contaminated air. The two most important factors that determine whether or not a health effect will occur are: 1) level of exposure (amount of chemical a person contacts); and 2) frequency and duration of exposure (how often and how long a person comes into contact with the chemical). Exposure to vinyl chloride in air is measured in **parts per billion by volume (ppbv)**. If the level of exposure is low enough or short enough, no health effects are expected. However, as exposure levels become higher and longer, the chance increases that health effects will occur.

As noted in Theme 4.1, low levels of vinyl chloride were found in the soil gas and crawlspace air of homes adjacent to the Site in September 1999. No vinyl chloride was detected during sampling of residential properties either before or after that event. Based on the available information, we do not believe that the health of people living in those homes has been affected. However, because vinyl chloride was once detected in residential soil gas, we recommend that, as a precautionary measure, residents and businesses directly adjacent to the Former AMCO Facility do not dig in the ground.

Based on the most recent sampling, we do not believe that vinyl chloride is affecting the health of residents or Site workers. Although the groundwater beneath the Site is contaminated, it is not used as a drinking water source for the community. For more information on where West Oakland gets its drinking water, *see Appendix D*.

Definitions - Page 20

- **Acute:** Short-term, severe or high-intensity.
- **Chronic:** Long-term, lower intensity.
- **Parts Per Billion by Volume (ppbv):** One part contaminant in one billion parts air.

Is my drinking water contaminated?

Water beneath the Site is not used as a drinking water source. The community's drinking water comes from a protected watershed of the Mokelumne River in the Sierra Nevada, where snowmelt flows into the protected Pardee reservoir. The water is then piped 90 miles to the East Bay for dispersal at residences.

For more information on West Oakland's drinking water source, see Appendix D.

According to the U.S. Department of Health and Human Services, acute exposure to high levels of vinyl chloride affects the brain and can also cause headaches, unconsciousness, and even death.

Chronic exposure to vinyl chloride has been associated with tumors of the liver, lungs, and brain. Skin, stomach, pancreas, and intestinal cancers have been indicated in some studies, but not confirmed in others. Chronic exposure has also been shown to cause problems with blood flow in the hands with associated bone degeneration, where the tips of the fingers hurt, turn white, and bone degeneration is seen. Most of the studies on long-term exposure (1 year or longer) to vinyl chloride evaluated workers that make or use vinyl chloride. They were exposed to much higher levels of vinyl chloride in the air than the general population.

If you spill vinyl chloride on your skin, it will cause numbness, redness, and blisters. The effects of drinking high levels of vinyl chloride are unknown. Because the community receives its drinking water from the Sierra Nevada instead of the groundwater underneath the Site, residents should not be concerned about drinking vinyl chloride in their water. *See Appendix E - Vinyl Chloride and ATSDR* for more information on how vinyl chloride can affect your health.

What can I do about it?

Four South Prescott residents asked specific questions regarding ways to keep vinyl chloride from affecting them and their families. Residents asked about actions that they can take to prevent exposure, treat exposure, or otherwise "deal with it on a daily basis." Neighbors wanted to learn about any "proactive and preventative techniques" available to them until the Remedial Action is implemented.

Right now, pavement on the Former AMCO Facility is limiting potential exposure to contaminants in the soil and groundwater. As noted above, crawlspace air and soil gas contamination has not been detected in recent monitoring events, but was detected in 1999. Because we do not know precisely the extent of the plume offsite, we advise residents and businesses right on the Former AMCO Facility fenceline (on Center and 3rd Streets) to contact us before digging on their property. Currently available data does not suggest that groundwater contamination extends towards the businesses located north and east of the Site. City of Oakland work in the area follows all applicable health and safety procedures to avoid exposure to chemicals.

Has EPA monitored the community's health? What is the percent of cancer/disease in the community as a result of this Site?

Most interviewees, regardless of how familiar they are with the Site, wanted to

know if anyone had monitored the community's health. One Site neighbor told us that "lots of people have died here from cancer, especially pancreatic cancer. Look at who's dying of cancer in the neighborhood." One South Prescott resident was especially concerned with locating studies particular to race, gender, and age. Several residents were concerned that acceptable levels of contaminants would not be acceptable for infants and children. Overall, the community would like to see a health assessment done for the South Prescott neighborhood and also have us assess the risk of vinyl chloride to youth and infants.

We realize that the community is alarmed with the rate of cancer and other illnesses that may or may not be caused by contaminants at the Site. Under CERCLA, the **Agency for Toxic Substances and Disease Registry (ATSDR)** and the California Department of Health Services (DHS) are required to conduct a **public health assessment (PHA)** within one year of site nomination to the NPL. The PHA focuses on past and current exposures, takes into consideration the health concerns of the community, and determines if people are exposed to contaminants at levels that could cause health problems. The PHA is also a means for DHS and ATSDR to make recommendations to reduce or eliminate public health risks.

What's the Difference?

Both EPA and ATSDR conduct assessments on the sites they are involved in, but they are focused in different directions.

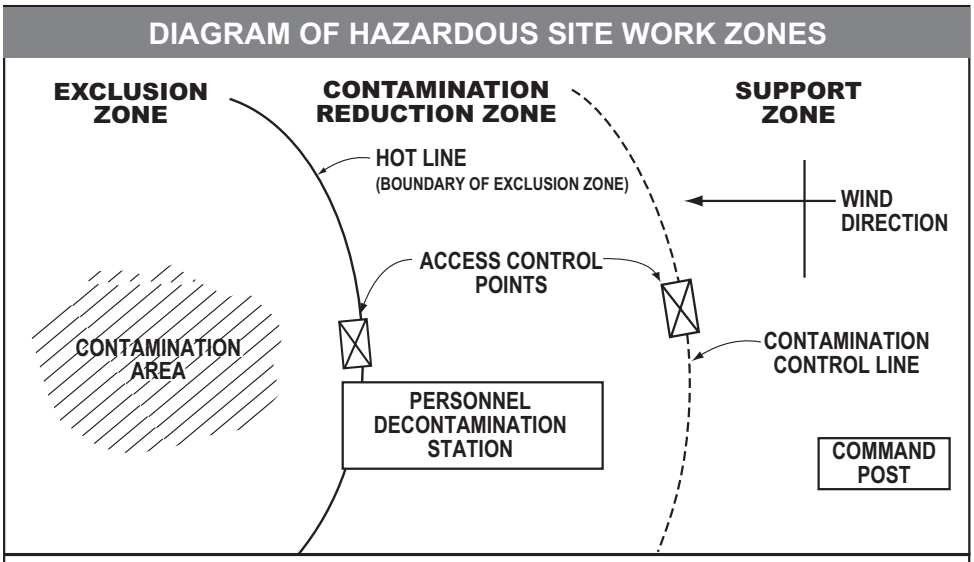
- The ATSDR public health assessment (PHA) focuses on the exposed or potentially exposed people and recommends/performs appropriate prevention and follow-up health activities.
- The EPA risk evaluation focuses on the environmental contamination and what should be done to prevent exposure.
- Together, these two agencies work to provide the community with information and services needed to protect human health.

In addition to the PHA, EPA will perform a **risk evaluation**. An EPA risk evaluation determines if something should be done at a site, what actions (if any) should be taken, and when enough has been done to prevent exposure. Together with ATSDR, we work to get communities the information and services they need to make sure families' health are protected from actual or potential threats due to contaminants released into the environment.

The California State Cancer Registry maintains detailed information on a wide variety of cancers which can be separated by geographical population-based areas. The registry data can be further divided into cancer mortality and incidence as well as by age, race, and sex. EPA will look at this data with ATSDR to determine the cancer rates in the community.

Definitions - Page 22

- **Agency for Toxic Substances and Disease Registry (ATSDR):** An agency of the U.S. Department of Health and Human Services that was created to perform specific functions concerning the effect of hazardous substances on human health.
- **Public Health Assessment (PHA):** An ATSDR document that examines hazardous substances, health outcomes, and community concerns at a hazardous waste site to determine whether people could be harmed from coming into contact with those substances. The PHA also lists actions that need to be taken to protect public health.
- **Risk Evaluation:** EPA's process of evaluating whether a hazardous substance poses a potential threat, either currently or in a reasonably likely future, to human health and the environment.



Action 4.4-A ATSDR will perform a public health assessment.

Action 4.4-B EPA will perform a risk evaluation, which includes an assessment of the risks to children, pregnant women, and the elderly.

Action 4.4-C EPA will work with ATSDR to obtain and analyze data from the California State Cancer Registry to determine if there are any unusual rates or trends of cancer in the community who live near the Site.

4.5 EPA needs to maintain control of the contaminated air during work so neighbors are not affected by escaping chemicals.

Four interviewees were concerned that activities at the Site would expose neighbors to high levels of vinyl chloride. Specifically, interviewees requested that we be sure to "pre-test" the area so we know how to protect Site neighbors before work begins. Safety during Site activities was a priority for most of the Site neighbors that we interviewed, as well as one government official.

The safety of the community is our top priority. Safety measures to protect people who live and work near the Site are incorporated into EPA's Superfund site activities. These measures will be part of the Proposed Plan and will be subject to comment from the community. For example, EPA establishes work zones to protect Site workers and the public (*see diagram*). Also, an information board will be kept near the Site where contact numbers and safety information will be posted as appropriate.

4.6 EPA should have an emergency plan in place to alert neighbors.

As a result of concerns regarding exposure to vinyl chloride should there be a release, several interviewees suggested that we develop a warning system and/or emergency plan to advise Site neighbors and nearby businesses "in case something goes wrong." Site neighbors and local businesses want to know how to respond in case of an emergency situation.

The City of Oakland Fire Department is responsible for on-scene management of all hazardous materials incidents. Oakland has a Hazardous Materials Area Plan that provides an organized response to hazardous materials emergencies to minimize exposure and/or damage to human health and safety, the environment or property. The Fire Department's Hazardous Materials Response Team responds by coming to the Site, assessing the situation, and taking appropriate action. In addition, the Fire Department coordinates closely with other agencies and emergency services personnel, such as EPA and the Alameda County Health Care Services Agency. *For more detailed information, see Appendix F - Emergency Planning.* As noted in Theme 4.5, Site-specific safety measures will be developed as part of the Proposed Plan.

How do the contaminants at the Site interact with other contaminants at other nearby sites?

Several interviewees told us that they are not only concerned about vinyl chloride, but also about other contaminants in the area, and how they all might react together. One South Prescott resident emphasized that EPA's risk evaluation should consider the cumulative effects on the community by all chemicals known to be present in the area.

As part of the Remedial Investigation, we will be performing a risk evaluation that looks at the health risks caused by each chemical at the Site identified as a potential concern. Only chemicals of potential concern will be evaluated as part of the RI/FS. For example, diesel fumes from truck traffic will not be considered.

The risk evaluation will determine the total risk by adding together the individual risk caused by each chemical of potential concern. However, we will not evaluate any additional risks that may occur due to interactions between chemicals. We are unable to address the health effects of chemical interactions because not enough scientific research has been performed to provide a basis for such an evaluation.

What happens if there is an earthquake?

Interviewees were concerned about the potential effect of an earthquake on the Site. They were worried that any crack in the pavement covering the Site might release trapped vinyl chloride gas into the open air. One Site neighbor was also concerned about what might happen if the large spools of cable were to fall over and break the pavement.

It is true that vinyl chloride is present in soil gas at the Site. However, the soil gas is present in the pore spaces (small spaces between individual soil particles); therefore, earthquake-induced cracks in the soil or pavement will not result in a catastrophic release due to the amount of time it takes for the gas to migrate through the soil. Because the Site is generally paved with cement concrete, impact from spools is not likely to cause significant damage. However, if cracking were to occur, the result would be similar to that described above. In the event of an earthquake, it is conceivable that there could be a small release of contaminated groundwater to the surface, resulting in the release of some vinyl chloride to the air until the water seeps back into the ground.

Definitions - Page 25

Volatile: Evaporates readily at normal pressures and temperatures.

4.9 Is the dust contaminated with vinyl chloride?

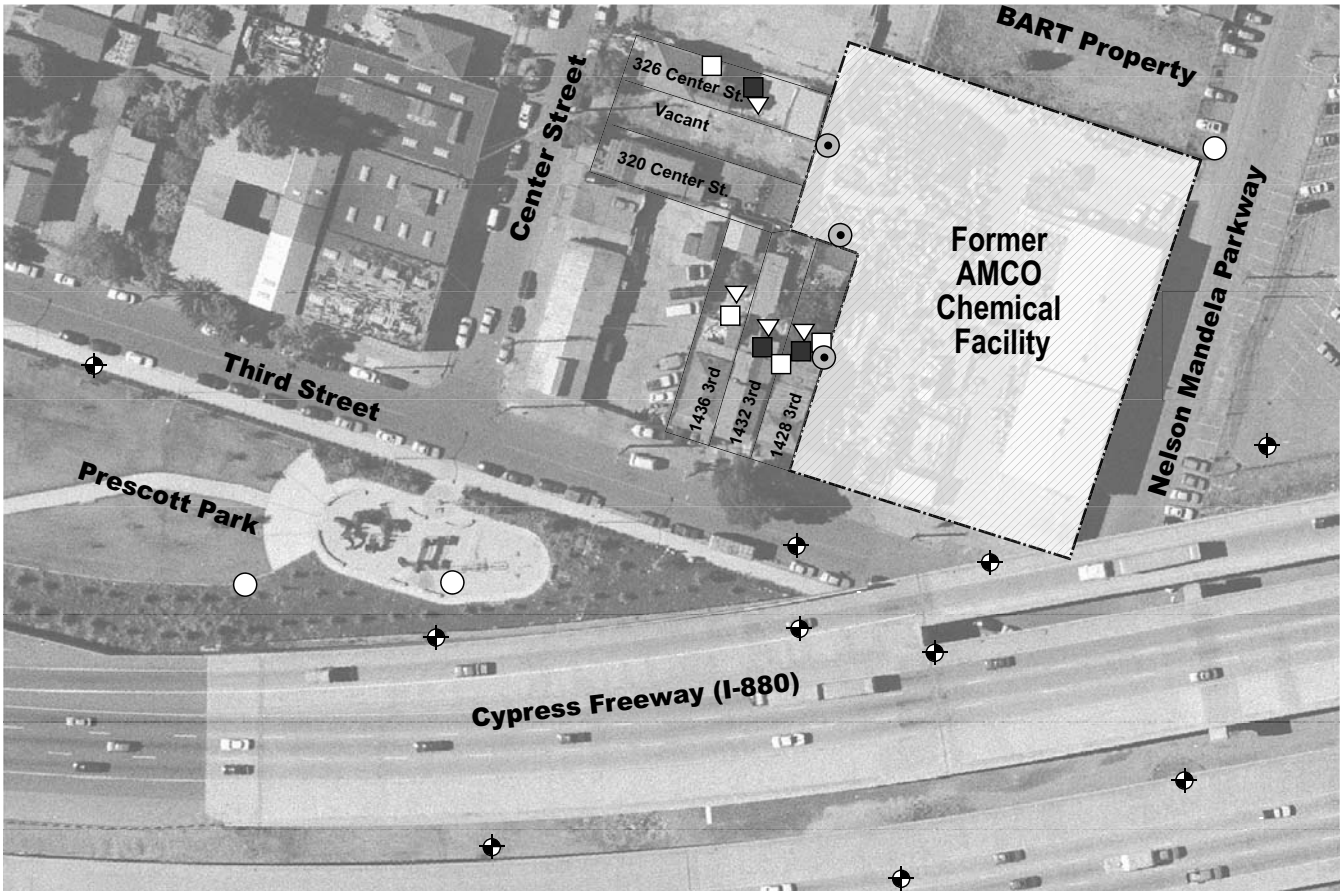
All of the Site neighbors that we interviewed complained about the amount of dust that collects in their house on a daily basis. One neighbor wants to know specifically if vinyl chloride is in the dust. Another neighbor simply stated, "There's dust. There's smoke. We cough."

Dust in the area is not contaminated with vinyl chloride. Vinyl chloride is a **volatile** substance and does not "stick" to dust particles.

4.10 Can I dig in my backyard? Can I plant fruits and vegetables?

One of the agency representatives that we interviewed wanted to know what precautions residents should take concerning the dirt in backyards. She was especially concerned with people wanting to dig deep holes for planting. Overall, interviewees were concerned with whether or not vinyl chloride is "in the dirt" or how deep underground it can be found.

We are in the early stages of the Remedial Investigation. Because we have not yet determined the nature and extent



Selected Monitoring Locations in the Vicinity of the Former AMCO Chemical Facility

For complete monitoring locations, please refer to PA/SI located in the Site Repositories

LEGEND

- Former AMCO Chemical facility
- Groundwater monitoring well
- Permanent soil gas monitoring location
- Ambient air sample
- Crawl space air sample
- Soil gas sample
- Soil boring sample

Note: All locations are approximate

Prescott Park, 3rd and Center Streets

of the contamination, we advise residents and businesses right on the Former AMCO Facility fenceline (on Center and 3rd Streets) to contact us before digging on their property. Though we do not believe that vinyl chloride is taken up by plants at levels of significant risk to human health, if you garden, we recommend that you use raised garden beds. Residents and businesses adjacent to the Former AMCO Facility may request sampling on their property by contacting the Community Involvement Coordinator, Wenona Wilson, at 415-972-3239.

Action 4.10-A EPA is working with the City of Oakland Environmental Services Division to flag records of properties near the Site so that people seeking permits to dig in the area will be notified of the Site contamination.

4.11 Why will EPA workers wear protective suits but say neighbors don't need to wear anything?

This question was raised by a Site neighbor, and was also echoed by several youth that we interviewed. The concern is that if EPA workers are wearing protective "space suits," why don't Site neighbors need the same protection? The youth we interviewed strongly suggested that we specifically inform the neighborhood why they should not be alarmed to see people wearing "space suits," and also explain why neighbors are not in danger.

As required by the **Occupational Safety and Health Administration (OSHA)**, during investigation and remediation activities at hazardous sites, the Site will be divided into work zones to help control work and reduce the chance of transferring contaminants from work area to clean areas. These zones include the exclusion zone, the contaminant reduction zone, and the support zone. The potential level of exposure to Site contaminants determines the boundaries of each zone, with the exclusion zone being the highest risk (*see diagram, page 23*). Workers wear protective clothing in the exclusion zone because there is a higher potential to be exposed to the contamination while remediating the Site. In the support zone they usually wear normal work clothes because the potential to be exposed to the contamination is lower. Site neighbors will be outside all work zones; therefore, there is no need for protective clothing or equipment. Health and Safety Plans for the project are available at the Site repositories.

Action 4.11-A EPA will put information on Site safety and protective clothing on the Site bulletin board *(See Action 2.5-B)*.

4.12 Temporary/permanent relocation of Site neighbors.

During the interviews, we learned that some residents insist on moving during Site work, while others are adamant about staying put, no matmatter what effect to their health. Several people we interviewed had lived in the South Prescott neighborhood their entire lives. Moving

Definitions - Pages 26-27

- **Occupational Safety and Health Administration (OSHA):** The Federal agency responsible for creating and enforcing workplace safety and health regulations.
- **Parts Per Billion (ppb):** One part contaminant in one billion parts substance (soil, water, etc. except air, see parts per billion by volume on page 20).

temporarily or permanently as a result of Site activity is a very distressing thought to them. "People want to stay in their property here. This is my family's house," commented one Site neighbor. Another Site neighbor had the opposite perspective and insisted on relocating his family during construction at the Site, regardless of risk. Another related concern raised by a Site neighbor is that people would be relocated under the pretense of health risk, when the real motivation is the resale of the property for redevelopment.

We recognize that during Site activities, some Site neighbors would like to be relocated and others insist on staying. Once a remedy has been selected, EPA will assess potential risks to Site neighbors and take appropriate action to eliminate any identified risks. Appropriate actions may include temporary relocation if determined necessary by EPA. Currently, we do not anticipate any threat to Site neighbors during work.

Action 4.12-A Prior to the start of Remedial Investigation and Remedial Action activities, EPA will meet with Site neighbors to discuss potential risks posed by the activities and suggest actions that neighbors can take to minimize impacts to themselves and others.

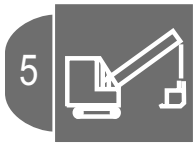
What is the effect of contamination on South Prescott Neighborhood Park?

One of the most frequently mentioned concerns was how the Site affects South Prescott Neighborhood Park (Park). "I'm concerned about contamination spreading to contact with the park," said one South Prescott resident. Many people requested that we be sure to test the Park for contamination. During one of our interviews with youth at McClymonds High School, nearly one-third of their questions for us were about the Park. They wanted to know what happens if the vinyl chloride gets into the sand, why a park would be put next to a contaminated site, if we had sampled the Park yet, and whether or not people around the Park know that it could be contaminated.

Although vinyl chloride has been detected in groundwater wells located just outside the Park (near the eastern edge of the Park), it has not been detected in a well located along the southeastern boundary of the Park. This well was sampled three times between December 2000 and December 2001. Also, vinyl chloride was not detected in the soil sample or the two groundwater samples collected at the Park in September 1999. The only contaminant detected in the soil sample was xylene, a chemical commonly found in gasoline. Xylene was detected in one sample at a concentration of 6.9 **parts per billion (ppb)**. EPA's preliminary remediation goal for xylene is 270,000 ppb. The only contaminant detected in either of the groundwater samples was trichloroethene (TCE). TCE was detected in one groundwater sample at 0.5 ppb. The MCL for TCE is ten times greater at 5.0 ppb.

We understand that the safety of the Park is of prime importance to the South Prescott neighborhood, and assessing the potential for contamination at the Park will be a priority during the RI.

Action 4.13-A As part of the Remedial Investigation, EPA will assess the potential for movement of contaminated groundwater from the Site to Prescott Park.



Impact of the AMCO Chemical Site on Redevelopment

Redevelopment of the Site was the major theme common to both neighborhood homeowners and interest groups outside of South Prescott. Future uses of the Site

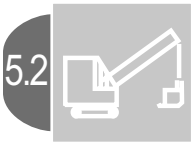
present opportunities for change, as well as for improvement of the local neighborhood. We heard various opinions on what should happen with the Site in the future. The one outcome that no interviewees want is another industrial facility at the Site. Interviewees' suggestions for future land use ranged from purely commercial to purely residential, although most interviewees expressed a preference for residential or mixed-use redevelopment, if it could be done safely.

Living near a Superfund site.

A few interviewees told us that they are concerned about selling their homes or other property in the area because of the stigma associated with being located near a Superfund site. For example, one interviewee requested that we wait at least one year before Superfund site listing to avoid any negative publicity which may result in decreased property values and hinder redevelopment.

Property values can be affected by a number of environmental factors such as perceived health risks, air pollution, odor, construction activity, and noise. We are concerned about potential effects on property values that may result from the designation of a Superfund site in the South Prescott neighborhood. However, we are not able to assess property values, adjust tax status, or compensate homeowners for losses of property value. We suggest you consult a professional in your community who can give you a more accurate and current answer regarding your property values. Real estate agents, banks and other lenders, appraisers, and public and private assessors should be able to assist you. Local government agencies – such as your taxing authority or planning commission – may also be able to give you information on property values and tax adjustments.

Based on past cleanups, we believe that a Superfund remedy has an overall beneficial impact on the community, including rebounding property values. The biggest factor affecting property value is the perception of the buyer. We make a wide variety of information available to potential buyers, including background information on the Superfund program, its activities and responsibilities, and opportunities for public participation. We can also conduct presentations or provide information about Site cleanup plans for the public, including the real estate and lending/financial community. Contact the Community Involvement Coordinator, Wenona Wilson, if you have further questions, or would like real estate/property values to be considered for a topic of an upcoming workshop or public meeting.



If the Site is unsafe, it doesn't make sense that Cable Moore moved in after DC Metals.

One of the Site neighbors asked us why Cable Moore is allowed to operate on the Site if we have deemed the Site toxic. This question was also indirectly raised by people concerned with whether or not they could be exposed to vinyl chloride simply by being on or near the Site.

Cable Moore is allowed to operate at the Site because their operations do not pose an immediate risk to Site workers or the surrounding public. The pavement over the Site is limiting the potential exposure of Site workers to contaminants in the soil and groundwater. Because Cable Moore's activities onsite do not cause workers to be exposed to contaminated soil or groundwater, the operations are allowed to continue.

To what level of health/ safety standards will the Site be improved? What kind of uses will be permitted on the Site?

Most of the local government officials, as well as local residents involved with the redevelopment of West Oakland, were strongly interested in how clean the Site would be after remediation. Half the interviewees would like to see the Site improved to residential standards to allow more housing to be built. Six interviewees told us that they would like to see some form of "quiet" commercial use, such as a parking lot, computer store, or grocery store. Most of the remaining interviewees just asked that the Site be improved to "safe" or "normal" land use conditions. A couple of interviewees mentioned that "we still don't know how the vinyl chloride will affect the overall dynamics of this place" and remained undecided on the subject.

The remedial alternative selected, which could be no action at all, will determine the extent to which hazardous chemicals remain at the Site. As pointed out by interviewees, the level of residual hazardous chemicals at the Site affects future land use. Future land use is not determined by EPA but by property owners and local agencies such as the city planning commission. When we propose remedial alternatives, we consider and evaluate information from these local agencies and community members. This process is called the **reuse assessment** (see box). Information collected in the reuse assessment then allows us to make assumptions about future land uses, called a "land use assumption." The cleanup alternatives we propose will reflect and be consistent with these future land use assumptions.

Action 5.3-A EPA will conduct a reuse assessment.

Definitions - Page 29

Reuse Assessment: Collection and evaluation of information from local government officials, property owners, and community members to develop reasonably anticipated future land use assumptions.

Why isn't the Site turned over to the community after EPA finishes its work?

As indicated in Theme 5.3, nearly all interviewees are interested in what the community could use the Site for in the future. "We would like to purchase the DC Metal property so that people can live there," commented one West Oakland resident. Another interviewee wanted to know why Superfund regulations do not automatically turn over a listed site to the community: "They [the original contaminators of the Site] can't afford to clean it up so they should hand it over to the community." One community leader

What is a Reuse Assessment?

The reuse assessment involves collecting and evaluating information to develop reasonably anticipated future land use assumptions at the Site. The assessment may involve reviewing available records, visual inspections of the Site, and discussions with local government officials, property owners and community members. We have already started gathering this information through interviews, public meetings, letters received from community members and local agencies, and comments received during the public comment period held during the NPL Site listing process.

told us that "the community needs to be engaged so they know how to turn the land over to themselves."

It is important to clarify that the ownership of the Site will not change simply because the Site is contaminated or listed as a Superfund site. We do not have the authority to force the owner to turn over or sell the property.

Why hasn't EPA said who is responsible for the contamination?

Several interviewees questioned why we are working on building a case against the responsible parties when "it's obvious." "What do you mean, you don't know who's responsible for the contamination?" expressed one community member. Several South Prescott residents who had lived in the area nearly their entire lives feel strongly that they know who the responsible parties are in this case.

We are currently investigating parties that we believe may be responsible. As you can probably imagine, **potentially responsible parties (PRPs)** are typically not eager to claim ownership over the damage done. Under the Superfund process, EPA may seek to have any identified PRPs conduct some or all of the response actions at the Site and reimburse EPA for its costs. In some cases where EPA is unable to identify financially viable PRPs, EPA may continue to use federal funds to address the contamination at the Site.

Definitions - Page 30

Potentially Responsible Parties (PRPs): Entities that are potentially responsible for generating, transporting, or disposing of the hazardous waste found at a site.

EPA's Commitments to the Community

During the April/May 2003 community interviews, we heard five major themes raised by interviewees, which include: 1) EPA's past performance; 2) the community's desire to be engaged, not just informed; 3) the community's desire to influence EPA decisions; 4) concerns regarding the effect of the Site on human health; and 5) concerns related to the impact of the Site on redevelopment. In response to the questions and concerns raised in each theme, EPA has committed to taking the actions detailed below (See "What We Heard" for more detail). Some of the activities listed below go beyond what is required under Superfund. *For a complete listing of Community Involvement activities required under CERCLA, see Appendix B.*

- EPA will provide community members and leaders at least two weeks' notice prior to events hosted by EPA. (Action 1.5-A)
- EPA will provide two weeks between the publication of a milestone document and any public meeting to present the document and describe the public comment process. The public will then have 30 days to comment on the document. (Action 1.5-B)
- EPA will allow at least two weeks between the publication of a milestone document and holding a study group to allow the community a chance to develop questions. (Action 1.5-C)
- EPA will place milestone documents in the repositories promptly after publication, and will provide notice of placement to the Site mailing list. (Action 1.5-D)
- EPA will hold meetings to gather input from the community during major decision points in the Superfund process. The outcome of these meetings will

Working Hard for You

EPA has committed to the activities listed in this section. Most of these activities go *above and beyond* what is legally required for a Superfund site. Activities required by law are referenced in Appendix B - Superfund Process.

be valuable to us when making a final decision. (Action 2.1-A)

- EPA will provide educational information by attending meetings of existing neighborhood groups and organizations periodically upon request. (Action 2.1-B)
- EPA will host at least one educational workshop each year. The topic will be determined by the community at project update meetings. (Action 2.1-C)
- EPA will provide the resources and administrative support for the community to create a Community Advisory Group if community members are available and willing to participate. (Action 2.1-D)
- EPA will offer a Technical Assistance Grant to the community to fund an independent technical advisor. TAG funds must be applied for and will be awarded based on qualifications indicated in the application. (Action 2.1-E)
- The Project Manager (Bruni Dávila) will continue to meet regularly with government and city officials to coordinate activities among West Oakland sites. (Action 2.3-A)
- EPA will contact congressional liaisons, city officials, and key community stakeholders at all project milestones. (Action 2.3-B)
- EPA will host periodic project update meetings to inform the entire community of the Superfund process. Prior to the meeting, a notice will be sent to the Site mailing list, public notices will be posted, and key community stakeholders will be telephoned. (Action 2.3-C)
- EPA will mail at least one project fact sheet each year to the Site mailing list. (Action 2.3-D)
- EPA will make every effort to attach a document description (1-2 paragraphs describing purpose and content) in laymen's terms to all public technical documents. (Action 2.4-A)
- EPA will hold study groups after releasing milestone technical documents, as necessary. (Action 2.4-B)
- The Site's West Oakland Branch Library information repository will be more clearly identified. A repository index binder will be located with documents to help guide the public. The index will include a list of documents available, identify the document purposes, and define key terminology using a descriptive glossary. (Action 2.5-A)
- EPA will construct an AMCO Site bulletin board/sign near the Site to update local residents. The primary purpose of the board is to designate the Site as a Superfund site, but it will also provide ongoing Site-related information to the neighborhood during field investigation activities. The bulletin board will contain information pertinent to Site safety, contact information, upcoming events, and other Site-related information. (Action 2.5-B)
- EPA will translate all future documents related to community outreach into Spanish. These documents include, but are not limited to this CIP and fact sheets containing technical information. (Action 2.6-A)
- EPA will provide a Spanish interpreter at public meetings. Any boards/diagrams used at public meetings will be trans-

lated into Spanish. (Action 2.6-B)

- EPA will host Spanish-only study groups, as needed. (Action 2.6-C)
- During the Superfund process, there will be times that we would like to obtain a consensus from the community regarding specific issues. During public meetings where community consensus is desired, we will alter the format of the meeting to incorporate community-building tools facilitated by EPA. The use of community-building tools allows equal footing for all participants. The goal is to encourage participation by all attendees by creating a friendly environment in which everyone can feel comfortable expressing their opinions. (Action 3.2-A)
- ATSDR will perform a public health assessment. (Action 4.4-A)
- EPA will perform a risk evaluation, which includes an assessment of the risks to children, pregnant women, and the elderly. (Action 4.4-B)
- EPA will work with ATSDR to obtain and analyze data from the California State Cancer Registry to determine if there are any unusual rates or trends of cancer in the community who live near the Site. (Action 4.4-C)
- EPA is working with the City of Oakland Environmental Services Division to flag records of properties near the Site so that people seeking permits to dig in the area will be notified of the Site contamination. (Action 4.10-A)
- EPA will put information on Site safety and protective clothing on the Site bulletin board. (Action 4.11-A)
- Prior to the start of Remedial Investigation and Remedial Action activities, EPA will meet with Site neighbors to discuss potential risks posed by the activities and suggest actions that neighbors can take to minimize impacts to themselves and others. (Action 4.12-A)
- As part of the Remedial Investigation, EPA will assess the potential for movement of contaminated groundwater from the Site to Prescott Park. (Action 4.13-A)
- EPA will conduct a reuse assessment. (Action 5.3-A)

For additional information and resources, please refer to the Appendices.