July 29, 2014

Mr. Richard H. Kamimura, Co-Chairperson
Clean Air Coalition of North Whittier
and Avocado Heights
843 Caraway Drive
Whittier, California 90601

INVESTIGATION OF DEPOSITION/ACCUMULATION OF AIRBORNE LEAD EMISSIONS AT QUEMETCO INCORPORATED (AKA RSR CORPORATION), LOCATED AT 720 SOUTH 7TH AVENUE, CITY OF INDUSTRY, CA 91749; EPA ID NUMBER CAD 066 233 966

Dear Mr. Kamimura:

Your letter to Ms. Stacy Lear on behalf of the Clean Air Coalition of North Whittier and Avocado Heights dated May 13, 2014, regarding the Quemetco facility was forwarded to me for response. In your letter it was requested that the Department of Toxic Substances Control (DTSC) consider sampling in the communities of Avocado Heights, North Whittier and Gladstone to assess lead levels in the soil.

DTSC, not the South Coast Air Quality Management District (SCAQMD), investigated the off-site deposition and accumulation of airborne emissions of lead on the periphery of Quemetco in 2004 and in 2013. In 2004, DTSC suspected that lead might be accumulating adjacent to the facility and confirmed that by sampling a number of locations. This led to DTSC requiring Quemetco to do more extensive perimeter sampling and to take emergency interim measures (EIMs) to limit public exposure in both off-site areas and publicly accessible on-site areas that were outside Quemetco’s fencing. Quemetco cleaned surfaces along the L.A. County Flood Control access-way to San Jose Creek next to Quemetco, paved a dirt public walkway at the front of its facility, and covered publically accessible on-site areas. In 2013, DTSC suspected that areas previously cleaned or covered might have been re-contaminated by the continuing emissions. It again confirmed lead contamination outside the facility and required Quemetco to re-clean several areas.
The full off-site extent of deposition/accumulation of airborne emissions, including lead, has not been determined but DTSC has now required Quemetco to expand determination of the lateral extent of airborne and/or surface water-borne deposition/accumulation of site emissions, including but not limited to lead, in a 1320-foot radius around the facility. Specifically, Quemetco is required to: 1) perform a phased radial step-out (phases to have a minimum of a two-block radius) sampling using the U.S. EPA Region 9 regional soil screening levels (RSLs) to determine the lateral extent of off-site airborne deposition/accumulation of site-derived hazardous waste and hazardous waste constituents; (2) sample the storm-water curb boxes to evaluate deposition/accumulation of off-site surface water-borne site-derived hazardous waste and hazardous waste constituents; (3) evaluate maintenance status of the plastic fabric cover part of the emergency measures that were performed in 2004; (4) evaluate re-contamination of all of the stabilized areas by airborne deposition/accumulation in years subsequent to 2004. This work is expected to be performed in the fall of 2014.

After the foregoing work is completed, DTSC will evaluate the need for further step-out samples in order to determine the full extent of off-site deposition/accumulation of site emissions. If these additional step-out sampling locations extend to the point of involving the communities you mention in your letter, we will contact you to provide input into developing the workplan.

DTSC has also required Quemetco to investigate soil and groundwater contamination on-site at its facility. Information regarding these investigations may be found on Envirostor at [http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=80001454 and http://www.envirostor.dtsc.ca.gov/public/hwmp_profile_report.asp?global_id=CAD066233966&starttab]

Please contact Mr. Jess Villamayor (jvillama@dtsc.ca.gov) at (818) 717-6601 or myself (pchandle@dtsc.ca.gov) at (818) 717-6608 if you require further information.

Sincerely,

Philip B. Chandler, R. Geophys.
Brownfields and Environmental Restoration Program – Chatsworth Office
Department of Toxic Substances Control

cc: Mr. Gerry Manley
Vice President, EH&S Compliance
RSR Corporation
2777 N. Stemmons, Suite 1800
Dallas, Texas 75207
cc: Mr. Richard Freudenberger  
WSP Environment & Energy  
2025 Gateway Place, Suite 435  
San Jose, California 95110  

Mr. Edwin Pupka  
Senior Enforcement Manager  
Office of Engineering and Compliance  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765-4178  

Mr. Rizgar Ghazi, P.E.  
Supervising Hazardous Substances Engineer II  
Permitting  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826-3200  

Ms. Stacey Lear  
Public Participation Specialist  
Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, California 90630  

Mr. Farshad Vakili, P.E.  
Senior Hazardous Substances Engineer  
Permitting  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826-3200  

Mr. Todd Wallbom, P.G.  
Brownfields and Environmental Restoration Program  
Chatsworth Geological Services Unit  
Department of Toxic Substances Control  
9211 Oakdale Avenue  
Chatsworth, California 91311  

Mr. Jess Villamayor  
Brownfields and Environmental Restoration Program  
Department of Toxic Substances Control  
9211 Oakdale Avenue  
Chatsworth, California 91311