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Angeles Chapter

Mr. John Scandura
Department of Toxic Substance Control
5796 Corporate Avenue
Cypress, CA 90630

June 29, 2009

Dear Mr. Scandura,

The Sierra Club Angeles Chapter met on June 28, 2009 and all agreed that I write this letter to you asking for your support to obtain a new Health Risk Assessment for the Palos Verdes Landfill Five Year Review that would include the use of the current Federal EPA Air Modeling known as Air Mod, as well as other points at the conclusion of this letter. We are also asking for your help in obtaining an extension to the Department of Toxic Substance Control present comment period from July 8, 2009 until September 8, 2009. These requests are consistent with our club policies and environmental priorities.

The DTSC and Los Angeles County Sanitation District held a public meeting for the PV Landfill Five Year Review on April 27, 2009. Although this Review was due on September 4, 2004, it was just published. The review was presented as a 6000+ page document that is available on line. However, this document is quite difficult to read and to decipher.

We have found in reviewing the document that there are several flaws and problems that specifically affect the outcome of the also included Human Health Risk Assessment. Since there are flaws in the data the conclusions reached in the Risk Assessment are not scientifically accurate.

1. The meteorological data, for the Palos Verdes Landfill, is taken from 1981 Redondo Beach air sampling. That means that the conclusions regarding emissions and their effects on human health risks are not accurate. We have no idea how the landfill emissions are effecting the community without the accurate meteorological data from the landfill itself.
2. The Department of Toxic Substance Control allowed the Sanitation District to use the Johnson and Ettinger model tool to assess the Health Risk Assessment.
(Exhibit A)

However, the DTSC did not allow the United States Army to use the Johnson and Ettinger model tool for landfill gas and health risks in 2008, explaining to the Army “that this model is not designed to evaluate landfill gas.” How then is it possible to use the Johnson-Ettinger model to analyze the Palos Verdes Landfill gas and health risks?
(Exhibit B)

The appropriate model must be replaced and analysis redone to ensure public safety.

3. The 5 Year Review only tested approximately half the wells that have been historically placed as monitoring systems around the landfill. The goal of the 5 Year Review is to guarantee containment of the landfill system

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for public health. Since the Review identifies high levels at certain wells in 1994, then compares this data to only a partial sampling of half the wells, this does not constitute a scientific claim of containment. There is no comparative data from 1994 -2006 for almost ½ the wells in the neighborhoods.
(Exhibit C)

4. Attaching the Gas Well temperatures that are listed under ‘Community Outreach’ in the Five Year Review. FEMA defines a landfill fire as any temperature over 140 degrees. You can imagine the concern seeing the temperatures over 300 degrees in 2004. There is no more current temperature information, but historically there have been landfill fires. We would like to have the current data on gas well temperatures.
(Exhibit D)

We the Sierra Club are asking for your support to meet our goals in asking that the Department of Substance Control, require that the Los Angeles County Sanitation District:

- Complete a new Human Health Risk Assessment for the Palos Verdes Landfill Five Year Review.
- This Review must be based on complete and accurate data that includes real meteorological data from the Palos Verdes Landfill property and includes the monitoring data from every well indicated in the Groundwater Monitoring Wells included in the Sub-Appendix A-C Concentration Contour Maps, Five Year Review. All wells monitored in 1994 must be currently monitored for a comparative basis.
- DTSC must require that the LACSD use the current Federal EPA Standard for Air Modeling called “Air Mod” to reanalyze the air data submitted by LACSD.
- The DTSC must require that the LACSD reanalyze data for Human Health Risk Assessment purposes and deny the validity of the Johnson-Ettinger model that the DTSC refused to the United States Army as an analytical tool since not designed for evaluating landfill gas.
- Sierra Club is asking that the DTSC extend the comment period at least 60 days from the July 8, 2009 date or until such time as the DTSC can accurately publish a valid Human Health Risk Assessment based upon the statements of fact above.

I may be contacted at my email address or cell phone, 310-897-9022 or home phone 310-378-6719.

I look forward to hearing from you.

Yours truly,

Joan Davidson
Member, Executive Committee, Sierra Club Angeles Chapter