Minutes of August 13 Meeting: Hamilton Building Associate Working Liaison Group
Thursday, August 13, 1998, 9:00-11am, Gramercy Building conference room 320
Present: Troy Allison, Rose Bauss, Marta Channel, Jim Fewel, Rochelle Harma, Mamie Warrick, Roberta Ritter, Bob Pitts, Lori Lacy, Richard Lester, Charles Zacharie, Doug Formby, Mark Kachen
Absent: Roberta Ritter, Kathleen Joyce
Special Guest: Dante Rodriguez, Environmental Engineer - Hazardous Waste Management, U.S. Environmental Protection Agency
The meeting began at 9:10am.
Summary of Bob Pitts' introduction:
The purpose of this meeting is:
- Review the status of the current testing going on
- Get EPA information on the Hamilton site from Dante Rodriguez
- Address questions about documents and availability that Lori is gathering.

The minutes from the previous meeting were approved.
Lori Lacy said she has all the documents available for people to check out. She has the questions people have been asking about Hamilton environmental matters and they are being reviewed prior to posting on the Hamilton web site.

Testing Status
Bob Pitts explained that testing was delayed a week because TMS didn't realize that the Hamilton Building owners in New York would need to have indemnification before we could proceed. Thanks to Martin Smith of the TMS Legal Department who was in New York at the time and also knew the Hamilton people in New York, we were able to proceed quickly.
Bob apologize that the testing equipment is noisy - it's part of trying to get valid test results at the request of TMS's associates.

Mark Kachen said the sampling has been going on from 6:30 AM until 11 PM at the various sites. Hamilton is complete, and tests will soon be complete at the other TMS sites. Two summa canisters are being re-deployed because they were inadvertently set at too high a valve setting, which caused them to fill up in only 2-3 hours. They are evacuated canisters that normally suck
air in all day, but if the valve fails or is misadjusted they suck at a much faster rate and don't get a good all-day sample. Luckily, they are not pump-driven, so they don't make any noise.

There was discussion about sampling times, in which Mark explained that since we're dealing with very low levels of chemicals with readings in the parts-per-billion (PPB) range, the testing is about finding long-term, or chronic, exposure to the 30 chemicals being tested for. The tests results are displayed via gaschromatigraph, which shows the 30 targeted chemicals as spikes, and the spike size indicates intensity. If a non-targeted chemical showed up on the display, it would enable us to look into its cause and characteristics.

This is relative, not absolute, risk analysis, because it compares the Hamilton site to the greater LA area and to the TMS site, and compares inside readings to outside readings. It aims to test for differences in degree of exposure to the 30 target chemicals on the list, primarily benzene.

Bob Pitts said that with the level of interest being indicated by associates who would like to see the Hamilton site, he will set that up.

Summary of EPA presentation by Dante Rodriguez

Dante said that his presentation would cover four parts:

Site history
EPA studies and plans
Information gathered around and in the Hamilton building
Comparative risk information in context.

Site History

DelAmo was a 280 acre site leased to manufacturers by the government as part of the World War II effort. It included light industrial facilities and a synthetic rubber manufacturing plant. Along the southeast corner of the plant was a rectangular facility including a loading dock, where the worst pollution occurred. Superimposed on a map of the Hamilton site, the plant takes up a large section of the grounds outside and to the south of the main entry to the Hamilton building.

The synthetic plant dumped sludge, a heavy concoction that included waste styrene and benzene, which is now a known carcinogen. There were six small sludge ponds and three large evaporation pools.

In 1990, the EPA expanded its investigation of the site, splitting it into separate areas (the Montrose DDT plant site and the DelAmo synthetic rubber factory).

Sludge Pit remediation

The EPA made an official record of decision, and is currently designing a remediation plan which includes soil vapor extraction for the sludge pits, to keep volatile chemicals out of the air stream. Soil vapor extraction vacuums the volatile organic contaminants from the soil, with each unit affecting a diameter of approximately 100 feet.

Soil vapor extraction is performed under a cap multi-layer cap that is designed to channel surface runoff away from the area. The lower layers are sand and gravel, then an impermeable layer of high density polyethylene, topped by synthetic clay. At the bottom layers, a pipe collects the vapors
and vacuums them out of the soil, trapping them in special filters.

Montrose DDT site
The main focus of the EPA study was on the worst areas. South of the waste pits at 204th street 60 homes were built just below Normandy. At some point during the 1950s, someone leveled out a low-lying area using land fill that turns out to have been taken from the Montrose DDT site, one of the largest DDT plants ever built.

In 1990, an EPA off-site migration study made this discovery. Remediation could have been much simpler than the steps that have since been taken, but because of political pressure Shell Oil stepped in with a major goodwill effort. Shell is not involved with DDT, but since it owned the land, it bought all the houses and demolished them and, along with the remediation of the soil, Shell will develop the site in accordance with the local residents' wishes (see previous meeting minutes).

EPA comment on bulldozer dust, sulfur odor and stinging eyes at site south of 204th street.
Marta Channel asked for Dante's comment on a TMS associate's email documenting dust from bulldozers at the site, the sulfurous smell and stinging eyes the associate experienced, as well as the findings of the associate that dust-suppression measures that were to have been taken had not been.

Dante addressed each element separately.
Dante said he would pass the information to the field about the dust suppression, saying that if the South Coast Air Quality Management District had ordered dust suppression, then they should be following it. While the associate's email mentioned hydrogen sulfide as the source of the odor and the eye stinging, Dante answered that the waste pits could be the source of it if the sludge came into contact with air, but the site is not known to be releasing hydrogen sulfide steadily, as it was not picked up by the EPA's summa canisters.

He said that since the site was not the source of the sulfur smell, the source might be industrial or from a sewer. Rick Lester said that a sulfur smell can be produced by an engine, possibly from the bulldozers. Dante said that when moving DDT it does not smell like hydrogen sulfide. The dirt that is being moved by the bulldozers is clean dirt, and is part of the grading and planting in preparation to build the community facilities on the remediated site.

The EPA had the Army Corps of Engineers implement the operation, which has been subcontracted to vendors.
Bob Pitts said that the key part of the remediation will be the removal of all DDT. Dante said the process will take about two weeks, and all eyes will be on their dust suppression during that process.

Safety management during remediation
Rose Bauss asked about procedures in place to control releases into the air. Mark and Dante explained that building the cap on the sludge pit is not a disruptive process. Some dust suppression is done for the local residents as sand and gravel are brought in to build the slope that is to be capped, as some dust is generated as the fill is graded and built up. The drilling to install the soil vapor extraction pipes does produce some
cuttings, which are handled as hazardous waste by being buried beneath the cap or disposed of some other way.

Rose asked about procedures for alerting those in surrounding areas if a dangerous emission occurs.
Mark and Dante explained several points:
Such an event could occur if the initial plan is wrong, or if some control fails or an error occurs.
In such an instance, there is a safety plan deployed, which includes alerting officials and the people when it's unsafe, and advising on the emergency action to be taken, which can include evacuation or staying indoors until the danger has passed.
The greatest danger is at a site where the toxic waste is being dug up, because they are actually handling the waste.
Where drilling occurs, such as when soil vapor extraction pipes are being installed, the drillers are at the greatest risk. At the drill site special meters are monitored, and there are additional perimeter monitors. Fenceline monitoring determines if a release has been diluted by the time it reaches the site perimeter. In severe situations, it may be determined that a dangerous release is unavoidable and the initial planning would include dissemination of the warning and full evacuation before the work is started.
Troy Allison asked about protective suits worn by site workers. The types that would be worn depend on the type of risk:
  - Level B includes respirators, hard-hat, goggles, suit and gloves.
  - Level C is suite and gloves
  - Level D is standard construction safety gear - hard-hat, steel-toed boots.
Mark said that the sludge pits are a tarry substance with heavy constituents, and not a situation in which volatiles are a significant factor.
Rick Lester asked about Mobil as one of the top 20 percent of gross polluters, a description he had seen published.
Bob Pitts said that he wanted to defend Mobil because they are aware of and are working on their issues, since they are a huge complex handling volatile chemicals. Mobil has been engaging in good dialogue with the mayor's blue ribbon team and constantly upgrading as part of the consent decree resulting from being sued by the city of Torrance.
Rick said that relative testing may hypothetically show TMS HQ worse than Hamilton. Bob Pitts said the proximity of Mobil is a given, but that no issues have arisen from monitoring.

EPA site-wide investigation
Dante said that the EPA looks for unacceptable risk:
  - The nature of the contamination is determined.
  - The pathway is addressed, as well as potential or future pathways.
  - Risk numbers are calculated for incremental cancer risk, and a hazard index is developed for non-cancerous health risks:
At risk levels above 10 to the negative fourth, the EPA is authorized to take action.
At risk levels between 10 to the negative fourth and 10 to the negative 6th, it's up to EPA discretion.
At levels below 10 to the negative sixth, the EPA is not authorized to take
The EPA focus has been on the three worst areas on the site, based on groundwater contamination data. The former synthetic rubber plant locale where the parking lot is, south of the main Hamilton entryway. The DelAmo site south of the Hamilton building. The former tank farm of toxic storage tanks, at near Pacific Gateway and Francisco, by the current Coca Cola plant.

The EPA looks for NAPL - Non-Aqueous Phased Liquid. These are "blobs" of stuff, either in huge masses or stringers. The highest concentrations were in what was the lab research building of the synthetic rubber factory, there south of the Hamilton entry in the parking lot. The loading bay of that former facility has left high concentrations of NAPL.

EPA did soil gas sampling by punching a hole in the ground and sucking the vapors, which is better than soil sampling, which can be hit-or-miss. In 1994 and 1995 the EPA did indoor air sampling in the Hamilton building to measure the current level of exposure. What the EPA found in three rounds of sampling was that the interior air and the exterior air were the same. Levels were at 0.4 or 0.3 parts per billion (PPB), with one hit in the third round of 11 PPB, still well below the OSHA threshold for benzene of 1 part per million (PPM). The EPA standard is one twentieth the OSHA standard.

In addition, the EPA sampled several buildings in the industrial park which is on top of the Superfund site, including Nippon Express, the TransPacific building, and the building where Toyota houses its records and parks its race cars (the cars are soon to be moved to a new building). The TransPacific building is on a part of the Superfund site with no history of plant activities. It is furthest from the polluted spots of the site, and had the lightest readings of all the other buildings sampled, and its readings tied with the readings from the Hamilton building. The building with Toyota's race cars in it had higher readings inside than outside, because of the volatiles in the race cars themselves.

Dante provided EPA information including a summary table showing the range of background constituents, which ranges from 0 to 40 PPB for indoor air and 0 to 15.9 PPB for outdoor air.

Bob Pitts asked Mark Kachen if data from a sampling site in Hawthorn is available, as it might be more useful than from the sampling site in Long Beach, and Mark said he would check to see.

Troy Allison asked about methylene chloride, a chemical shown on the summary table. Dante and Mark discussed it, advising it is a volatile organic contaminant, usually used as a solvent by air conditioner technicians. Dante said it may be flagged because there are no ambient readings for it. It is shown at levels of 1.3, 1.4 and 1.5 PPB indoors and 1.5 PPB outside. Dante said a reading of 5,000 would be 1/20th of OSHA's standard, and that it is less than benzene. Mark explained that a part per billion is like a drop of water in a
swimming pool, a very small amount. It is amazing that it can be picked up. At these levels, the chemicals being tested for are being considered only for exposure sustained over time, or chronic exposure, because they are too low to be at trigger levels for acute risk. Blips in the testing are not problematic because what the testing looks for is patterns sustained over time.

Dante said that potential exposure sources include during construction or digging. The EPA range of discretion is between 10 to the negative fourth and ten to the negative sixth.

Marta Channel said she understands that even though two of the three sources are close to Hamilton, there is no risk from groundwater, but what about during remediation? Dante said that there are considerations made during modeling of a remediation plan. If the building is right on top of the groundwater and there is migration into the building from the source and a greater than a 10 to the negative fourth risk, they would remediate the soil.

Techniques would include
- soil vapor extraction of the contaminated volatiles. This is the safest and most non-intrusive, as well as the cheapest means.
- Another technique would be excavation of the contaminated soil.
- Ex-situ soil treatment would remove the soil and clean it up and repatriate it.
- In-situ soil treatment would neutralize the contaminant without removing the soil.

Mark said this is like what you would commonly see at some gas stations, where there is special equipment cordoned off. Dante said it is conceivable to use these techniques even directly under the building, especially at Hamilton with its open courtyard.

Doug Formby asked the purpose of remediation at these low levels. Dante said it is to protect against potential situations if there is a change in condition, such as aging in buildings, where vapors can find a way to get inside.

Marta Channel asked what happens if someone buys the adjacent lots by Hamilton and builds there. Dante said the EPA would look into the soil gas information on the site and its historic use, and possibly advise or require them to sample the soil before they dig. For example, when Donnelly wanted to deepen part of their foundation, the EPA made them sample the soil before digging. The same would go for an undeveloped area.

Mamie asked if it is correct to say for TMS associates that nothing is seeping up through the soil, but EPA has procedures in place for any activity that would disrupt the soil. Dante said while you can't say for sure that there is nothing there, you have to focus on the historic evidence and the groundwater evidence. The EPA is still studying the site.

Doug asked if there were any past releases of dangerous chemicals from the site. Dante said the EPA's '93 and '94 readings found several instances of soil gas contamination, due to the tank farms. The highest such reading was 1.9 PPM.
Jim asked about concerns among associates that old info is being used as part of the site research. Dante advised that EPA info from the 90's is not considered old, and that if anything, the readings would naturally decrease over time. Mark said that there is no movement and change in ground water and soil gas.

Dr. Dean Baker Health Concerns
Doug Formby passed out copies of Dr. Dean Baker's study about health concerns, a summary he received from an associate. Dante said Dr Baker's study is done under a grant for the Agency for Toxic Substance and Disease Registry (ATSDR), which has authorities under the Superfund law. While the EPA works on the environmental side of things, the ATSDR is on the health side of things. The EPA's position is to look at information for where are the environmental contaminants to the EPA can find them, target them and remediate them. The Dr Baker study was voluntary and was done in the neighborhood in 1995, 1996 and 1997. Mark said that Dr Baker's study is about epidemiology, and that statistically it suffers from being from a small group of people who are affected and who volunteer to participate. A better study would include all the affected, not just the volunteers, and would also include all the unaffected, and would have a larger sample size. Marta offered to show Mark the study. Mark said he can possibly see about getting Dr Baker himself to come to a future meeting. Another concern with the study is that the symptoms reported by the volunteers are non-specific, such as dermatitis, headache, hay fever and rhinitis. Not to downplay the study, but the results are hard to understand. In small sample studies, clusters are usual, and they represent a methodological problem that is difficult to deal with. For example, when six or seven women on the floor of a UC facility had breast cancer, there was no way to link their symptoms to being on the same floor.

Associate concerns mounting over health concerns, train has left the station
Doug Formby said TMS associates are getting the sense that the train has already left the station, no matter what the test results say, and that the test results will be made to say what Toyota wants them to say. Associates are fearful and their concerns are increasing, and that we must be proactive and get out in front of these issues instead of reacting to them. Our assessment of documents like Dr Baker's should be part of our presentation to the associates. The website doesn't have much info on it, and it should be made immediately available. This is necessary as there is quite a bit of skepticism, and many grumble that the testing and the associate liaison committee is a farce because the decision to move to Hamilton is irreversible. Rose Bauss said that one reason people think the train has left the station already is because they don't know that Toyota already did tests before moving people into the Hamilton building. Rose said she didn't know that, and it really helped when she learned it. The website is full of items such as workstations and fitness center, but everyone is waiting for the health questions. We need to develop a strategy for communication to associates to address this. Rochelle Harma said associates she has spoken to think it's a done deal and feel resigned and defeated. Rick Lester said in his area defeated is too strong a term, but there is resignation. Rochelle said it would be better
for the Dr Baker health report to compare test results with LA county instead of nationwide.

Maps showing other companies on Superfund site, tours of site recommended. Rick Lester suggested using the map in the EPA documents that show the multiple businesses on the Superfund site, rather than the map on the website that just shows Hamilton all by itself on the site. Mamie Warrick recommended tours for associates. Charles Zacharie said CR representatives have been seeing the meeting minutes via Lotus Notes and have been following them, and have gone down in groups to see Hamilton on their lunch hours. Bob Pitts said he had held off on tours to avoid looking like Toyota is trying to sell associates on the Hamilton site, but if there are groups interested in seeing Hamilton he would be glad to facilitate it.

Risk communication tips
Dante provided risk communication tips based on EPA's experience working with such situations. "Done deal" syndrome should be addressed by graphics showing the process - icons of people - at various steps along the way. You start with identification of the concern, then you show the studies phase. You show the part where you utilize community input, diagramming the process with a decision diagram. The decision diagram would should that there is an escape provision in the lease if tests show the site is harmful. The plan would be laid out step by step. First data is gathered, communication is opened with the concerned communities. The situation is studied. A plan is drawn up, Results are expected by such and such a date. Results are validated by such and such a date. The strategy for communicating the data is blocked in. TMS's situation is easier than most situations, because it can draw upon studies that already exist that show the situation at the site. Mamie recommended that updates and Q&A be added to the site as quickly as possible. Mark said he would get them by midweek for the website. Bob Pitts led discussion about the next meeting, which is set at Tuesday, August 25th, from 2 to 4 PM, and possibly longer if a longer time can be reserved.

Respectfully submitted by James Fewel

---

attachments will follow under separate email via paperport/lotus notes.