

Stakeholder's Comments and Recommendations for Regulators

Questions 1 & 2

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National Stakeholders' Forum on Vapor Intrusion

Wednesday, March 12

San Diego



Communicating with the Public

- When, where, and how should regulators notify building occupants and the concerned community about vapor intrusion investigations?
- The affected community has to be told what is taking place and why. This information needs to go out before **any** action is taken.



- The people who have the potential of being impacted directly should be notified; local meetings are one effective means of notification. Occupants in areas which rim the contamination and several blocks of the surrounding area should be informed.



- Mailers and flyers can be used; flyers posted in neighborhood schools, shops, eateries, gas stations, and Laundromats.
- Email can be used by schools, day care centers, and businesses to notify people through a prepared notice.
- Local newspapers should be provided with a press release; large bi-lingual signs around the area of investigation should be posted with contact information included.

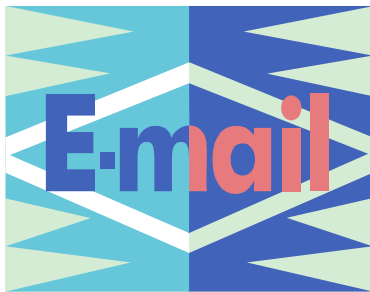


- Communicate with the public through many avenues, notifying the press at the same time as mailers and flyers go out.



- Information should be very specifically targeted. Homeowners and/or occupants should be contacted directly until each affected home has responded.

- Information should be multi-lingual; translation should be provided.



- **Affirmative duty to organize groups:** Absolutely!
Homeowners/occupants in general have no organized power unless they have an existing homeowners association.
- Individuals are overwhelmed when confronted with the reality that they and their families may be living with TCE contamination. I was powerless for many years because
 - there was no guidance,
 - there was no easily obtainable or understandable information about the Superfund Site that was 100 feet from my front door, and
 - I did not even know where to begin.



- Political clout and power to affect change happens through association or groups.
- Where there is no existing group or organization, the regulatory agency should be **obligated** to help form and support such groups.
- When there are existing groups, support is still needed. Without guidance and support to form and maintain groups, people have very few tools to deal with their situation.



Sampling

- **Based on your experiences what would you recommend should trigger vapor intrusion investigations?**
- What should trigger vapor intrusion investigations? Living across from or on top of a Superfund Site should be a mandatory no-brainer to offer indoor air testing.
- Knowing that TCE has been spilled or illegally dumped is another obvious trigger.

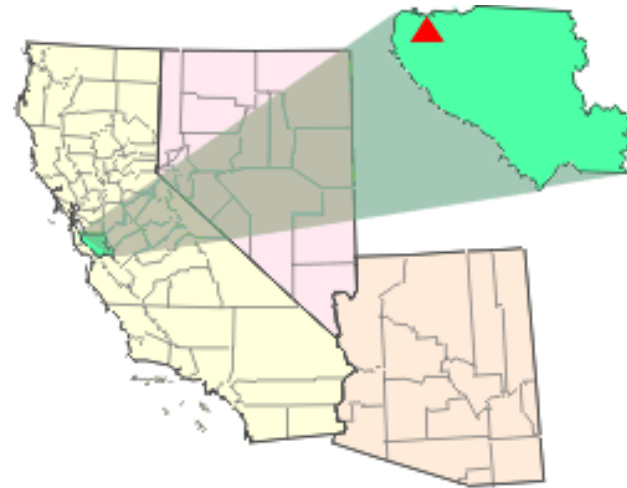


- There is also anecdotal information; people who worked and lived in an area many years ago often are the only ones who have accurate information about dumping, about well locations, and about farms and the chemicals that were used there.



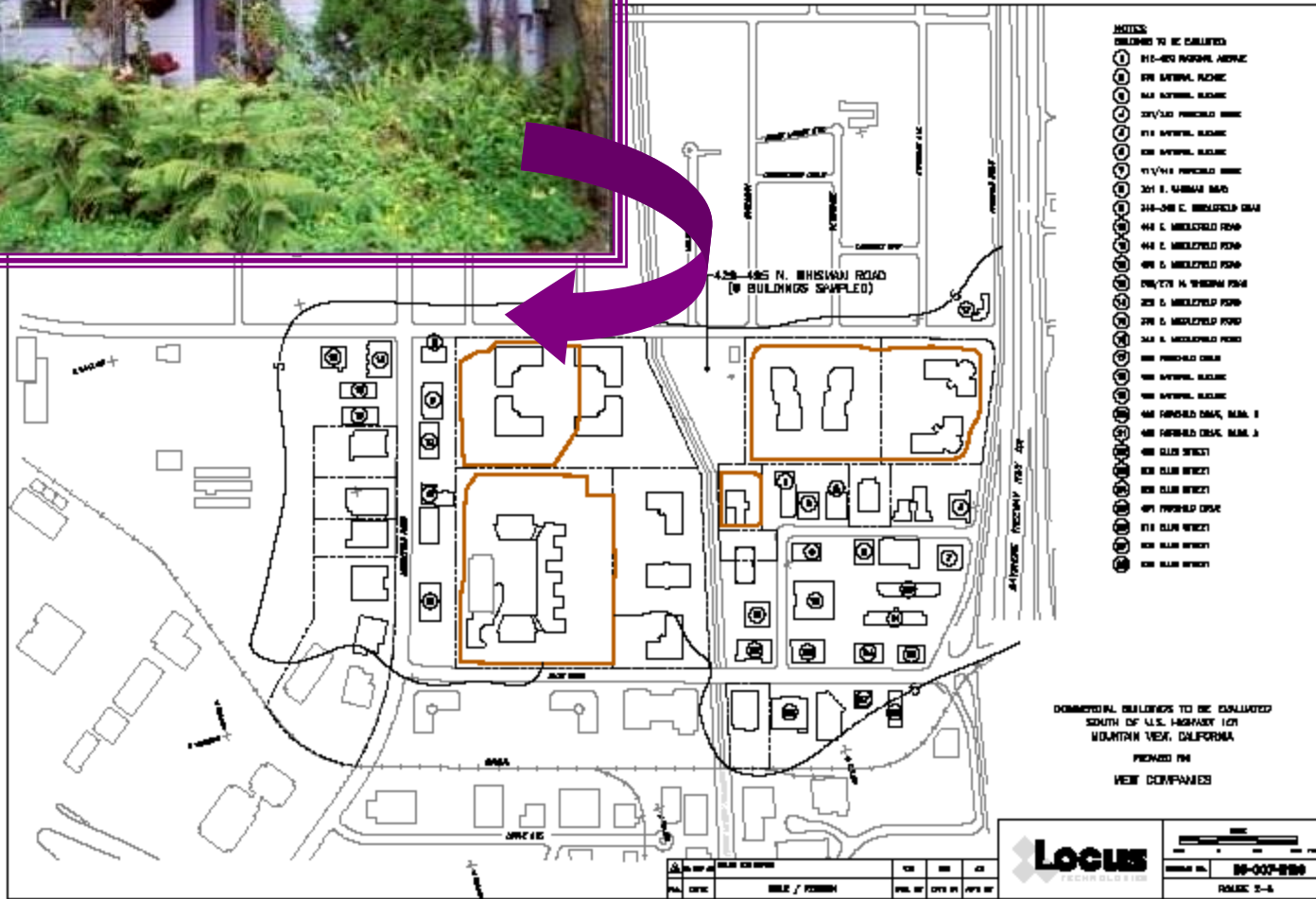
- With all the variability in soils and preferential pathways, it should be mandated that indoor air testing happen for any inhabited building within several hundred feet of volatile organic contamination, and that the perimeter for testing expand outward until no contaminated indoor air is found.

- My experience: Indoor air testing was never offered, discussed, or explained until after I had lived across the street from a Superfund Site for DECADES.
- Only a slight redrawing of the plume gave me the perceived right to strongly request indoor air testing. At that point the site was 75% remediated, with approx 75K tons of TCE removed, and my home indoor air tested high enough to recommend remediation, which was designed and installed.

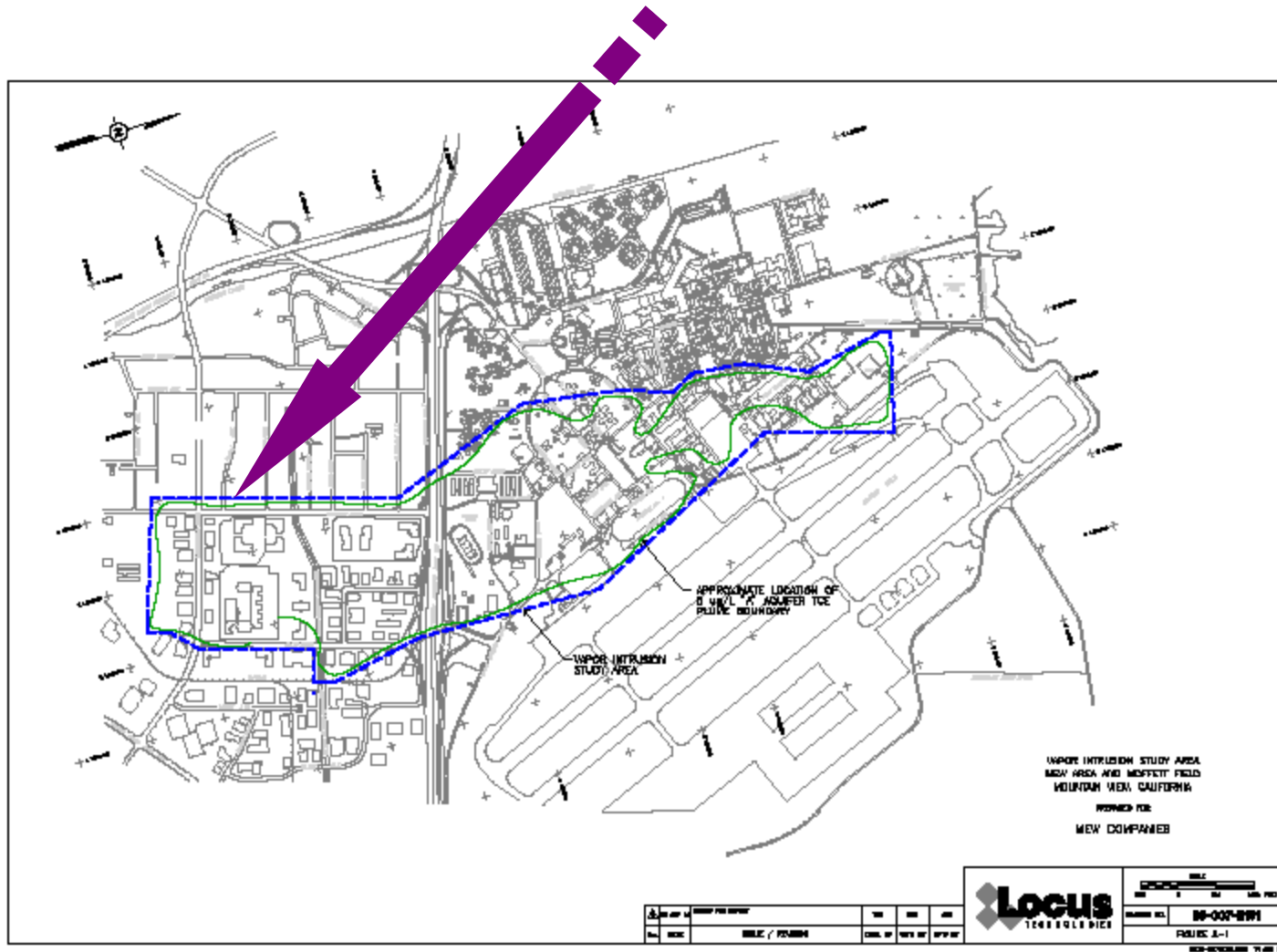




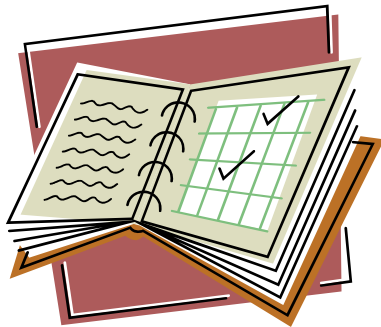
My House – Follow the Arrow



Another view – a larger area – where my house is located

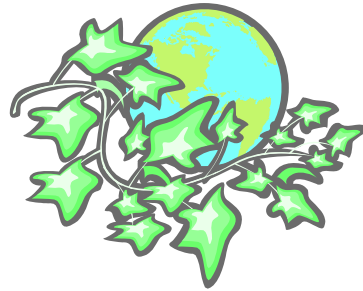


- How much more socially responsible and “the right way” it would have been to canvas the neighborhood 25 years earlier and ensure at that time that people were not living in homes or working in businesses with forced and unsolicited contaminated air.
- As soon as it is determined that there is contaminated groundwater and that the indoor air has not been tested, all efforts should be made to start the indoor air testing immediately.
 - “Immediately” does not mean that it happens quickly; canisters need to be available, labs for testing have to be scheduled, and homeowners and testing staff need to coordinate their efforts.



- If there is indoor air contamination found, sampling should be ongoing until the groundwater is cleaned up. If there is no contamination found, there is still the potential for new vapor intrusion pathways to happen. Testing for both detected and non-detected TCE contamination in the indoor air should take place every six months; any father apart and people are put at additional long-term health risks.
- We have one earth – hold the polluters responsible and do not allow this mess to be passed on to further generations.





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“Remember Who You Wanted to Be”