

FORCO Site Clean-Up  
EPA Brownfields Cleanup Grant  
Public Comments & Response Summary  
November 2022

Commenter	Meeting or Written Comment	Comment/Question	Districts' Response
Coalition for a Safe Env't (CFASE)	Meeting	The Coalition supports the application for an EPA Brownfields Cleanup grant.	Comment noted.
CFASE	Meeting	Suggested that, in our application, the Districts use CalEnviroScreen data to demonstrate the burdens on the community, or the US EPA Environmental Justice screening tool that was recently released.	The Districts have analyzed CalEnviroScreen data for the target area and included key statistics in the Narrative Application.
CFASE	Meeting	Have the Districts identified the remediation technologies for which the grant will be used?	Yes, the Districts prepared a Feasibility Study, and identified Air Sparging/Soil Vapor Extraction (AS/SVE) as the primary technology for source areas after a comparative analysis for effectiveness, implementability, and cost. The Districts plan to use the existing infrastructure on site, including AS and SVE wells as well as groundwater monitoring wells, and greatly expand it. The Districts have identified other technologies available that will be used if necessary. The Districts are using an adaptive approach to optimize cleanup efforts.
CFASE	Meeting	Does the remediation technology selected use combustion?	Yes, SVE extracts the vapors and oxidizes them into CO <sub>2</sub> and water vapor. There are two mechanisms for AS/SVE remediation approach to remove hydrocarbon from the subsurface. First is the physical volatilization of the vapors and the second is bioremediation by supplying air to naturally existing microorganisms that can break down petroleum. In the case of the first mechanism, extracted hydrocarbon are further oxidized

			above ground to CO <sub>2</sub> and water vapor.
CFASE	Meeting	What proportion of the total petroleum hydrocarbons on the site has been removed to date? Do we know what is the maximum amount that can be removed?	The Districts estimate that we have removed about 75% already, but records are not great about how much was released. Current efforts are getting diminishing returns. Therefore, the Districts plan to install more AS/SVE wells in order to maximize petroleum hydrocarbons removal to meet site remediation objectives.
CFASE	Meeting	Will any soil excavation occur that will grind up the petroleum hydrocarbons?	The Districts excavated some soil during the 1 <sup>st</sup> phase of cleanup (11,000 cub yards of soil – down to 10 ft below ground surface), but excavation of deep soil and groundwater is not the most cost effective remediation method and may result in other environmental impacts. So major soil excavation is not anticipated for the Phase 2 remediation.
CFASE	Meeting	The Districts should use renewable power such as solar power or hydrogen fuel cells for cleanup activities and/or the Pure Water Program.	This suggestion has been forwarded to the Districts' Energy Recovery Section, which investigates and develops renewable energy projects for the Districts.
CFASE	Meeting	The Districts should be aware that there is a risk of an earthquake in the region, which could cause a risk of release of petroleum hydrocarbons. This is another reason for proceeding with the brownfield cleanup.	Comment noted.
CFASE	Meeting	CFASE recommends that Districts use a high percent of contractors/subcontractors that are local & minority-based enterprises for this project.	For the Pure Water Southern California Program, Metropolitan approved a Project Labor Agreement (PLA) in October 2022, which includes provisions to ensure that women- and minority-owned businesses have equal opportunities to compete for contracts and a goal for 60 percent of jobs to go to local workers.
		CFASE recommends that the Districts use local firms/groups including non-profits like CFASE for public outreach. CFASE is also interested in promoting workforce development and youth education. Good	The Districts appreciate the comment, and will consider utilizing local firms as part of outreach. The Districts have a variety of public education programs including

CFASE	Meeting	to educate local youth about these types of activities and employment opportunities.	school tours and presentations to schools and community groups. We are considering development of additional workforce development efforts.
CFASE	Written	We support the future plans of L.A. County Sanitation Districts and the Metropolitan Water District of Southern California to use this remediated land to build a new state-of-the-art Pure Water Southern California Program.	Comment noted.
CFASE	Written	We request that that the remediation process maximize the use Zero Emission Vehicles, Equipment and Power.	The Districts will consider incorporation of specifications for zero emission vehicles, equipment and power into contracting documents, to the extent feasible.
CFASE	Written	We request that the contaminated hydrocarbon soil remediation process include and maximize the use of bioremediation supported by biostimulation and bioventing.	One of the mechanisms for the current air sparge system to remove hydrocarbons is bioremediation by supplying air to naturally existing microorganisms that can break down petroleum. Biosparging is another technology that will be considered during the adaptive site management process.
Dianne Thomas, Cypress Church of Christ Church	Meeting	I support this project and hope more people will become aware of it. It is very much needed.	Comment noted.
Anonymous (online) commenter	Meeting	How long does air sparging go on?	We expect the bulk of the remediation program to continue for 5-6 years and perhaps longer in some limited areas.