



February 7, 2018

Greenaction for Health and Environmental Justice Comments to DTSC on Draft Remedial Action Plan & Negative Declaration for Former PureGro Company Facility, Brawley, CA

Greenaction for Health and Environmental Justice submits these comments to the Department of Toxic Substances Control on behalf of our constituents in Brawley and at the request of Comite Civico del Valle.

1. We disagree with DTSC's plan to have Chevron develop and implement the remedy. DTSC should develop the remedy in partnership with residents and their community organizations, and require Chevron to pay for and implement it. Allowing the corporation responsible for the contamination site to develop and implement the remedy for dealing with the significant toxic contamination is not appropriate and will not provide the maximum protection for public health and the environment. This is especially true as Chevron does not have a positive environmental track record in our state or in the world.
2. It is inexcusable that the contamination was allowed by DTSC to remain at the site next to homes. Remediation of this site is long overdue. Although we disagree with the "Negative Declaration" under the California Environmental Quality Act (this project clearly has the potential for significant environmental impacts) we want this site to be finally remediated as quickly and safely as possible, with full public oversight and participation.
3. Where will the contaminated soils that are currently stockpiled be disposed of? Did DTSC consider the environmental health and justice issues in the community nearest the proposed disposal site? DTSC must not allow the contaminated soils to be disposed of in an environmental justice community burdened by pollution and injustice.
4. DTSC's plan to leave and spread 14,500 cubic yards of contaminated soils on site and untreated is unacceptable. We join the community in opposing this plan due to the proximity of homes right next to the site and the threat to groundwater. In developing this portion of the "remedy" did DTSC conduct a comprehensive cumulative impact analysis including information in CalEnviroScreen 3.0? If not, why not?

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5. Did DTSC consider any onsite treatment of the contamination and if so, what treatments were considered and why were they rejected?
6. Which agency and/or company will be required to regularly inspect the site, and monitor groundwater and the adequacy of the cap? For how many years will this monitoring and inspecting take place?
7. When will the proposed site remediation and capping work take place? What are the projected start and end dates?
8. What site mitigation measures are planned to prevent emissions of toxic and non-toxic dust? Will the site be tarped? What dust suppression measures will be used?
9. Residents living adjacent to the site must be offered temporary relocation to nearby hotels/motels and be provided per diems to cover expenses associated with being displaced during the work at the PureGro site.
10. Comite Civico del Valle should be provided a multi-year Technical Assistance Grant in order to ensure full community oversight and input into the remediation plan and remediation project.

For environmental health and justice,

A handwritten signature in black ink that reads "Bradley Angel". The signature is written in a cursive, flowing style.

Bradley Angel
Executive Director
Greenaction for Health and Environmental Justice