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LEHR Superfund Site
UC Davis Campus

DSCSOC's Community Acceptance Criteria

The development of the FS/ROD for the LEHR Superfund site must consider the public (community) acceptance of the proposed remediation approach(es). DSCSOC has developed the draft community acceptance remediation criteria, which are presented below. These are being released as a draft to provide the opportunity for RPMs, PRPs and others to comment on the current DSCSOC LEHR site investigation/remediation issues of concern.

1. **Cleanup Objectives**: The cleanup objectives should be fully protective of public health and environmental impacts associated with the waste at the LEHR site and at locations that have been impacted by LEHR site releases of wastes/chemicals. The cleanup objectives should be the most protective and most complete that is technically possible.

2. **Adequacy of Current LEHR Site Investigation and Risk Characterization:** The public health and environmental risks associated with LEHR wastes have not been adequately investigated. A critical review should be conducted of existing information gaps, where an assessment is made of the potential public health and environment significance of the information gaps. A comprehensive report should be developed that discusses the results of the information gaps review and presents an assessment of cost of conducting the studies needed to fill the most significant information gaps.

3. **Remediation Goals:** Milestones must be established and cleanup goals established and committed to by the LEHR site Responsible Parties (UCD and DOE). Land use restrictions must be strictly enforced. Provisions for oversight and enforcement by the remedial agencies with public oversight must be included in the Record of Decision (ROD) to ensure that the schedule, milestones and land use restrictions are being adhered to.

4. **Cleanup Levels:** The cleanup levels must meet the strictest state and federal government requirements and be fully protective of public health and the environment. As a condition of the ROD, there needs to be a provision that the cleanup goals will meet any future change in cleanup requirements.

5. **Groundwater Cleanup Goals:** The polluted groundwater plume(s) should not be allowed to migrate beyond its (their) current location or allowed to degrade additional groundwater quality. The groundwater cleanup goals must include a provision that will require remedies that are effective in cleaning up the polluted plume(s). The groundwater cleanup needs to be aggressively pursued, efficient and cost-effective.

6. **Putah Creek Protection Goals:** Surface (storm water) runoff to Putah Creek from the LEHR site must not be allowed to potentially impact Putah Creek's water quality and/or require restrictions on the public's use of the creek. The LEHR site runoff to Putah Creek must continue to be monitored and evaluated in connection with UC Davis's campus sewerage system and other stormwater discharges so there can be an evaluation of UC Davis' cumulative impact on Putah Creek's beneficial uses, with particular reference to how the other (non-LEHR-derived) discharges may impact the magnitude of LEHR discharges on Putah Creek water quality. The LEHR site's contribution of mercury to Putah Creek must be controlled so that it does not contribute to the excessive bioaccumulation of mercury in Putah Creek fish and other aquatic life.

7. **LEHR Waste Disposal Area and Landfills Site Goals:** LEHR Waste Disposal Areas and Landfills remediation must be protective of the groundwater quality and the landfill-caused groundwater pollution plumes must not be allowed to pollute additional groundwater. The UCD LEHR landfills have not been adequately investigated to characterize waste composition, and the waste has not been adequately characterized to evaluate past, current and potential future impacts. Adequate near-waste-disposal-site and near-water-table sampling should be conducted to evaluate current and future impacts of each waste disposal area. The most protective remedy would be to remove the waste from the landfills. If UC Davis is allowed to leave the waste in place and covered with a cap, the landfill caps must control moisture infiltration through the cap. A cap integrity monitoring program that will detect failure in the cap before additional contamination is allowed to reach the groundwater must be required.

8. **LEHR Site Computer Modeling of Groundwater Pollution:** Some decisions in the site investigation have relied upon vadose zone modeling to predict the transport of contaminants in the soil column to the water table. This computer modeling has been shown in some cases to be potentially unreliable. Modeling should not be used to determine whether a chemical in the soil column or in a waste disposal area will impact groundwater quality at any time in the future. Appropriately located groundwater monitoring should be used to assess whether groundwater pollution is occurring from a particular location at this time and in the future.

9. **Future Risk Characterization and Remediation Needs:** A review of the potential need for followup additional studies to further characterize the reliability and adequacy of the past risk characterization compared to the then available information base on the potential impacts of chemicals on public health and the environment should be conducted. This review should be conducted every five years as part of the US EPA five-year review, provided that the US EPA review takes place.

10. Public Involvement: After the US EPA Technical Advisor Grant for the site is no longer funded by the US EPA; there is currently no provision for public oversight at LEHR. There is need to establish a community group with funding to continue the oversight at LEHR. Periodic public meetings should be held to inform the public about the LEHR site situation and activities, including presenting the results of the ongoing monitoring program of the effectiveness of the remediation in controlling further pollution of the environment by LEHR site wastes.

11. Funding: Adequate funds must be committed by the Responsible Parties to ensure that the remediation/cleanup will maintain its schedule and meet its milestones. There is need for contingency funds to be available for any unforeseen investigation/remediation that becomes necessary at the site.

12. Post Remediation Monitoring: All post-remediation monitoring of the site must be conducted for as long as the wastes/chemicals associated with the monitored area are a threat to release pollutants that can impact public health and the environment. The RPMs and the public need to understand that LEHR site wastes may never be completely remediated and will remain a threat to the groundwater and surface waters far beyond the minimum 30 years specified in RCRA/Superfund regulations and in LEHR site documents. Site documents should state that monitoring will be required for as long as the waste remains a threat.