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July 5, 2019

Carlos A. Torres, Director  
Office of Environmental Health & Safety  
Los Angeles Unified School District  
333 S. Beaudry Avenue, CA 90017

Dear Mr. Torres:

**CONCERN OVER OPERATIONS OF ATLAS IRON & METAL COMPANY AND POTENTIAL IMPACTS ON JORDAN HIGH SCHOOL, LOS ANGELES**

Thank you again for your letter of March 12, 2019 to County Health Officer Muntu Davis, M.D., M.P.H, detailing health and safety concerns at David Star Jordan High School stemming from the operations of Atlas Iron & Metal Company (Atlas). Dr. Davis asked that we investigate the concerns in your letter and reply on his behalf. The County Department of Public Health (DPH) conducted a review of available environmental and health data and a site visit to Jordan High School on May 8, 2019. Our review focused on the concerns raised in your letter, our inspection, and readily available regulatory records on the operations of Atlas. The results of our review are presented below.

Atlas is situated in a densely populated neighborhood in South Los Angeles at 10019 S. Alameda Ave; the facility has been in operation since approximately 1949. The site is immediately adjoined by Jordan High School to the south and west, and proposed mixed residential and commercial land use to the north. Residents in the area include families with young children and elderly, and there are at least five schools within a half-mile radius of the facility. According to CalEnviroScreen, the community closest to Atlas has a higher pollution burden than 95-100% of communities in the state of California.

**ENVIRONMENTAL CONDITIONS OF CONCERN TO THE SCHOOL COMMUNITY**

Your letter identified several health and safety concerns related to operations at the Atlas facility. Based on our review and observations made at the Atlas facility and along the perimeter of Jordan High School, DPH noted several conditions that pose a health and safety risk to the school population.



### **1. Standing water on the Atlas property and runoff of contaminated stormwater**

The Los Angeles Unified School District (LAUSD), Office of Environmental Health and Safety (OEHS) provided documentation and photographs of standing water on the Atlas site, and stormwater runoff from the site, because of poor site drainage. As we have discussed previously, standing water provides a breeding ground for mosquitos and harborage for rodents, thereby increasing the risk of vector-borne disease among facility personnel and students and staff at Jordan High School. Mosquito-borne diseases endemic to the Los Angeles Basin, such as West Nile Virus, can lead to meningitis, encephalitis, and limb paralysis. During periods of heavy rainfall, the added volume of accumulated waste water on-site may result in the runoff of contaminated stormwater which could expose staff and students of the school and the occupants of adjoining properties.

**Recommendation:** Steps must be taken to establish adequate site drainage, eliminate accumulated stormwater/waste water, and implement an effective stormwater management plan as required by the California Regional Water Quality Control Board (RWQCB). We are referring this issue to RWQCB for appropriate action.

### **2. Site operations occurring within the 50-foot buffer zone**

Site operations, equipment, and stockpiled materials were noted to occur within the 50-foot buffer zone established under the site's Conditional Use Permit (CUP) along the western and southern fence line. Additionally, OEHS reports that stockpile height regularly exceeds the height of the retaining wall along the facility perimeter. These conditions could potentially expose school occupants to airborne dusts and contaminants generated during site activity, and the effect of winds in mobilizing contaminants in the stockpile. Exposure to airborne metal contaminants and other particles associated with scrap metal recycling can lead to a wide array of health impacts, including eye, nose and throat irritation; headaches; worsening of asthma and other respiratory conditions; developmental disabilities; and negative impacts on quality of life and physical well-being. These health risks are heightened for sensitive populations, such as young children, and may occur even when emissions are compliant with regional air quality standards.

**Recommendation:** DPH believes a 50-foot buffer along the western and southern perimeter fence should be maintained, and that waste stockpiles should be limited to a height below the perimeter retaining wall. It is also vital that effective measures be taken to control dust emissions from the stockpile and from any condition or activity on the Atlas site. We understand the establishment and enforcement of a buffer within the Atlas facility may require action by the City of Los Angeles Planning Department and other regulatory agencies. We stand ready to assist you and the agencies in this regard.

### **3. Physical hazards, chemical exposures and worker/resident safety**

Metal scrap recycling operations involve large and potentially hazardous equipment, the use of flammable and/or explosive gases, and the generation of metal fumes, dusts, and toxic vapors. Unless strict controls are in place to ensure against exposure to emissions in adjoining



occupancies, such operations are incompatible with nearby school and residential uses. As an example, school administrators report that when Atlas is actively working scrap metal piles, visible particulate emissions are observed. Other health and safety issues have been identified including: operations occurring in proximity to electrical lines; the solid wall on the perimeter of the Atlas facility is in substantial disrepair; and trash has accumulated between the solid wall and metal fence. These issues increase risks for Atlas personnel, occupants of Jordan High School, and occupants of other properties in proximity to the facility.

**Recommendation:** The operator must follow best management practices for scrap metal recycling as outlined by USEPA.<sup>1</sup> Large and potentially hazardous equipment must be located away from overhead powerlines and other structures as specified in OSHA Standard 1926.1408(h). Other best practices for workers include ensuring the workplace is ventilated to minimize employee exposure to dusts, metal fumes, and other contaminants. The perimeter wall must be repaired to ensure its integrity. The noted conditions are being referred to the lead regulatory agencies for appropriate action: health and safety concerns to Cal/OSHA; accumulated trash and debris to County DPH/Environmental Health; and the need for repairs to the perimeter wall to LA City Department of Building and Safety.

**Recommendation:** LAUSD's Office of Environmental Health and Safety (OEHS) should consider HVAC maintenance "best practices" at Jordan High School especially for those buildings situated in close proximity to the Atlas facility. Please also note that higher concentrations of particulates, including heavy metals, could impact the longevity and efficacy of air filters in use at the school, requiring more frequent change-out.

**Recommendation:** OEHS should consider environmental site assessment along parking areas or other areas adjoining the Atlas facility to determine if ongoing fugitive emissions from facility operations continue to impact air and soil at the school.

## **OTHER INFORMATION IDENTIFIED THROUGH REVIEW OF REGULATORY RECORDS**

Our review of regulatory records identified prior serious violations and incidents at the facility. The operations of Atlas are primarily regulated by the Department of Toxic Substances Control (DTSC); the South Coast Air Quality Management District (AQMD); Los Angeles City and County Fire Departments; and the City of Los Angeles Planning Department.

Two explosions occurred at the facility in 2002, both of which resulted in metal fragments (approximately the size of a small coffee can) landing on the Jordan High School athletic field. A 2004 DTSC investigation of soil contamination the school grounds in 2004 led to the removal of arsenic and lead contaminated soils within the athletic field, potentially from the operations at Atlas or other neighboring industrial facilities.

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<sup>1</sup> [https://www.epa.gov/sites/production/files/2015-10/documents/sector\\_n\\_scraprecycling.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/sector_n_scraprecycling.pdf)

A subsequent DTSC investigation in 2006 resulted in orders to Atlas to remove contaminated soil from the Atlas site, along the border the facility shares with Jordan High School. Contaminated soils were found to contain arsenic, lead, copper, and zinc at concentrations above hazardous waste levels. In more recent years, violations were observed at Atlas during routine inspections by Los Angeles County Fire Department in 2013 and 2017; and AQMD issued Atlas "Notices to Comply" in 2013 and 2018.

The five recommended actions above are responsive to LAUSD's request that Public Health provide guidance and recommendations that are health-protective of the school community. We look forward to assisting you and the regulatory agencies in assuring the health and safety of students and staff at Jordan High School and residents in the surrounding communities. If you should have any questions, please let me know.

Sincerely,

A handwritten signature in blue ink, appearing to read "Angelo", with a long horizontal flourish extending to the right.

Angelo J Bellomo, MS, REHS, QEP  
Deputy Director for Health Protection

AB/lk

cc: Dr. Muntu Davis, LACDPH  
Meredith Williams, DTSC  
Wayne Nastri, SCAQMD  
Deborah Smith, RWQCB  
Alfred Varela, Cal/OSHA  
John Biezins, LADBS  
Liza Frias, LACDPH  
Dr. Cyrus Rangan, LACDPH