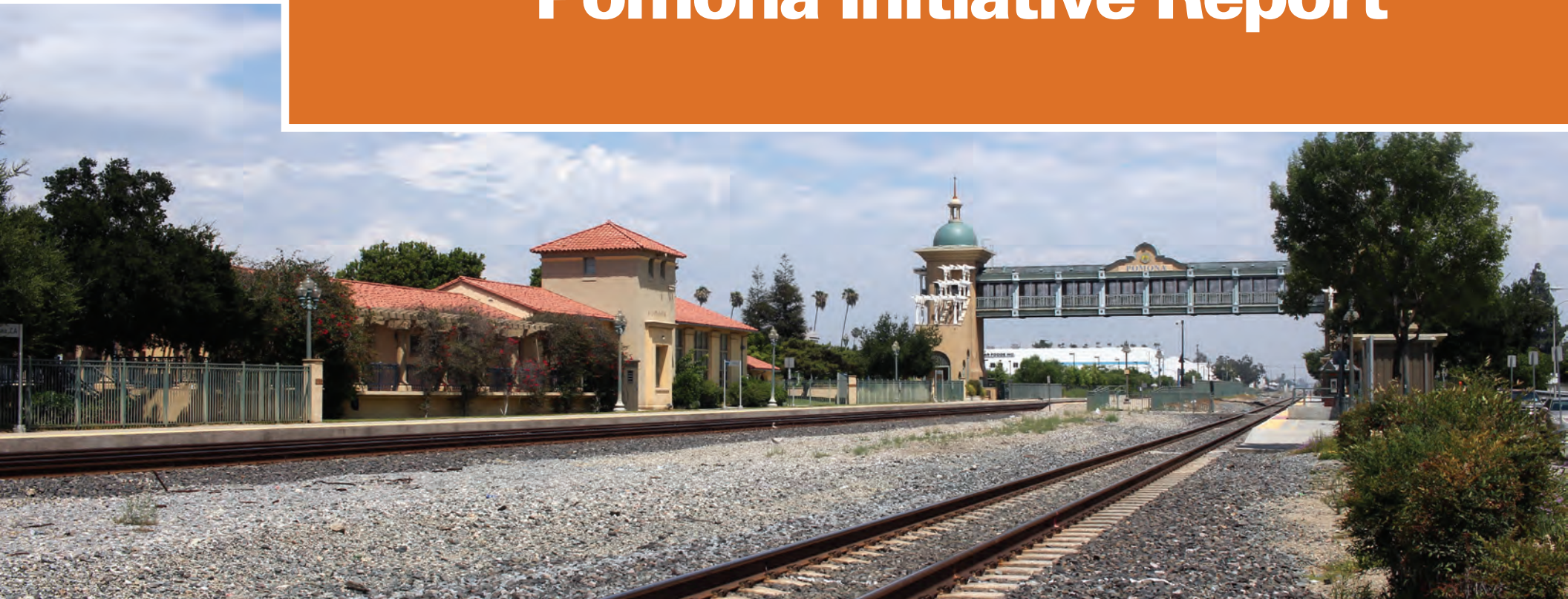


*Environmental Justice
Task Force*

Pomona Initiative Report





Environmental Justice Task Force

Pomona Initiative Report

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Acknowledgements

Local Partners

Community Partners

United Voices of Pomona for Environmental Justice
Clean & Green Pomona
Pomona Hope
Pomona Chapter of the National Association for the Advancement
of Colored People (NAACP)

Public and Government Agency Partners

Code Compliance Division, City of Pomona
Pomona City Manager's Office
Pomona Unified School District

Regional Regulatory Partners

South Coast Air Quality Management District
Los Angeles Regional Water Quality Control Board
Los Angeles County Agricultural Commissioner
Los Angeles County Department of Public Health's Environmental
Health Program
Los Angeles County Fire Department (LACoFD)

State Agency Partners

California Air Resources Board
CalRecycle
Department of Pesticide Regulation
Department of Toxic Substances Control
State Water Resources Control Board
Occupational Safety and Health Administration, Department
of Industrial Relations
California Department of Motor Vehicles

Federal Partners

U.S. Environmental Protection Agency

Introduction

In 2018, the California Environmental Protection Agency's Environmental Justice Task Force (EJ Task Force) selected the city of Pomona for a focused environmental enforcement and regulatory compliance initiative. This initiative is referred to in this report as the Pomona Enforcement Initiative or the Initiative.

At the outset of the Pomona Enforcement Initiative, the EJ Task Force worked with residents and local organizations, including United Voices of Pomona for Environmental Justice (UVP), Clean and Green Pomona, Pomona Hope, and the Pomona Unified School District, to learn about local environmental problems and concerns. The EJ Task Force's goal in this initial phase of the Initiative was to identify locations where focused environmental enforcement efforts could have a significant impact in protecting public health and achieving compliance with environmental regulations. Based on the input received from the community, the EJ Task Force conducted multi-agency inspections of various facilities in Pomona.

At the conclusion of the inspection work, the EJ Task Force provided compliance assistance for businesses in coordination with local regulatory agencies. Businesses found to be in violation of environmental regulations were cited and ordered to remediate their violations. EJ Task Force staff additionally worked with schools and after-school programs to promote youth engagement on environmental protection issues. EJ Task Force staff also provided local community organization partners with information to support existing urban beautification and zero-waste efforts. At

the conclusion of the Initiative, the EJ Task Force shared results from their enforcement efforts with the community and encouraged residents and local government leaders to continue with their ongoing work to address environmental problems in Pomona. This report provides a summary of the work performed during the Pomona Enforcement Initiative.

Pomona residents hear results from inspections related to air pollution regulations.



Background

California law defines environmental justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws.”¹ CalEPA recognizes that the process of achieving environmental justice requires that all California residents have a meaningful opportunity to participate in environmental regulatory decisions.

Environmental justice represents an aspiration towards a state where the racial composition and relative income of community members are no longer indicators of the environmental pollution burdens in their community. This aspiration is based on the fact that many disadvantaged communities in California continue to bear disproportionate pollution burdens, while also facing serious socioeconomic, health, and other challenges. These communities have long voiced their concerns about the pollution burdens they experience. Among the concerns are land use decisions that placed multiple sources of pollution in or near their neighborhoods with the associated risks of adverse health effects. Residents of these communities have also expressed concern about perceived lax enforcement of environmental regulations to prevent pollution contamination in their neighborhoods.

CalEPA’s environmental justice policies and programs aim to integrate environmental justice considerations into the

¹ Government Code Section 65040.12.

environmental regulatory activities, programs, and other actions of each of its boards and departments.

In 2013, CalEPA formed the Environmental Justice Enforcement and Compliance Working Group, later renamed the EJ Task Force. The EJ Task Force consists of regulatory agencies that implement and enforce environmental laws in California, including representatives from CalEPA, its boards and departments and representatives of regional and federal agencies. The EJ Task Force identifies disadvantaged communities that suffer multiple pollution burdens and focuses enforcement and compliance efforts in those areas.

There are two important components of the EJ Task Force’s initiatives: multi-level government coordination of enforcement activity, and meaningful community consultation. Multi-level government coordination allows the EJ Task Force to address environmental problems in a comprehensive manner. Meaningful community consultation is the process of working closely with community advocates and residents who live in the focus area in order to identify problems that have escaped the attention of regulators.

The Pomona Enforcement Initiative is the EJ Task Force’s fourth multi-agency enforcement and compliance initiative. The EJ Task Force has conducted previous initiatives in Fresno, Los Angeles and Oakland.²

² The Task Force conducted an initiative in Fresno in 2013-2014, in the Boyle Heights and Pacoima neighborhoods of Los Angeles in 2015, and the communities in East and West Oakland in 2016-2017. Visit the EJ Task Force’s webpage for more information about the task force and its past initiatives: calepa.ca.gov/enforcement/environmental-justice-compliance-and-enforcement-task-force.

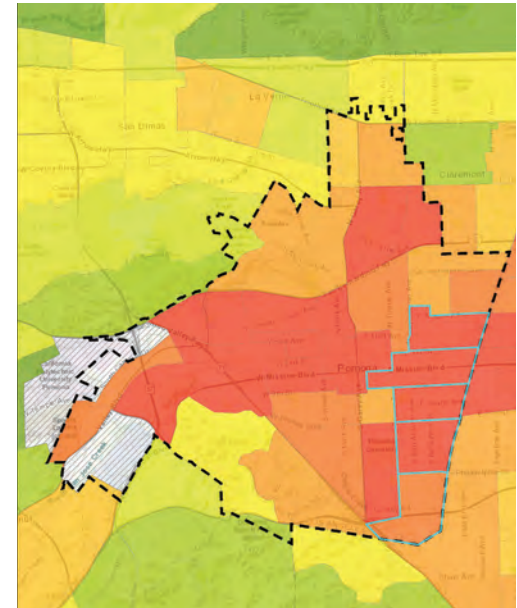
Community Focus Area

The EJ Task Force uses the CalEnviroScreen statewide screening tool to identify areas of focus for its environmental justice enforcement and compliance initiatives. The EJ Task Force focused its enforcement efforts in Pomona because CalEnviroScreen helped identify the area of the state as one where residents experience high pollution burdens and have increased vulnerability to the adverse effects of pollution. More precisely, the EJ Task Force focused efforts in the industrial corridor in southeastern Pomona, which has a high concentration of residential neighborhoods intermixed with heavy industrial facilities. The industrial corridor also falls within the 92nd percentile of areas in California with the highest pollution burdens.

Pomona was named for the Roman Goddess of fruit based on its lush and fertile soil and history of agricultural production. Over the years, the area has grown to become the seventh largest city in Los Angeles County, with a population of 152,939.³ As the city's economy grew, heavy manufacturing and industry emerged as one of the largest sectors of employment in Pomona. Today Pomona is home to a large number of waste and recycling facilities.

³ US Census QuickFacts, updated July 1, 2017, [census.gov/quickfacts/fact/table/pomonacitycalifornia/PST045217](https://www.census.gov/quickfacts/fact/table/pomonacitycalifornia/PST045217).

In recent years, controversy has surrounded some of these industries, and in particular the waste and recycling industries. Residents living near these facilities have voiced their frustrations with, “smells, dust, traffic, rodents, wear and tear on city streets and fire dangers.”⁴ These issues and complaints gained much attention in recent years with a string of fires at recycling facilities that caused the Pomona City Council to adopt a temporary moratorium in 2014 to prevent the opening or expansion of recycling businesses in the city.⁵ Pomona residents and members of citizen groups reached out to CalEPA to request support to address their concerns. They advocated for more attention on environmental compliance issues in Pomona's industrial corridor.



The area highlighted in blue was the focus area for concentrated enforcement and compliance efforts.

The EJ Task Force's Pomona Enforcement Initiative began in June 2017, with a focus on the industrial corridor in southeast Pomona and surrounding residential neighborhoods. (See map in Figure 1.)

- ⁴ Monica Rodriguez. Pomona moves closer to ban on waste and recycling businesses, The Daily Bulletin, April 30, 2017, [dailybulletin.com/2017/04/30/pomona-moves-closer-to-ban-on-waste-and-recycling-businesses/](https://www.dailybulletin.com/2017/04/30/pomona-moves-closer-to-ban-on-waste-and-recycling-businesses/)
- ⁵ Monica Rodriguez. Pomona moves to ban new businesses in this industry, The Daily Bulletin, June 7, 2017, [dailybulletin.com/2017/04/30/pomona-moves-closer-to-ban-on-waste-and-recycling-businesses/](https://www.dailybulletin.com/2017/04/30/pomona-moves-closer-to-ban-on-waste-and-recycling-businesses/), The Daily Bulletin, April 30, 2017, [dailybulletin.com/2017/06/07/pomona-moves-to-ban-new-businesses-in-this-industry/](https://www.dailybulletin.com/2017/06/07/pomona-moves-to-ban-new-businesses-in-this-industry/)

There are 17,598 residents in southeastern Pomona, a significant number of them living adjacent to, or within, the industrial corridor where the EJ Task Force focused its efforts. Forty-six percent of the residents in this area have less than a high school diploma as their highest form of educational attainment. Sixty percent of the households are linguistically isolated, which means that everyone in the household over the age of 14 speaks English “less than well.” Additionally, one out of every three households in the area has an income of less than \$25,000 a year – well below the median household income in California.⁶

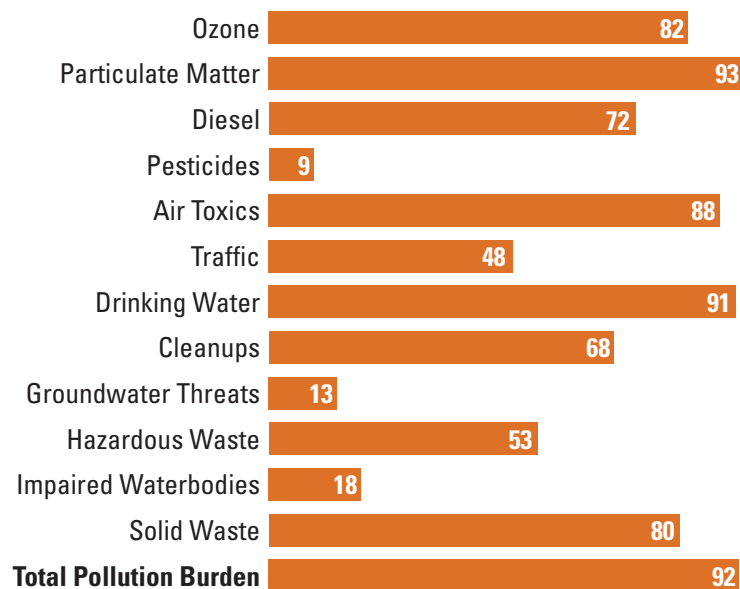
The pollution burden indicators in CalEnviroScreen, which estimate total pollution burden compared to other areas in California, is estimated to be at the 92nd percentile, meaning only 8% of areas in California have a higher cumulative pollution burden.⁷ Additionally, the CalEnviroScreen population characteristics indicators in the Pomona focus area, which represent biological traits, health status, and community characteristics that can result in increased vulnerability to the effects of pollution, fall within the 89th percentile. This data indicates that people in the focus area are not only more likely to live with higher risks and exposures to pollution, but also that there are socioeconomic and health conditions that make them more susceptible to the negative health effects associated with that pollution burden.

6 United States Census Bureau/American FactFinder. 2011–2015 American Community Survey. U.S. Census Bureau’s American Community Survey Office, 2016. factfinder2.census.gov.

7 CalEnviroScreen is a mapping tool developed by CalEPA’s Office of Environmental Health Hazard Assessment that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution’s effects. For more information, visit: oehha.ca.gov/calenviroscreen.

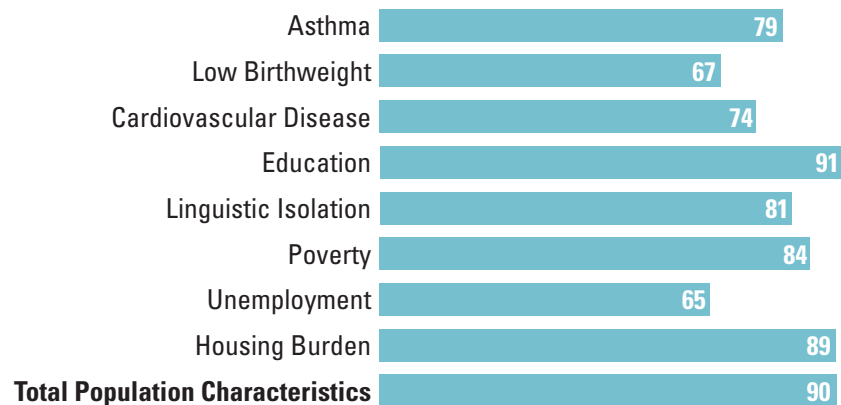
POMONA POLLUTION BURDEN

Indicator Percentiles



POMONA POPULATION CHARACTERISTICS

Indicator Percentiles



Community Partner Profiles

Despite the environmental and economic challenges faced by some of Pomona's residents, the community maintains a strong network of individuals and organizations dedicated to improving neighborhoods for the benefit of all residents. At the beginning of the Pomona Enforcement Initiative, the EJ Task Force collaborated with United Voices of Pomona for Environmental Justice, Clean and Green Pomona, Pomona Hope, and the Pomona Unified School District to find out more about the areas of most concern to residents. In addition to sharing information themselves, the organizations helped the EJ Task Force engage with local residents and concerned stakeholders to bring them into the dialogue throughout each stage of the Initiative. The task force specifically wanted to find out which facilities and industries have been out of compliance or causing nuisances in the community.

United Voices of Pomona for Environmental Justice

United Voices of Pomona for Environmental Justice (UVP) has been in existence since July 2012. The group was formed in response to the decision to allow the construction of a waste transfer station in an area with waste management facilities and other sources of pollution. The main work of the group has been to educate the community and the city government about

pollution burden in south Pomona, and to help imagine and implement policies to protect the community. UVP conducts "toxic tours" for youth and interested community members to raise awareness about the number of waste and recycling centers and to show their visible pollution, dangers and disregard for state and city regulations. The group also advocates for zero waste in the city of Pomona and plans to build a compost farm to demonstrate a grassroots means of managing organic and food waste.

Clean & Green Pomona

In January 2011, ICON (Inland Communities Organizing Network, named Inland Empire Sponsoring Committee at the time) started the "Don't Trash Pomona Campaign" to oppose the development of a waste transfer station in the city. ICON is a broad based organizing network, which included the following member organizations from Pomona in this campaign: St. Madeleine's Catholic Church, First Christian Church of Pomona, First Presbyterian Church of Pomona, Primm AME, Temple Beth Israel, and the Associated Pomona Teachers. During the "Don't Trash Pomona" campaign, many ICON members and their allies were concerned by the seeming pollution and lack of enforcement in the industrial zones of Pomona. Since relationships had formed between these community members organically during the long waste transfer station fight, Clean & Green continued at the end of the campaign in 2012 to work for positive change in Pomona.

Pomona Hope

Since 2003, Pomona Hope has provided a home for at risk youth and their families to cultivate relationships and broaden their minds. Pomona Hope equips students with holistic knowledge to enhance their lives and serve those around them. Through the arts, technology education, daily homework help, physical activity, community garden workshops at Center Street Community Garden, attention to spiritual development, college success programming, leadership training, summer enrichment, internships for both high school and college students, and a support group for parents, the youth in Pomona Hope's programs are building relationships and learning their individual worth.



Pomona community partners and EJ Task Force enforcement staff at the conclusion of the community led bus tour.

Community Consultation and Priorities

A central part of the EJ Task Force's work is to facilitate meaningful opportunities for community residents to participate in the planning and implementation of the enforcement work conducted in their neighborhoods. The EJ Task Force partnered with the community-based organizations profiled above to bring together environmental regulators and members of the community before finalizing the agencies' enforcement and compliance activities.

Environmental regulators listen as residents identify potential areas of illegal storm water contamination from facilities in Pomona.



As part of its community consultation efforts, CalEPA worked closely with the United Voices of Pomona, Clean and Green Pomona, Pomona Hope, and the Pomona Unified School District, to provide neighborhood bus tours for regulators involved in the Initiative. These tours allowed residents to highlight particular areas and facilities of concern to regulators, including concerns regarding heavy truck traffic in residential neighborhoods, fire dangers at facilities near residential neighborhoods, airborne sawdust from a wood recycling facility in residential neighborhoods, and overbearing odors from industrial and recycling facilities.

On the evening of October 26, 2017, CalEPA collaborated with local community partners to host an initial community consultation meeting with the broader public. Members of community organizations, churches, and other residents and students attended the meeting, with representatives from CalEPA, its boards and departments, the U.S. EPA, local partner agencies, and the media. CalEPA gave a short presentation at the meeting, answered questions from members of the community, then invited community members to engage in conversations with regulators at tables focused on different environmental enforcement areas. Several areas of concern were expressed at the meeting:

- Lead contamination in soil on commercial and residential properties
- Illegal dumping throughout residential neighborhoods
- Fires, trash, vectors, and odors from recycling and manufacturing facilities
- Pesticide applications on school grounds and testing of produce served in schools for pesticide residues
- Odors from large industrial facilities

- Large concentration of trucks resulting in traffic, potholes, and pollution
- Concern for high particulate matter (PM) levels from local business activities

State Water Board's Office of Enforcement Senior Water Resource Control Engineer Bryan Elders said, "The bus tour and evening meeting with Pomona residents was probably one of the most rewarding experiences of my water board career. It was truly special to interact directly with the community in such a positive and enriching way."

The information from the bus tour and the evening community mapping meeting provided a wealth of information that helped direct and provide critical context for the EJ Task Force agencies' enforcement work.

Community leader describes odor issues from a nearby facility.



EJ Task Force staff takes input from community partners as they describe impacts of a fire at a local metal recycling facility.



Solid Waste

CalRecycle is the state's solid waste management and recycling agency. CalRecycle works with local tire and solid waste enforcement agencies to ensure compliance with its regulations. In Pomona, the Los Angeles County Department of Public Health (LA Department of Public Health) is the local enforcement agency and the tire enforcement agency.

CalRecycle and the LA Department of Public Health conducted inspections at three types of facilities: solid waste facilities, beverage container recycling facilities, and facilities that generate, haul or utilize used tires. For solid waste facilities, such as landfills, transfer stations, and composting sites, CalRecycle ensures that these businesses meet state standards for environmental protection, public health and safety.

The LA Department of Public Health has the authority, as a local enforcement agency, to inspect, permit, and enforce state solid waste facility requirements. CalRecycle administers and evaluates compliance with the beverage container recycling program and the waste tire enforcement program.

Within the beverage container recycling program, people visit recycling centers to exchange their empty bottles and cans that have a California Redemption Value (CRV) for cash. The recycling centers pay back what the people originally paid as a CRV fee when they purchased the beverages. Inspections are conducted at beverage recycling centers to ensure the centers are not purchasing materials

that have no refund value and to ensure that the centers properly pay for the materials that do have a refund value.

Within the waste tire enforcement program, inspections are conducted to ensure that the reusable and waste tires generated in the state are safely transported, stored, processed for recycling or disposed of in a manner to protect public health and safety and the environment. CalRecycle conducts regular, unannounced inspections of waste tire generators, haulers, and end-use facilities. The LA Department of Public Health carries out CalRecycle's waste tire program in Los Angeles County.

Solid Waste Enforcement Inspection Summary

Solid waste and recycling facilities were a focus area in Pomona due to input from community members and local government that these facilities had historically been a concern for compliance issues. Additionally, according to CalEnviroScreen 3.0, three of the five census tracts in the enforcement focus area are in the top 10 percent of statewide census tracts with high concentrations of solid waste facilities.

CalRecycle and the LA Department of Public Health conducted nine inspections in Pomona. These included four inspections of recycling centers, one inspection of a construction and demolition wood debris facility, three inspections of transfer stations, and one inspection of a waste bin storage site. The LA Department of Public Health determined that three of the four of the recycling centers were in compliance with all regulatory requirements, that two of the three transfer stations were no longer in operation, and that the waste bin storage site was in full compliance with all applicable waste handling and operation regulations. Issues were identified at three facilities:

- Local residents shared a number of concerns regarding a construction and demolition wood debris facility adjacent to homes during a community meeting, including strong odors coming from the site. The Inspectors of the construction and demolition wood debris facility found that it was

operating without a permit, receiving and processing “green waste”, which is landscaping waste like grass clippings or hedge trimmings. Furthermore, the operator had allowed the green waste piles to remain on site long enough to cause the piles to decompose and heat up from bacterial growth, greatly increasing the potential for odors and fires. As a result of the inspection, the site operator was required to apply for a permit and implement an Odor Impact Minimization Plan as part of its request to be allowed to continue receiving green waste. The LA Department of Public Health will monitor the site on a more frequent basis to ensure compliance with the Odor Impact Minimization Plan.

- At another facility, inspectors found that portions of the facility’s odor management system had not been activated on the day of the inspection. The operator activated the full system, and the inspectors verified that it was functioning properly. The LA County Department of Public Health

Green waste pile identified as the source of odors during the inspection, heard about from residents during the bus tour.



also noted that there was an accumulation of debris onsite from the cleaning of route trucks, and requested that the operator keep the area clean. The department will follow up on future inspections to verify that the facility complies with the cleaning and nuisance control requirements. Contact information for the LA County Department of Public Health was distributed to local businesses and residents to report any odor issues in the future.

- One recycling facility was accepting consumer goods for repackaging and destruction. Alongside these consumer goods, the facility was also handling food material for repackaging and destruction. Due to the variety of goods and material handled in the facility, the facility is being considered for a Food Warehouse Permit issued by the LA County Department of Public Health, which means the facility will be required to follow additional requirements to comply with the California Food Sanitation Act.

In a public workshop following the inspections, Dee Hanson-Lugo, registered environmental health specialist for the LA Department of Public Health, encouraged residents to contact the department’s Solid Waste Management Program at 626-430-5540 to report any issues with excessive dust, vehicle exhaust or odors from various types of solid waste, composting, and recycling facilities. She also informed residents that state law requires signs to be posted at the entrance of such facilities to provide the phone numbers for reporting complaints.

Beverage Container Enforcement Inspection Summary

CalRecycle visited five beverage recycling centers in Pomona as a part of the Initiative. Three of the sites inspected in Pomona complied with the beverage container and recycling program, and two were in violation of the program’s requirements. One of the violators was issued a notice of noncompliance, a notice of violation and fine of \$1,000 for purchasing CRV material that has no refund value. The other violator was issued a notice of violation and a \$200

fine for failing to post mandated signs required of all recycling centers. The signs must inform consumers of the proper prices paid for CRV material, the hours of operation, and consumer rights when deductions are taken from the refund value.

Waste Tire Enforcement Inspection Summary

The LA Department of Public Health and CalRecycle conducted 51 waste tire inspections in Pomona during the Initiative. Of the nine sites found to be out of compliance with waste tire regulations, all nine were unable to produce required tire disposal manifests and/or receipts, and seven conducted waste and used tire hauler activities without permission or proper registration. The LA Department of Public Health conducted follow up inspections at each of these facilities and determined that all of the facilities have since come into compliance since their initial inspections.

CalRecycle and LA Department of Public Health staff conduct an inspection at a construction and demolition wood debris facility.



Water

The Los Angeles Regional Water Quality Control Board (Regional Water Board) is responsible for protecting ground and surface water quality in its jurisdiction, which includes enforcement of water quality laws, regulations, and waste discharge requirements. The State Water Resources Control Board (State Water Board) worked closely with the Regional Water Board and the U.S. Environmental Protection Agency (U.S. EPA) to inspect facilities in Pomona to ensure that the operations at those facilities comply with the federal and state law.

Stormwater is a surface water regulated by the nine regional water quality control boards in California. It is water that picks up nutrients and pollutants as it runs off streets, rooftops, and lawns; enters into storm drains; and empties into streams and rivers. In urban and industrial areas, contaminants found in stormwater can include toxic metals such as copper, zinc, and lead, as well as sediment, bacteria, oil, grease, and other pollutants. The accumulation of stormwater pollutants can make local rivers, streams and lakes unsafe for swimming and fishing, and has major impacts on the ecosystems in these waterways.

The EJ Task Force focused its water-related inspections in Pomona

on industrial facilities that discharge pollutants to stormwater, and on monitoring their compliance with the state-issued Stormwater Industrial General Permits, which are issued to ensure businesses compliance with stormwater pollution management regulations. In preparation for the Initiative, the State Water Board and Regional Water Board analyzed compliance in several areas: drinking water systems, wastewater and collection systems, sanitary sewer overflows, cleanup sites, municipal stormwater, impaired water bodies, and operator certification. Based on this analysis and community input, industrial stormwater inspections were identified as a primary concern.

Burned recycled material. The material appears to be paper, but there were pieces of plastic imbedded in the stockpile. The material is stored outdoors and poses a threat to water quality. The photographs were taken at a "non-filer" facility.



Staff from the State Water Board, the Regional Water Board, and the U.S. EPA, conducted 39 stormwater management compliance inspections. The facilities inspected included auto dismantlers, furniture and plastic manufactures, recycling facilities, trucking companies, and electroplating and anodizing facilities. Twenty-eight of these facilities were in violation of provisions of the stormwater management regulations. The violations observed ranged from non-enrollment in the Stormwater Industrial General Permits to unauthorized non-stormwater discharges. Examples of the violations observed at some of the inspected facilities include:

- Exposed containers containing asphalt emulsions stored near a creek without overhead coverage and secondary containment
- Outdoor storage of scrap metal and trash without best management practices (BMPs) in place
- Outdoor storage of unknown liquids and trash without BMPs in place
- Debris and cardboard boxes stored outdoors without secondary containment to prevent the debris from washing offsite

The enforcement actions taken by regulators on the EJ Task Force in response to these violations ranged from issuing verbal warnings to written notices of violations to the operators. Regulators also returned for a second inspection to confirm and document that noted violations had been remedied. Those facilities that received written notices of violation will be subject to progressive enforcement, meaning future violations may escalate to formal enforcement actions. Meaning future violations may escalate to monetary penalties and cleanup orders, to cease and desist orders requiring a full shutdown.

Identifying Unpermitted Facilities

Identifying unpermitted facilities, or non filers, and getting them to register for coverage under the *Stormwater Program's Industrial General Permit* is a priority for the Regional Water Board. There are over 3,400 facilities monitored by the Regional Water Board that are currently covered by the general permit. The permit ensures that these businesses properly manage contaminants and waste so they don't wash off site down storm drains during rain events.

Facilities that are not registered can be large contributors to pollution of California's waterways because they are not inspected by the Regional Water Board and most likely do not have appropriate best management practices (BMPs) in place that are necessary to protect human health and the environment. These non filer operators also do not pay fees associated with the program, which provide them with an unfair business advantage over their competitors who do comply with the law. These non filer operators are also often located in communities that have other significant issues related to environmental justice.

In part due to community input during the bus tour, the Regional Water Board identified and issued notices of violation to nine facilities that did not have proper permits for stormwater management and issued notices of violations. Seven took corrective action and submitted permit applications, and will now be monitored by the Regional Water Board to ensure compliance moving forward. Two facilities have not enrolled up to the point of the publication of this report, and facilities that fail to enroll under the general permit are subject to progressive enforcement, including issuance of mandatory penalties by the Regional Board.

The Regional Water Board also shared tips with community groups on how to help identify potential non filers, and plans to continue to work with community members and community groups on their ongoing concerns.

Luz Vargas, an inspector for the Regional Water Board, explained the value of the Pomona Enforcement Initiative for addressing storm water issues in Pomona: "The CalEPA Initiatives have given us the opportunity to address non compliance with the general permits in impacted disadvantaged and environmental justice communities in a targeted, efficient fashion, and most importantly have provided the opportunity to interact with community members to educate them about our role as a regulatory agency, listen to their concerns, and ask for their help in identifying non compliance and non filers in their neighborhoods.

Air

The California Air Resources Board (CARB) regulates mobile sources of air pollution, including heavy-duty vehicles and ocean-going vessels, that emit greenhouse gasses (GHGs), which contribute to climate change. CARB also certifies new vehicles, engines, and parts to reduce the public's exposure to localized air pollution impacts. California's 35 local air districts regulate air pollution from stationary sources, such as refineries, metal recycling facilities, and other industrial facilities. CARB provides oversight of the air districts. CARB therefore focuses on collaborating with the local air districts to ensure local enforcement programs are effective.

CARB Inspection Activity in Pomona

Diesel engines emit exhaust containing solid material known as particulate matter. Exposure to particulate matter is associated with increased risk of respiratory illness, heart disease, cancer, and premature death. In response to community concerns related to heavy-duty diesel truck traffic, idling and odors, CARB inspected 300 heavy-duty diesel

trucks at 30 different locations throughout Pomona. A focus area for these inspections was Reservoir Street, where residents expressed concern about heavy diesel traffic, truck idling and diesel odors. From these inspections, CARB issued 68 citations – over half of which were on Reservoir Street. These citations itemized various violations, including illegal idling, inadequate emission controls in the vehicles, illegal tampering with emissions controls, and violations of mobile source labeling requirements. The table below summarizes the truck inspections and the related citations.

In addition, CARB's Consumer Products Enforcement Program staff conducted inspections at four facilities to determine compliance with CARB's composite wood regulation. The regulation is designed to ensure a variety of composite wood products comply with formaldehyde emission standards. The wood products include hardwood plywood, particleboard, medium density fiberboard, thin medium density fiberboard, and finished goods (e.g. floorings, cabinets and furniture) made with composite wood products. CARB staff concluded the facilities were in compliance with the regulation.

TABLE 1: HEAVY DUTY DIESEL TRUCK INSPECTION RESULTS

Date of Inspections	November 6-9, 2017	November 13-16, 2017	November 20-22, 2017	Total Inspections & Citations
Total Inspections	109	76	115	300
Total Citations	27	22	19	68
Statewide Truck & Bus Citations	22	16	13	51
Transport Refrigeration Unit Citations	1	3	1	5
Tampering Citations	1	1	0	2
Emission Control Label Citations	2	1	1	4
Idling Citations	1	1	3	5

South Coast Air Quality Management District Inspection Summary

The South Coast Air Quality Management District (SCAQMD) regulates stationary sources of air pollution for all of Orange County and the urban populations of Los Angeles, Riverside, and San Bernardino counties. SCAQMD inspects facilities to ensure compliance with air quality regulations and responds to air quality complaints from the public.

SCAQMD, in cooperation with CARB and other regulatory agencies, inspected 10 facilities in the city of Pomona. One facility that operates under CARB's Portable Equipment Registration Program was issued a notice of violation. The SCAQMD determined it was operating without a valid permit because the engines no longer met the definition of "portable" because the engine had not been moved off of the facility in over 12 months, thus requiring the facility to apply for a local Air District permit to operate it further. The case was still pending as of publication of this report.

CARB staff inspecting heavy duty diesel truck.



Toxics

The Department of Toxic Substances Control (DTSC) enforces laws that apply to the generation, handling, treatment, and disposal of hazardous waste in California. DTSC regularly inspects hazardous waste treatment and storage facilities, used oil recycling handlers, large quantity hazardous waste generators, and electronic waste facilities. In Pomona, and other parts of Los Angeles, the Los Angeles County Fire Department (LACoFD) is the local Certified Unified Program Agency (CUPA), which means it is responsible for enforcing hazardous waste laws and regulations at a local level. DTSC and LACoFD worked together to prioritize and conduct hazardous waste inspections, and educate the public and businesses on proper handling of hazardous waste.

Toxic waste management facilities were a focus area during the Initiative, due to community concerns over the high concentration of such facilities near residences. According to CalEnviroScreen 3.0, the EJ Task Force's enforcement and compliance target area falls in the 88th percentile for the number of facilities with a potential for toxic releases, meaning that only 12 percent of other areas in California have more facilities that have potential for toxic releases. This is a concern because facilities that manage hazardous waste and chemicals may have unpermitted releases from poor management practices or accidents that can pose a threat to the health and safety

of residents who come into contact with unpermitted releases or who regularly breathe the air near these sites.

DTSC's goal for the Pomona Enforcement Initiative was to assess and promote compliance with hazardous waste laws and regulations in southwestern Pomona. The facility inspections were prioritized based on the type of industry, inspection history (or lack of inspection history), and input from the community and local government. DTSC inspected 35 facilities, including two big-box stores in the Pomona area. In 13 of those inspections, inspectors observed significant to moderate violations. Most of the other facilities had multiple minor violations. All of the facilities have returned to compliance with hazardous waste requirements. DTSC and LACoFD continue to work with the two in violation to achieve full compliance with hazardous waste regulations.

Examples of the violations detected during the Initiative are described below based on the facility type:

- **Hazardous Waste Generators** – Failure to properly label hazardous waste containers; failure to find out if a waste is hazardous; failure to maintain accurate and current information in the California Environmental Reporting System; failure to close hazardous waste containers; failure to dispose of hazardous waste within 180 days; and failure to minimize the release of hazardous waste to the ground.
- **Hazardous Waste Transporters** – Treatment of hazardous waste without a permit; unauthorized storage of hazardous waste on-site for longer than 10 days; failure to properly label hazardous waste containers; failure to properly submit hazardous waste manifests to DTSC.
- **Electronic/Universal Waste Facilities** – Unauthorized storage of electronic/universal waste over the allowed time limit; failure to provide required record keeping documentation at the time of the inspection.
- **Treated Wood Waste (TWW)** – Failure to recycle and/or reuse TWW in accordance with regulations; failure to provide TWW training to all employees handling or

reasonably expected to contact TWW; failure to properly label the containerized TWW accumulation area.

Additionally, DTSC's Office of Criminal Investigations (OCI) inspected eight facilities in cooperation with the California Department of Motor Vehicles as part of the Auto Dismantler Task Force. (See Auto Dismantling, below.) One of these inspections resulted in an ongoing criminal investigation into improper handling of hazardous waste at an auto dismantling facility. OCI also inspected two big box stores to determine if there was lead in jewelry or toxics in packaging. OCI found no violations at the big box stores at the time of the inspections.

Compliance Assistance Efforts

DTSC and LACoFD conducted outreach and provided educational information to the local communities and business owners to assist with compliance with hazardous waste laws and regulations.

In addition to conducting inspections, one major component of DTSC and LACoFD inspections is to deliver educational information to business owners and operators on all aspects of complying with hazardous waste laws. Inspectors informed the business owners and operators of applicable hazardous waste requirements, provided guidance documents, and web addresses to DTSC's website for more information. They also provided their contact information, for any questions in the future.

In addition, DTSC and the LACoFD held a hazardous waste generator training provided by the California Compliance School (CCS) on June 16, 2018. CCS, a partnership between DTSC and California Community Colleges, provides an overview of hazardous waste classification, on-site management requirements, transportation requirements, and emergency preparedness. The free, four-hour class was offered to 30 representatives from Pomona businesses that handle hazardous waste. Presenters issued personal invitations, with an emphasis on attendance by facilities that were found to be out of compliance with hazardous waste management requirements during the inspections.

Metal Treating and Plating Shops

LACoFD conducted hazardous waste generator inspections at two facilities that generate metal-related waste. Prior to the Initiative inspections, one metal plating facility had settled a civil enforcement order, including a \$4,000 penalty for violations pertaining to failure to minimize



a release of hazardous waste and failure to properly respond to a leak/spill. In November of 2017, LACoFD re inspected the facility as a part of the Pomona Enforcement Initiative and found six violations: two minor and four moderate. These violations included two leaking hazardous waste tanks and failure to properly adjust for inflation the estimate for the cost of safely closing the facility. The business ultimately complied with all of the corrective actions for the violations, which included replacing the faulty tank with a new one.

In November of 2017, LACoFD also inspected a metal treating facility as part of the Initiative and observed what appeared to be metal fines (dusts, grounds, and shavings) on the ground. LACoFD cited the facility for three hazardous waste violations, including failure to make a hazardous waste determination of fines on the ground; failure to implement the Spill Prevention, Control, and Countermeasure Plan; and failure to keep an accurate map of the site. Further, soil samples near where the fines were located exceeded the California hazardous waste levels for copper, nickel, and total chromium. LACoFD issued a civil enforcement order to the facility based on its failure to minimize the release of hazardous waste to the ground at the facility.

In January 2018, LACoFD returned again to the facility to investigate the potential release of heavy metals onto the surface soils outside the facility boundaries. All samples collected outside the property boundary were below the regulatory threshold for metals, so the business was not subjected to more stringent enforcement actions. The facility was issued a \$5,000 penalty, and as a result of the enforcement order, the facility was required to spend over \$50,000 to clean up the heavy metals within the property and implement a plan to prevent future releases of hazardous waste. Both of these facilities also received referrals to, and are under investigation by, the Occupational Safety and Health Administration regarding potential workplace safety violations.

Auto Dismantling

The state of California is actively confronting the problem of unlicensed vehicle dismantling. Governor Edmund G. Brown Jr. signed Assembly Bill 1858 (AB 1858) in September 2016, requiring the Department of Motor Vehicles (DMV) to collaborate with representatives from six state agencies to coordinate enforcement and compliance activity related to unlicensed and unregulated automobile dismantling, including tax evasion, adverse environmental impacts, and public health impacts. The collaborating agencies are: the California Department of Tax and Fee Administration (CDTFA), CalEPA, DTSC, SWRBC, CARB, and CalRecycle. The DMV established the Vehicle Dismantler Industry Strike Team (VDIST), tasked with identifying unlicensed vehicle dismantlers and imposing appropriate sanctions on anyone in violation of the law.

Unlicensed auto dismantling was a specific focus area of the Pomona Enforcement Initiative based on concerns expressed by community members and local government over the number of areas in residential communities where potential illegal auto dismantling activity has been taking place. It is unlawful for any person to act as an automobile dismantler without having an established place of business, meeting specified requirements, and having a current, valid license or temporary permit issued by the DMV.

Unlicensed vehicle dismantling often occurs in private garages, empty lots, industrial areas, residential neighborhoods, and near parks, schools, and vulnerable waterways, such as storm drains. Individuals who dismantle vehicles without proper permits typically do not properly dispose of hazardous chemicals such as anti-freeze, engine oil and transmission and radiator fluids. This hazardous waste ends up contaminating soil, rivers and streams, and can infiltrate groundwater and become a threat to the public's drinking water. Additionally, businesses operating without proper licensing gain an unfair advantage over their competitors who pay for permits and implement required environmental and safety practices.

To respond to concerns about unlawful auto dismantling in Pomona, the DMV coordinated over 20 inspections in Pomona. DMV investigators were joined by inspectors from CARB, Cal Recycle, LA County Environmental Health, DTSC's Office of Criminal Investigations, the Pomona Police Department and the Los Angeles

Poor hazardous waste management at auto dismantling operation in Pomona.



County Taskforce for Regional Auto Theft Prevention (TRAP).

Eleven citations and two arrests resulted from the Initiative inspections:

- Four misdemeanor citations for unlicensed dismantling activities
- Two misdemeanor citations for unlicensed auto repair activities
- Three misdemeanor citations, for both unlicensed dismantling and unlicensed auto repair activities
- One misdemeanor citation for unlicensed auto dealing, unlicensed auto repair and unlicensed dismantling at a single facility
- One citation for failure to maintain a tire manifest
- One arrest on charges of disassembling stolen vehicles for parts
- One arrest for failing to appear in court on an unrelated crime

Lastly, one stolen vehicle was found and impounded during the inspections.

Randy Vera, area commander for the DMV's strike team, explained the value of the Pomona Enforcement Initiative's multi-agency approach: "Working with the Pomona Environmental Justice Task Force was an excellent experience for the Vehicle Dismantler Industry Strike Team. We collaborated with multiple agencies during inspections. This gave VDIST an understanding of what each agency looks for when they are in the field, thereby, adding to our expertise when we inspect dismantler businesses on our own. Our future referrals will be more comprehensive and relevant."

Multiple locations during the inspections warrant further investigation by DTSC and the SCAQMD, including further investigation by DTSC's Office of Criminal Investigations for improper handling of hazardous waste related to auto dismantling.



Pesticides

The California Department of Pesticide Regulation's (DPR) mission is to protect human health and the environment by regulating pesticide sales and use, and by fostering reduced-risk pest management. DPR works closely with county agricultural commissioners, who have the primary responsibility to enforce pesticide use laws. In Pomona, staff at the Los Angeles County Agricultural Commissioner's office (LA CAC) conducted inspections to ensure compliance with pesticide use requirements, investigate pesticide incidents, and take administrative actions against violators.

Discarded cilantro that tested positive for illegal pesticide residues.



DPR's Enforcement Branch administers the state's Pesticide Residue Monitoring Program, which helps keep produce with illegal pesticide residues out of the California marketplace. Under this program, DPR collects produce samples from throughout the channels of trade, including wholesale and retail outlets, distribution centers and farmers markets throughout California. DPR analyzes the samples to detect any that carry pesticide residues over the tolerance levels permitted by law and any that carry residues of pesticides for which there are no tolerances established. As part of the 2017 Pomona Enforcement Initiative, staff at DPR's Southern Regional Office in Anaheim focused their monitoring on local produce vendors and on 29 target commodities frequently consumed by the different ethnic demographics in Pomona:

TABLE 2: PRODUCE TESTED FOR PESTICIDE RESIDUES DURING INSPECTIONS

Tomato	Lime	Apple	Tomatillo	Cilantro
Chili Peppers	Orange	Cabbage	Banana	Chayote
Bell Peppers	Avocado	Mango	Potato	Zucchini
Lettuce	Cactus Pear	Cactus Pad	Guava	Green Onion
Radish	Corn	Cucumbers	Tangerine	Nectarine
Eggplant	Ginger	Garlic	Bok Choy	

DPR staff collected samples of produce from 17 retail stores located in Pomona. Of the 112 samples collected, six (5.4 percent) were found to contain illegal pesticide residues. DPR staff contacted and issued warning letters to businesses that sold, packed, or shipped produce carrying illegal pesticide residues. For each sample identified as carrying illegal pesticide residue, DPR investigated the source of the contaminated produce, and removed remaining produce from the contaminated lot from sale. Of the six illegal pesticide residue investigations, three commodities were imported and three were grown in California. For one investigation involving illegal pesticide residues on cilantro, a California grower voluntarily disked a fourth of an acre where 200 cases of cilantro had been harvested.

In addition to conducting inspections, DPR staff provided inspected facilities with brochures about the California Pesticide Residue Monitoring Program.

Another section of DPR's Enforcement Branch is the Product Compliance Unit (PCU). It performs inspections and monitors pesticide products within the channels of trade to determine if they are properly registered and labeled, thus providing consumer protection and marketplace equity. The PCU conducts two types of inspections: Marketplace Surveillance Inspections (MSI) where pesticides are sold and distributed, and Produce Establishment Inspections where pesticides are manufactured, processed and packaged or re-packaged.

In Pomona, the PCU identified and inspected two pesticide-producing facilities. One was in compliance while another had possible labeling violations. DPR forwarded the inspection report to the U.S. EPA for a final determination of the violations, as required under federal law. PCU also collected five pesticide product samples for analysis of ingredients. The samples included antimicrobial and insecticide products. All five samples passed the analysis.

During its marketplace inspections at 10 retail stores, which included four discount stores, DPR observed two product registration violations: Terrific Disinfectant Cleaner is registered with U.S. EPA, but not with DPR; Mold Kill is not registered with U.S. EPA or DPR. One misbranded product was also found. The Ozium Air Sanitizer label did not match the label registered with DPR. Both of these products were ordered to be removed from sale.

DPR inspectors provided all inspected facilities with information on what constitutes a pesticide, along with a Small Business Resources Information Sheet produced by the U.S. EPA. The sheet provides resources for small business that may be faced with environmental issues.

Los Angeles County Agricultural Commissioner Inspections

As part of its authority over pesticide use, the Los Angeles County Agricultural Commissioner (LA CAC) staff inspect fumigations performed on structures and commodities. Lethal gases are applied to structures to eliminate termites and other wood-destroying organisms, and to commodities for export to eliminate stored-product-pests. The LA CAC staff conducted 27 structural fumigation inspections and nine agricultural-use inspections to ensure compliance with label requirements and California regulations. No violations were observed.

Supporting Community Revitalization Efforts

To create long-term meaningful change, the EJ Task Force not only focused on compliance with environmental laws by industrial facilities, but also on supporting local capacity building efforts of environmental justice organizations and providing educational opportunities for young people who will be the next generation of environmental leaders in Pomona.

As part of that effort, the EJ Task Force worked with the United Voices of Pomona, Clean and Green Pomona, and Pomona Hope, to provide opportunities for youth engagement and education concerning environmental justice issues. Staff from CalRecycle, CalEPA, and CARB also provided technical assistance and support on local revitalization efforts and information on a number of funding and other opportunities provided by the state.

Youth & Teacher Engagement in Pomona

Young people and educators play an important role in increasing knowledge about important topics like environmental health, recycling, and pollution prevention. The Initiative included a concerted effort to educate Pomona youth and teachers to support the broader goals of the EJ Task Force.

Pomona students and teachers were provided information about local environmental challenges and current enforcement efforts. They were also given opportunities to meet with state and local government staff.

Led by CalRecycle, staff from various agencies facilitated weekly leadership workshops with high school students participating in *an after school program with Pomona Hope*. During the workshops, regulators discussed local issues related to pollution and equity, shared the roles of local and state government agencies in enforcing environmental regulations, and explored the different ways students could participate. They also used CalEnviroScreen to identify local sources of pollution and the factors that make Pomona especially vulnerable to pollution's effects.

Students also participated in activities to gain insight into the role of local and state government and learned about different ways to participate in civic affairs. For example, youth and teacher engagement efforts throughout the Pomona Enforcement Initiative led to active involvement of students and educators in both the community consultation and "report back" meetings where

Providing Technical Assistance and Education to Support Existing Capacity Building Efforts

The EJ Task Force identified current environmental efforts led by local community partners, and worked to support those efforts by sharing technical assistance, resources, and information. For example, five CalRecycle staff members gave a comprehensive and tailored presentation on zero waste for United Voices of Pomona, which has been advocating for local zero waste efforts. This presentation provided extensive technical information about waste streams in and out of Pomona, as well as case studies of other types of zero waste efforts that have been successful throughout California.

In meetings with Clean and Green, CARB staff described grant programs in the California Climate Investments program that may help to expand on the organizations current Re LEAF grant, provided to local schools for tree planting. In addition, CalEPA staff conducted a presentation on the agency's Environmental Justice Small Grants Program.

Lisa Engdahl from Clean & Green, speaking about the presentations, "I believe that we will access grants and consider creative ideas for new projects that we would not have accessed or considered without our interaction with CARB and CalEPA.

they offered their input on local issues related to air, water, toxic substances, pesticides, and waste and recycling. Their input led DPR to ensure pesticide enforcement efforts focused on school lunch vendors and led the State Water Board to share information about a new state program that provides free tests to sample for lead in drinking water systems and fixtures in K-12 schools.

The EJ Task Force staff also collaborated with the community organization *United Voices of Pomona for Environmental Justice* to host a “toxic tour” designed specifically for students and teachers. A toxic tour is an educational community-led tour to raise awareness of the problems and challenges in areas where people live adjacent to multiple sources of pollution. An educational tour of this kind can be – and frequently is – an impetus for action to address such issues. After participating in the toxic tour, one teacher, Mr. Ion Puschila from Garey High School, tasked students in his Advanced Placement macroeconomics class with a project exploring the economic costs of pollution. Staff from CalRecycle and CARB gave the students a presentation on environmental justice and the relationship of pollution to both equity and the economy.

To encourage broader environmental literacy, task force members distributed information about the curriculum offered by the California Education and the Environment Initiative (*EEI*). EEI offers free, K-12 curriculum designed to increase environmental literacy through lessons and activities designed to help educators teach “science and history-social science” within the context of the environment..

Finally, in an effort to support current work of students and teachers in Pomona, CalRecycle staff collaborated with both students and educators at Kingsley Elementary to showcase student projects on the impacts of plastic pollution at the annual meeting of the Association of State and Territorial Solid Waste Management Officials (ASTSWMO). The third-graders presented their work on plastic pollution to a room of around 250 solid waste and recycling government officials from across the nation and U.S. territories. The students addressed the Great Pacific Garbage Patch and dead zones in the Gulf of Mexico. The also shared videos they created to

encourage fellow students to purchase reusable water bottles as way to reduce plastic and raise funds for the school.

“It was priceless to have the opportunity for our students to present their work. As third-graders, our kids have an awareness of global problems. We believe it’s crucial for our youth to have such an awareness so that they may create change for the better.” Ms. Fischer and Ms. Villagran, Kinglsey Elementary.

“I thought the experience was fun and nice to do to tell other people what is going on, on the planet,” said Darian, one of the students who presented.

Another student, Eneyda, explained, “Before we went, I was kind of nervous, but once I got in there I was excited. When I was speaking in front of the audience, it brought me out of my shell and I had fun.”

In an effort to support their fundraising efforts, ASTSWMO, the solid waste association, provided funding for reusable water bottles for students at the school.

Students presenting their projects to ATSWMO officials.



Conclusion

At the conclusion of the Pomona Enforcement Initiative, the EJ Task Force held public meetings to share the results with local leaders, city government officials, students, and concerned residents. The EJ Task Force shared information about ongoing work to address problems identified during the initiative. The EJ Task Force also provided resources and contact information for residents needing assistance with recurrent or new environmental problems in their neighborhoods. The meetings also included an opportunity for community residents to provide feedback to environmental regulators on their work and, to ask the regulators questions.

Residents hear about results from inspections related to air, water, solid waste, hazardous waste, pesticides and produce, and auto dismantling enforcement and compliance efforts.



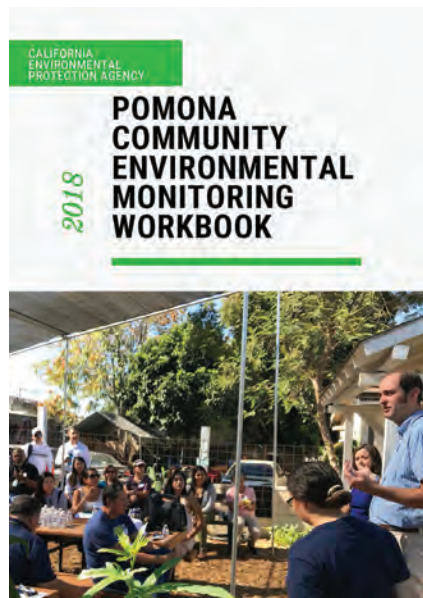
The Pomona Initiative resulted in a number of key takeaways:

- **Neighborhood residents, and community members play a critical role in identifying environmental problems that require attention and response from local and state government agencies** – There was general consensus among inspectors and others on the EJ Task Force that the community consultation meetings and the bus tour provided them with valuable information about the places and issues of concern in southeast Pomona. They also found that the facilities and areas that Pomona’s residents and organizations identified as problem areas were often the areas where inspectors found the most compliance issues and potential environmental and health risks. While city staff knew about most of these facilities’ compliance issues, the process of bringing in agencies and pointing out specific problems that needed to be addressed led to significant progress at many of these facilities. Progress included requiring businesses to get additional permits in order to be regulated adequately, collecting samples that showed illegal contamination from poor management practices, and distribution of information on how to file complaints about continuing environmental issues.
- **There is a need for better communication and follow-up on complaints made to state and local government agencies through complaint systems** – One challenge identified early in this initiative was that many community members did not have confidence in the complaint systems provided by state and local regulatory agencies. Residents expressed surprise when they were told about the low number of complaints from Pomona that have been filed with these agencies. In developing the community enforcement training and compiling a booklet of the agencies’ complaint system information as part of the Initiative, it became clear that the information available on regulatory agencies’ websites is not user-friendly. Additionally, many government entities tasked with responding to complaints do not follow up in a timely

way with residents who file reports of illegal activity. The EJ Task Force is encouraging each participating agency to review its public outreach materials and tips for identifying violations, and to ensure follow through on complaints to restore the public's trust in our complaint systems.

- **There is a continued need for community engagement and transparency** – It was clear from our engagement with the city and community that a lot of progress has been made on assessing and addressing compliance issues with recycling facilities in Pomona. During our initial community dialogue, community members reported that results from inspections coordinated by the City of some of the problematic facilities had not been shared with the public. While the City staff expressed the difficulty at addressing many of the community concerns with limited staff, the Initiative revealed the benefit of transparency in building trust with local organizations and concerned residents.

- **There is a need for stormwater permit coordination with the City** – The City of Pomona could play a greater role in getting businesses to register for coverage under the Stormwater Industrial General Permit. The EJ Task Force identified that the city could help by using its business license office



Workbook that was created to assist Pomona residents in identifying, documenting, and reporting environmental violations in or near their neighborhoods.

to share information about the stormwater permit. Identifying non-filers and obtaining their enrollment is a priority for the Regional Water Board, which oversees the registrations of the more than 3,400 facilities that are currently enrolled statewide. Inspections during the initiative revealed that there are also facilities in Pomona that should be enrolled and are not. These facilities increase the risk of unregulated storm water pollutants contaminating surface waters and groundwater.

The Initiative concluded with a training to help residents identify, document, and report violations. The purpose of the training was to strongly encourage residents to stay vigilant in monitoring for illegal practices, and regulatory agencies must also foster relationships and trust with these residents through following up on environmental problems identified by the community. The EJ Task Force agencies that participated in the Pomona Enforcement Initiative will also maintain a commitment to monitor the facilities where compliance issues were identified and build on the connections developed with Pomona's residents, citizen groups and local government officials to further improve the environment in Pomona for all of its residents. Long-term progress toward building a culture that values compliance depends on Pomona residents, city, state, and federal government continuing to prioritize these issues and work together to create sustainable change.



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