EPA

Frontier Fertilizer Superfund Site

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY • REGION 9 • 75 HAWTHORNE ST., SAN FRANCISCO, CA • JUNE 2006

EPA Proposes Groundwater and Soil Remedies and Requests Public Comment

The United States Environmental Protection Agency (EPA) is requesting public comment on this Proposed Plan (Plan) to address the groundwater and soil contamination at the Frontier Fertilizer Superfund Site (Site) in Davis, California (see map, this page). The 30-day comment period is from June 12, 2006 to July 12, 2006 and a public meeting is scheduled for June 22, 2006. To learn more about how to comment, see the box below. Terms that appear in bold are defined in the glossary on page 11.

Once the comment period ends, EPA will review the comments and formalize its cleanup decision in a document called a Record of Decision (ROD). The ROD will also include a responsiveness summary that will address comments received. A notice will be published in the local newspaper when the signed ROD is available at the Site's information repositories (see page 11). The remedy selected could differ from what is outlined here based on public comment.

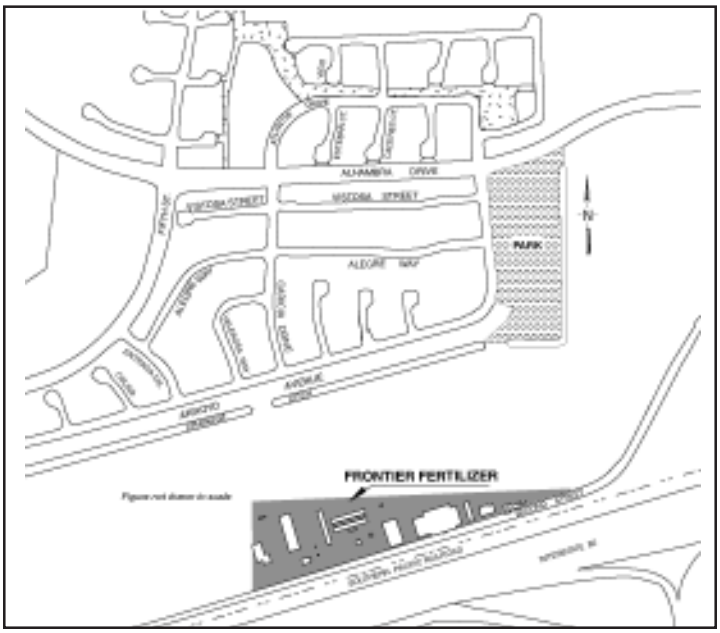

Figure 1: Frontier Fertilizer Superfund Site, Davis, California

How You Can Comment

A **30-day public comment period** on this proposed plan begins **June 12, 2006** and closes **July 12, 2006**. The public is invited to the following public meeting where EPA will present the proposed plan, answer questions about the plan and record public comments.

Come to a Public Meeting

Date: **June 22, 2006**
Time: **7:00 p.m. to 9:00 p.m.**
Place: **Public Works Training Room**
1717 Fifth Street
City of Davis, CA 95616

The public may send their comments by fax, email or in writing, postmarked **no later than July 12, 2006**, to:

Bonnie Arthur (SFD-8-2)
EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105
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Fax: (415) 947-3520

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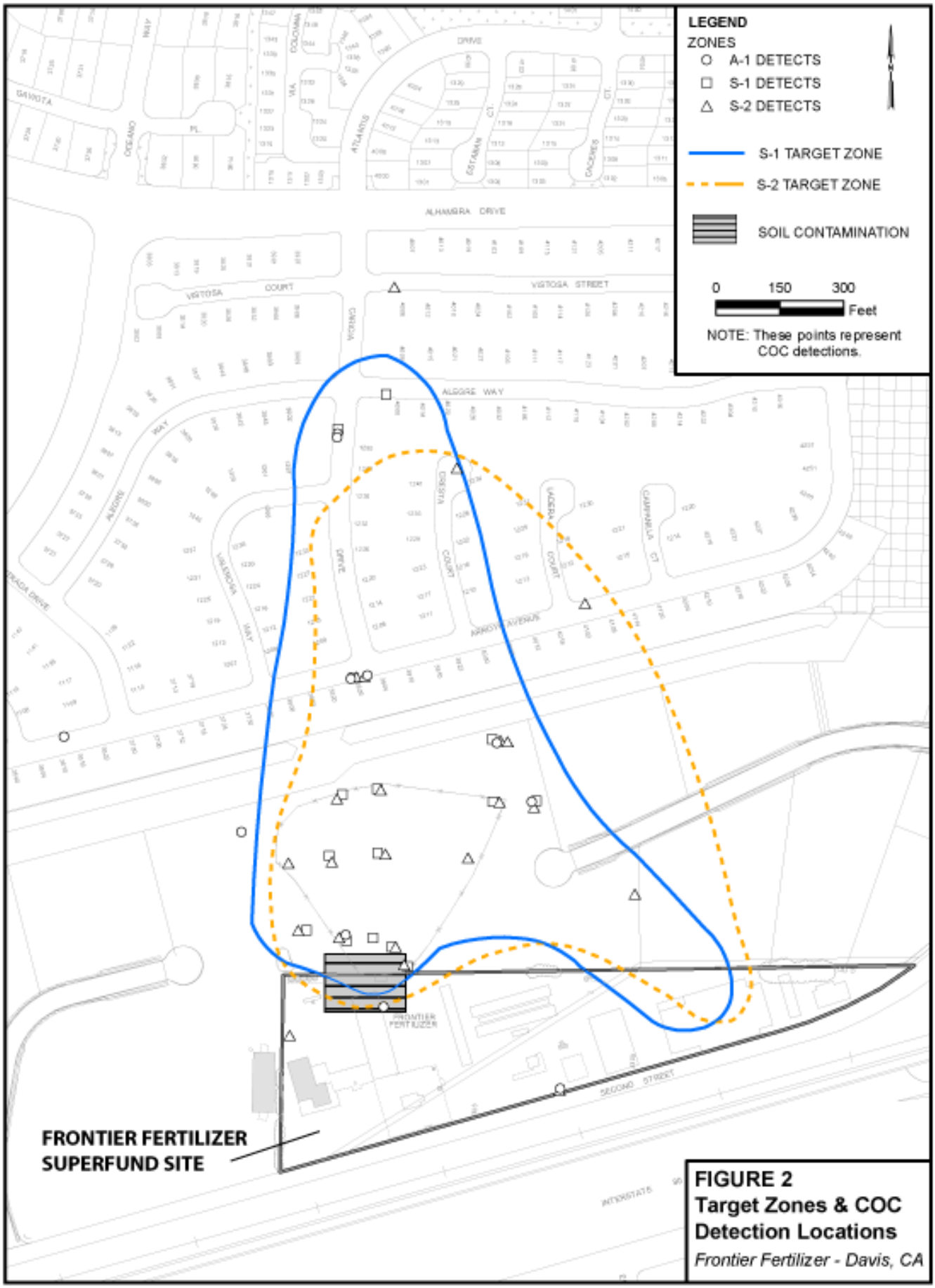

FIGURE 2
Target Zones & COC Detection Locations
Frontier Fertilizer - Davis, CA

The purpose of the Proposed Plan is to inform the community about the history of the Site and environmental findings, describe the cleanup alternatives evaluated and solicit public comments to help EPA make a final cleanup decision. The EPA, as the lead agency for the Site, has prepared this Proposed Plan in consultation with the California EPA, Department of Toxic Substances Control and the California Regional Water Quality Control Board. The Plan summarizes the evaluation process and identifies cleanup alternatives considered including EPA's preferred cleanup remedy. If you would like more detailed information about this evaluation, the Remedial Investigation and Feasibility Study (RI/FS) Reports and other documents can be reviewed in the Administrative Record (AR). The AR and other Site documents are available for public review at the Site's information repositories.

Site Characteristics

Between 1994 and 2001, EPA completed soil, groundwater, and soil gas sampling to understand the extent of contamination. These studies are summarized in the "Interim Remedial Investigation Report (1997)", "Supplemental Remedial Investigation Report (1999)"and "Supplemental Remedial Investigation #2 Report (2001)". These reports are available in the information repositories and on EPA's website: www.epa.gov/region9/waste/sfund/superfundsites.html

Chemicals of Concern (COCs)

Contaminated groundwater has moved north of the Site to beneath the Mace Ranch Park Subdivision residential area. Figure 2 shows the soil source area and the approximate boundary of the groundwater contamination that the current pump and treat system is attempting to capture. EPA's primary objective is to protect public health and the environment from contaminants found at the Frontier Fertilizer Superfund Site. The COCs that present the most risks in the soil and groundwater at the Site are the pesticides: EDB (1,2-dibromoethane) and DBCP (1,2-dibromo-3-chloropropane), DCP (1,2-dichloropropane), and TCP (1,2, 3-trichloropropane). Carbon tetrachloride also was used as a grain fumigant, and the source appears to be separate from the pesticides. These compounds are shown to cause cancer in laboratory animal studies and EDB and DBCP also are shown to cause reproductive problems. The COCs are contaminants released to the environment by former Site activities and identified in the Final Baseline Risk Assessment Report (1999). Although the pesticides were disposed of over 20 years ago, significant amounts of soil contamination are still present at the Site, down to 90 feet below ground surface. The largest percentage of soil contamination is concentrated between 20-40 feet below ground surface.

Nitrate is not considered a primary COC because it is less toxic than the other COCs, however, it is included in the remedial alternatives discussion because it is found in many Site monitoring wells and the possible cleanup options for it are different from the COCs. Nitrates are not treated by the present onsite pump and treat system.

Site History and Background

The Frontier Fertilizer Superfund Site includes a triangular shaped eight-acre parcel that is recorded as Pine Tree Properties and a seven-acre parcel known as the "Remainder Parcel." The Site is in an area zoned for light industrial/business park at the eastern edge of Davis. The parcels contain contaminated soil and a groundwater plume that extends north from the parcel. The underground plume extends to adjacent property and continues to an area of residential housing (see figure 2). The nearest residence is approximately 600 feet north of the property boundary. The chemicals of concern (COCs) detected in soil samples consist primarily of pesticides while the COCs in the groundwater are pesticides and carbon tetrachloride.

The Site was first developed in the 1950s as an area to store agricultural equipment. The Barber and Rowland Company operated a pesticide and fertilizer distribution facility on the parcel from 1972 to 1982, and the Frontier Fertilizer Company continued operations from 1982 to 1987. Both companies handled chemicals on the western four acres of the parcel. Chemical related operations consisted of storing, mixing, and loading pesticides and fertilizers into mobile tanks for farm application. Tanks and containers previously used were rinsed prior to re-use . It appears from the quantity of pesticides found that waste chemicals, mainly pesticides and fertilizer tank or container rinsate, were discharged into one or more disposal basins. Pesticide handling was discontinued during the 1980s when Yolo County discovered high levels of pesticides in the unlined disposal basin.

The first groundwater extraction and treatment system was installed in 1993 by DTSC and the Frontier Fertilizer Site was placed on the Superfund National Priorities List in 1994. In 1995 EPA significantly upgraded the system to treat more groundwater, commonly referred to as a "pump-and-treat" system. The system is operated and maintained with the goal of controlling the movement of contaminated groundwater. The system typically uses 16 **groundwater extraction wells** to remove contaminated groundwater. **Granular activated carbon** (GAC) is contained in three above-ground vessels and is used to remove **volatile organic compounds** (VOCs) from the extracted water. The EPA samples and discharges the water to the City of Davis sanitary sewer system under a discharge permit.

They are treated by the City of Davis Wastewater Treatment Plant.

Geology of Site

EPA has identified three groundwater zones at the Site that are impacted by COCs. Contaminant levels vary significantly between the three groundwater zones. Layers of material that is like clay appears to limit water's movement between zones, although this varies across the Site. The shallow zone, called the S-1, extends to approximately 60 feet below ground surface (bgs). The S-2 zone extends from approximately 60-90 feet bgs. The A-1 aquifer extends from approximately 90 to 140 feet bgs.

The drinking water supply for the City of Davis comes from a deeper A-2 aquifer that begins at approximately 180 feet bgs. No contaminants above drinking water standards have been detected in the A-2 aquifer. Implementing a final remedy will prevent contamination from the S-1, S-2 and A-1 aquifers from reaching the A-2 aquifer.

Summary of Human Health Risk Assessment

The Final Baseline Risk Assessment Report for the Frontier Fertilizer Superfund Site (Bechtel, 1999) evaluated the potential risk to public health from chemicals detected in the soil and groundwater at the Site. Assessing potential risk is a way to determine what could happen to the public or environment if they are exposed to COCs at current levels over a long time period. The risk assessment looks at the "baseline condition" and assumes that no cleanup of the Site takes place. EPA is planning to address the contaminants through a combination of cleanup and Site access restrictions to reduce the potential risks predicted in the risk assessment. Currently, the Site is fenced and secure, and there are no activities other than those associated with EPA's ongoing investigation and cleanup.

Based on the current and potential future land use, and existing Site conditions, the following scenarios were evaluated in the risk assessment:

- Current offsite residents who live in the Mace Ranch residential area
- Hypothetical children and adult residents living at the source area, within the eight-acre Site
- Future workers at the eight-acre Site

Risk for Current Offsite Residents

To evaluate the current risks to people living in the Mace Ranch residential area, EPA looked at the possibility that vapors emitted from contaminated groundwater could rise through the soil and enter homes through cracks in the floor or subsurface walls. This is also known as the "vapor intrusion pathway." In order to gauge what could happen if there was vapor intrusion, the highest concentration samples taken from the S-1 groundwater zone (shallow zone) and soil gas were used to estimate the cancer and non-cancer related disease risk associated with the indoor air pathway. The study showed that if chemicals were to volatilize into indoor air today, the concentrations would be very low and that cumulative risk to residents of Mace Ranch would be insignificant (below a one-in-a-million lifetime cancer risk) and also below a level that would cause non-cancer health effects. EPA is responsible to manage cumulative site risk so that risks fall within or below the range of one in a million to one in 10,000 lifetime cancer risks.

Risk for Hypothetical Onsite Residents

The potential future risk if the Site were developed for future housing was evaluated. Under this scenario, it was assumed that residential development could take place if there were no restrictions placed on the eight-acre Site prior to cleanup. In theory, this hypothetical homeowner could build a house on the most contaminated location of the Frontier Fertilizer Site, install a private drinking water well in the most contaminated portion of the groundwater "hot spot" and eat homegrown vegetables. The highest risks in this hypothetical case would result from installing a groundwater well in the "hot spot" and using the water for drinking, showering, and washing.

Although the risk assessment evaluated the use of groundwater for domestic purposes, it is considered highly unlikely. Typically Davis residents use water that is provided by the local water purveyor which meets safe drinking water standards. In general, the future residential risks associated with shallow soil are much less than those associated with domestic use of the groundwater. Potential cancer risks for the hypothetical onsite residents were predicted to be highest for indoor vapor inhalation, followed by direct contact with soils (touching and eating the soil), outdoor vapor inhalation, eating homegrown vegetables, and finally by breathing in dust. Without drinking water from a contaminated well onsite, a hypothetical resident would be exposed to a lifetime cancer risk that exceeds EPA's risk management range (4 in 10,000). Drinking water at the Site would pose a 1,000 times higher risk. Potential non-cancer risks for the hypothetical onsite resident were predicted to be highest for breathing indoor vapor followed by breathing outdoor vapor, eating soil, skin contact, eating homegrown vegetables and finally by breathing in dust from the soil.

Risk for Future Site Workers

Risks also were estimated for a potential worker because a light industrial park is planned for the Frontier Fertilizer Site property. The risk assessment predicted that cancer risks for workers would be highest for breathing indoor vapors, followed by eating soil and skin contact, breathing outdoor vapors and finally by breathing in dust from soil. Worker non-cancer risks were predicted to be highest for indoor vapor inhalation, followed by outdoor vapor inhalation, soil ingestion and dermal contact, and finally by breathing dust from the soil. The risk assessment predicted that the cumulative cancer risk is close to the upper end of EPA's risk management range (1 in 10,000). The restrictive covenant (see box on page 6) prepared for the Site will incorporate building engineering controls (ventilation systems) to prevent exposure to COCs.

Summary of Ecological Screening Risk Assessment

The Final Screening Level Ecological Risk Assessment Report (CH2MHill, 2006) identified EDB and many other contaminants that could potentially harm animals and plants living on or in the Site's soil. For the most part, these chemicals are different from the chemicals posing a potential risk to current or future onsite workers. Additionally, the Site area posing a risk to animals and plants is larger than the area posing a potential risk to onsite workers. The screening level risk assessment concluded that risks are elevated. EPA believes that further ecological risk evaluation is not warranted due to the proposed industrial land use, the small size of the Site property (eight acres), the poor quality of onsite habitat and isolation from offsite habitat. To protect animals from the contamination in the surface soil, each of the cleanup alternatives considered includes a temporary cap of wood chips or gravel for the area not included in the remedy. The temporary cap will provide a barrier to the soil until the proposed development occurs. If the proposed development does not occur, the surface soils can be resampled to determine the current risk.

Cleanup Goals

The cleanup action objectives describe what the proposed Site cleanup action is expected to accomplish. EPA has identified preliminary cleanup levels for soil beneath the Site and contaminated groundwater as part of the cleanup action objectives. The preliminary cleanup levels are based on Federal and California Maximum Contaminant Levels for groundwater and health-based goals determined during the Frontier Fertilizer Baseline Risk Assessment. The final cleanup levels will be identified in the ROD. EPA's cleanup objectives for the Site are presented in the box below. The alternatives presented in Table 1 (see page 9) were developed to meet the cleanup objectives. Preliminary cleanup levels for soil and groundwater are listed in the chart below and in the Feasibility Study (CH2MHill, 2006).

The specific cleanup action objectives for soil and groundwater include:

- Reduce levels of chemicals in onsite soils to prevent future exposures (workers and/or residents) to chemicals in soils above health-protective levels.
- Reduce levels of chemicals in groundwater (and chemical sources to groundwater) so that the groundwater could ultimately be used for domestic purposes.
- Prevent future onsite exposures (workers and/or residents) to chemical vapors in indoor air above health-protective levels.
- Reduce risks to plants and animals to a level consistent with habitat quality, and proposed future use of the Site.

Preliminary Cleanup Levels for Soil and Groundwater

Contaminant of Concern	Groundwater MCL (mg/L)	Soil Cleanup Values (mg/kg)
1,2-Dibromo-3-chloropropane (DBCP)	0.20 ug/L	1.20
1,2-Dibromoethane EDB	0.05 ug/L	0.18
1,2-Dichloropropane (1,2-DCP)	5.00 ug/L	20.00
Carbon tetrachloride (CT)	0.50 ug/L[a]	90.00
1,2,3-Trichloropropane (TCP)	0.50 ug/L[b]	2.50 [b]

[a] California MCL, which is more stringent than the Federal MCL.

[b] Detection limit for TCP; there is no MCL for TCP

Cleanup alternatives were developed for the Site through the Superfund process (see Figure 5, page 10). EPA considered cleanup alternatives in the "Feasibility Study (2006)" that ensured protection of human health and the environment. Each alternative must meet the cleanup action objectives. The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA, also known as Superfund)) requires each cleanup action alternative to be evaluated in terms of how well it meets the EPA's nine cleanup selection criteria developed by statutory requirements of CERCLA Section 121 and the National Contingency Plan (see Table 1, page 9). Each of the cleanup alternatives, with the exception of the No Action Alternative, have four Common Components: institutional controls, groundwater monitoring, access restrictions and a temporary cap. The alternatives under consideration, including EPA's preferred alternative, are summarized at right.

Cleanup Alternatives Common Components

Institutional Control (Restrictive Covenant): Descriptions of contaminated groundwater and soil and their respective restrictions are incorporated into the property deeds to minimize risk until cleanup action objectives are reached. Restrictions may include prohibiting residential use and groundwater extraction. Excavating, grading and trenching may also be limited in the soil source area. Specific building requirements in the source area, such as ventilation systems, may also be included in the restrictive covenant.

Groundwater Monitoring: Groundwater monitoring continues until cleanup action objectives are achieved.

Access Restrictions: Access to the contaminated surface soils is restricted with fencing and signage to prevent access by unauthorized personnel until cleanup action objectives are reached.

Temporary Cap: Wood chips or gravel will cover the Site to prevent animals from contacting contaminated surface soil until the proposed development takes place (see the "Summary of Ecological Screening Risk Assessment" for further discussion).

Cleanup Alternatives

No Action

EPA is required to consider a no action alternative for comparison with other cleanup alternatives. The no action alternative provides a baseline for evaluation in terms of risk if no action is taken. This alternative assumes that no action is taken to cleanup contaminated soil and groundwater and that the current pump and treatment systemment, groundwater monitoring and access restrictions are not continued.

The no action alternative does not meet EPA's cleanup action objectives and does not comply with state and federal requirements.

Groundwater Pump and Treat System

This alternative includes continuing the present operating groundwater treatment system.

The system pumps contaminated water from the ground and pipes it to the granular activated carbon units which clean the contamination from the water. This alternative includes the Common Components (see box at left) discussed earlier. This treatment will continue until monitoring indicates that the cleanup action objectives are achieved. The monitoring will also determine if additional pumping (extraction) wells or monitoring wells, or modifications to the system are necessary. The treated water will continue to be discharged to the City of Davis sanitary sewer. Because there is no upfront treatment of the contaminated source area, chemicals will be removed slowly through rainwater and groundwater movement. It is estimated to take decades to restore the area to beneficial uses.

Biological Treatment Plus Groundwater Pump and Treat

This alternative proposes to use in-situ (in place) anaerobic (oxygen free) biological degradation for the source area to reduce the continuing source to groundwater contamination. This involves injecting or applying a substrate, such as beer fermentation process waste, to the subsurface to initiate and maintain anaerobic conditions for contaminant-degrading microorganisms. An infiltration system will apply the substrate to the subsurface. The substrate supports the growth of microorganisms that convert toxic contaminants to less toxic compounds. In addition, this alternative would include the current pump and treat system and the Common Components.

The potential for biological treatment to reach cleanup action objectives is uncertain, however, there has been some success at other sites with similar contaminants. Laboratory testing using groundwater and soil from the Frontier Fertilizer Site was inconclusive for pesticides degradation during a five month test period, although nitrate was rapidly degraded. Because of the effectiveness uncertainty, EPA is estimating that 10 years will be required for biological treatment. After bioremediation is complete, it is estimated that pump and treat will be needed for a significant period because the microorganisms cannot reach all of the soil regions.

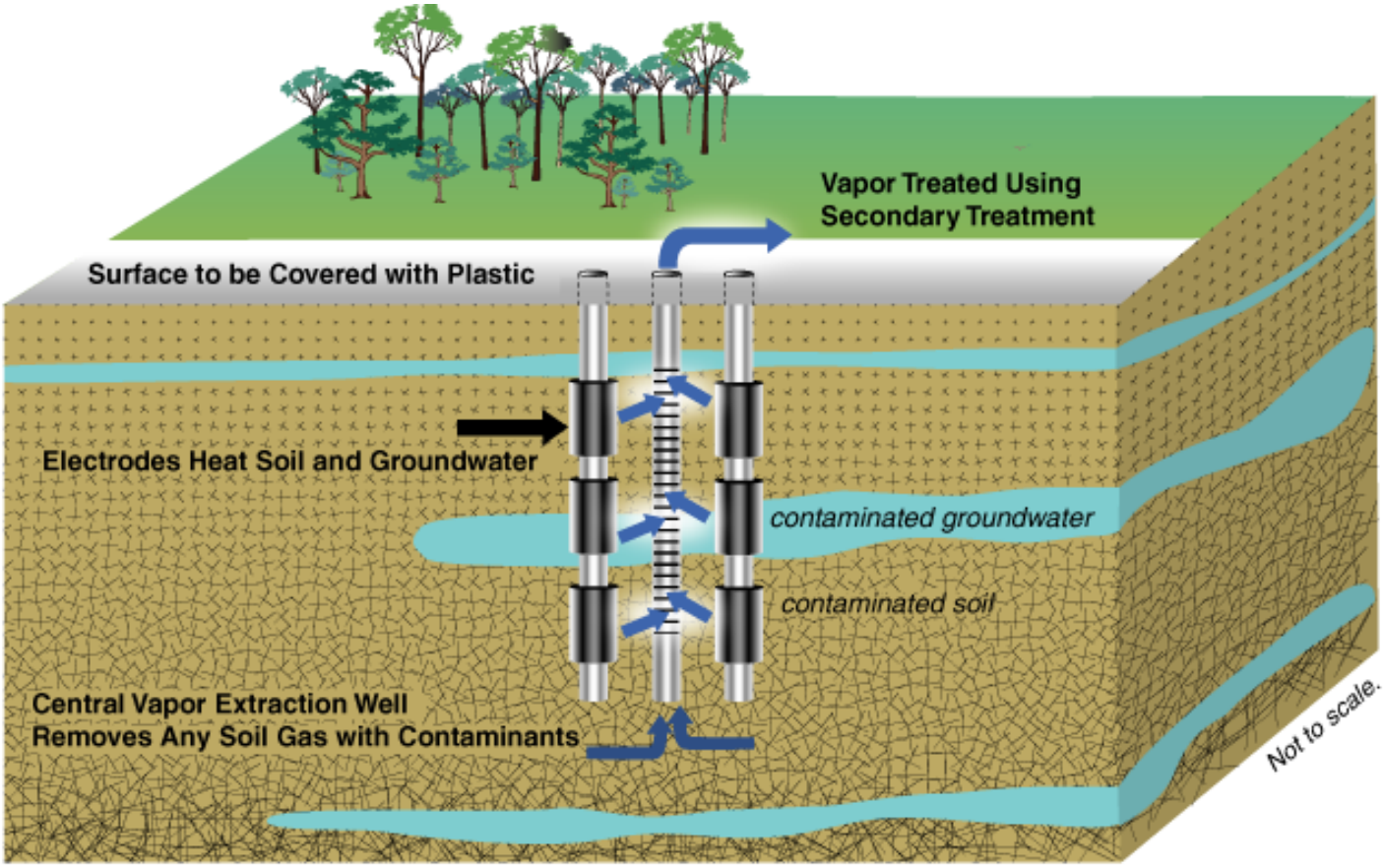

Figure 3: In-Place Soil and Groundwater Heating

EPA's Preferred Alternative: In-situ (in place) Thermal Treatment plus Groundwater Pump & Treatment plus Biological Degradation

This alternative includes in-situ (in place) heating using electrical energy to heat the soil, sediments and groundwater up to 60 feet below ground surface that are a continuing source to groundwater contamination. Both *electrical resistance* and *conduction heating* are available and are proven technologies to heat the subsurface. Electrical resistive heating passes electrical current through the subsurface while the resistance presented by the soil raises the temperature. Conduction heating uses heated well casings to conduct heat through the subsurface. Heating treatment breaks COCs down to less toxic compounds. These technologies use electrodes installed into the ground along with vapor controls. Vapor controls include air monitoring, an impermeable layer of plastic over the source area, and soil vapor collection and treatment (see Figure 3, above).

Since a three-week laboratory test indicated that heating degrades Site pesticides at temperatures both below (90 degrees centigrade) and above (110 degrees centigrade) the boiling point of water, both temperature conditions are being considered.

This alternative also includes operation of the current groundwater pump and treat system, anaerobic biological treatment of the source area to treat nitrates and the Common Components. It is predicted to take approximately 1 year for heating treatment to be completed and an additional 5 years for biological treatment of nitrates. The pump and treat system will be needed for a significant time period after the heating is completed to treat the remaining groundwater to drinking water standards. Groundwater COC levels are expected to reduce sharply after the heating portion is finished.

EPA recommends this alternative because it will reduce risk by treating the source area more effectively and quickly. The preferred alternative is protective of human health and the environment, complies with state and federal regulations, is cost-effective, and satisfies the preference to permanently treat the soil and groundwater.

Figure 4: EPA's Nine Cleanup Criteria

How Do the Alternatives Measure Up to EPA's Nine Cleanup Criteria?

CLEANUP CRITERIA	NO ACTION	GROUNDWATER PUMP & TREATMENT	IN-SITU (IN PLACE) BIOLOGICAL DEGRADATION + GROUNDWATER PUMP & TREATMENT	IN-SITU (IN PLACE) THERMAL TREATMENT + GW PUMP & TREAT + BIOLOGICAL DEGRADATION *EPA'S PREFERRED ALTERNATIVE*
PROTECTION OF HUMAN HEALTH & THE ENVIRONMENT	Does not provide overall protection	Provides high degree of overall protection	Provides high degree of overall protection	Provides high degree of overall protection
COMPLIANCE WITH STATE & FEDERAL REGULATIONS	Does not comply	Complies	Complies	Complies
LONG-TERM EFFECTIVENESS & PERMANENCE	Least effective; No	Effective as rain & groundwater move COCs to pump & treat system; Partially meets criteria	Effective in removing source mass by in place biological treatment and groundwater pump and treat; Partially meets criteria	Highly effective in removing source mass by in place heating. Pump and treat continues to treat remaining contaminated groundwater
REDUCTION OF TOXICITY, MOBILITY, OR VOLUME	No reduction	Effective; COCs are collected with GAC and regenerated; Partially meets criteria over a long time period	Effective; predict that some source mass is treated in place with the balance collected with GAC and regenerated; Partially meets criteria	Effective; predict that 80%of source mass is treated quickly by in place heating with the balance collected with GAC and regenerated
SHORT-TERM EFFECTIVENESS	No action is taken	Effective over long time period; however, source area is only treated by groundwa-ter pump and treat	Effective over shorter time period; limited COC source area reduction from in place biologi-cal treatment	Effective over shortest time period; predict in place heating will significantly increase how quickly COC mass is reduced in soil and groundwater
IMPLEMENT-ABILITY	No action is taken	Easy to implement as pump and treat already in place and operation	Easy to implement although possible difficulty to distribute treatment substrate to complex subsurface	Easy to implement with phased design
COMMUNITY & STATE ACCEPTANCE		will be evaluated after the public comment period		
PRESENT DAY TOTAL COST	**$0**	**$11,342,000**	**$12,371,000**	**$18,413,000**
CAPITAL PRESENT DAY COST	**$0**	**$1,430,000**	**$1,798,000**	**$7,520,000**
YEARLY OPERATION & MAINTENANCE	**$0**	**$ 690,400**	**$742,300**	**$778,300**

Table 1: Comparison of Alternatives

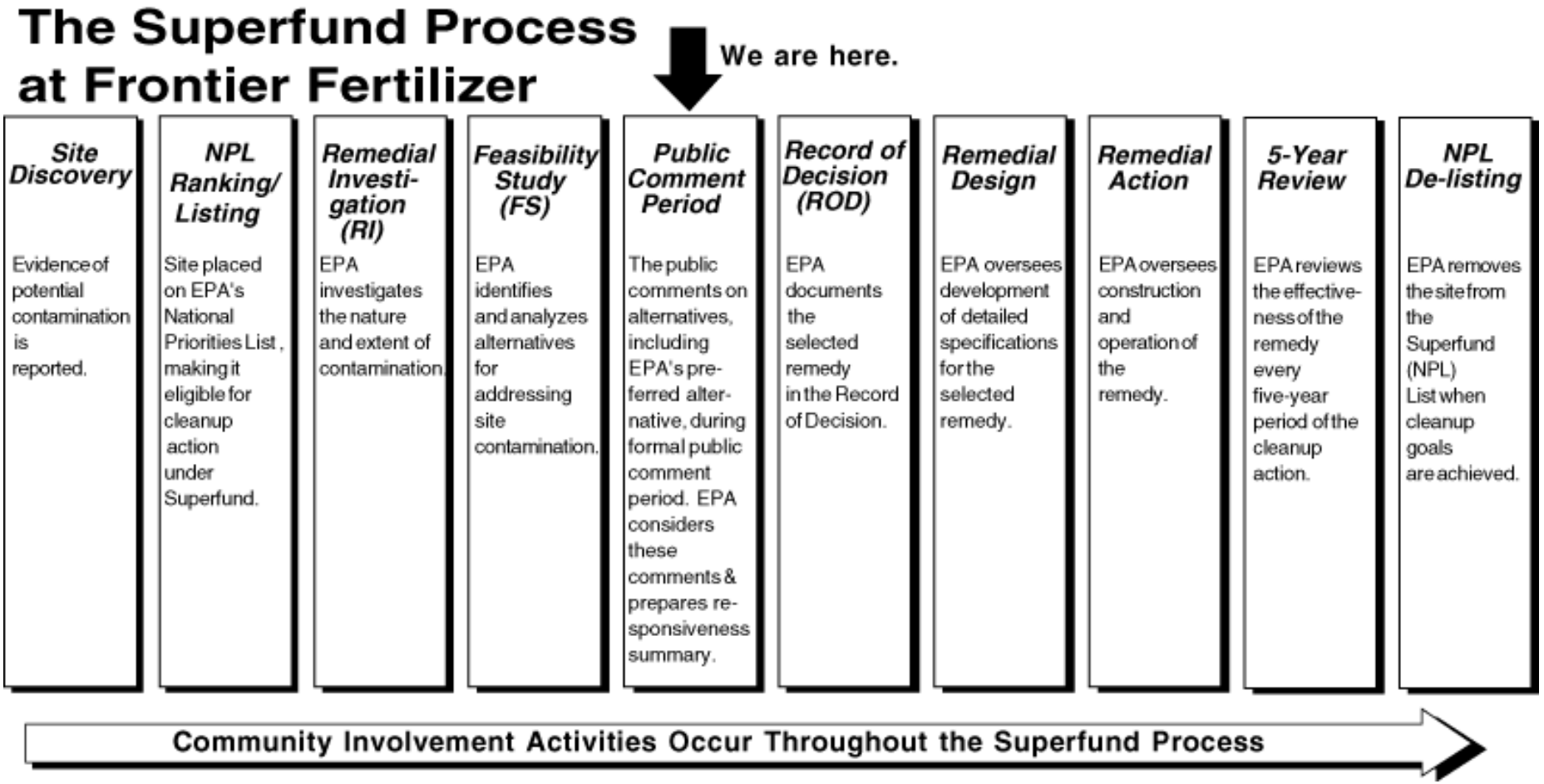

Figure 5: The Superfund Process

Glossary

Administrative Record File: Complete body of documents that forms the basis for selecting a CERCLA response action.

Aquifer: Water found within layers of material (such as soil, rock, sand, or gravel) below the ground surface.

Bgs: Below ground surface.

Chemicals of concern (COCs): Site-specific chemicals identified in the risk assessment.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA): A federal law first passed in 1980 and subsequently amended. The act created a trust fund, known as Superfund, to investigate and cleanup abandoned or uncontrolled waste sites.

Feasibility Study: EPA study that determines the best way to cleanup environmental contamination.

Granular Activated Carbon (GAC): Pure carbon that can adsorb pollutants.

Groundwater: The supply of water found below the ground surface, usually in aquifers.

Groundwater Extraction Wells: Wells designed to remove groundwater. Groundwater extracted from these wells is sent to a treatment facility for cleanup.

In-situ: Actions conducted in their original location. With respect to remedial actions, in-situ refers to cleanup in place where soil or groundwater contamination exists.

Monitoring Well: A well used either to collect groundwater water samples for water quality testing, or to measure groundwater levels.

National Priorities List (NPL): EPA's annually updated list of the most serious uncontrolled or abandoned hazardous waste sites in the U.S. identified for possible long-term cleanup under Superfund.

Pump and Treat System: Installation of extraction wells that remove contaminated groundwater. The water is then treated by removing the contamination by carbon absorption.

Record of Decision (ROD): A legal document issued by EPA that provides the remedy actions for cleaning up a Superfund site.

Responsiveness Summary: A written summary of oral and/or written comments, criticisms, and new relevant information received by the agency during a public comment period and the agency's responses to these comments. A responsiveness summary is an appendix to a Record of Decision.

Substrate: With respect to remedial actions, materials injected into subsurface to cleanup contaminants in the soil and groundwater.

Subsurface: Soil and groundwater below the ground surface.

Volatile Organic Compounds (VOCs): Carbon-containing chemical compounds that evaporate readily at room temperature.

Volatilize: Turn to vapor.

Information Repositories

The Administrative Record and all other information regarding the Frontier Fertilizer Superfund Site are at the following locations:

Yolo County Library, Davis Branch
Attn: Marilyn Corocan
315 East 14th Street
Davis, California 95616
(530) 757-5593

Hours: Mon: 1 to 9 p.m.
Tues-Thurs: 10 a.m. to 9 p.m.
Fri, Sat: 10 a.m. to 5:30 p.m.
Sun: 1 to 5 p.m.

Shields Library
Government Documents Department
Attn: Linda Kennedy
University of California
Davis, California 95616
(530) 752-6561

Hours: Mon-Thurs: 7:30 a.m. to 12 midnight
Fri: 7:30 a.m. to 6 p.m.
Sat: 12 p.m. to 6 p.m.
Sun: 12 p.m. to 12 midnight

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Public Meeting

The public is invited to the following public meeting where EPA will present the proposed plan, answer questions about the plan and record public comments.

Date: **June 22, 2006**
Time: **7:00 p.m. to 9:00 p.m.**
Place: **Public Works Training Room**
1717 Fifth Street
City of Davis, CA 95616

Public Comment Period

A **30-day public comment period** on this proposed plan begins **June 12, 2006** and closes **July 12, 2006**. Send comments by fax, email or in writing, postmarked **no later than July 12, 2006**, to:

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