

March 8, 2010

Client-Matter: 24369-060

VIA U.S. MAIL AND EMAIL

Mr. Wayne Praskins
EPA Project Manager
US EPA (SFD-7-3)
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Re: "B.F. Goodrich" Superfund Site RI/FS

Dear Mr. Praskins:

Goodrich Corporation ("Goodrich") submits the following comments regarding the draft Remedial Investigation/Feasibility Study Report prepared by CH2MHill concerning the "B.F. Goodrich" Superfund Site in Rialto, California, dated January 25, 2010 (the "RI/FS"). As indicated below, Goodrich believes that there is not adequate support in the RI/FS for the selected remedial alternative, including its location, and that other important considerations relevant for the selection of the remedial alternative have not been addressed. As such, EPA should revisit the RI/FS and its justification of the selected remedial alternative.

The RI/FS Does Not Adequately Take Into Account Other Available Data and Potential Sources of Contamination in Selecting the Remedy

The RI/FS does not take into account all available data and does not adequately address the relationship of the purported plume from the 160-Acre Area, for which the RI/FS proposes an interim remedy, with other sites in the Rialto-Colton Basin connected with perchlorate and/or trichloroethylene (TCE). This would affect the outcome of the modeling and the design and success of the proposed remedy. For instance, other available groundwater analytical data exists in the basin that has not been incorporated into the RI/FS, is left out of the plume depicted in Figure 7, and is not utilized in the groundwater modeling (*e.g.*, N-16 and F-27). The RI/FS also fails to address or incorporate recent available data from EPA's own monitoring wells (see attached).

Similarly, the history of the area and the identification of potential sources in the basin set forth in the RI/FS are incomplete and inaccurate. The RI/FS does not adequately consider the potential contribution to the "operable unit" from other sources in the basin, despite some of

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them being mentioned in the RI/FS (e.g., the bunker area). Some potential sources, such as the Denova site and the Broco manufacturing location, are ignored, despite being identified the administrative record. Moreover, while focusing on site locations associated with perchlorate, EPA has not investigated other potential sources of TCE in the basin despite listing the site on the National Priorities List based upon TCE. Without an accurate assessment of at least the available data, EPA cannot accurately characterize the purported plume or design an appropriate remedy.

The RI/FS Fails to Explain the Basis for Selecting the Location for “Option 2”

The RI/FS does not adequately explain or support the basis for implementing an interim remedy and locating the selected remedial alternative at Rialto-2. EPA indicates that the operable unit is an incremental step toward cleanup and that its proposed action is considered “interim.” However, in proposing two options and selecting the interim remedy, the RI/FS does not take into account the impact of other remedial measures that would later be needed in the basin as a result, including the total costs of the combined anticipated remedial actions.

Although the RI/FS sets forth the basis for ruling out Option 1, which proposed extracting contaminated groundwater from the Intermediate Aquifer at or downgradient of the 160-Acre Area, it does not adequately explain the reasoning for placing an extraction system at Rialto-2 under Option 2. The RI/FS merely explains that its downgradient target area boundary is downgradient of the merging of the Intermediate and Regional aquifers, which distinguishes it from Option 1. However, the location of Option 2 is questionable in light of the RI/FS indicating that contamination above the MCL is detected further down the basin and at higher levels than in the Rialto-2 area, such as in PW-5 (TCE at 32 ug/L and perchlorate at 1,400 ug/L) and PW-9 (TCE at 8.8 ug/L and perchlorate at 370 ug/L). The RI/FS should therefore consider other potential locations for the remedy, including in the area of Rialto-6, as discussed below.

The RI/FS Fails to Adequately Assess the Long Term Effectiveness and Performance and the Implementability of the Selected Interim Remedy

The RI/FS does not adequately assess the long-term effectiveness and performance and the implementability of the selected remedy, as required under the evaluation criteria. Despite recognizing the importance of the safe yield and limited available water rights in the Rialto-Colton Basin (*see, e.g.*, RI/FS Sections 2.3 and 2.4, respectively) and indicating that the *current* rate of groundwater production may not be sustainable, the RI/FS does not adequately address the long term implementability of the selected alternative or factor in the impact from the operations of other existing and future systems, including the additional cleanup actions planned downgradient in the basin as referenced by EPA. The reliance of the RI/FS on the fact that water

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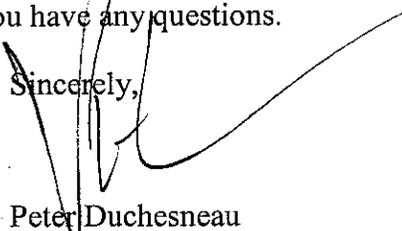
could be discharged into reinjection wells as a viable option to minimize or avoid water rights issues is entirely unsupported and not consistent with the law or the facts.

Further, the RI/FS references a project to construct a bioreactor to treat water from Rialto-6 (page 1-7). Goodrich understands that this project is "shovel ready" as West Valley Water District ("WVWD") and the City of Rialto have completed design plans to treat groundwater from WVWD-11 and Rialto-6, which have been submitted to the California Department of Public Health for Proposition 84 funding. Yet, the RI/FS does not consider the possibility of utilizing this project as the foundation of a remedial alternative, nor the need or ability to simultaneously operate both the selected remedial alternative and the WVWD/Rialto system.

In revisiting the RI/FS, EPA should consider the value of first initiating the proposed system in the area of Rialto-6, which, given the status of its design, funding and local community support, could be installed significantly faster than the remedial alternative selected in the RI/FS. In addition to WVWD and Rialto, Goodrich also understands that other parties are participating in the project at Rialto-6, including the Department of Defense, which has committed \$3 million toward the bioreactor, and the State of California's Cleanup and Abatement Account, which has designated approximately \$3 million for the project. Despite the RI/FS being silent as to EPA's own well results, EPA's test results from Well MP-1 (August, 2009 and December 2009) have not shown any contamination, at any depth, thereby supporting the understanding that contamination has not migrated nearly as far as depicted on RI/FS Figure 1-5 (nearly to CPW-17), but rather is not far beyond the Rialto-6 area. These results further support the need for the RI/FS to be reevaluated and to consider whether implementation of the remedy further downgradient in the area of Rialto-6 would be overall more effective.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Peter Duchesneau

Attachment

cc: Bruce Amig, Goodrich Corporation

