B.F. GOODRICH SUPERFUND SITE

COMMUNITY INVOLVEMENT PLAN

United States Environmental Protection Agency

JULY 2013

INTRODUCTION

The U. S. Environmental Protection Agency (EPA) develops a Community Involvement Plan (CIP) at sites where it has taken responsibility for environmental cleanup. The CIP specifies outreach activities intended to address community concerns and expectations, and help EPA meet the following goals:

- Provide the affected community with accurate, timely, and understandable information about site activities;
- Encourage community interest and give the public the opportunity to provide meaningful input into site cleanup decisions;
- Respect and fully consider community input

To identify community concerns and expectations at the B.F. Goodrich Superfund Site (the "Site), EPA conducted a series of community interviews in October and December 2010 with residents, business representatives, elected officials, and other stakeholders in the Rialto and Colton areas. EPA used information gained in those interviews to develop this CIP. The CIP is a "living document" that may be modified as new information becomes available and new issues arise at the Site.

PROPOSED NAME CHANGE

In May 2013, EPA proposed changing the name of the B.F. Goodrich Superfund site to the Locust Avenue site. EPA will make a final decision whether to change the name of the site later this year.

BRIEF SITE HISTORY

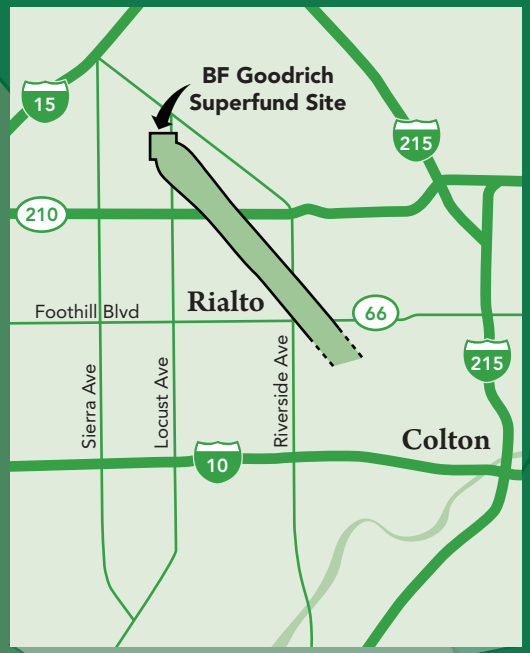
The Site includes a 160-acre industrial area in Rialto, CA and contaminated groundwater that has spread from the 160-acre area. The Site location is shown in the figure at right.

The 160-acre area is part of a larger area acquired by the U.S. Army in 1942 for use as an inspection, consolidation, and storage facility for railcars transporting bombs, ammunition, and other ordnance to the Port of Los Angeles, California. Since the United States government sold the property in 1946, portions of the property have been used by a variety of private companies to manufacture flares and other pyrotechnic devices, solid-fuel rocket propellant and rocket motors, and fireworks.

In 1997 high levels of perchlorate, a chemical used at the 160-acre are, were discovered in groundwater in an area that is now part of the Site. In about 2002, the Santa Ana Regional Water Quality Control Board (the "Water Board"), a State agency, began efforts to identify the sources of the contamination and plan for its cleanup. EPA became the lead agency for cleanup of the Site in about 2008, added the Site to the federal Superfund list in 2009, adopted a cleanup plan (a "Record of Decision") for the first of two planned groundwater cleanup projects at the Site in 2010, and is currently conducting testing needed to develop a cleanup plan for the second planned cleanup project. The first project is directed at the most contaminated groundwater at the Site beneath the 160 acre area. The second project will address groundwater in the southern portion of the site, where contamination levels are lower but still above those allowed in drinking water supplies. The design of the first cleanup project began in 2012. EPA expects to adopt a cleanup plan for the second project in 2015 or 2016.

Appendix 1 provides a more detailed Site history.

EPA's official guidance for Community Involvement is available on the internet at: **www.epa.gov/superfund/community/cag/pdfs/ci_handbook.pdf**



Rialto, CA

CIP ORGANIZATION

THE COMMUNITY — Chapter One of the CIP provides a brief community profile and identifies issues and concerns raised during the community interviews. 2

THE COMMUNITY INVOLVEMENT ACTION PLAN — Chapter Two presents EPA's action plan for addressing the issues and concerns identified during the interviews. The CIP relies on tools and techniques that EPA has developed over the years at hundreds of Superfund Sites. 6

THE CLEANUP SCHEDULE — Chapter Three provides EPA's current schedule for investigation and cleanup activities at the Site and planned community involvement activities. 10

APPENDICES — The Appendices provide the following: 12

- Site history
- overview of the federal Superfund cleanup program
- list of Site contaminants
- list of acronyms
- key contacts

THE COMMUNITY

COMMUNITY PROFILE

The City of Rialto is located in western San Bernardino County in the area known as "the Inland Empire." According to 2010 US Census Bureau results (**http://quickfacts.census.gov/**):

99,170 Population of the city of Rialto

68% Hispanic or Latino population, compared to a California average of 38%

Reported percentages for white, black or African-American, and Asian were 44, 16, and 2% respectively, compared to California averages of 58, 6, and 13% respectively

$50,555 Median household income, compared to a California average of $60,883

15% Percentage of families below the poverty level, compared to a California average of 14%

COMMUNITY ISSUES & CONCERNS

In order to better understand the Rialto community, EPA interviewed a number of stakeholders, including local residents, business representatives, representatives of neighborhood watch groups, and government officials. In the interviews, EPA representatives asked about environmental and site-specific concerns, and communication preferences.

During the interviews it became apparent that drinking water issues were a major concern for local residents. Many of those interviewed knew that a chemical called perchlorate had affected the local water supply. Air quality, the Mid-Valley Sanitary Landfill, and endangered species were also identified as environmental concerns during the interviews.

The community concerns are grouped into the following categories:

I. Environmental / Human Health,
II. Superfund Cleanup Activity,
III. Communications and Public Education

I. Environmental / Human Health Concerns

Water Quality

The most frequently raised question was whether or not the water in the Rialto-Colton area is safe to drink. Many respondents did not feel informed about what steps have been taken to ensure that their drinking water is not contaminated.

At least three respondents stated that they simply do not trust the quality of their drinking water and instead regularly purchase bottled water. This lack of trust appears to stem from several sources. Some respondents thought that the

community lacked knowledge about the health risks of perchlorate, one of the contaminants in the groundwater. EPA was shown marketing materials that had been distributed in the community. The materials were misleading and alarmist. One incorrectly illustrated the contamination areas and sources.

RESPONSE: The local water utilities, and a state agency known as the California Department of Public Health (CDPH), are responsible for ensuring that the drinking water supplied to homes and businesses in Rialto complies with all federal and state standards for drinking water and is safe to drink. The CDPH enforces standards for a variety of possible contaminants, including perchlorate and TCE, the two primary contaminants in the groundwater at the Site. See **http://www.cdph.ca.gov/certlic/drinkingwater/pages/chemicalcontaminants.aspx** for additional information about the CDPH drinking water program.

Former Pyrotechnic manufacturing building

EPA's primary role at the Site is to clean up chemical contamination that has affected or is threatening the groundwater supply. EPA expects its cleanup activities to lessen rather than increase fears associated with the contamination. EPA has also reached agreements with the companies that EPA believes contaminated the groundwater to pay for the cleanup.

Air Quality

Air quality is a significant community concern. Residents expressed concern about diesel truck emissions and the rail-yard in Colton. Although significant progress has been made, San Bernardino County continues to frequently have unhealthy levels of ozone (an air pollutant). Residents noted that there are many people who work in Los Angeles or east of the Inland Empire who commute long distances to work every day and could be adding to the pollution.

RESPONSE: EPA agrees that air quality is a significant environmental issue in the Rialto-Colton area and throughout much of Southern California. The environmental problems that EPA is addressing in its cleanup of the Site are primarily in the groundwater. The Site has not adversely affected air quality in the area. Air quality in the Rialto area is regulated primarily by a State agency, the South Coast Air Quality Management District.

Mid Valley Sanitary Landfill

Many individuals also expressed concern about the proximity of the Mid-Valley Sanitary Landfill to residential areas and whether or not the landfill contributes toxic chemicals to the groundwater contamination.

RESPONSE: The Water Board is working with San Bernardino County to clean up soil and groundwater contamination believed to originate from properties occupied by the landfill. A groundwater cleanup project near the landfill was constructed and began operation in 2006. EPA is closely coordinating its cleanup efforts at the Site with the Water Board's efforts.

Endangered Species

Three respondents explained that the community has expressed opposition to development that would harm endangered species in the Rialto area, including the San Bernardino Kangaroo Rat in northern Rialto and nesting birds in or near southern Rialto.

RESPONSE: EPA will make every effort to eliminate or minimize any adverse effects caused by its cleanup work on threatened or endangered species, or their critical habitat.

Noise Pollution

Two respondents identified noise pollution as an environmental issue.

RESPONSE: EPA has worked to minimize noise during its groundwater well drilling in the Rialto area and will attempt to minimize noise pollution during future investigation and cleanup work.

II. Superfund Cleanup Activity Concerns

Cleanup Duration

A few of those interviewed asked questions about the time required for the cleanup. Two respondents noted that because contamination associated with the Site was decades in the making, it will take decades to remediate. For this reason, a few respondents thought that community interest in EPA's efforts may decrease over time.

RESPONSE: See pages 10–11 for a timeline of planned cleanup activities at the Site. EPA will periodically update the timeline on its Site webpage.

Cleanup Responsibility

Some respondents expressed confusion about the role of EPA, the City of Rialto, and other agencies in dealing with water quality. Two respondents specifically commented on, and complained about, the perchlorate surcharge included on their water bills.

RESPONSE: EPA has been the lead Agency for the cleanup of contamination at the B.F. Goodrich Site since about 2008, and expects to remain the lead agency until the cleanup is complete. EPA frequently consults with representatives of the City of Rialto and other local agencies on the cleanup. The perchlorate surcharge is a local matter.

PUBLIC HEALTH INVESTIGATIONS AT THE B.F. GOODRICH SITE

In 2012 the CDPH completed an investigation of the public health implications of the contamination, particularly in the years before the contamination was discovered. CDPH conducted its investigation though a cooperative agreement with the federal Agency for Toxic Substances and Disease Registry (ATSDR). Information about the study, including a November 2012 report, is available at the CDPH website at **http://www.ehib.org/project.jsp?project_key=BFGR01** or the ATSDR website at **http://www.atsdr.cdc.gov/HAC/pha/index.asp**

Communication between Entities

At least two respondents asked about communication and collaboration between state, local and federal government in the cleanup efforts. They stressed the need for good communication and consistency in key messages to establish credibility. One respondent mentioned that before the Site was added to the Superfund list, City of Rialto officials feared that naming the area a Superfund site would turn away local businesses.

RESPONSE: This CIP outlines some of the ways that EPA has worked with cities, local water agencies, State agencies, and other organizations and stakeholders. EPA will continue to work with and maintain communication with local groups.

Water Supply and Quality

One interviewee raised questions about how the cleanup is going to impact Rialto's long term water supply and water quality.

RESPONSE: EPA's cleanup efforts will help protect Rialto's groundwater supply from further contamination and begin the long-term process of removing the contaminants from the groundwater supply. Rialto draws some water from the Rialto-Colton groundwater basin, but obtains much of its water from other sources unaffected by the Site. Additional information about the sources of drinking water supplied to Rialto residents and businesses is available from the city's website at: **http://www.ci.rialto.ca.us/perchlorate/water_city-water-system.php**

III. Communications and Public Education Concerns

Communication Philosophy

In nearly all interviews, respondents suggested that EPA work through local clubs and organizations because they are important sources of information, and have ample experience working with communities. Several respondents recommended that EPA better communicate how the cleanup benefits local residents.

RESPONSE: EPA will communicate with the community through a variety of means, including fact sheets, public meetings, attendance at local special events, a site webpage, email, and local media. EPA hopes to work with long standing neighborhood groups, environmental justice organizations, service clubs, faith based organizations, and chambers of commerce in order to reach diverse segments of the population.

Promoting Civic Engagement

Over half of the respondents conveyed a strong sense of dissatisfaction with local politics in Rialto and are largely disengaged from civic issues and activities. One respondent commented that most residents are not active in the community. Two respondents reported that Rialto residents largely work outside of the city. A lack of interest in local affairs may make it harder for EPA to generate community interest in the cleanup.

RESPONSE: EPA will continue efforts to inform, engage, and work with the community in a transparent manner, and will try to schedule meetings and other events in the evening to allow residents who work outside of Rialto to attend.

Communicating to the Core Spanish speaking Audience

Latinos make up over 50% of the population in both Rialto and Colton. In Rialto, the Latino population has grown in the last 10 years, from 51.2% of the population in 2000 to 67.6% in 2010.

RESPONSE: EPA is committed to reaching and engaging Spanish-speaking community members as part of its outreach plan. EPA will provide key documents in Spanish, as described further in *The Community Involvement Action Plan* Section.

Downtown Rialto, CA

THE COMMUNITY INVOLVEMENT ACTION PLAN

Based on the community interviews completed in 2010, EPA commits to carry out the following activities to inform the community and encourage involvement in the cleanup process. EPA will use a variety of methods to provide Site information (email, webpage updates, occasional mailings and public events), use plain language when communicating technical information, translate key documents into Spanish, make EPA staff easy to reach, and advertise opportunities for community members to provide input into Site cleanup decisions.

1. Fact Sheets, Hand-outs and Flyers

Fact Sheets

Fact Sheets are one of EPA's main methods of providing site-related information to the community. They typically are short (two to four page) documents written in non-technical language. They are made available at the Site Repository (see #4 below for location), posted on EPA's Site webpage (see #3 below), and mailed directly to people and organizations on EPA's Site mailing list (see #5 below). They may summarize larger, technical documents, announce community meetings, or describe the status of cleanup efforts. On average, EPA expects to create fact sheets every 12 to 18 months, but will prepare fact sheets more frequently if needed.

Flyers

Flyers are 1-2 page notices typically distributed door-to-door, when residents may be inconvenienced by EPA-directed construction activities in their neighborhood. Flyers may also be posted on community bulletin boards, made available on the EPA Site webpage, and placed at Site repositories.

Handouts

Handouts typically provide supplemental information at EPA events related to the Site and/or to EPA's overall mission. Handouts may also be posted to EPA's Site webpage.

2. Community Public Events

EPA holds public events as needed. Meeting formats vary, depending on the purpose of the meeting.

- Public Meeting – EPA usually organizes a town hall style meeting when it proposes cleanup work, but may organize meetings at other times to inform and consult with the community and to allow the public to ask questions or voice its concerns.
- Open House – EPA may organize an open house to present information about the Site and to consult with the public on a wide range of issues. An open house is an informal event where information is typically made available through handouts and posters and EPA staff are available to discuss Site issues. Open houses may be combined with other public events.
- Tours – If there is significant interest, EPA may organize Site tours after cleanup facilities are constructed.

The first Site town hall meeting was held at the Rialto Senior Center in December 2008. A second town hall meeting was held at the Senior Center in February 2009. EPA staff also attended and spoke at a public meeting organized by the California Department of Public Health in September 2011. Possible public meeting locations are as follows.

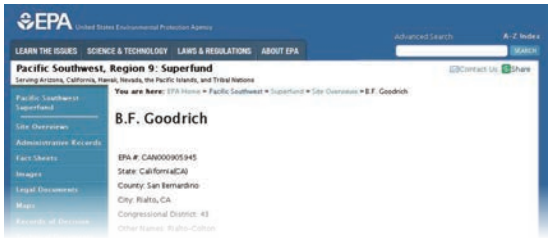
Rialto Senior Center
1411 S. Riverside Ave.
Rialto, CA 92376
Capacity: 80

Rialto Branch Library – Community Room
251 West 1st St.
Rialto, CA 92376
Capacity: 80

Rialto Fire Station - Community Room
131 S. Willow Ave
Rialto, CA 92376
Capacity: 30

3. Web Site

EPA has created a webpage specifically for the Site. The website includes electronic copies of technical documents, fact sheets, EPA's 2010 cleanup plan, and other Site information. EPA updates the webpage on a regular basis. Please visit the website at:
http://www.epa.gov/region09/bfgoodrich



4. Information Repositories and Administrative Record

EPA maintains copies of key Site documents in a local "Information Repository." The Repository contains hardcopies of major Site documents, fact sheets and other relevant items. Some documents are available on compact disk. To browse or check-out Site documents, please visit the Information Repository at:

Rialto Branch Library
251 West 1st St.
Rialto, CA 92376

When EPA formally proposed a cleanup action in February 2010, it compiled documents that were considered or relied upon in developing its proposal. This collection of documents is called the Administrative Record, and is available at the Site Information Repositories. An index of documents in the Administrative Record is also available on EPA's webpage.

There is a second Information Repository for every Superfund Site located at EPA's Regional Office in San Francisco. The Superfund Records Center is open during business hours Monday through Friday (except Federal holidays). See page 19 for contact information.

5. Postal and Email Mailing Lists

EPA maintains a postal mailing list for hard copy distribution of fact sheets and meeting notices. EPA also maintains an email list for electronic distribution of fact sheets, meeting notices, and periodic Site updates. To be added to or deleted from the mailing list(s), contact the community involvement coordinator for the Site (see contact information in Appendix E).

6. Door-to-door Notifications

When EPA is working in the field, it may provide notices to affected residents and businesses through door-to-door notifications. In 2009, 2011, and 2013, during the installation of groundwater monitoring wells, EPA visited residents and businesses likely to be affected or inconvenienced by installation of the wells. EPA will make every effort to give advance notice of construction activities.

(left) EPA officials explain its proposed groundwater cleanup plan at a public meeting in Rialto in 2010
(opposite page) Construction of a groundwater monitoring well

7. Technical Assistance Grant (TAG)

A TAG is a federal grant awarded to an incorporated nonprofit organization of community members affected by a Site. It is used to fund an environmental professional to provide an independent technical review of cleanup documents. An initial grant up to $50,000 is available to help the community understand technical information about their site. A TAG has not yet been awarded at this Site. Interested community members may contact the Site Community Involvement Coordinator for more information.

8. Community Advisory Group (CAG)

A CAG is a self-forming, self-governing stakeholder group that meets regularly to learn about EPA's cleanup process, discuss Site issues and concerns, and provide feedback to EPA. EPA is able to provide support to the CAG by attending meetings, making presentations, procuring a meeting room, advertising the meetings and providing copies of Site documents. A CAG has not yet been formed at this Site. Interested community members may contact the Site Community Involvement Coordinator for more information.

9. Presentations to Groups

EPA staff are available to make presentations at meetings of local community groups and institutions, such as the Librería del Pueblo, Adopt a Neighborhood groups, the Center for Community Action and Environmental Justice, religious groups, Kiwanas and Rotary clubs, the Rialto Chamber of Commerce and local schools. To arrange a group presentation, please contact the Site Community Involvement Coordinator.

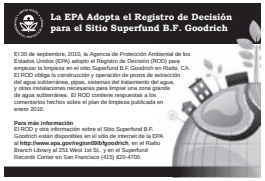
10. Public Notices

To reach individuals not on the Site's mailing list, EPA will announce community meetings in a display advertisement in the main sections of local newspapers such as the Rialto Record and the Spanish language newspaper La Opinión.

11. Press Releases/Media contacts

EPA will provide press releases and maintain media contacts with English language newspapers such as the Rialto Record, Colton Courier, San Bernardino Sun, and Riverside Press-Enterprise, and Spanish Language newspapers such as La Prensa and La Opinión.

12. Spanish Language Needs


La EPA Adopta el Registro de Decisión para el Sitio Superfund B.F. Goodrich

El 30 de septiembre, 2010, la Agencia de Protección Ambiental de los Estados Unidos (EPA) adoptó el Registro de Decisión (ROD) para empezar la limpieza en el sitio Superfund B.F. Goodrich en Rialto, CA. El ROD obliga la construcción y operación de pozos de extracción del agua subterránea, pipas, sistemas del tratamiento del agua, y otras instalaciones necesarias para limpiar una zona grande de agua subterránea. El ROD contiene respuestas a los comentarios hechos sobre el plan de limpieza publicada en enero 2010.

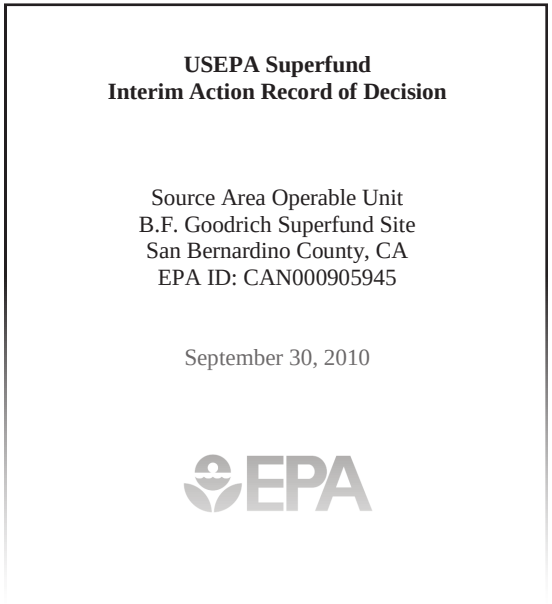
Para más información
El ROD y otra información sobre el Sitio Superfund B.F. Goodrich están disponibles en el sitio de internet de la EPA al **http://www.epa.gov/region09/bfgoodrich**, en el Rialto Branch Library al 251 West 1st St., y en el Superfund Records Center en San Francisco (415) 820-4700.

Spanish is the most prevalent second language in the Rialto-Colton area. To bring as many stakeholders as possible to the table, EPA will be providing the following Spanish language services to the community:

- EPA will provide an interpreter at community meetings it hosts and will publish concurrent Spanish and English versions of its fact sheets.
- EPA will make available a bilingual Community Involvement Coordinator able to make presentations to community members and groups or to discuss Site issues.
- EPA will work through local organizations, such as the Librería del Pueblo, to provide updates to the Spanish-speaking community.

13. Technical Documents

More detailed information on the Site is available in technical documents produced by EPA and others. Technical documents are available describing the results of soil and water testing, evaluations of cleanup options, and many other topics. Key documents are available on EPA's website and others are available from EPA upon request. At this time, EPA will not be translating technical documents into Spanish.


USEPA Superfund
Interim Action Record of Decision

Source Area Operable Unit
B.F. Goodrich Superfund Site
San Bernardino County, CA
EPA ID: CAN000905945

September 30, 2010

EPA

14. City Councils and Elected Representatives of Other Local Agencies

If requested, EPA staff will provide updates to the city councils of Rialto and Colton, and governing boards of other local agencies.

(left) Processing soil samples to be sent for labratory analysis
(opposite page) A portion of the "160-acre" area

THE CLEANUP SCHEDULE

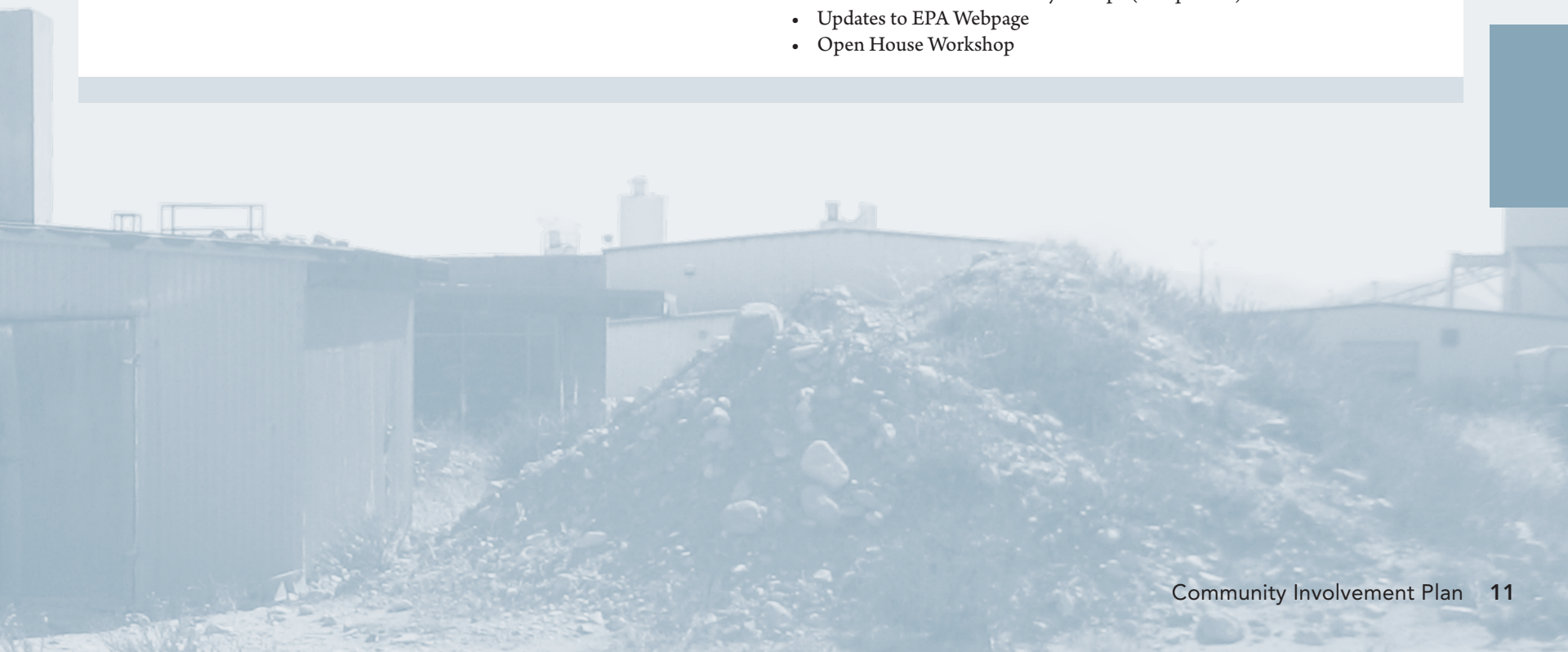
There are opportunities for community involvement throughout the cleanup process.

PAST ACTIVITIES

Year(s)	Activity	Community Involvement
2008	• Site Proposed to Superfund List • Remedial Investigation (RI) Began	• Site Webpage Created (epa.gov/region09/bfgoodrich) • Site Mailing List Created
2009	• Six Groundwater Monitoring Wells Constructed • Remedial Investigation and Feasibility Study (FS) for Source Area Remedy Continued	• Email List Established – 1st email sent • Local Repository Established (Rialto Library) • Flyers Distributed Door-to-Door • EPA/CDPH Kick-Off Community Meeting in Rialto • Updated EPA Webpage
2010	• RI/FS for Source Area Remedy Completed • Proposed Plan for Source Area Remedy Available for Public Comment • Record of Decision for Source Area Remedy Adopted	• RI/FS Report Published on EPA Webpage & Placed in Information Repositories • Public Comment Period on Proposed Cleanup Plan » Notice Published in Local Newspapers » Plan Published on EPA Webpage, Placed in Repositories, Mailed, and Distributed by Local Environmental Justice Organization • EPA Explained Plan at Community Meeting in Rialto • Community Interviews • Updated EPA Webpage
2011	• Pre-Design Work for Source Area Remedy Began	• Updated EPA Webpage
2012–2013	• Remedial Design for Source Area Remedy Begins	• Community Involvement Plan Completed • Updated EPA Webpage • Flyers Distributed Door-to-Door

FUTURE ACTIVITIES (PLANNED)

Year(s)	Activity	Community Involvement
2013-2016	• Design and Construction of Source Area Remedy • RI/FS, Proposed Plan, and ROD for the Mid-Basin Groundwater Cleanup Project	• Factsheets • Email Communication Updates • Presentations to Community Groups (if requested) • Updates to EPA Webpage • Public Meeting and/or Open House Workshop
2017-2018	• Design and Construction of the Mid-Basin Groundwater Cleanup Project	• Factsheets • Email Communication Updates • Presentations to Community Groups (if requested) • Updates to EPA Webpage • Open House Workshop



APPENDICES

APPENDIX A

Site History

The EPA has gathered information about the Site from government records, documents obtained from businesses that operated at the Site, the testimony of former employees of those businesses, newspaper clippings, and aerial photographs.

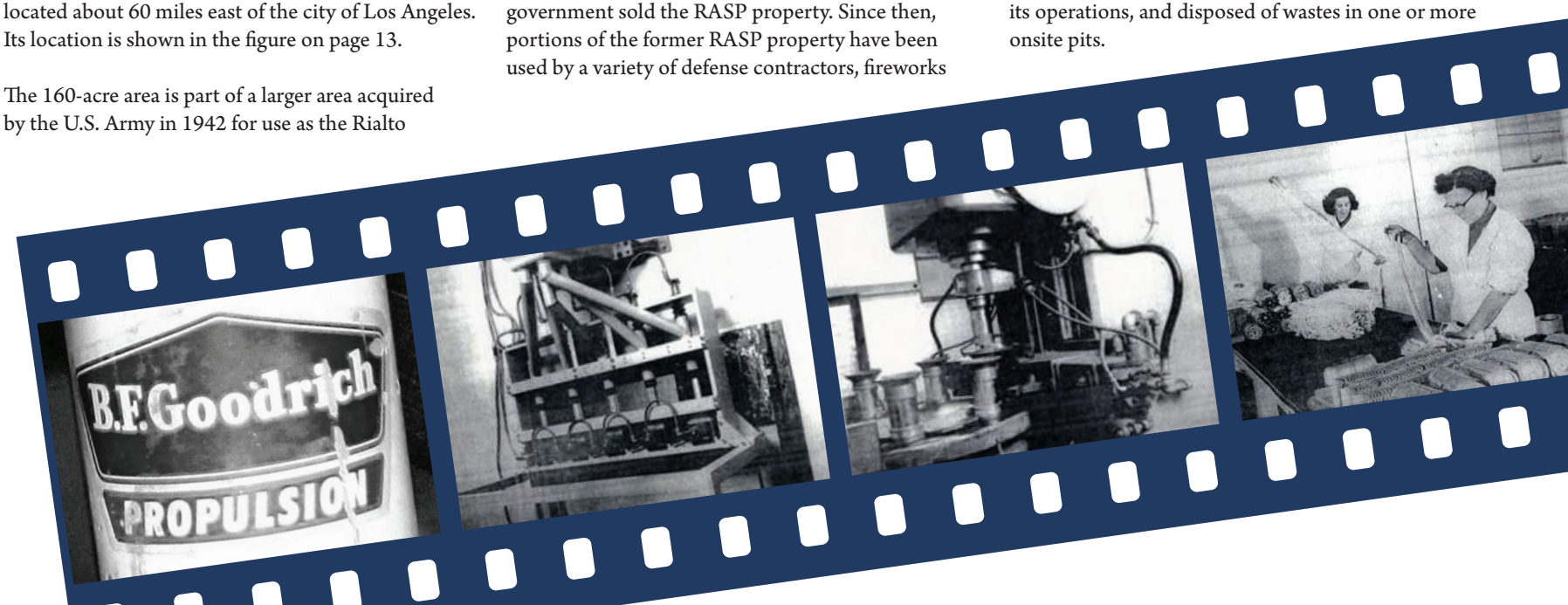
The Site includes a 160-acre industrial area in Rialto, CA and contaminated groundwater that has spread from the 160-acre area. The 160-acre area is bounded by West Casa Grande Drive on the north, Locust Avenue on the east, Alder Avenue on the west, and an extension of Summit Avenue on the south. The Site is located about 60 miles east of the city of Los Angeles. Its location is shown in the figure on page 13.

The 160-acre area is part of a larger area acquired by the U.S. Army in 1942 for use as the Rialto Ammunition Backup Storage Point (RASP). The U.S. Army acquired 2,822 acres of mostly undeveloped land and subsequently developed and operated on approximately 740 of the 2,822 acres. The RASP included a network of rail spurs to store rail cars, bunkers adjacent to the rail spurs, approximately 20 earthen-covered concrete storage igloos, approximately four magazines used to store ammunition, and assorted buildings. The RASP was an inspection, consolidation, and storage facility for railcars transporting bombs, ammunition, and other ordnance to the Port of Los Angeles, California. The materials handled at the RASP may have included flares and other pyrotechnics containing perchlorate salts.

In 1946, after World War II ended, the United States government sold the RASP property. Since then, portions of the former RASP property have been used by a variety of defense contractors, fireworks manufacturers, and others who used perchlorate salts and other chemicals in their manufacturing processes or in their products.

From about 1952 to 1957, the West Coast Loading Corporation tested and manufactured pyrotechnic devices onsite. West Coast Loading manufactured photoflash flares and ground-burst simulators, both containing potassium perchlorate, and disposed of wastes onsite. They also may have used solvents.

From about 1957 to 1962, B.F. Goodrich Corporation conducted research, development, testing, and production of solid-fuel rocket propellant and solid-fuel missile and rocket motors containing ammonium perchlorate, used chlorinated solvents in its operations, and disposed of wastes in one or more onsite pits.



From about 1968 to 1987, Pyrotronics (including its Apollo, Red Devil, and California Display Fireworks divisions) manufactured, tested, and distributed pyrotechnics containing potassium perchlorate, and disposed of wastes onsite. Since 1979, Pyro Spectaculars Inc. (PSI), which produces fireworks shows throughout the U.S., has operated on the 160-acre area. PSI has tested fireworks, burned waste materials, and disposed of wastes onsite. Since about 1989, American Promotional Events – West (APE-West) has operated on the 160-acre area. APE-West has tested and stored fireworks containing potassium perchlorate and burned defective and off-spec fireworks onsite.

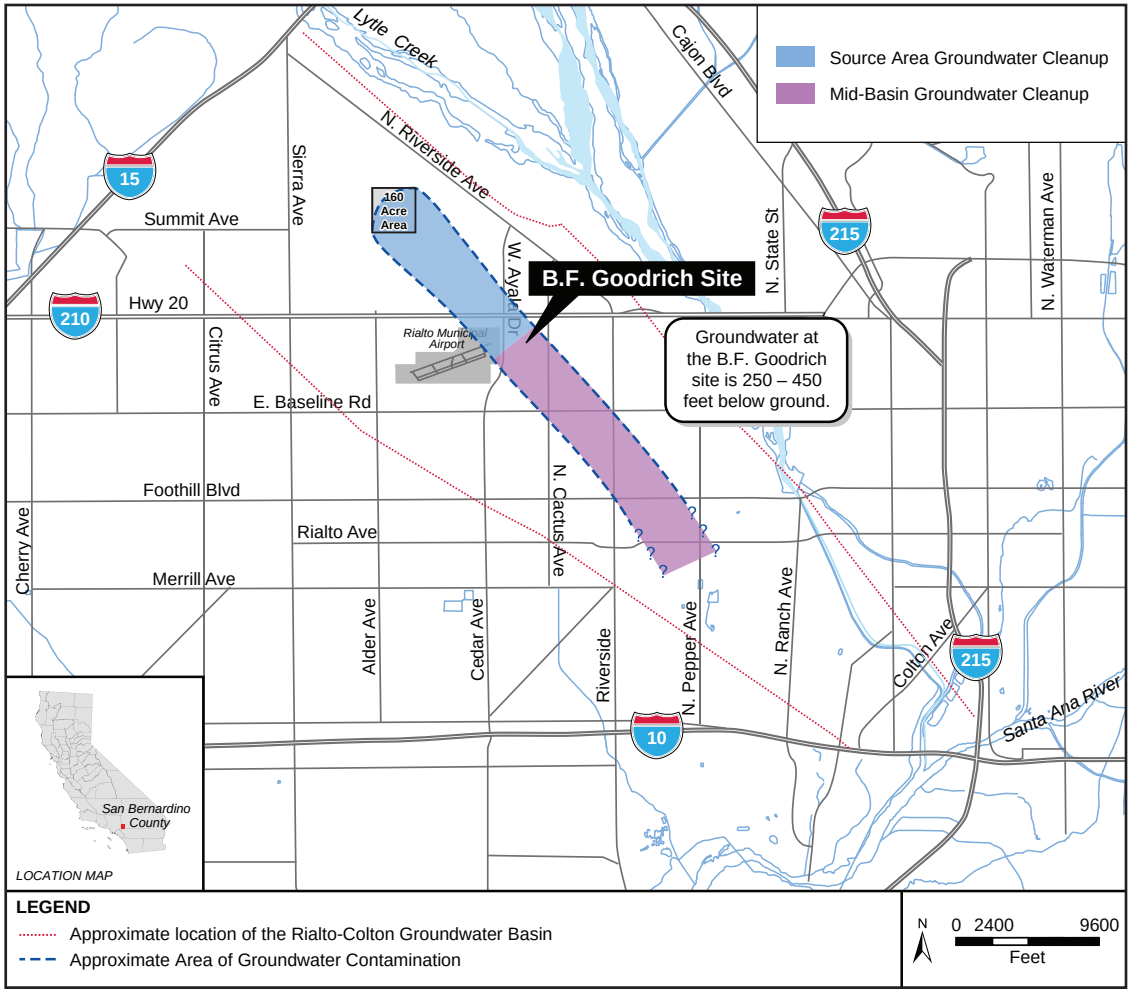
Many of the buildings constructed in the 1950s and 1960s are still present at the Site.

EPA and State Efforts (2002-2008)

TCE was discovered in groundwater in a water supply well in an area that is now part of the Site in the 1980s. Another chemical contaminant, known as perchlorate, was discovered in the groundwater in 1997. Efforts to identify the sources of the contamination and plan for its cleanup began in about 2002, when the Santa Ana Regional Water Quality Control Board (the "Water Board"), a State agency, began efforts to investigate the extent of soil and groundwater contamination at and near the Site. Between 2002 and 2008, the Water Board actively worked with Potentially Responsible Parties (PRPs) and property owners to conduct several investigations. Since 2005, the California Department of Toxic Substances Control (DTSC) has also directed and overseen soil testing on a portion of the Site.

EPA began assisting the Water Board in 2002, and became the lead agency for cleanup of the Site in about 2008. EPA investigation and cleanup efforts have included searches of historical records; interviews of former employees; issuing an administrative order to two PRPs to complete soil and groundwater testing , oversight of testing efforts by Potentially Responsible Parties, completing soil and groundwater testing that the PRPs refused to carry out; and the award of approximately $1.3M in grants to the water purveyors.

These efforts have identified several likely sources of the groundwater contamination, including disposal of wastes by Goodrich Corporation, West Locust Loading Corp., Pyrotronics, and others.



B.F. Goodrich Superfund Site

National Priorities Listing (2008-2009)

In 2008, after the Water Board's efforts were stalled by legal challenges, EPA increased its efforts at the Site. In September 2008, after determining that the Site was eligible for the Superfund List and receiving a letter of support from the State of California, EPA proposed adding the Site to the Superfund National Priorities List. In September 2009, after considering numerous comments on EPA's proposal, EPA formally added the Site to the Superfund list. The cities of Rialto and Colton both supported placement of the Site on the Superfund list.

EPA Cleanup Efforts (2009 to present)

In February 2010, EPA completed a remedial investigation and feasibility study (RI/FS) for the first of two planned groundwater cleanup projects at the Site (known as the "Source Area Operable Unit"). After making its proposed groundwater cleanup plan and RI/FS Report available, EPA held a public meeting in Rialto, CA to explain and accept comments on its proposal. EPA carefully considered the comments, and then adopted a cleanup plan (a "Record of Decision") on September 30, 2010. The Record of Decision describes the selected remedy, explains the basis for EPA's decision to select the remedy, and responds to comments on EPA's proposed cleanup plan.

EPA's cleanup plan calls for the construction and operation of a groundwater pump and treat system intended to intercept and remove contaminated groundwater spreading from the 160-acre source area. The 160-acre source area is where most or all of the contaminants entered the groundwater and testing has identified the highest levels of groundwater contamination.

The groundwater pump and treat system will include groundwater extraction wells, water treatment equipment to remove the contaminants from the extracted groundwater, pipelines and pumps to convey the treated water from the treatment plant, and a groundwater monitoring program. EPA's preference is that the treated groundwater be delivered to a local water utility for use as drinking water. EPA estimated the cost of the remedy to be $13 million for design and construction, and $1.3 for annual operation and maintenance. Design work on the project began in late 2012.

In 2010, EPA began the RI for the second of the two planned groundwater cleanup projects (known as the "Mid-Basin Operable Unit"). To date, the RI has included the installation and testing of a network of 11 deep groundwater monitoring wells and annual testing of more than 90 groundwater wells or well zones. Additional testing and evaluation is planned in 2013 and 2014.

EPA Enforcement and Cleanup Efforts (2010 to present)

In 2010 and 2011, on EPA's behalf, the U.S. Department of Justice (DOJ) filed a lawsuit against four companies that operated at the Site (or their corporate successors) and two current property owners believed to be responsible for the contamination. The lawsuit sought reimbursement of EPA's investigation and cleanup costs and a court judgment that the parties are responsible for carrying out the cleanup.

In 2012 and 2013, EPA reached agreements with the U.S. Department of Defense and the companies that had been sued. The agreements will result in "Potentially Responsible Parties," rather than EPA, paying for most or all of the cleanup work at the Site.

Site Meetings

Year	Date	Activity
2009	December 2	Joint EPA and CDPH Public Meeting
2010	February 10	EPA Proposed Plan Public Meeting (EPA's "Source Area" Groundwater Cleanup Plan)

B.F. GOODRICH SITE PROGRESS

1 Site Discovery

2 Preliminary Assessment/Site Investigation (PA/SI)

completed 2009

3 Placement of the Site on the Superfund National Priorities List (NPL)

Site proposed 9/3/08; final on 9/23/09

4 Remedial Investigation (RI)

Source Area Cleanup: completed 2/3/10
Mid-Basin Cleanup: underway

5 Feasibility Study (FS)

Source Area Cleanup: completed 2/3/10
Mid-Basin Cleanup: planned start in 2014 or 2015

6 Proposed Plan

Source Area Cleanup: completed 2/3/10
Mid-Basin Cleanup: est. 2015

7 Remedial Design (RD)

Source Area Cleanup: underway
Mid-Basin Cleanup: est. 2015 - 2017

8 Remedial Action (RA)

Source Area Cleanup: planned start in 2015
Mid-Basin Cleanup: est. 2018

9 Five Year Review

10 Deletion

APPENDIX B

Superfund Cleanup Program Overview

During community interviews, EPA was asked about its cleanup process. This appendix summarizes major steps in the cleanup process, from the initial investigations through the deletion of the Site from the National Priorities List (Superfund List).

EPA plans two groundwater cleanup projects at the Site. As of June 2013, the Site is currently at Step 7 for the first project (the Source Area Cleanup), and Step 4 for the second project (the Mid-Basin Cleanup).

1. Site Discovery

The first step in the Superfund process is called Site Discovery. EPA "discovers" sites that may need cleanup from a variety of sources, including the public, state and local agencies, and the media.

2. Preliminary Assessment/Site Investigation (PA/SI)

In the Preliminary Assessment, EPA reviews existing information about the Site, such as historical records about waste disposal and the results of soil or water testing. In the Site Investigation, EPA may conduct a Site visit and complete additional testing.

3. National Priorities List (NPL)

At sites that EPA may propose adding to the National Priorities List (NPL), EPA scores the Site using the Hazard Ranking System. If EPA decides to formally propose adding the Site to the NPL, EPA publishes the name of the Site in the Federal Register (the official daily publication for rules and notices of Federal agencies) and seeks comments on its proposal from the public.

After considering public comments for and against adding the Site to the NPL, EPA decides whether to add the Site. As of June 2013, there are 1,320 sites on the NPL (Another 365 sites have been deleted from the NPL).

4. Remedial Investigation (RI)

Following NPL listing, EPA conducts a thorough investigation of the Site, characterizing the sources of contamination, the extent of contamination (e.g., the area affected and to what depth), the types and concentrations of contaminants, and potential risks to people or wildlife that may come into contact with contaminated water or other materials. This may require air, soil, surface water and/or groundwater testing and multiple sampling events that can take several years. Testing procedures are usually described in a Sampling and Analysis Plan (SAP).

Reports summarizing the results of the Remedial Investigation (RI) are placed in the Site Information Repositories.

During this time, EPA staff conducts stakeholder interviews to help understand the community's issues and concerns. The information acquired from the interviews is used to prepare a Community Involvement Plan (CIP), which guides EPA's public participation efforts. The CIP includes a cleanup timetable, a list of activities to involve the public, and contact information.

5. Feasibility Study (FS)

Once the nature and extent of contamination is reasonably well understood, EPA develops a list of ways to address the contamination. The options are organized into "remedial alternatives" that are evaluated using EPA-prescribed criteria, including protectiveness of human health and the environment, ease of implementation, cost, and time to reach cleanup goals. The results of the evaluation are described in a Feasibility Study report.

The Feasibility Study report is made available in the Information Repository. The RI and FS are often spoken of in combination (as the "RI/FS") and summarized in a single document (an "RI/FS" report).

EPA also considers two other criteria, State and community acceptance, after the receipt of public comments on a Proposed Plan.

6. Proposed Plan and Record of Decision

A Proposed Plan is an EPA document written for and distributed to the public. It summarizes the findings of the RI/FS, compares various ways to address the health risks posed by Site contaminants, identifies EPA's preferred cleanup alternative, and explains how the public can comment on EPA's proposal. After carefully considering the comments, EPA adopts a cleanup plan (a "Record of Decision"). The Record of Decision explains which cleanup methods, actions, tools and/or techniques will be used at the Site.

7. Remedial Design (RD)

Remedial Design is the development of engineering drawings and specifications to carry out the cleanup plan described in the Record of Decision.

8. Remedial Action (RA)

Remedial Action is the actual building of treatment facilities, removal of wastes, and other actions required by the cleanup plan. Treatment facilities often operate for decades, particularly at sites where contaminants have affected the groundwater.

9. Five Year Review

The Five Year Review is an analysis, prepared every five years after cleanup begins at sites where contaminants remain, to determine if Site remedies remain protective of human health and the environment. When the Five Year Review process begins, the community is notified and asked to provide any information, issues, or concerns about the remedy. When a Five Year Review report is completed, the community is notified of the results.

10. Site Deletion

When a site has met its cleanup objectives, it can be removed from the NPL (the Superfund List). The public is notified and a comment period is held.

APPENDIX C

Site Contaminants

Due to past industrial activities, perchlorate, trichloroethylene (TCE), and other volatile organic compounds have contaminated groundwater at the Site. Test results from groundwater wells have found perchlorate, TCE, and carbon tetrachloride in groundwater at levels exceeding drinking water standards (known as "Maximum Contaminant Levels" or "MCLs").

The contaminants can affect your health only if they enter your body through consumption or use of contaminated soil or groundwater, and only if the dose (how much) exceeds safe levels. To prevent the consumption of contaminated groundwater at the Site, the water utilities supplying drinking water to homes and businesses in the Rialto area have closed contaminated wells, installed water treatment systems to remove perchlorate and TCE from the water,

obtained water from uncontaminated sources, and continue to test the water to make sure that it meets or exceeds State and Federal drinking water standards. The State of California enforces standards limiting TCE, carbon tetrachloride, and perchlorate in drinking water to no more than 5, 0.5, and 6 parts per billion respectively.

For more information on site contaminants and environmental exposure, please visit the ATSDR website at **http://www.atsdr.cdc.gov/**

APPENDIX D – ACRONYMS & ABBREVIATIONS

ATSDR – Agency for Toxic Substances and Disease Registry
CDPH – California Department of Public Health
CIP – Community Involvement Plan
DOJ – United States Department of Justice
DTSC – California Department of Toxic Substances Control
EPA – United States Environmental Protection Agency
FS – Feasibility Study
MCL – Maximum Contaminant Level
NPL – National Priorities List
PRP – Potentially Responsible Party
RASP – Rialto Ammunition Backup Storage Point
RI – Remedial Investigation
Site – B.F. Goodrich Superfund Site
TCE – Trichloroethylene
Water Board – Santa Ana Regional Water Quality Control Board

Construction of a groundwater monitoring well in Rialto, CA

APPENDIX E

Key Contacts

EPA Contacts

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Community Involvement Coordinator
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Santa Ana Regional Water Quality Control Board (Water Board) Contact

Kurt Berchtold
Executive Officer
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California Department of Toxic Substances Control Contact

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Senior Project Manager
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City of Rialto

See the city's website at: **http://www.ci.rialto.ca.us/water_index-perchlorate.php**

Former Site manufacturing building

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San Bernardino, CA 92407
(909) 889-9666

The Press-Enterprise
3450 Fourteenth Street
Riverside, CA 92501
(951) 684-1200

Information Repository and Website

Local

Rialto Branch Library
Manager: Michael Jimenez
251 West 1st St
Rialto, CA 92376
(909) 875-0144
Hours:
Monday – Wednesday: 10:00am – 8:00pm
Thursday and Friday: 10:00am – 6:00pm
Saturday: 9:00am – 5:00pm
Sunday: closed

Regional

EPA Region 9
Superfund Records Center (SFD-7C)
95 Hawthorne Street, Room 403
San Francisco, CA 94105
(415) 820-4700
Hours:
Monday through Friday: 8:00am – 5:00pm

EPA Website

www.epa.gov/region09/bfgoodrich

Aerial view of northern Rialto, including "160-acre" area at right

B.F. Goodrich Superfund Site
www.epa.gov/region09/bfgoodrich

Community Involvement Plan
July 2013

United States
Environmental Protection
Agency