



Newmark Groundwater Contamination Superfund Site

U.S. Environmental Protection Agency • Region 9 • San Francisco, CA • July 2014

San Bernardino, CA

U.S. EPA Proposes Final Cleanup Plan

Introduction

This Proposed Plan presents the U.S. Environmental Protection Agency's (EPA) preferred alternative for a final cleanup remedy for the Newmark and Muscoy Operable Units (OUs) to address contaminated groundwater at the Newmark Groundwater Contamination Superfund Site (Site) in San Bernardino, California (Figure 1). EPA encourages the community to become involved by reviewing and commenting on this Plan. The public comment period begins on August 4, 2014 and ends on September 4, 2014. EPA will hold a public meeting on August 13, 2014 when the Plan will be presented and verbal comments are formally recorded. See right for more details on how to comment.

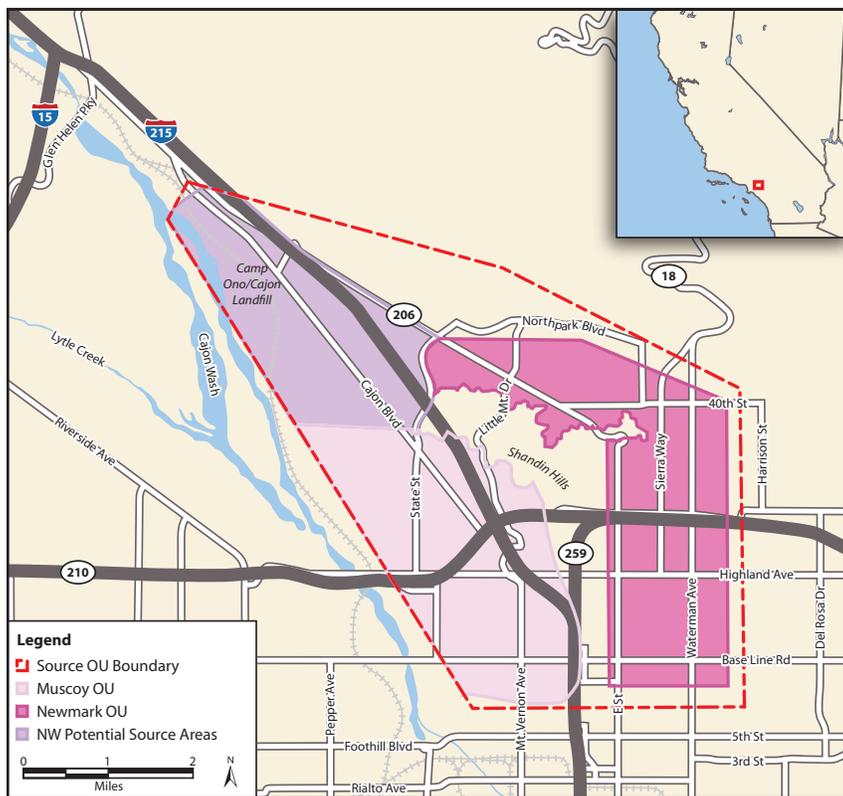


Figure 1: Map of Newmark Groundwater Contamination Superfund Site and Operable Units (OUs).

You're Invited to a Public Meeting

EPA will hold a public meeting to present the Newmark Groundwater Contamination Superfund Site Proposed Plan, answer presentation clarification questions, and record verbal comments. Public comments will be accepted at the meeting on:

Wednesday, August 13, 2014

6:00 pm – 8:30 pm

City Hall of San Bernardino
Council Chambers
300 North "D" Street
San Bernardino, CA 92401



Public Comment Period is from August 4 – September 4, 2014

Public comments may be made at the public meeting or submitted by e-mail, phone, or postal mail no later than September 4, 2014. You can send your comments to:

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The Site was added to EPA's National Priorities List in 1989 following the detection of tetrachloroethene (PCE) and trichloroethene (TCE) in groundwater and the subsequent closure of 20 water supply wells.

The two current interim remedies were selected in two earlier decision documents called Interim Records of Decision (ROD) for the Newmark and Muscoy OUs in 1993 and 1995, respectively. The interim remedies use groundwater extraction wells to inhibit and contain the contaminated groundwater from spreading further into unaffected groundwater areas. Extracted groundwater is treated to meet federal and state drinking water standards

(e.g., the current federal and state drinking water standards for both PCE and TCE is 5 micrograms per liter [$\mu\text{g/L}$] or 5 parts per billion [ppb]) and the drinking water supply permit requirements so it can be used as part of the local drinking water supply. The 2004 Explanation of Significant Difference (ESD) report supplements the interim RODs with institutional controls (ICs) to protect the performance of the interim remedies. Specifically, ICs in the form of a permit and review process via a City ordinance and use of the Institutional Controls Groundwater Management Program Agreement (ICGMPA) when new or modified supply wells, and/or artificial recharge practices are proposed in the vicinity of the remedy. The 2005 Consent Decree (CD)

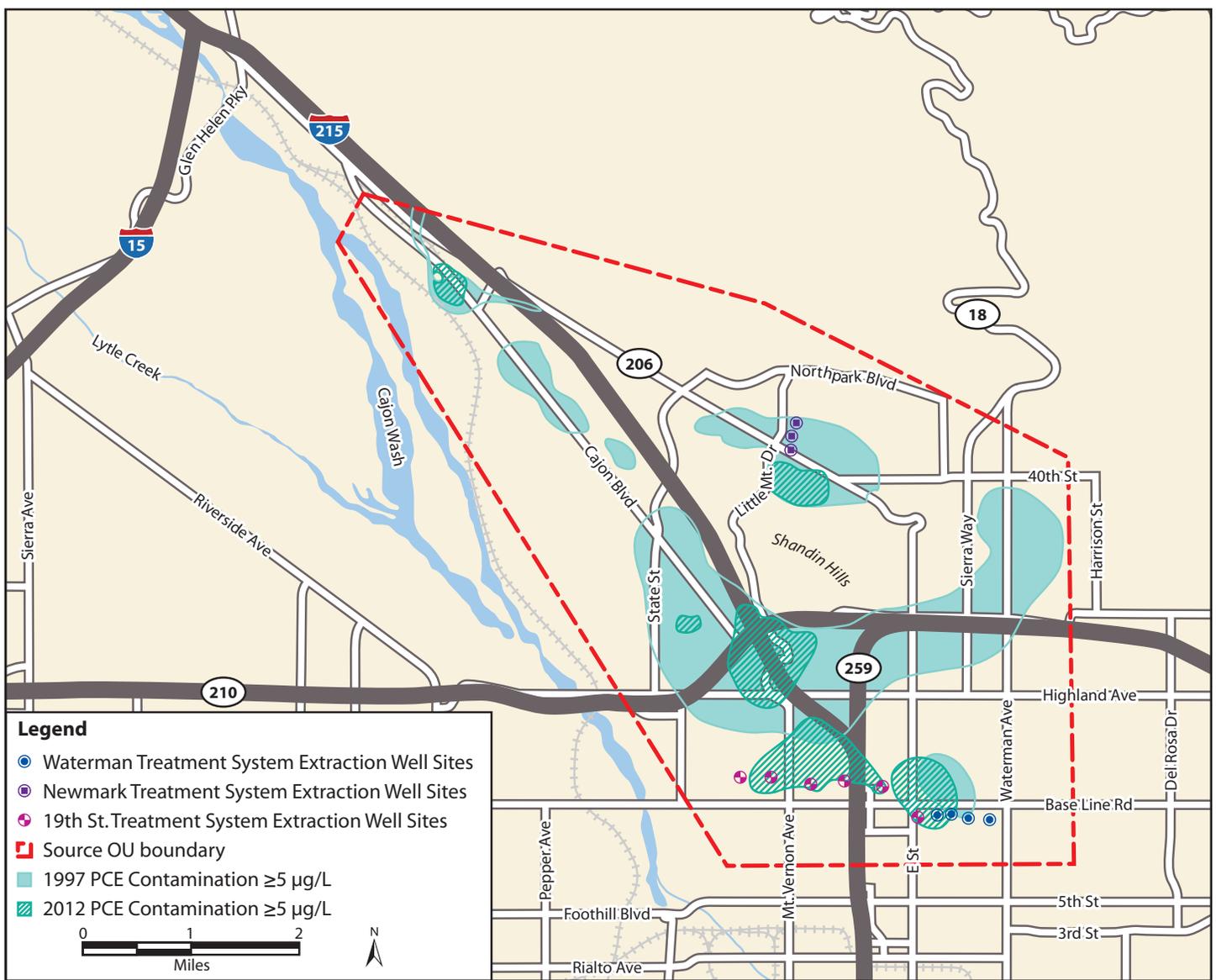


Figure 2: Map of the plume in 1997 and 2012 showing PCE contaminated groundwater at concentrations greater than or equal to federal and State drinking water standards (MCL of 5 micrograms per liter ($\mu\text{g/L}$)).

between the federal government and State of California detailed the operation and maintenance of the interim remedies and the implementation of the ICs.

After 16 years of operation of the Newmark OU treatment plants and nine years of the Muscoy OU treatment plant, the interim remedies have inhibited the contamination, preventing it from spreading further and significantly reducing the extent and magnitude of the remaining groundwater contamination (Figure 2). EPA's Proposed Plan would adopt the two interim groundwater containment remedies as one final groundwater restoration remedy for the Newmark and Muscoy OUs. Based on the latest analysis provided in the *Final Technical Memorandum; Source Identification, Plume Delineation, Restoration Time-frame Estimation and Transition from Interim to Final Remedy; Newmark Groundwater Contamination Superfund Site Source Operable Unit; San Bernardino, California* (Technical Memorandum) (May 2014), it is estimated to take at least 17 years of continued treatment to restore the aquifer in the Newmark and Muscoy OUs to federal and state drinking water standards (e.g., maximum contaminant levels (MCLs)) for PCE. The concentration of TCE contamination remaining in groundwater is below federal and State drinking water standards (5 µg/L) in all monitoring and extraction wells at the Site, and therefore TCE analysis was not included in the above Technical Memorandum.

EPA prepared this Proposed Plan in consultation with the California Department of Toxic Substances Control (DTSC) and the City of San Bernardino Municipal Water Department (SBMWD). Public comments

EPA's Preferred Alternative

The proposed preferred alternative is to continue the existing interim remedies being implemented at both the Newmark and Muscoy OU, which includes: 1) a groundwater extraction and treatment system where groundwater is pumped (extracted) and treated for PCE and TCE by a granular activated carbon (GAC) system (Figure 3) at three locations: the Newmark, Waterman, and 19th Street Treatment Plants; 2) ICs to prevent spreading of the contamination is implemented through a City Ordinance and an Agreement between the local water purveyors using a basin wide Groundwater Flow Model. The 2005 CD provides the detailed requirements for these implementations.

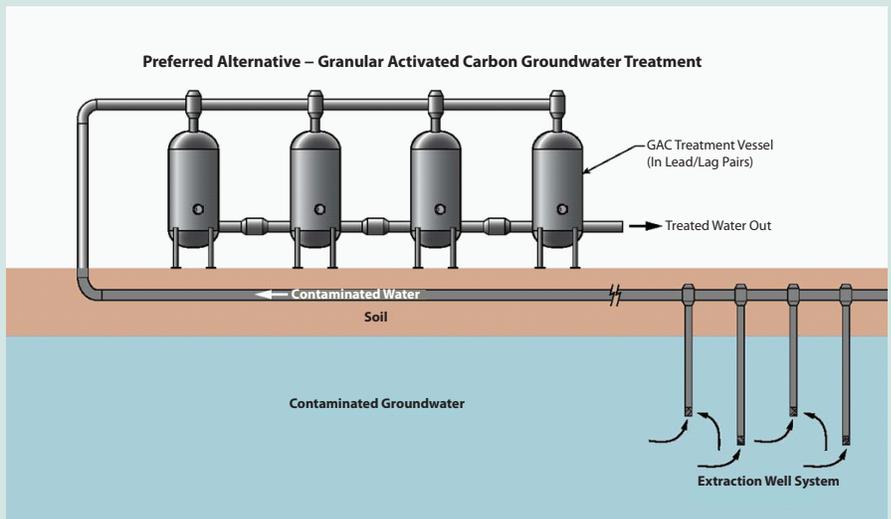


Figure 3: Pump and treat system with granular activated carbon (GAC).

received will be reviewed and responded to in a responsiveness summary included in the decision document called the Final Record of Decision (ROD) for the Newmark and Muscoy OUs (Figure 1).

For a detailed description of the information and analysis this Plan is based on, see the Technical Memorandum (May 2014) and other documents in the Administrative Record.

About the Newmark Site

The Site includes a plume of contaminated groundwater that has been divided into two separate parts by the Shandin Hills and covers an area in the north-western and east-central portions of the City of San Bernardino. EPA designated three operable units (OUs), defined as separate activities undertaken as part of a Superfund site cleanup, to address the groundwater contamination, the Newmark and Muscoy OUs, and a 23 square mile contamination source investigation area, or Source OU (Figure 1). The Source OU boundary is essentially the Site boundary (Figure 1).

Groundwater Contamination OUs

The splitting of the contaminated groundwater plume, also known as a bifurcating plume, occurs due to a combination of fluctuations in groundwater elevation and site geology influencing the direction of groundwater flow, and thus explaining the historical migration pathways of the plume. Groundwater preferentially flows to the north of the Shandin Hills except during wetter periods when groundwater elevation is high enough to also flow to the west of the Shandin Hills during wetter periods, thus creating the Newmark and Muscoy OU plumes. The Newmark OU plume is approximately eight miles in length originating in the northwest portion of the Site, crossing the Shandin Hills to the north and then east, until it reaches the Waterman Treatment Plant extraction well network (Figure 2). The six mile long Muscoy OU plume originates at the same location as the Newmark OU plume but passes the Shandin Hills to the west and extends just past the 19th Street Treatment Plant extraction well network (Figure 2).

Source Contamination OU

Several investigations to identify potential contaminant sources have also been conducted by EPA in the area northwest of Shandin Hills including the former Camp

Ono, a World War II era Army Depot, and the Cajon Landfill, and in the vicinity of the former San Bernardino Airport, east of Shandin Hills (Figure 1).

Past Site Activities

Key milestones in the site history are displayed in Figure 4.

The first interim remedy for the Newmark groundwater contamination plume was selected in the 1993 Newmark OU interim ROD (Figure 4). The cleanup objectives or remedial action objectives (RAOs) stated in the Newmark OU Interim ROD include:

1. To inhibit migration of groundwater contamination into clean portions of the aquifer;
2. To limit additional contamination from continuing to flow into the Newmark OU plume area; and
3. To begin to remove contaminants from the groundwater plume for eventual restoration of the aquifer to beneficial uses. (This is a long-term project objective rather than an immediate objective of the interim action.)

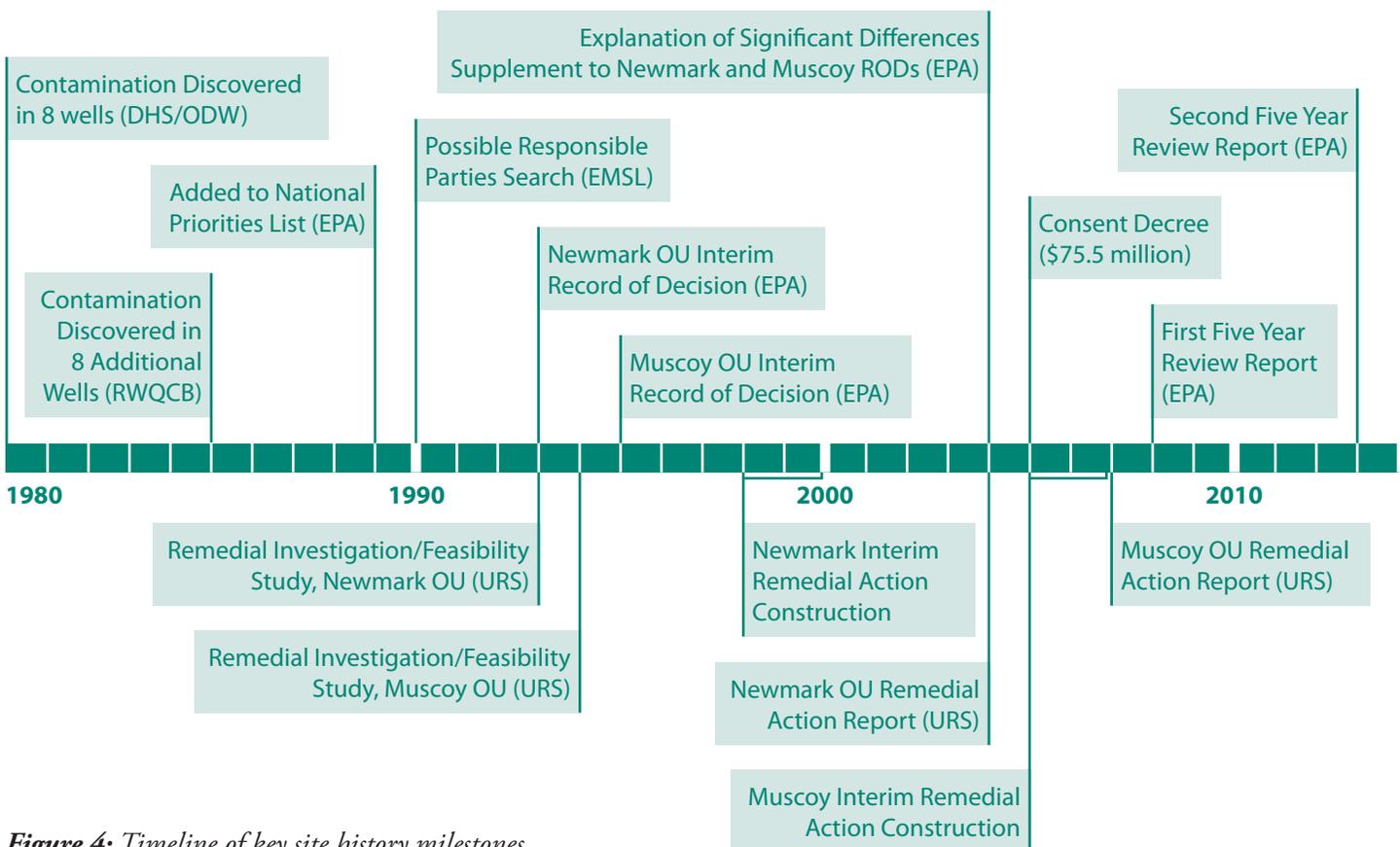


Figure 4: Timeline of key site history milestones.

In 1995, an interim remedy was also selected for the Muscoy groundwater contamination plume (Figure 4). The cleanup objectives or RAOs as stated in the Muscoy OU Interim ROD include:

1. To inhibit migration of groundwater contamination into clean portions of the aquifer;
2. To protect downgradient municipal supply wells south and southwest of the Shandin Hills; and
3. To begin to remove contaminants from the groundwater plume for eventual restoration of the aquifer to beneficial uses. (This is a long-term project objective rather than an immediate objective of the interim action.)

The ESD signed in 2004, modifies the 1993 and 1995 Interim RODs by requiring an ICs to protect the performance of the interim remedies (Figure 4). The requirements for the interim remedy operation and maintenance are established in the 2005 CD and the CD Statement of Work between the EPA, DTSC, and SBMWD. In addition, EPA transferred the Lead Oversight Agency role for the Operation and Maintenance (O&M) to DTSC and the implementation of the interim remedies to SBMWD in 2005.

Implementation of the interim remedies resulted in the construction of two extraction and treatment systems: 1) the North System in the Newmark OU that includes three Extraction Well Sites and the Newmark Treatment Plant to limit additional contamination from continuing to flow into the Newmark OU plume area, and 2) the South Barrier System for both the Newmark and Muscoy OUs

that includes 10 Extraction Well Sites (one of the sites includes two extraction wells) and the two Waterman and 19th Street Treatment Plants to pump and treat contaminated water to inhibit migration of groundwater contamination into clean portions of the aquifer and to begin to remove contaminants from the groundwater plume for eventual restoration of the aquifer to beneficial uses. A system of ten monitoring wells south of the South extraction barrier wells is used to monitor the performance of the extraction barrier wells.

Implementation of the ICs (from the ESD) includes: 1) a City Ordinance implemented by SBMWD which requires entities that propose to install or modify a production well, or modify artificially recharge practices within a designated management zone, to submit a permit application detailing the location, construction and pumping rate of the proposed well, or the location and volume of water of a proposed artificial recharge activity, 2) the ICGMPA between SBMWD and several water purveyors with water rights in the Bunker Hill basin to manage production rates so as not to spread contaminated water into their clean drinking water wells; and 3) the development of a groundwater model as the technical tool to be used in the implementation of the City ordinance and the ICGMPA. This model was developed by the SBMWD in collaboration with the San Bernardino Valley Municipal Water District, with concurrence from all signatories of the ICGMPA.

Since their implementation, the Muscoy OU and Newmark OU treatment systems have inhibited migration of the contaminated groundwater and remove contaminants from the Newmark and Muscoy plumes. The combined volume of treated water from all plants is approximately 7.2 billion gallons annually. Since 1998, the treatment facilities have collectively removed almost 3,000 lbs of site-related contaminants from the groundwater (Figure 5). The treated water is used as part of the San Bernardino drinking water supply.

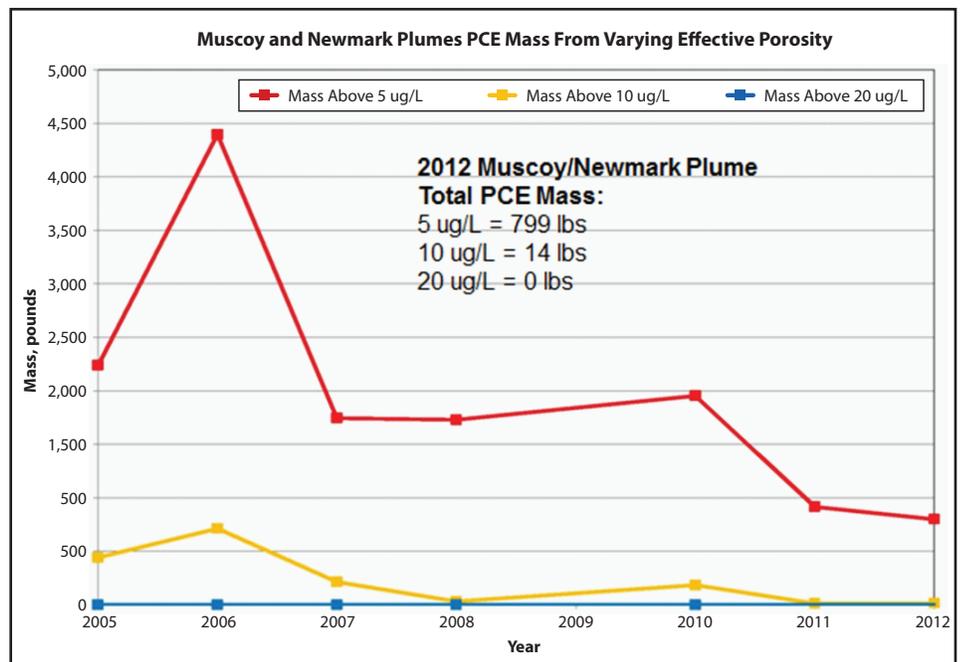


Figure 5: Newmark and Muscoy OU PCE mass calculation over time.

There are over 100 groundwater monitoring wells at the Site to monitor the extent and cleanup progress of the contaminated groundwater. Based on EPA's assessment of long-term groundwater monitoring data, there do not appear to be any active contamination sources that would result in an increase in the concentration or the present size of the Muscoy/Newmark plumes. An analysis of groundwater analytical sampling results indicates that concentrations of PCE and TCE in Site groundwater have continued to decrease (Figure 5) since the treatment systems became operational in 1998 and 2005. Additionally, the lateral and vertical extent of groundwater contamination has been significantly reduced. Today, the extent of site-related groundwater contamination is reduced to six localized areas with TCE above the federal and state drinking water standards (5 µg/L) (Figure 2).

Scope and Role of This Present Action

This ROD provides the final remedial action goals to continue the operation of the existing remedies for the restoration of the groundwater aquifer to its beneficial use as municipal and domestic water supply.

EPA's Reasons for Taking Action

Given the successful implementation of the Interim RODs and ESD the likelihood of restoring the affected aquifer to drinking water standards within a reasonable timeframe appears to be very high. Therefore, EPA proposes to adopt the interim remedial actions including the pump and treat (P&T) remedies from the two Interim RODs and the ICs from the ESD as final remedies for the restoration of the groundwater aquifer to beneficial use as a municipal and domestic water supply.

Current Contaminant Concentrations

The contaminants of concern at the Site are PCE and TCE. At present, there are approximately six localized areas of PCE groundwater contamination remaining in the plume at concentrations greater than the current MCL at 5 µg/L, located primarily in two areas south and east of the Shandin Hills (Figure 6). The latest findings in the 2014 Technical Memorandum, referenced above, indicate that the treatment systems will remove the remaining groundwater contamination (PCE plume mass that is above 5 µg/L) within nine years in areas to the south of the Shandin Hills and at least 17 years in the area to the east of the Shandin Hills (Figure 6), given the rate of contamination mass removal in the last eight years (Figure 5). Analysis of current monitoring data indicate the most concentrated area remaining located in the northwest source area of the site, is no longer acting as a source of contamination for the Newmark and Muscoy plumes.

What are Institutional Controls?

ICs are legal, non-engineering controls used to minimize the potential for exposure to contamination or to protect the remedy after it is completed. The ICs at this Site includes a permitting process for 1) new wells; 2) modifications to existing wells; and 3) modifications to artificial recharge practices, and the use of a groundwater flow model to assess the impact the change could have on the remedy performance.

Current Risks

There are currently no human health risks at the Site because no one is being exposed to contaminated groundwater. The groundwater P&T systems and ICs prevent exposure and are protective of human health. EPA evaluated the human health risk posed if no steps were taken to clean up the contaminated Site groundwater and presented its findings in the Remedial Investigation and Feasibility Study (RI/FS) (March 1993 and December 1994) reports. The cancer risk value and non-cancer hazard value presented in the RI/FS were recalculated for this investigation to reflect the most up to date scientific information available. For PCE contamination in groundwater, the cancer risk values range from 1.8E-05 to 7.7 E-06 and



Figure 6: Map of localized plume areas in 2012 in showing contaminated groundwater at concentrations greater than or equal to 5 µg/L.

the non-cancer hazard values range between 0.12 and 0.29. EPA determined that the contamination in the groundwater does not pose an unacceptable cancer risk or non-cancer risk. An “acceptable” risk level (or range) of a contaminant, defined by law, that EPA uses to make cleanup decisions at Superfund sites. This is a risk level (or range) that people can be exposed to, including sensitive populations, without health problems. For carcinogens, the acceptable risk range is between 1.0E-04 (1 in 10,000) and 1.0E-06 (1 in 1,000,000). For non-cancer, the acceptable hazard index values is below 1.

An ecological risk assessment (ERA) was also completed in the Interim RODs’ RI/FS (March 1993 and December 1994) to determine if any plants or animals within the Site could be threatened or at risk from Site-related contamination. Findings in the ERA indicate that there is no evidence of surface or near surface soil contamination and no surface water discharge of contaminated groundwater. As there is no complete exposure pathway, site-related contamination does not present any ecological risks.

The Preferred Alternative recommended by EPA is necessary to protect public health, welfare and the environment from actual or threatened releases of hazardous substances into the environment.

Cleanup Objectives

The cleanup objectives for this Proposed Plan, also known as RAOs, for PCE and TCE in groundwater are: 1) to inhibit migration of groundwater contamination into clean portions of the aquifer; 2) to limit additional contamination from continuing to flow into the Newmark OU plume area; 3) to protect downgradient municipal supply wells south and southwest of

the Shandin Hills; 4) to restore the aquifer to its designated beneficial use as an existing municipal and domestic water supply (MCLs); 5) to protect the public from coming into contact with contaminated groundwater; and 6) to protect the function and effectiveness of the treatment remedy.

Completion Certification Requirements

In order for the remedy to be certified complete, both of the following criteria must be met: 1) restoration of the aquifer to below MCLs for PCE and TCE is confirmed using the latest groundwater flow model; and 2) assurance that SBMWD and neighboring wells will continue to be able to operate in compliance of the drinking water supply permit requirements without treatment for PCE and TCE.

Summary of Cleanup Alternatives

EPA evaluated two cleanup alternatives for the Site: (1) No Action and (2) Adopt interim groundwater containment remedies as a final groundwater restoration remedy. No other remedies were evaluated because the current interim treatment systems and ICs have been very effective at reducing contaminant concentrations, preventing contaminant migration, and preventing exposure to humans. Moreover, the treatment systems have not only inhibited the spread of groundwater contamination into unaffected groundwater areas, but have also removed sufficient contaminant mass to where groundwater restoration to drinking water standards is achievable within a reasonable timeframe.

Is Vapor Intrusion a Concern at this Site?

Vapor intrusion is the process by which volatile chemicals, in vapor form, migrate up through the soil column and enter into overlying buildings. In the last Five Year Review (2013), it was determined that because depth to contaminated groundwater in both the Newmark and Muscoy OUs is greater than 100 feet, vapor intrusion is unlikely to be a significant exposure route.

Alternative 1: No Action

By law, EPA is required to consider the No Action alternative, a baseline alternative, on all of its Superfund cleanup sites. Under this baseline alternative, there would be no monitoring or cleanup activities and no ICs would be in place to prevent human exposure to contaminated groundwater. This alternative was considered in both Interim RODs and not selected as preferred alternative in both of them.

Estimated Capital Cost: **\$0**
Estimated Annual Operation and Maintenance (O&M) Cost: **\$0**
Estimated Present Worth (Total) Cost: **\$0**
Estimated Construction Timeframe: **None**

EPA's Proposed Preferred Alternative

Alternative 2: Adopt the Interim Groundwater Remedies as Final Groundwater Remedies

Alternative 2 would adopt the implementation of the current interim groundwater remedies as described above for the restoration of the Site's groundwater to its beneficial use as municipal and domestic water supply.

The current P&T systems would continue to operate, the groundwater monitoring network would be maintained, and the ICs would remain in effect. A recently approved expansion of two of the 19th Street Treatment System Extraction Well Sites to include an additional extraction well at each site will proceed under this alternative. This modification was made for the Muscoy OU to assure continued compliance. Groundwater would continue to be pumped to the three treatment plants and treated with GAC (see: Figure 3) to off-site water supply permit requirements and used as part of the municipal water supply. This Alternative would not change any of the operational groundwater containment criteria or potable water supply criteria embodied in the 2005 CD between the City of San Bernardino and state and federal regulatory agencies.

Estimated Capital Cost
(Muscoy OU prior settlement)..... **\$2,225,000**
Estimated Annual O&M Cost:..... **\$2,317,700**
Estimated Net Present Value (Total) Cost:..... **\$17,913,000**
Estimated Time to Achieve RAOs:..... **at least 17 years**

Evaluation of Alternatives

To determine which cleanup alternative to select, EPA evaluated and compared all alternatives using nine standard evaluation criteria, which EPA categorizes into three groups: (1) threshold criteria, (2) balancing criteria, and (3) modifying criteria. To be selected as the preferred alternative, an alternative must meet the two threshold criteria:

- Overall protection of human health and the environment; and
- Compliance with federal and state applicable or relevant and appropriate requirements (ARARs).

If an alternative meets the threshold criteria, it is evaluated further using the five balancing criteria:

- Long-term effectiveness and permanence
- Reduction in toxicity, mobility, and volume through treatment
- Short-term effectiveness
- Implementability
- Cost

Finally, the two modifying criteria are:

- State acceptance
- Community acceptance

Threshold Criteria

Alternative 1 is not protective of human health and the environment and does not meet ARARs, because it allows in situ contamination to remain above drinking water standards (MCLs). As Alternative 1 did not pass the threshold criteria, it was not evaluated against the other criteria and was eliminated from further consideration. Alternative 2 is protective of human health and the environment by preventing exposure to contaminated groundwater, preventing the spread of contaminated groundwater, and complying with all ARARs. Key ARARs for the aquifer are the federal and state drinking water standards for PCE and TCE, 5 µg/L.

Balancing Criteria

Long-term Effectiveness and Permanence

The cleanup achieved by Alternative 2 would be permanent. This alternative would clean up the aquifer to its beneficial use as an existing municipal water supply, and includes groundwater level monitoring and sampling to aid in evaluating the treatment effectiveness. The ICs in place are part of the long-term management to protect the function and the effectiveness of the interim remedy treatment systems and to prevent exposure to contaminated groundwater. This alternative would be implemented for at least 17 years based on estimates presented in the 2014 Technical Memorandum.

Reduction in Toxicity, Mobility, and Volume Through Treatment

Alternative 2 would reduce the volume of PCE and TCE by removing them from the groundwater using P&T with GAC technology and so satisfies the preference for treatment.

Short-term Effectiveness

Alternative 2 poses no new risks to workers and community members. The treatment systems are already built and any potential adverse impacts through their operation and maintenance would be controlled through existing worker health and safety programs.

Implementability

As Alternative 2 involves no change to the current treatment systems beyond the recently approved expansion of two of the extraction well sites, and ICs are currently in place, this alternative is highly implementable.

Cost

Alternative 2 is already actively cleaning up the contaminated groundwater and requires only minimal additional construction to accommodate recently approved extraction well site expansion, with a capital cost estimated at \$2.2 M. The estimated long-term O&M cost of this remedy has a Net Present Value estimate of \$50 M (total future costs over the lifetime of the project, with O&M, discounted at a rate of 7% per year).

Modifying Criteria

State Acceptance

The lead state agency, the California DTSC, has reviewed the Proposed Plan and concurs with EPA's proposed preferred alternative.

Community Acceptance

Community acceptance will be determined after the close of the public comment period. See page 1 of this Proposed Plan for details about how to provide comments to EPA.

EPA's Proposed Preferred Alternative

The proposed Preferred Alternative for cleaning up the Site is Alternative 2: No Change to Current Remedies: Groundwater P&T and ICs. The current remedies have successfully met the interim remedies' RAOs and ICs to "inhibit contamination migration and begin to remove contaminants from the groundwater plume for eventual restoration of the aquifer to beneficial uses." Under continuing operation, this remedy is estimated to clean up the groundwater to federal and state drinking water standards within at least 17 years. This RAO will be amended in the Final ROD to describe in situ groundwater aquifer

For More Information

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Information Repositories

The Administrative Record file, which contains documents EPA used to develop this Proposed Plan, is available to review online at EPA's website: www.epa.gov/region9/newmark and at the following locations:

John M. Pfau Library

Cal-State San Bernardino
5500 University Parkway, PL 401
San Bernardino, CA 92407
(909) 537-5090

Hours:
Monday – Thursday 8am – 10pm

EPA Superfund Records Center

95 Hawthorne Street, Room 403 S
San Francisco, CA 94105
(415) 820-4700

Hours:
Monday – Friday 8:30am – 5:00pm

restoration to its existing designated beneficial use as a municipal and domestic water supply.

Based on information currently available, the EPA believes the proposed Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other alternative with respect to the balancing and modifying criteria. EPA expects the proposed Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): (1) be protective of human health and the environment; (2) comply with ARARs (or justify a waiver); (3) be cost effective; (4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable; and (5) satisfy the preference for treatment as a principal element, or explain why the preference for treatment will not be met.

Drinking Water Standards Ensure Compliance with State and Federal Drinking Water Requirements

Drinking water supplied to the City of San Bernardino area residents and businesses is regularly tested to ensure compliance with all federal and state drinking water standards and water supply permit requirements before being served. In the past, drinking water supply wells that did not meet these standards were either equipped with water treatment systems or were shut down.

Glossary of Terms

Aquifer: A geologic formation or group of formations or part a formation that is capable of yielding a significant amount of water to a drinking water well or spring.

Applicable or Relevant and Appropriate Requirements (ARAR): Cleanup standards, criteria, or limitations that must be met by a remedy.

Explanation of Significant Differences (ESD): A public document that explains a change of a component of a remedy of a previous ROD without changing the overall cleanup approach.

Granular activated carbon (GAC): A material made from raw organic matter such as coconut shells, which is in a filter and traps chemicals dissolved in water. When full, the filters are returned to the vendor, the chemicals are destroyed and the remaining material is disposed of in a Class IV landfill.

Groundwater: Water that occurs below the surface of the Earth, where it occupies spaces in soil and geologic strata.

Institutional controls (ICs): Legal controls that help minimize the potential for human exposure to contamination, such as permits for new residential wells.

Maximum Contaminant Levels (MCLs): The threshold concentration of a contaminant above which water is not suitable for drinking.

PCE: Tetrachlorethene, a volatile solvent commonly used in dry cleaning operations.

Plume: A defined area of contaminated groundwater.

ppb: part per billion parts water; the equivalent of micrograms per liter water ($\mu\text{g/L}$).

Record of Decision (ROD): The public document that explains which cleanup alternative will be used to clean up a Superfund site.

Remedial action objectives (RAOs): Describe what the proposed site cleanup is expected to accomplish.

Remedy: The remedial alternative that is selected, documented in a ROD, and implemented at a site. A long-term action that stops or substantially reduces a release or threat of a release of hazardous substance.

TCE: Trichloroethene, a volatile solvent commonly used as a metal degreaser.

$\mu\text{g/L}$: micrograms per liter of water; the equivalent of one part per billion (ppb)

United States Environmental Protection Agency, Region 9
75 Hawthorne Street (SFD-7-3)
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Attn: Mariam Fawaz (Newmark 7/14)

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San Bernardino, CA 92401

**Public
Comment Period**
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