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18 June 2014

*Via Electronic Mail*

Mr. Wayne Praskins  
Remedial Project Manager  
United States Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105



Subject: Final Design  
Source Area Operable Unit,  
Rockets, Fireworks, and Flares Superfund Site

Dear Mr. Praskins:

On behalf of Emhart Industries, Inc. (Emhart), ERM-West, Inc. (ERM) submits this Final Design for the Source Area Operable Unit (SAOU) at the Rockets, Fireworks, and Flares Superfund Site, formerly known as the B.F. Goodrich Superfund Site. This Final Design is for implementation of remedial actions described in the Statement of Work for Remedial Design and Remedial Action for the Source Area Operable Unit, B.F. Goodrich Superfund Site (Statement of Work), which is Appendix F to the Consent Decree entered by the U.S. District Court for the Central District of California in *City of Colton v. American Promotional Events, Inc. et al.*, Case No. ED CV 09-01864 PSG (SSx) on 2 July 2013 (Doc. No. 1820).

The Final Design includes the following components:

- Enclosure 1 includes U.S. Environmental Protection Agency (USEPA) and California Department of Public Health (CDPH) comments and Emhart responses on the Preliminary Design and Pre-Final Design.
- Enclosure 2 includes an updated schedule for construction and implementation of the remedial action through satisfaction of “Operational and Functional” criteria.
- Enclosure 3 includes the capital and annual operation and maintenance cost estimate. There are no changes from the cost estimate included with the 18 February 2014 submittal.

- Enclosure 4 includes construction specifications that conform to Construction Specification Institute format. The key revisions to the specifications submitted on 18 February 2014 include:
  - Section 01 45 00 was updated as noted in the 1 May 2014 Emhart responses to USEPA comments;
  - Section 31 23 23 was added to specify gravel and crushed rock base for structures such as manholes and vaults;
  - Section 40 91 13.16 was added to specify the chlorine process measurement devices;
  - Section 40 91 16 was added to specify the pressure transmitters;
  - Section 40 91 17 was added to specify the pressure switches; and
  - Section 40 91 18 was added to specify the ultrasonic level transmitters and controller.
- Enclosure 5 includes design/construction drawings. Revisions to the drawings submitted on 18 February 2014 (beyond minor editorial modifications) include:
  - Sheet 5A - As requested by USEPA in its 17 April 2014 comments, this overall Site Plan, including the infiltration basin, was added to the package.
  - Sheets 14, 15, 16, and 39 - This update to the Pre-Final Design was submitted on 16 May 2014. These sheets present the drawings for the Linden Avenue pipeline connecting the Combined Treatment Plant to the City of Rialto (Rialto) municipal water supply system (Drawings C-9, C-10, and C-11) and an updated drawing M-1 for the treatment plant presenting the details of the connection from the treatment plant to Linden Avenue.
  - Sheets 21, 26, 27, and 28 - These drawings include additional detail on the Randall Avenue sampling box and the associated electrical/controls enclosure based on additional discussions with Rialto and Colton.
  - Sheets 43, 44, 46, and 55 - These drawings were updated in response to CDPH comments received on 25 March 2014.
  - Sheet 49 - This drawing was updated in response to USEPA comments received on 17 April 2014.

- Sheets 68, 75, and 78 - These sheets were added to provide additional details on the electrical site plan for the treatment plant.
- Sheets 79, 80, 81, and 82 - These sheets were added to provide electrical details for the Randall Avenue connection.
- Enclosure 6 includes the Final Construction Quality Assurance Plan revised in accordance with the 1 May 2014 Emhart responses to USEPA comments.

The Construction Health and Safety Plan will be finalized following selection of the contractor(s) so the contractor specific hazard analysis can be included as attachments.

With the above referenced additions and modifications reflecting the responses to comments approved by USEPA in its 19 May 2014 letter, the enclosed design package is now final, subject to potential modifications based on: (1) discussions with CDPH regarding amendment of Rialto's domestic water supply permit as required for implementation of the remedial action; (2) conditions for permits required for construction from Rialto and the City of Colton; (3) discussions with the County of San Bernardino regarding planning for potential future expansion of the Combined Treatment Plant; and (4) actual field conditions (i.e., presence of unidentified utilities, access limitations, etc.).

If you have any questions or concerns, please contact Mr. Truong Mai at (949) 623-4700 or Ms. Heather Balfour at (916) 924-9378.

Sincerely,



Heather D. Balfour, P.E.  
*Project Manager*



Truong T. Mai, P.E.  
*Partner*



Enclosures

cc:

Work Consent Decree Notices:

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