



Modesto Groundwater Contamination Superfund Site

SFUND RECORDS CTR
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SFUND RECORDS CTR
2464-00175

U.S. Environmental Protection Agency, Region IX, San Francisco, CA

Modesto, California

July 1997

EPA Proposes Plan for Groundwater Cleanup Project AR0330 in Modesto, California

Introduction

In accordance with section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, this fact sheet is the U.S. Environmental Protection Agency's (EPA's) Proposed Plan for interim cleanup of tetrachloroethene (PCE) - contaminated groundwater at the Modesto Groundwater Contamination site. EPA, in coordination with the California Department of Toxic Substances Control (DTSC) and the City of Modesto, is requesting comments on this Proposed Plan and encourages you to comment on the alternatives discussed here. **A community meeting will be held on July 29, 1997 to discuss these alternatives and to take your comments on the plan (see page 10 for details). A final decision on the interim remedial action will be made after public input is received.**

After the public comment period, EPA will select one of these alternatives, based on public input, to begin cleanup of groundwater contamination. EPA will summarize the alternative selected in the interim Record of Decision (ROD) for the Modesto site.

The interim remedial action will be monitored carefully to determine the feasibility of achieving applicable requirements throughout the aquifer for the final remedial action. It is EPA's goal to determine a final remedial decision for this site within 18 to 24 months from implementing the interim remedial action.

EPA's Preferred Remedial Alternative

EPA's preferred remedial alternative for groundwater contamination at the Modesto site involves groundwater extraction (pumping) at the source area near Halford's Cleaners and treatment of the water by air stripping. Figure 1 shows the site layout and well locations. Figure 2 shows the approximate proposed location of the treatment system and a schematic of the system itself. Air stripping is the preferred technology for groundwater treatment because it

is the most cost effective. Pending approval of a groundwater discharge permit by the City of Modesto, treated groundwater will be discharged to the sewer system.

In addition to directly treating the groundwater by air stripping, a soil vapor extraction (SVE) system will also be installed to remove PCE from pore spaces in the soil zone directly above the water table. PCE in the soil vapor is in equilibrium (goes back and forth) with PCE in the groundwater. The SVE system will increase the efficiency of the preferred remedial alternative by removing more PCE in a shorter time than with groundwater treatment alone

The preferred remedial alternative, called "SVE and Groundwater Extraction and Treatment of Main Source Area (One Extraction Well); Monitoring and Evaluation of Downgradient Edges of the Plume," is expected to remove 90% to 95% of dissolved PCE from the groundwater. It is significantly more cost effective than other alternatives because it will generate less treated water to be discharged and also avoids unnecessary negative impacts to the community (e.g., additional extraction wells in residential areas).

Additionally, EPA will be monitoring the downgradient edge of the plume to determine if the other five to ten percent of the PCE would be removed through natural physical mechanisms (i.e., natural attenuation).

As part of the preferred remedial alternative, EPA will collect additional data to determine whether other measures are necessary to achieve drinking water standards within a reasonable time frame. At this time, EPA need not meet maximum contaminant levels (MCLs) in the aquifer. The interim action is only part of a total remedial action that will ultimately meet applicable or relevant and appropriate requirements (ARARs) for groundwater. If monitoring reveals that natural attenuation is not occurring, the edges of the plume will be addressed in the final remedy.

Figure 1

MODESTO GROUNDWATER CONTAMINATION SITE

(Detailed Inset of Well Locations at Right)

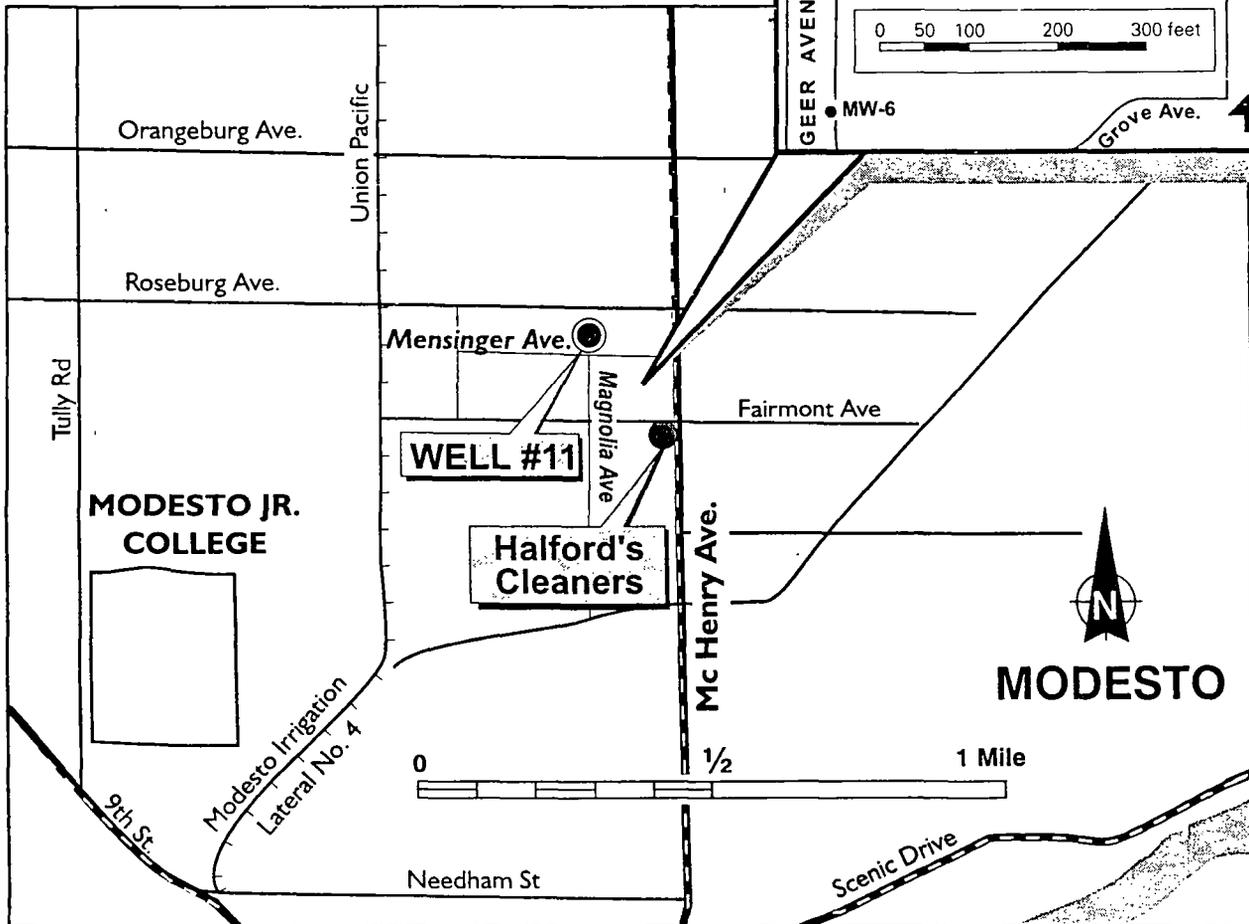
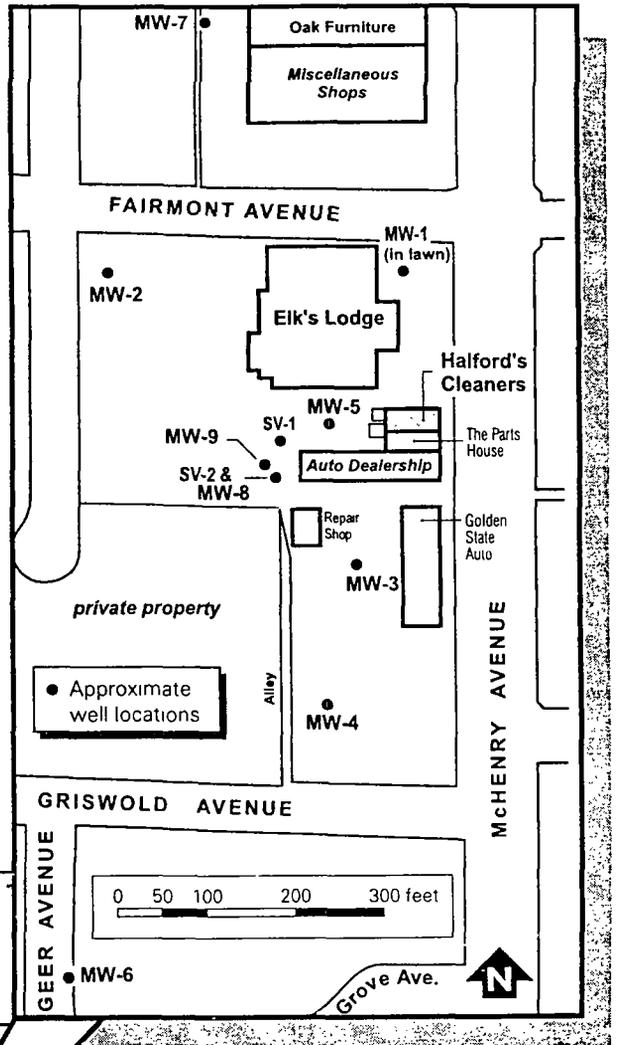
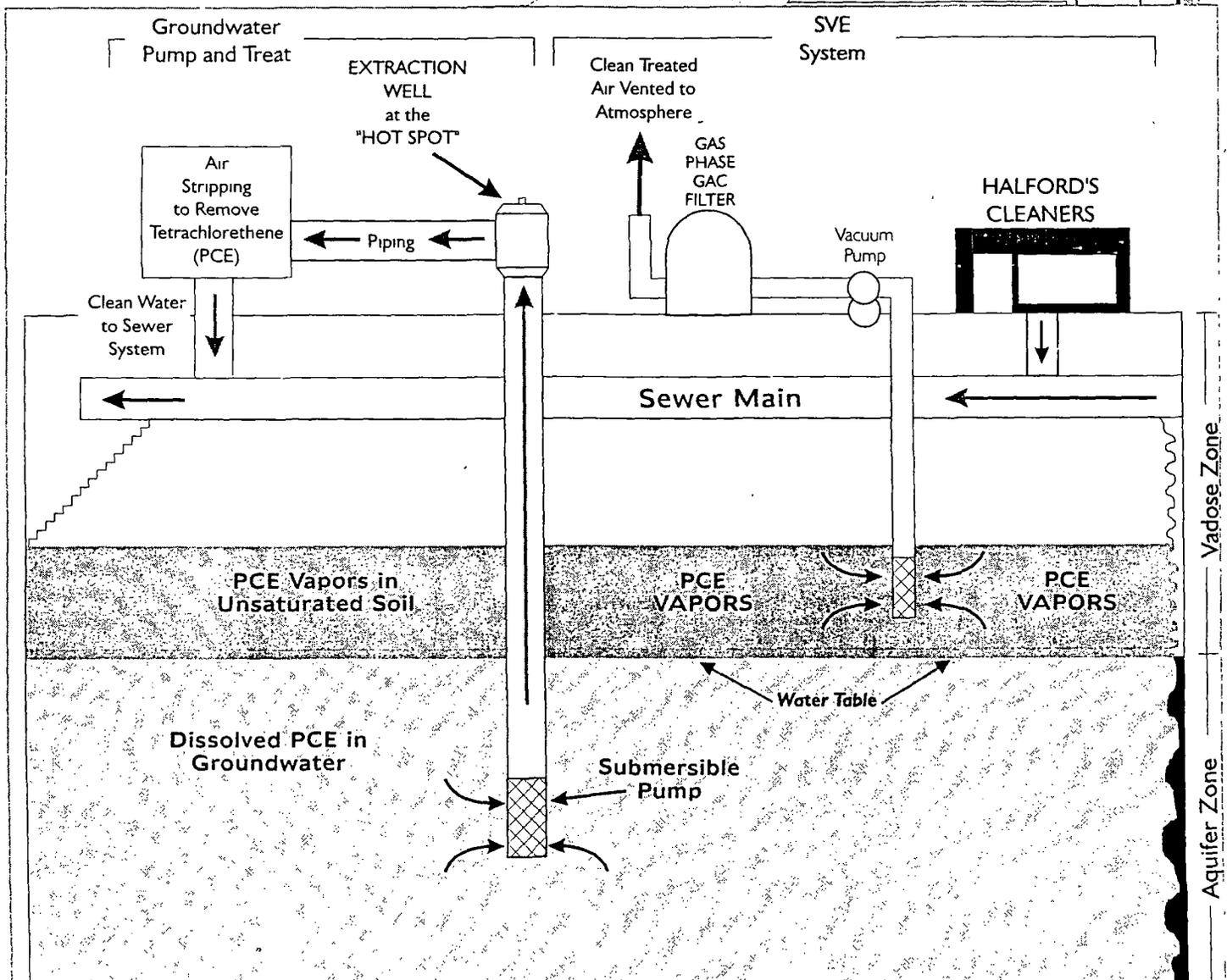
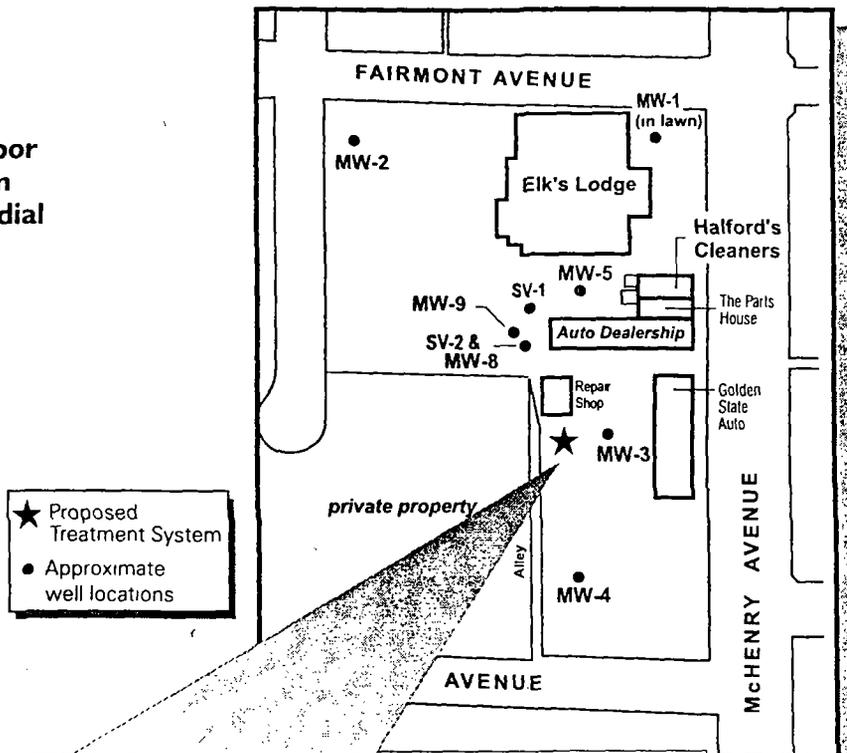


Figure 2
Groundwater and Soil Vapor Extraction (SVE) System
For EPA's Preferred Remedial
Alternative



Structure of this Proposed Plan

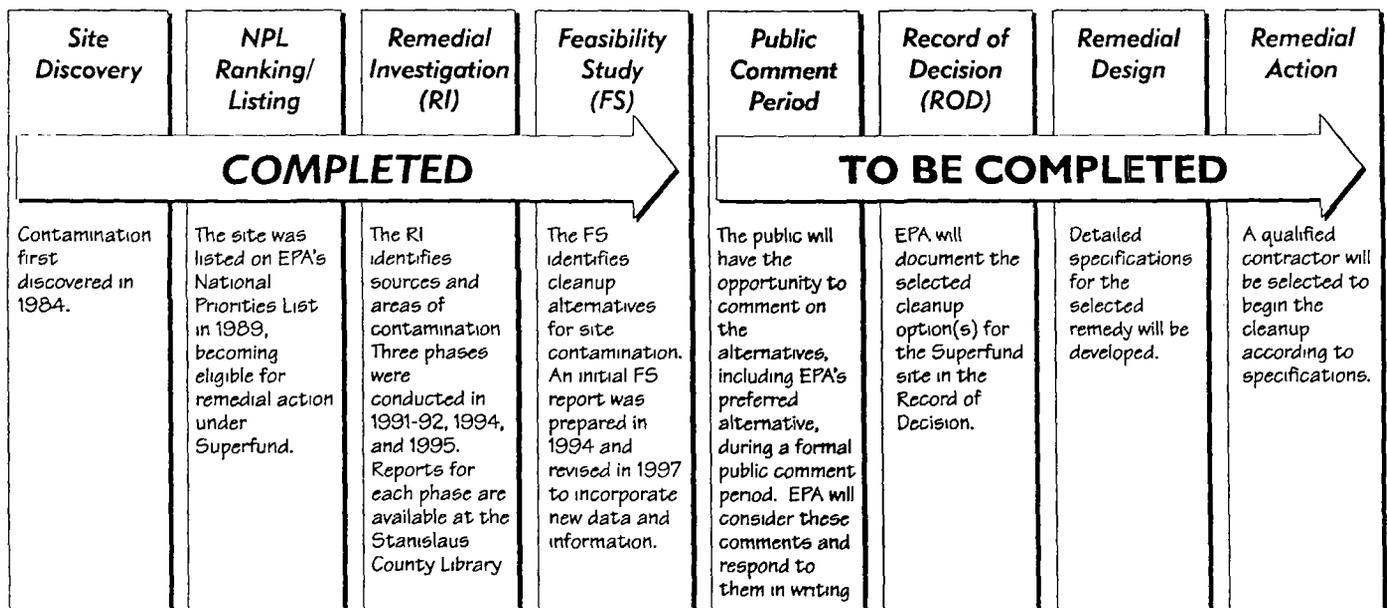
In addition to describing the alternatives considered for site cleanup, including EPA's preferred remedial alternative, this Proposed Plan describes the history of the site, summarizes site risks, explains the federal Superfund program, and indicates the opportunities for public participation. This Proposed Plan highlights key information from the Remedial Investigation (RI), Feasibility Study (FS), and Risk Assessment (RA) reports but is not a substitute for these documents. The RI, FS, and RA reports provide detailed, technical explanations of the nature and extent of contamination, possible cleanup remedies that were considered, and the possible health and environmental effects of contamination. Figure 3 outlines the Superfund process. These reports are included in the Administrative Record, which is available at the Stanislaus County Free Library. See the back of this Proposed Plan (page 12) for location and hours. The Administrative Record is also available at EPA Region IX in San Francisco, California.

Site History

In 1984, the City of Modesto first discovered contamination at Municipal Well 11, at the corner of Magnolia and Mensinger Avenues (see Figure 1). The discovery was made through routine sampling conducted under provisions of California Assembly Bill 1803, which requires sampling and analysis of public drinking water supplies to determine whether hazardous levels of organic chemicals are present. Laboratory analysis of the 1984 Municipal Well 11 sample indicated tetrachloroethene, or PCE, in excess of the federal and state MCL of five parts per billion (ppb). PCE is a chlorinated industrial solvent commonly used in dry cleaning. The contamination was later found to have originated at Halford's Cleaners, approximately 1000 feet away from Municipal Well 11.

The City took Municipal Well 11 out of service in 1984 and reactivated it in April 1987 after continued monitoring indicated no detectable levels of PCE or other chlorinated solvents. In February 1989, Municipal Well 11 was again taken out of service after PCE exceeded the MCL a second time. The well remained out of service until May 1991 when the City installed a wellhead Granular Activated Carbon (GAC) treatment system to ensure that water entering the public drinking water supply did not contain PCE above the MCL. Municipal Well 11 was returned to service in June 1991 and operated until October 1995 when the City indefinitely deactivated it due to naturally occurring levels of uranium above the MCL of 20 pico Curies per liter (pCi/L).

**Figure 3 The Superfund Process at the Modesto Groundwater Contamination Site
June 1997**



Community Involvement Activities Occur Throughout the Superfund Process

US EPA Investigation Activities

The Modesto Groundwater Contamination site was listed on EPA's National Priorities List (NPL) for cleanup of PCE contamination on March 31, 1989. In December 1989, EPA's Emergency Response Section collected soil and soil gas samples in the vicinity of Halford's Cleaners, and did additional sampling in July 1990. Based on the data obtained, EPA's Emergency Response Section issued an order to Halford's Cleaners to remove the most contaminated soil from the site. Halford's subsequently complied with this order.

EPA began the RI in 1991 to define more completely the extent of soil and groundwater contamination, and to obtain information necessary for the FS and RA. The RI was conducted in three phases; a summary of specific objectives and conclusions of each phase is presented in Table 1.

Based on the RI conclusions, EPA developed a PCE concentration contour map (see Figure 4). In addition the map shows the proposed location of the extraction well for this interim remedial plan.

Table 1
SUMMARY OF REMEDIAL INVESTIGATION
ACTIVITIES AND RESULTS

Phase 1 RI Activity	Result
Area wide soil gas survey to locate potential sources of PCE contamination that could impact Municipal Well 11.	Halford's Cleaners is the major source of contamination at Municipal Well 11.
Soil sampling near Halford's Cleaners. Soil samples collected while drilling 4 new monitoring wells.	The highest levels of PCE contamination were found at or below the water table.
Groundwater sampling in four monitoring wells.	PCE was found in each groundwater monitoring well. Highest PCE level is 2,800 ppb in monitoring well MW-4 near Halford's Cleaners (see Figure 1).
Aquifer pump test to determine the radius of influence for Municipal Well 11.	Halford's Cleaners is within the radius of influence for Municipal Well 11, which is 1,000 feet away.
Phase 2 RI Activity	Result
Soil gas survey in the immediate vicinity of Halford's Cleaners.	PCE is present in small quantities in the soil gas near Halford's Cleaners and the adjacent sewer line.
Groundwater sampling in four monitoring wells.	Highest PCE level is 4,200 ppb in monitoring well MW-3 near Halford's Cleaners (see Figure 1).
EPA performs a Human Health Risk Assessment.	Groundwater extracted at the source area, near Halford's Cleaners, would not be safe to drink; currently it is not a drinking water source.
Phase 3 RI Activity	Result
Groundwater sampling in existing monitoring wells and five new wells.	Highest PCE level is 74,000 ppb in monitoring well MW-8 at Halford's Cleaners. Toluene is also present at MW-8 at 13,200 µg/L. Uranium concentration exceeded MCLs at most wells (see Figure 1).
Soil gas sampling at Halford's Cleaners.	PCE is present in all samples.
EPA revises Human Health Risk Assessment to include Phase 3 RI data.	Final Risk Assessment conclusions are consistent with the initial conclusions.

Risk Assessment

EPA performed a human health risk assessment in 1994 during Phase 2 of the RI to evaluate risks associated with PCE and other volatile organic chemicals in groundwater and soil gas at the Modesto site. The original risk assessment was revised in 1997 to incorporate Phase 3 RI data. EPA's assessment found that current risk levels do not exceed EPA standards because contaminated water is not being ingested. Unacceptable risks, however, are predicted in a hypothetical future scenario in which an individual ingests untreated groundwater from the area of highest contamination near Halford's Cleaners.

Two residential exposure pathways, groundwater ingestion and indoor air inhalation, were evaluated under current and future land use scenarios using soil gas and groundwater data collected during the RI. The inhalation of chemicals of potential concern (COPCs) released during routine household water use, such as showering and dishwashing, was also evaluated; results were the same for both scenarios. For the current land use scenarios, the risks were estimated for ingesting treated and untreated drinking water from Municipal Well 11. Since Municipal Well 11 is currently inactive there is no risk. For the future land use scenario, risks were estimated for ingesting untreated groundwater near Halford's Cleaners.

PCE is also present in soil. However, no direct exposure hazards associated with PCE in soil have been identified because the highest PCE concentrations were found at depth (e.g., 60 feet below ground surface). Therefore, soil contamination will only be addressed in the cleanup alternatives as it relates to groundwater contamination.

In conducting the risk assessment, conservative upper-bound exposure values developed by EPA were used to calculate the "theoretical excess cancer risk," which is an estimation of the probability of developing cancer over and above the normal background incidence of cancer. A number of exceedingly protective assumptions were made in the risk assessment in order to avoid underestimating the risk to the public.

A Screening Ecological Risk Assessment conducted by EPA in May 1994 indicated that there is not significant potential for ecological exposure to site contaminants.

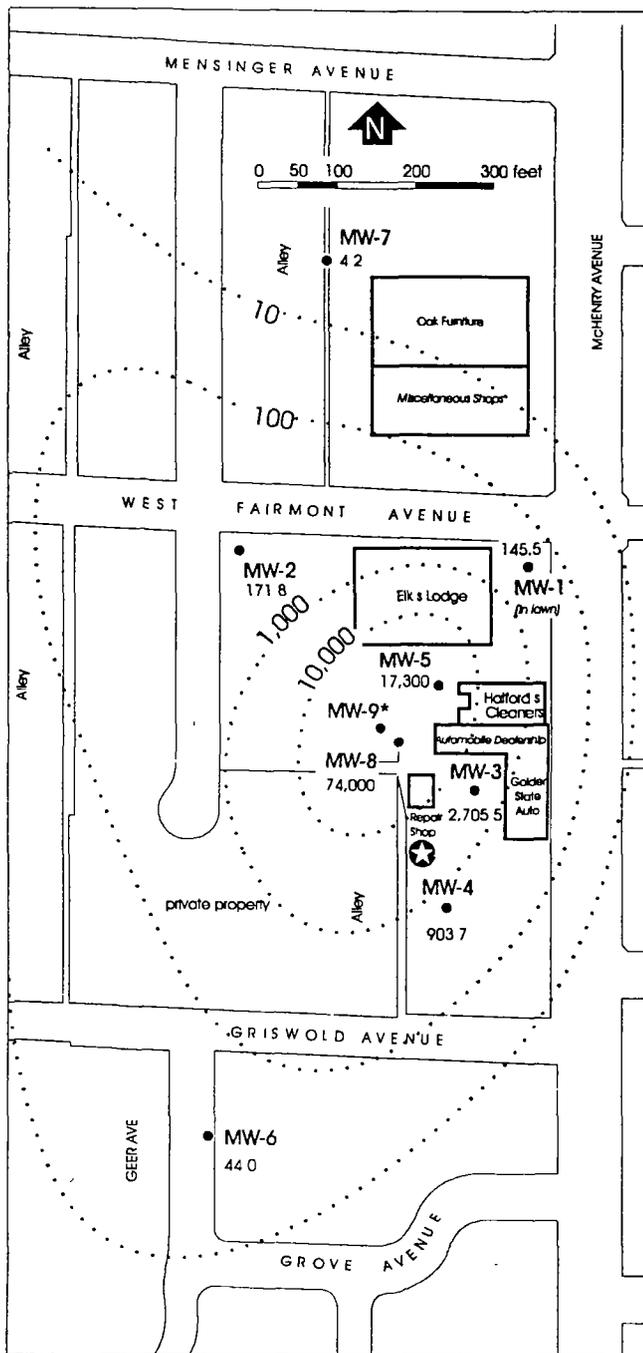
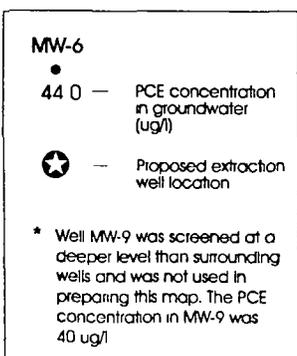


Figure 4
PCE Concentrations
in Groundwater
(August 1995)



Population Affected

The immediate area around Halford's Cleaners and the proposed extraction well location is light industrial and residential. If contaminated groundwater entered the Modesto municipal system through one of its supply wells, as many as 150,000 residents could be affected.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred remedial alternative or one of the other active measures considered, may present a current or potential threat to public health, welfare, or the environment.

Remedial Action Objectives

Based on the results of the risk assessment, ingestion of the most contaminated groundwater near Halford's Cleaners would present an unacceptable risk. Therefore, the cleanup will focus on reducing PCE and other organic contaminants in groundwater to safe levels. EPA's objectives for this interim remedial action are as follows:

- Eliminate the highest contaminant levels at the source (source control).
- Prevent exposure to human health and the environment.
- Minimize the impact of interim cleanup measures to the community.
- Collect data to determine if applicable requirements can be met throughout the aquifer
- To delineate more clearly the downgradient edges of the plume and to prevent its further migration.

Through the preferred remedial alternative, EPA proposes to determine if these remedial action objectives can be met. EPA will select a final remedy that will achieve appropriate cleanup levels or EPA will demonstrate that a waiver of these standards is justified.

Selection of Cleanup Alternatives

EPA's preferred remedial alternative for groundwater contamination at the Modesto site involves groundwater extraction (pumping) at the source area near Halford's Cleaners and treatment of the water by air stripping.

To reach this conclusion, EPA identified six comprehensive alternatives plus the "no-action" alternative. The "no-action" alternative is used as a comparison or basis. The seven alternatives are summarized on pages 10 and 11 of this Proposed Plan. Detailed descriptions of each alternative are provided in the revised FS report. The initial screening process identified only the most appropriate technologies. These were selected based on previous evaluations of the Modesto site and other sites with contamination of groundwater with chlorinated solvents.

Through previous groundwater sampling at Municipal Well 11, naturally occurring uranium was also found at levels above the drinking water standard. Since uranium is naturally occurring and is a regional feature unrelated to this site, no cleanup standard will be established. However, its presence may have an impact on the operation of the groundwater treatment system. For example, restrictions may be placed on disposal of treated water and treatment residuals. Therefore, each treatment alternative will include provisions for removing uranium from the groundwater as necessary to meet discharge permit requirements.

Each of the six "action" alternatives evaluated includes groundwater extraction and treatment. They differ by 1) pumping rates (speed of pumping and volume of water pumped); 2) the estimated total quantity of PCE extracted; and 3) the application of additional treatment technologies. All of the alternatives include institutional controls, such as signing and fencing around the treatment area.

EPA used nine specific criteria to evaluate the alternatives. The criteria are overall protection of human health and the environment; compliance with applicable or relevant and appropriate requirements (ARARs); long term effectiveness; reduction of toxicity, mobility or volume through treatment; costs; short term effectiveness; implementability; state acceptance; and community acceptance. (See Figure 5: "Selecting a Cleanup Remedy.")

SELECTING A CLEANUP REMEDY

Figure 5

The U.S. EPA uses nine criteria to evaluate alternatives for cleaning up a hazardous waste site. The nine criteria are as follows:

1 Overall Protection of Human Health and the Environment

Addresses whether a remedy provides adequate protection of human health and the environment and describes how risks are eliminated, reduced or controlled through treatment, engineering controls or institutional controls.

2 Compliance with Applicable or Relevant and Appropriate Requirements (ARARs)

Addresses whether a remedy will meet all ARARs or federal and state environmental statutes and/or provide grounds for invoking a waiver.

3 Long-term Effectiveness

Refers to the ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup goals have been.

4 Reduction of Toxicity, Mobility or Volume (TMV) Through Treatment

Refers to the anticipated ability of a remedy to reduce the toxicity, mobility and volume of the hazardous components present at the site.

5 Cost Evaluates the estimated capital, operation and maintenance costs of each alternative.

6 Short-term Effectiveness

Addresses the period of time needed to complete the remedy and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

7 Implementability Refers to the technical and administrative feasibility of a remedy, including the availability of materials and services needed to carry out a particular option.

8 State Acceptance

Indicates whether, based on its review of the information, the state concurs with, opposes or has no comment on the preferred alternative.

9 Community Acceptance

Indicates whether community concerns are addressed by the remedy and whether the community has a preference for a remedy. Although public comment is an important part of the final decision, EPA is compelled by law to balance community concerns with all the previously mentioned criteria.



FINAL REMEDY

Summary and Analysis of Treatment Alternatives

Alternative 1: Groundwater Extraction and Treatment (Four Extraction Wells); Monitoring and Evaluation of Downgradient Edges of Plume.

This alternative performs direct remedial action only on the groundwater medium. EPA would extract virtually all of the dissolved PCE in the contour of 5 ppb or greater. The extracted groundwater would be treated using an air stripping technology and disposed. The goal of this interim remedial action is to determine if the applicable requirements can be met throughout the aquifer.

Alternatives 1, 2, and 3 include four extraction wells targeted at the source area and what is believed to be the downgradient edge of the plume with PCE concentrations above 5 ppb. The downgradient edge of the plume will be monitored and evaluated to determine if concentrations are decreasing at the edge of the plume and to ensure that there are not additional contamination areas downgradient of these known contamination areas.

Analysis of Alternative 1: The cost of this alternative is expected to be significantly higher than the cost of the preferred alternative because this alternative would require the treatment and disposal of much larger quantities of groundwater without providing significant additional benefits to human health or the environment. There are also implementability, short-term effectiveness, and potential community acceptance issues in regard to extraction wells, which would be constructed in a residential area.

Alternative 2: SVE and Groundwater Extraction and Treatment (Four Extraction Wells); Monitoring and Evaluation of Downgradient Edges of Plume.

This alternative includes all elements of Alternative 1 (extraction and treatment of groundwater by air stripping), but also includes extraction of vapor phase PCE from the soil using SVE, and dissolved PCE from the groundwater. The SVE system will increase the efficiency by removing more PCE in a shorter time than with groundwater treatment alone. The goal of this alternative is the same as for Alternative 1.

Analysis of Alternative 2: Although the efficiency of this alternative is likely to be higher than for Alternative 1 with the addition of SVE technology, the

cost is still expected to be higher than Alternative 5 (Preferred Remedial Alternative) without any clear advantage in effectiveness, and the same implementability, short-term effectiveness, and community acceptance issues.

Alternative 3: Air Sparging, SVE, and Groundwater Extraction and Treatment (Four Extraction Wells); Monitoring and Evaluation of Downgradient Edges of Plume.

This alternative also includes all the elements of Alternatives 1 and 2 (extraction and treatment of groundwater by air stripping and SVE). In addition it includes the injection of air below the water table to mobilize the contaminants and increase recovery through the extraction process. The goal of this alternative is the same as for Alternatives 1 and 2.

Analysis of Alternative 3: The subsurface geology at the Modesto site may make air sparging difficult to implement. The flow of gases and vapors would be difficult to control, which could increase risk of exposure to humans. The cost of this alternative is expected to be significantly higher than the cost of the preferred alternative.

Alternative 4: Groundwater Extraction and Treatment of Main Source Area (One Extraction Well); Monitoring and Evaluation of Downgradient Edges of the Plume.

This alternative focuses on extracting and treating contaminated groundwater in the area with 1000 ppb or more of PCE near Halford's Cleaners and preventing migration of the plume. Approximately 90% to 95% of the known dissolved PCE contamination is expected to be captured. Monitoring is incorporated to ensure that the contaminant concentrations are decreasing at the downgradient edges of the plume while this source area is cleaned up. Sampling will also ensure that there are not additional areas of contamination downgradient of the main source area.

Analysis of Alternative 4: This alternative is more cost-effective than Alternative 1, *while still capturing most of the groundwater contamination*, but still could be more efficient with the addition of SVE technology.

PREFERRED REMEDIAL ALTERNATIVE

Alternative 5: SVE and Groundwater Extraction and Treatment of Main Source Area (One Extraction Well); Monitoring and Evaluation of Downgradient Edges of the Plume.

This alternative is nearly identical to Alternative 4; however, in addition to groundwater extraction and treatment by air stripping, SVE treatment of the soil would be performed. EPA will study the effectiveness of the soil vapor extraction system and will terminate SVE when, based on this study, EPA determines that the rate of contaminant removal is no longer significant. EPA may use a leaching model in this analysis. EPA will gather data to determine whether other measures are necessary to achieve drinking water standards in a reasonable time frame. Also, EPA will collect data at the edges of the plume to determine if natural attenuation is occurring. Figure 2 is a schematic representation of the preferred remedial alternative.

Analysis of Alternative 5: This alternative combines the benefits of Alternative 4 with SVE, which will increase the efficiency of groundwater remediation. Since this alternative appears to be most efficient and reliable for the estimated cost, it is EPA's preferred remedial alternative.

Alternative 6: Air Sparging, SVE, and Groundwater Extraction and Treatment of Main Source Area (One Extraction Well); Monitoring and Evaluation of Downgradient Edges of the Plume. This alternative combines the air sparging component of Alternative 3, with all of the elements of Alternatives 4 and 5. The air sparging component would be as described for Alternative 3. Although this removal process would address much of the source area, there would still be segments of the groundwater plume beyond the area addressed by air sparging.

Analysis of Alternative 6: This alternative is not recommended because of concerns regarding air sparging discussed under Alternative 3.

Alternative 7: No Action. This alternative serves as a baseline to compare other alternatives. It is evaluated to determine the risks that would be posed to public health and the environment if no action were taken to treat or contain the contamination.

Analysis of Alternative 7: Since contaminant levels are not necessarily reduced through this alternative, public health and the environment would not be protected under future groundwater use scenarios. Therefore, this alternative is not recommended.

Based on information currently available, EPA believes the preferred remedial alternative provides the best balance of criteria among the other alternatives with respect to the evaluation criteria. See Table 2, which evaluates each alternative against the nine EPA criteria.

OPPORTUNITIES FOR PUBLIC INVOLVEMENT

Public Comment Period: July 14 through August 13, 1997

EPA strongly encourages community participation in the decision-making process. During the public comment period, you may comment on all of the cleanup alternatives, including EPA's preferred remedial alternative. A final decision on cleanup will not be made until all comments are considered. Comments may be submitted verbally or in writing at the public meeting, or written comments may be sent no later than August 13, 1997 to:

**Michelle Schutz, U.S. EPA, SFD-7-2
75 Hawthorne Street, San Francisco, CA 94105
(415) 744-2393**

Community members are invited to attend a public meeting regarding the cleanup alternatives for the Modesto Groundwater Contamination Site. You are encouraged to attend to have your questions answered and your comments recorded for the record. The meeting will be held **July 29, 1997:**

Location: Modesto Senior Citizens Center, 211 Bodem Street (At Scenic Drive and Bodem Street)

Time: 7:00pm – 9:00pm

Table 2

EVALUATION OF ALTERNATIVES AGAINST U.S. EPA NINE CRITERIA

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Alternative 6	Alternative 7
	Groundwater Extraction and Treatment (Four Extraction Wells); Monitoring and Evaluation of Downgradient Edges of the Plume	SVE and Groundwater Extraction Treatment (Four Extraction Wells); Monitoring and Evaluation of Downgradient Edges of the Plume	Air Sparging, SVE, and Groundwater Extraction and Treatment (Four Extraction Wells); Monitoring and Evaluation of Downgradient Edges of the Plume	Groundwater Extraction and Treatment of Main Source Area (One Extraction Well); Monitoring and Evaluation of Downgradient Edges of the Plume	SVE and Groundwater Extraction and Treatment of Main Source Area (One Extraction Well); Monitoring and Evaluation of Downgradient Edges of the Plume	Air Sparging, SVE, and Groundwater Extraction and Treatment of Main Source Area (One Extraction Well); Monitoring and Evaluation of Downgradient Edges of the Plume	No Action
Overall Protection of Human Health and the Environment	Favorable	Favorable	Unacceptable	Favorable	Favorable	Unacceptable	Unacceptable
Compliance with ARARs	Favorable	Favorable	Favorable	Favorable	Favorable	Favorable	Unacceptable
Long Term Effectiveness	Favorable	Favorable	Favorable	Favorable	Favorable	Favorable	Unacceptable
Reduction of Toxicity, Mobility, or Volume through Treatment	Favorable	Favorable	Favorable	Favorable	Favorable	Favorable	Unacceptable
Cost	\$2,902,000 ¹	\$3,872,000 ¹	\$8,571,000 ¹	\$2,088,000 ²	\$3,058,000 ²	\$7,844,000 ²	\$71,000
Short Term Effectiveness	Less Favorable	Less Favorable	Unacceptable	Less Favorable	Favorable	Unacceptable	Unacceptable
Implementability	Less Favorable	Less Favorable	Less Favorable	Favorable	Favorable	Favorable	Favorable
State Acceptance	Unfavorable	Less Favorable	Unfavorable	Unfavorable	Favorable	Unfavorable	Unfavorable
Community Acceptance	To Be Determined	To Be Determined	To Be Determined	To Be Determined	To Be Determined	To Be Determined	To Be Determined

1. Additional \$423,000 if treatment of groundwater to remove uranium is required.

2. Additional \$240,000 if treatment of groundwater to remove uranium is required.

FOR MORE INFORMATION

To provide public access to documents related to the site, EPA has established an information center at the Stanislaus County Free Library in Modesto. The center contains the Work Plan, the Community Relations Plan, fact sheets, RI/FS reports, and other reference materials concerning the Modesto site in the Administrative Record

Stanislaus County Free Library

1500 "I" Street
Modesto, CA 95354
(209) 558-7814

Hours of Operation: Mon-Thurs 10am-9pm
Fri & Sat 10am-5pm
Sun 12pm-5pm

Also, the Administrative Record which is the basis for technical decisions is available for review at.

Superfund Record Center

U.S. EPA Region 9
75 Hawthorne Street (H-7-4)
San Francisco, CA 94105
(415) 744-2167

Hours of Operation:
Mon-Fri 8am-4:30pm

EPA CONTACTS

Technical Questions

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General Information

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San Francisco, California 94105
(415) 744-2184 or
toll-free message line **(800) 231-3075**

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Attn: Vicky Semones

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