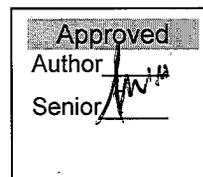


Central Valley Regional Water Quality Control Board

1 July 2015

FILE COPY

Mr. John Lyons
Acting Assistant Director
United States Environmental Protection Agency, Region 9
Superfund Division
75 Hawthorne Street
Mail Code: SFD-7
San Francisco, CA 94105



**LETTER OF CONCURRENCE, RECORD OF DECISION, BOUNDARY OPERABLE UNIT
(OU-6) AEROJET SUPERFUND SITE, RANCHO CORDOVA**

On 5 June 2015 Regional Board staff provided you with a letter of concurrence for the Record of Decision for the Aerojet Superfund Site Boundary Operable Unit. The concurrence was based on general agreement by staff from the United States Environmental Protection Agency (USEPA), The Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) and the Department of Toxic Substances Control (DTSC) on details within the Record of Decision. Recent discussions with USEPA staff have brought to light that the final version of the Record of Decision has changed values on Tables 2-2 and 2-3 providing performance standards for soils and soil vapor in ambient air. Several of the values for selected metals in soils have changed from the previously agreed to values. In some instances the performance values are based on background concentrations as the derived protective value is less than the background concentration and cleanup below background is not required. The background values that should have been used were the original agreed to values from the report *Background Metals in Xerorthents and Redding-Corning-Red Bluff Surface Soils at the Aerojet Superfund Site Main Plan, Sacramento, California (Aerojet 2007)*. The values now being placed into the Record of Decision were taken from the Remedial Investigation for the Boundary Operable Unit which modified those from the 2007 background report. Central Valley Water Board staff does not agree with those modifications.

However, in a further assessment of the changes in values that are now being placed in the Record of Decision, we have determined that there are no areas that should be remediated that now won't be because of the changes. We still contend that the performance standards should be those originally agreed to after lengthy discussion and evaluation. Therefore, our concurrence is caveated based on this issue. During remediation efforts we will assess whether or not the appropriate values are being used to determine the final cleanup at each of the sites requiring remediation.

If you have any questions regarding this matter, please contact me at amacdonald@waterboards.ca.gov or by phone at (916) 464-4625.



ALEXANDER MACDONALD
Senior Engineer

cc: Julie Santiago, USEPA, San Francisco
Steve Ross, Department of Toxic Substances Control, Sacramento
Chris Fennessy, Aerojet Rocketdyne, Inc., Sacramento