

Final Aerojet CAG Notes - 23 September 2015

Attendees:

Daniel Wolfe (City of Folsom)

Stephen Green (SARA)

Jackie Lane (EPA)

Steven Ross (Department of Toxic Substances Control [DTSC])

Kathy Lawson (Golden State Water Company)

Burt Hodges (SARA)

Jerald Drobesh – (Community)

Alta Tura (Sacramento Area Creeks Council)

Derrick Green (Community)

Chris Fennessy (Aerojet Rocketdyne Holdings, Inc. [Aerojet])

Janis Heple (CAG Chair)

Jimmy Spearow (Community)

Julie Santiago-Ocasio (EPA)

Lynn Keller (EPA)

Rick Bettis (Community)

John Valdes (Sacramento Suburban Water District)

Roy Brewer (Easton Development Company)

Allen Tsao (Community)

Kevin Thomas (Sacramento Suburban Water District)

Alex Macdonald (RWQCB)

General Stuff

1. The USEPA contractor providing CAG support went out of business. Meeting notes may not be as comprehensive as previously supplied. USEPA will need to get a new contractor for this and for support on OU3 and OU5. They still have Ch2M-Hill for OU 6 and 9 and are not sure when replacements will be on contract. A significant effort to secure contracts will be made after the start of the new Fiscal Year on 1 October.
2. Final notes for the May CAG meeting have not yet been distributed (*they were distributed after the November meeting*).
3. There is a need to have the Regional Board presentation at the July CAG meeting to finish the notes for that meeting.
4. Comments on current version of July CAG notes – EPA will send in some small edits. Inches should be feet on cleanup objectives on page 2.

Community Update by Aerojet

1. The City of Folsom required maintenance on Willow Hill Reservoir, which provides industrial water supply for the Aerojet Campus. Last year, in response to the drought, Aerojet advanced their project (use of GET AB treated effluent as industrial supply) to assist the City of Folsom in meeting their water needs; however, Willow Hill Reservoir was still required to provide emergency backup supply. The City of Folsom planned on providing Aerojet with an alternate industrial water emergency supply (at a projected cost of \$1M) during the 60-day maintenance activity. To help the City avoid this \$1M cost, Aerojet modified their system to allow work to proceed without the alternate industrial water emergency supply. The Aerojet industrial supply system is now completely served by the GET AB system with potable water backup for emergencies. The City of Folsom has stated that Willow Hill Reservoir will be back in service and Aerojet connection restored within 60 days (end of October).
2. Aerojet recently completed the dedication of a 12-megawatt solar field on approximately 100 acres of land in Camden, Arkansas. This 12-megawatt solar project is the first, large scale solar project in the State of Arkansas. Once complete, the facility will not only provide clean energy for Aerojet Rocketdyne operations, it will generate enough electricity to power the equivalent of 2,400 single-family homes.
3. Rodney Fricke, Aerojet Project Manager on the IRCTS project for the past 26 years, signed a voluntary separation agreement from Aerojet. His last day with Aerojet was September 18. Another Aerojet employee, Peter Kvam, will assume Rodney's role on IRCTS.

Cleanup Status Report – OU6 EPA – By USEPA

1. OU6 ROD was signed on 22 July 2015
2. Release to the public took a while in order to put in some additional language on the ARAR issues that went on between EPA and the State. This was added to the administrative record. The ROD is available on-line at the EPA website, as well as on GeoTracker and Envirostor. The Public Notice has not yet been issued. The ROD is also at the two public repositories – Sac State and the downtown libraries. EPA brought 5 hard copies of the ROD for the CAG + several CDs.
3. EPA provided a presentation on PowerPoint. OU 3, OU 5, and OU 6 now have RODs with OU4, OU7, OU8, and OU9 still to go.
4. The OU 6 ROD specifies that 81 areas require remedial action at an estimated cost of \$25 million.
5. The Administrative Record for OU6 has been updated – including proposed plan meeting minutes, ARARs requested by Regional Board, DTSC HHRA Note 3, DTSC vapor intrusion mitigation advisor, Aerojet PP and final OU6 BOU tables 2-2 and 2-3

comparison, and State concurrence letters. The Administrative Record is found in Appendix C of the ROD.

6. The Administrative Record for OU 6 now includes new OSWER guidance on vapor intrusion (June 2015)
7. It was pointed out that the correct address for the downtown Sacramento Library is 821 I Street. The address on the slide was incorrect and this was also the case on the public notice.
8. Next step – the Public Notice goes out next week.
9. EPA will then commence enforcement negotiations with Aerojet for a.) Cost Recovery Consent Order and b.) OU 6 Unilateral Administrative Order + SOW.
10. Transitioning after that to development of work plans, schedules, designs etc. for next 1.5 years.
11. Appendix B of OU6 ROD is a summary of remedial action areas, what is found in those areas, actions to be taken, and the issues and the rationale for decisions.
12. Appendix E of OU 6 ROD – Responsive summary – response to comments on proposed plan.
13. The State presented that there is agreement on sites to take action on and the cleanup values. The one difference was on the ARARs that were selected for inclusion in the ROD. The outcome will be the same even if all of the State ARARs were included.
14. The CAG had a question for the state on ARARs and implementation concern on how that will be done. The State representatives explained that during implementation it will be made sure that the intent of the ARARs that were not included would be adhered to. This was accomplished on the RODs for OU3 and OU5.
15. A CAG member requested that ARARs that were not included in this ROD be added in during the FS process for the next ROD. It was explained that is always the case – all potential ARARs are provided for development of the alternatives in the FS.
16. It was also mentioned that the cleanup standards for the protection of groundwater were the conservative screening values developed for the RI/FS. It could be upon further sampling that a site proposed for cleanup in the ROD could be eliminated if additional sampling demonstrates that the true concentration at the site is below the cleanup standards placed in the RODs.

Area 40 and OU7 - USEPA

EPA was approached by City of Folsom to accelerate Area 40 remedial actions as the area is in the planned Hillsborough Development. The site will be open Space, a park, and a utility corridor. OU 7 is still being characterized and a data gap analysis is being prepared. There are also ecological risks that require further evaluation. This would slow down the completion of OU 7, which currently includes Area 40. EPA does not have the resources to add Area 40 as its own operable unit and complete the ROD process. DTSC and RB (State) have agreed to step up

and take it on and make it OU 10. Aerojet would continue the process it already started in completion of the documents for Area 40 with State oversight. Radiological support would be obtained from EPA. EPA would maintain oversight through it having to provide concurrence with the selected remedy and future delisting efforts.

The City of Folsom's representative stated that the City Manager sent in a letter to EPA requesting the expedited review and completion of the remedy documents for Area 40. The development south of US 50, including Hillsborough is moving forward starting with property to the far east. The construction will likely start next year. The Superfund cleanup for Area 40 needs to be stipulated prior to the city takes the Area 40 property.

There was extensive discussion around what is Area 40 and the fact the land depicted as Area 40 has somewhat artificial boundaries that were initially established. Area 40 includes lands that were never used for industrial purposes. Residences are not proposed on any of the land that was used for burning and disposal of wastes. The proposed residences are found on the south end of Area 40 and north of the northern boundary of Area 40.

Steve (SARA) – His opinion was that EPA should not give away any of its authority on this site. It was explained that EPA will still be involved and will provide concurrence on the remedy. The State is at least as stringent as EPA in cleanup requirements.

The CAG asked how we are deciding if State has enough resources. The State says they have sufficient resources to take on Area 40 and not slow down any of the other Aerojet work. Aerojet' schedule on the other sites will not be revised due to establishment of OU 10.

EPA and the State still need to work on an MOU to provide the mechanism for transfer of the oversight to the State.

Aerojet, due to concerns with the reduced EPA resources, asked if the implementation of OU6 could move under State oversight. EPA stated that OU 6 is staying within EPA for implementation, as it was hard to transfer since there is a ROD.

The State described the Remedial Action Plan (RAP) process. Feasibility studies (FS), draft RAP and CEQA documents would be the next to be prepared after Aerojet completes the remedial investigation (RI) and risk assessment documents (under Agency review).

The CAG asked “what can we anticipate the schedule to be if State takes over Area 40?” The CAG can anticipate that Area 40 targets will be met. A schedule for Area 40 will be developed after the handoff to the State.

DTSC looking to make sure mailing list is up to date and include potential outreach in the City of Folsom Newsletter, website announcement.

Regional Board Presentation

The Regional Board provided a presentation of the Aerojet activities since the last CAG meeting. That presentation is attached. (To be sent out with Final meeting notes.)

There was some additional discussion on the closure of the Aerojet landfill. Aerojet has submitted a Clean Closure Plan and a Post-Closure Maintenance Plan. The agencies overseeing this closure include the Regional Water Quality Control Board, Department of Toxic Substances Control, Cal-Recycle and Sacramento County Environmental Management. The Agencies have submitted comments on the first document and Aerojet is in the process of responding to the comments. The plan consists of removal of the cover, fill material and wastes. The fines and wastes material will be sent to various off-site landfills depending on concentrations of pollutants. The larger coarse materials (rocks) will be reused. There is one landfill cell with asbestos material that will require special handling. A CEQA document will be prepared for the project. A CEQA document was originally prepared in 2004 but circumstances have changed with the potential that some of the Glenborough Phase I development having already occurred by the time the landfill is removed. This will place residences closer to the landfill than would have been the case if the landfill had been moved as originally anticipated in 2005-2008. The landfill is on the eastern portion of the Aerojet site.

Some members of the CAG expressed concern over the new conditions (residences). Of particular concern was the potential for exposure to pollutants in the landfill. It was explained that exposure evaluations were made based on the maximum allowed dust emissions during removal and the highest concentrations of pollutants that were measured in the landfill during characterization. This evaluation did not find an unacceptable exposure. Aerojet representatives also stated that the landfill may still be removed prior to occupancy of residences in Glenborough Phase I.

The next meeting of the Aerojet CAG is scheduled for November 18, 2015, at Rancho Cordova City Hall.