Technical Assistance Services for Communities
Contract No.: GS-10F-030N
TASC WA No.: EP-G13S-00087
TD No.: R9 #10 Aerojet General Corp Superfund Site

Discussion Outline
Aerojet General Corp Superfund Site
Operable Unit 6 Proposed Plan

Desired Outcomes:

- Provide initial information in response to preliminary questions raised in relation to the Proposed Plan.
- Identify any additional questions for further information gathering and discussion.

Information Review:

1. **Overview Materials – Introduction and Questions (5 min)**
   - TANA (Handout 1)
   - Community Involvement in the Remedial Process (Handout 2)
   - Crosswalk of RI/FS and Proposed Plan (Handout 3)

2. **Review remedial alternatives (Handout 3) (25 min)**
   - Overview of remedial alternatives
   - Selection process for areas not retained for remedial action
   - Review the combination of alternatives into remedial options

3. **Overview of institutional controls (Handout 4) (20 min)**

4. **Review remedial alternatives for areas proposed for residential use (30 min)**
   - Buffalo Creek Area / Westborough Map
   - Administration Area / Easton Place Map

5. **Are there remaining questions about how the remedial alternatives will be protective of the proposed uses?** (a few are listed below for reference) **(20 min)**

Additional Questions:

(These are questions that may need additional information gathering and discussion).

- *Who is responsible for implementing, enforcing and monitoring institutional controls?*
- *How will future residents be protected from groundwater vapors being addressed in other Operable Units?*
- *What is the risk of exposure to perchlorate of future residents with food gardens?*
- *How are contaminants in Buffalo Creek being prevented from migrating off-site?*
- *Other?*

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Technical Assistance Services For Communities

Technical Assistance Needs Assessments (TANAs)

This fact sheet introduces the EPA's Technical Assistance Services for Communities (TASC) program and explains the program's upcoming Technical Assistance Needs Assessment (TANA) for the Aerojet General Corp.

What is TASC?

TASC is a national EPA program. Its goal is to help people understand complex environmental issues and ensure meaningful community involvement in environmental decision-making.

What Is a TANA?

Since 2007, there have been 20 TANAs conducted nationwide, including 6 at sites in California. TANAs make it possible to address the broad needs of diverse community stakeholders. These interactive assessments are the gateway to the EPA's technical assistance services. By conducting interviews with community members, TANAs make sure that the EPA understands community needs and enables meaningful community involvement in environmental decision-making.

TANAs do this by reviewing key information and identifying local organizations that may be able to help. The TANA process leads to targeted efforts that directly address the broad technical assistance needs of communities. They also make sure that these efforts align well with related services provided by EPA site teams, external partners, and EPA grants and contracts.

The TANA process includes information gathering and interviews to identify community technical assistance priorities and potential resources to address technical assistance needs. The process also identifies perspectives of the EPA staff and other stakeholders on potential technical assistance services.

The TANA process results in a report. This concise document includes site background information, summaries of community, stakeholder interviews, and a prioritized list of technical assistance needs and recommendations for how to meet them.

The Aerojet TANA

Through the EPA's TASC program, independent contractors are planning to conduct a TANA for the Aerojet Community Advisory Group (CAG) during the summer of 2013. Its goal is to help EPA better understand the CAG's technical assistance needs.

For more information on the TASC program and TANAs, please attend the next Aerojet Community Advisory Group (CAG) Meeting:

July 17, 2013
7:00 p.m.
Rancho Cordova City Hall
2729 Prospect Park Drive
Rancho Cordova, CA 95670

FOR MORE INFORMATION, PLEASE CONTACT:

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EPA website for Aerojet Superfund Site:
http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/ViewByEPAID/CAD980358832

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The Superfund Process and Community Involvement

The TASC Program

The Technical Assistance Services to Communities (TASC) program is a national EPA program. Its goal is to help people understand complex environmental issues and ensure meaningful community involvement in environmental decision-making. This TASC fact sheet provides information about the Superfund process and community involvement at the Aerojet General Corp. Superfund site.

Background

The Aerojet General Corp. Superfund site covers 5,900 acres near Rancho Cordova, 15 miles east of Sacramento, California. Aerojet and its subsidiaries have manufactured industrial chemicals there since 1953. In 1979, volatile organic compounds (VOCs) were found in water wells off site and in the American River. Ground water use in areas surrounding the site is extensive. Ground water contamination led to the site's listing on the Superfund program's National Priorities List (NPL) in 1983.

The Superfund Process

The Superfund process follows a series of steps to address and clean up contaminated sites (see Figure 1). More detailed information is available at http://www.epa.gov/superfund/cleanup/index.htm.

The **Preliminary Assessment and Site Inspection (PA/SI)** are used by the EPA to evaluate the potential release of hazardous substances at a site. Information gathered during this stage determines eligibility for NPL status. During the PA/SI phase, the EPA may issue a notice or a fact sheet through the local media and distributes a fact sheet to let the community know the site is being investigated.

The **NPL Listing Process** guides the EPA in determining which sites need more investigation. During this phase, the EPA publishes a public notice, followed by a comment period, so interested community members are aware of and can comment on the NPL proposal.

The **Remedial Investigation (RI)** is a tool for collecting data at a site. The **Feasibility Study (FS)** uses the data collected to develop, screen and evaluate cleanup options. RI/FS information is then put into a draft **Proposed Plan**, which outlines proposed alternative remedial actions. The EPA publishes a public notice to notify community members, holds a public meeting to discuss the Plan and take formal comments.

After EPA issues the Proposed Plan, the Agency releases a **Record of Decision (ROD)** for a site. This decision document describes the selected remedy. The EPA issues a public notice to notify the community that the ROD is available. If changing the ROD is necessary, the EPA will develop a proposed ROD Amendment, again issue a public notice to notify the community, and hold a public meeting to discuss proposed changes and take comments. The EPA issues a Responsiveness Summary to formally respond to public comments received and it becomes part of the ROD.

After the ROD, detailed cleanup plans are developed and put in place during the **Remedial Design/Remedial Action (RD/RA)** step. During this step, EPA community involvement staff keeps community members advised about the progress of the cleanup.

The RD/RA leads to the cleanup completion and monitoring during the **Construction Completion** and **Post-Construction Completion** steps. Once sites are protective of human health and the environment, the EPA will start the deletion process from the NPL.

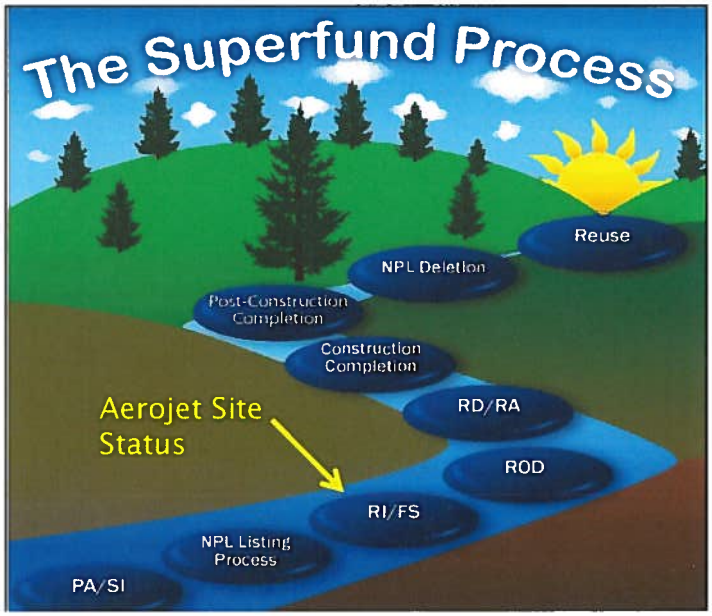
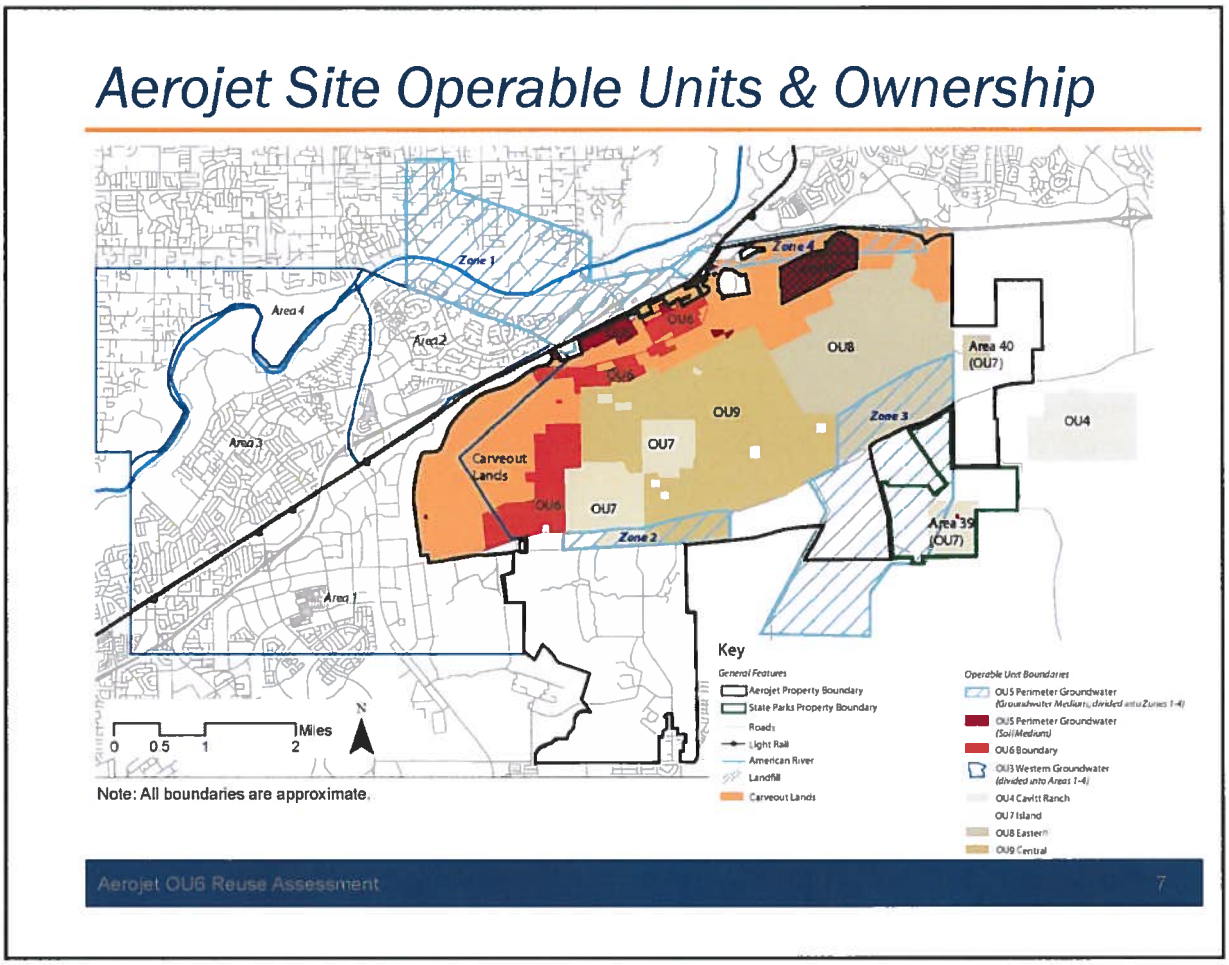


Figure 1. http://www.epa.gov/superfund/community/process.htm



Community Involvement and the OU6 Proposed Plan

As part of community involvement activities during the Superfund process, public comment periods are required at several times, including after the release of the Proposed Plan for a site's cleanup.

Comments received during the public comment period for the Proposed Plan for Operable Unit 6 (OU6) will inform the ROD and future Proposed Plans for other parts of the Aerojet General Corp. Superfund site.

The EPA released the Proposed Plan for OU6 (also known as the Boundary OU) in March 2013, with comments due to the EPA by September 20, 2013.

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http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/ViewByEPAID/CAD980358832

The Aerojet Community Advisory Group (CAG)

Community Advisory Groups can be a vital part of community involvement at a Superfund site. They serve as a conduit of information to and from EPA and as a link to the broader community.

For more information on the draft Proposed Plan for OU6, please attend the next Aerojet CAG meeting:

July 17, 2013
7:00 p.m.
Rancho Cordova City Hall
2729 Prospect Park Drive
Rancho Cordova, CA 95670

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Crosswalk of Proposed Plan for OU6 and Site Feasibility Study

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The remedial investigation and feasibility study (RI/FS) serves as the mechanism for the development, screening and detailed evaluation of alternative remedial actions at the eight Management Areas (MAs) and seven Open Space (OS) Areas within operable unit 6 (OU6). The Proposed Plan for OU6 summarizes the alternatives considered and identifies the EPA's preferred remedies. It summarizes the detailed information found in the RI/FS reports and other documents in the Administrative Record. The reference table below provides a crosswalk of the information presented in the Proposed Plan and the more detailed RI/FS content. EPA will consider public comments on the Proposed Plan in developing the Record of Decision for OU6. The comments will not be used to revise the Proposed Plan for OU6.

Crosswalk of Proposed Plan for OU6 and Site Feasibility Study

May 2013 Proposed Plan Sections	September 2012 Feasibility Study
Site Background **Site Characteristics** **Scope of OU**	***Section 1.3*** • Describes the site's history and physical setting. • Outlines current and projected future land use and ground water use. • Describes five current, interim ground water remedial actions.
Summary of Site Risk	***Section 1.4, pp. 1-14 through 1-32*** • Summarizes the risk to human health and the environment, as identified in the *Human Health and Ecological Risk Assessment*. • Includes summary tables describing the rationale and ultimate determination for which remedial areas would be retained or not retained for remedial action (Tables 1-4 through 1-20). • Includes 34 site maps depicting risk.
Preliminary Remedial Action Objectives (RAOs)	***Section 2, p. 2-1*** • Presents the preliminary RAOs for the OU cleanup
Summary of Remedial Alternatives	***Section 2-2 through 2-5*** ***Section 3, pp. 3-1 through 3-7*** • Identifies and describes the remedial alternatives potentially applicable to the OU. • Identifies "Applicable or Relevant and Appropriate Requirements" with which the remedial actions must comply. • Describes the four generalized remedial alternatives for the full OU and discusses the applicability of these general

	alternatives to the various MAs encompassed by the Boundary Operable Unit (BOU). • Includes more detailed discussion of Institutional Controls ICs.
Evaluation of Alternatives	***Sections 4 and 5, pp. 4-1 through 5-9*** • Presents a detailed analysis of the four alternatives. • Compares alternatives based on the nine National Oil and Substance Pollution Contingency Plan (NCP) criteria (as shown on Figure 6, p. 15 of the Proposed Plan).
Preferred Alternatives	***Section 6, pp. 6-1 through 6-18*** • Summarizes the application of Alternative 2 (Institutional Controls), Alternative 3 (Containment/Operational Controls) and Alternative 4 (Source Removal/Reduction) for retained remedial areas within the OU. • Depicts remedial areas and areas to be placed under ICs (as shown on Figures 3, 4 and 5 of the Proposed Plan).

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Aerojet General Corp. Site – Remedial Alternatives in the OU6 Proposed Plan

Remedial Alternatives for OU6

The Proposed Plan and feasibility study (FS) consider four remedial alternatives: No Action, Institutional Controls (ICs), Containment/Operational Controls and Source Removal/Reduction.

Remedial Alternative	Description	Recommended Application in OU6
Alternative 1 – No Action	No remedial activities would be implemented under this alternative. A No Action alternative does not reduce risk to human health or the environment, but is an alternative required for all Superfund sites.	Not selected
Alternative 2 – Institutional Controls (ICs)	Eliminates or limits exposure pathways by restricting land use at properties overlying areas of identified soil contamination, including areas where volatilization of volatile organic compounds (VOCs) from ground water may present an unacceptable risk.	Ground water ICs would be applied generally within OU6 (in addition to those that are already in place). Other ICs would be applied to portions of the remedial areas where: • Existing structures prevent access to subsurface contamination. • Risk from vapor intrusion warrants prohibiting residential use or requiring vapor barriers. • Contamination would pose a risk to ecological receptors if the land were to revert to habitat.
Alternative 3 – Containment/Operational Controls	Prevents exposure to contamination by: • Capping over soil areas with chemicals posing potential risks above commercial/industrial levels. • Maintaining existing barriers to prevent exposure to contaminants. • Developing and implementing ICs and engineering controls to reduce or prevent human exposure to contaminated soil vapors in existing or future buildings.	• Capping of soil areas to reduce infiltration, which would otherwise increase the movement of contamination into ground water. • Capping areas with non-VOC contamination to prevent human exposures. • Capping areas with VOC contamination to prevent human exposure to soil vapors.
Alternative 4 – Source Removal/Reduction	Removes source materials in soil, reducing contaminant concentrations to levels that would allow for restricted use (such as industrial or commercial uses) or unrestricted use.	• Excavation and off-site removal would be the primary method of cleanup in this alternative. • Soil vapor extraction of VOC soil contamination beneath inaccessible areas or at infeasible depths. • Soil flushing and air stripping to remove perchlorate from soils in areas where the risks to ground water are high, but excavation is infeasible due to depth.

Areas Not Retained for Remedial Action

The site's Remedial Investigation (RI) Report determined that the extent of chemicals in soil, sediment, soil vapor and surface water at source areas within operable unit 6 (OU6) have been sufficiently characterized to evaluate potential risks to human and ecological receptors and, if necessary, to develop remedial alternatives. Tables 1-4 through 1-11 and 1-14 through 1-20 of the 2012 Feasibility Study Report include a summary of risk associated with each of the potential remedial areas and a rationale for retaining or not retaining the site for no remedial action. These areas are included in the site's human health risk assessment.

The rationale for not retaining areas for further consideration is based on the level of contamination and the potential risk to human health and the environment. The EPA compared contaminant concentrations to recommended screening levels and did not retain those areas for which:

- Risk will be addressed through remedial action at other areas.
- Risk to ground water is considered low, based on low concentrations or low mobility contaminants.
- Risk to human health slightly exceeds the cancer risk level for further investigation (1E-6) and the noncancer risk is less than 1. If the risk was at the low end of the risk range (i.e., less than 1E-5) and the data point was isolated (e.g., a single sample), the area was not recommended for retention.
- Sample location indicated limited human exposure (e.g., a drainage ditch).
- Contamination is believed to be naturally occurring.

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Aerojet General Corp. Site – Proposed Plan
Institutional Controls for OU6

The EPA defines institutional controls (ICs) as non-engineered instruments, such as administrative or legal controls, designed to minimize the potential for human exposure to contamination or protect the integrity of a remedy. At sites where contaminants will remain above protective levels, ICs are implemented to ensure that unacceptable exposure from residual soil, soil vapor or ground water contamination does not occur. ICs typically serve to limit land use or resource use by providing information, restrictions or requirements to modify or guide human behavior where hazardous materials remain in place.

Generally, there are four categories of ICs for the EPA's cleanup programs:

IC Category	Description	Example
Proprietary Controls	Controls on land use that tend to affect individual parcels of property and are established between the EPA and property owners. Proprietary controls are typically recorded on the property deed and remain applicable even following changes in ownership.	environmental easements and restrictive covenants
Governmental Controls	Restrictions on land or resource use, using the authority of a government entity.	zoning restrictions, ordinances, building codes, state, tribal or local ground water use regulations, fishing bans
Enforcement and Permit Tools	Legal tools that limit certain site activities or require the performance of specific activities, such as monitoring requirements, maintaining vapor barriers, and reporting IC effectiveness.	Administrative Orders on Consent, Unilateral Administrative Orders, Consent Decrees
Informational Devices	Information or notification, as recorded notice in property records, or as advisories to local communities, tourists, recreational users or other interested persons that residual contamination remains on site. As such, informational devices do not provide enforceable restrictions.	state registries of contaminated sites, notices in deeds and fish consumption advisories

When an IC is a component of a remedial action, the status and effectiveness of the IC is evaluated during EPA's five-year reviews of the site remedy. In addition to the protectiveness determination, five-year reviews may identify IC issues and recommend the need for additional evaluation or follow-up actions.

OU6 IC Alternatives at the Aerojet General Corp. Site

Under the IC alternatives for the remedy for operable unit 6 (OU6), risks would be reduced and controlled through implementation, monitoring and enforcement of ICs. These would only allow land uses compatible with the presence of residual chemicals in soil and would restrict uses of the land that could result in exposure to residual concentrations of chemicals at levels that could pose an unacceptable risk.

Areas with Need for ICs	IC Alternatives
• Locations with contaminants present under existing buildings, utility corridors, landscaped areas and other infrastructure features. • Locations where buildings and infrastructure limit the options and effectiveness of various engineered controls that might otherwise be applicable.	• ICs are proposed to prevent exposure and ensure remedial action is taken when the infrastructure is removed.
• Areas where underlying ground water is a potential source for volatile organic compound (VOC) migration into overlying buildings via vapor intrusion. • Areas where contaminants are unlikely to meet acceptable risk levels in the near future.	• ICs are proposed to restrict property use (e.g., prohibit residential use) or to establish management controls (e.g., vapor barriers) that would allow for unrestricted use.
• Areas with potentially unacceptable ecological risk that are not selected for excavation.	• Land use controls are proposed to prevent the areas from reverting to habitat over time.

Specific mechanisms for implementing ICs for OU6 have not yet been determined. They could include governmental controls, proprietary controls or informational devices. Where applicable, ICs will be layered and combined with engineering controls. The RI/FS states that the objectives of ICs include notices and, as appropriate:

- Restrictions on residential land use (through management controls or government of proprietary controls) where residual chemicals of concern (COCs) would remain in place at concentrations above levels allowing for unrestricted use.
- Restrictions on commercial/industrial land use (through management controls or government of proprietary controls) in areas where existing chemical concentrations exceed risk-based levels for commercial/industrial uses.
- Restrictions on access to or use of ground water from beneath the Boundary Operable Unit (BOU).
- Requirements for appropriate health and safety and materials management procedures for excavations in areas of residual COCs.
- Restrictions on land use to prevent disturbed areas from reverting to viable habitat.

FOR MORE INFORMATION, PLEASE CONTACT:

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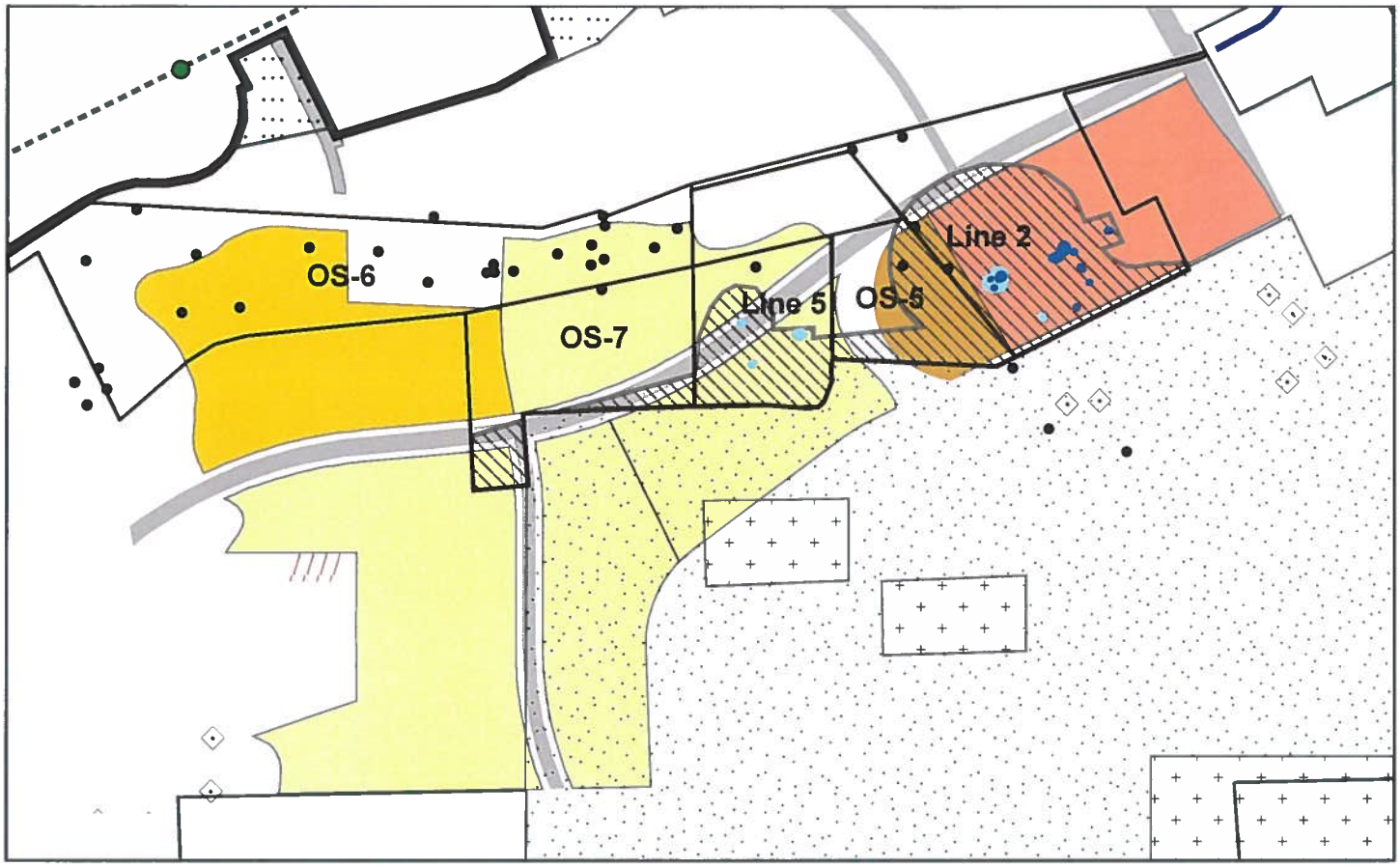
Recommended Remedial Alternatives and Proposed Residential Land Use Areas

Buffalo Creek, Line 2, Line 5 and West Lakes Open Space Areas



Key

OU 6 Remedial Considerations (Buffalo Creek Area)

- OU6 Management Areas / Open Space Areas
  (Management areas containing source sites and open space areas, based on Figure 1-1 in 2012 BOU Feasibility Study)
- Remedial Areas for Soil Excavation
  (Alternative 4 in BOU Proposed Plan to address soil impacts)
- Remedial Areas for Soil Vapor Extraction
  (Alternative 4 in BOU Proposed Plan to address soil vapor)
- Institutional Controls for Land Use / Development
  (to restrict property use (e.g., prohibit residential use) or to establish management controls (e.g., vapor barriers) that would allow unrestricted use.)
- Soil / Soil Vapor — Sampled Locations Not Retained for Alternatives Evaluation
  (Soil and Soil Vapor Sample location, based on Figure 1-28; Final BOU FS, Sept. 2012)

Proposed Westborough Development
(Uses with Residential Component)

- Commercial/Mixed Use
- High Density Residential
- Low Density Residential
- Medium Density Residential

General Features

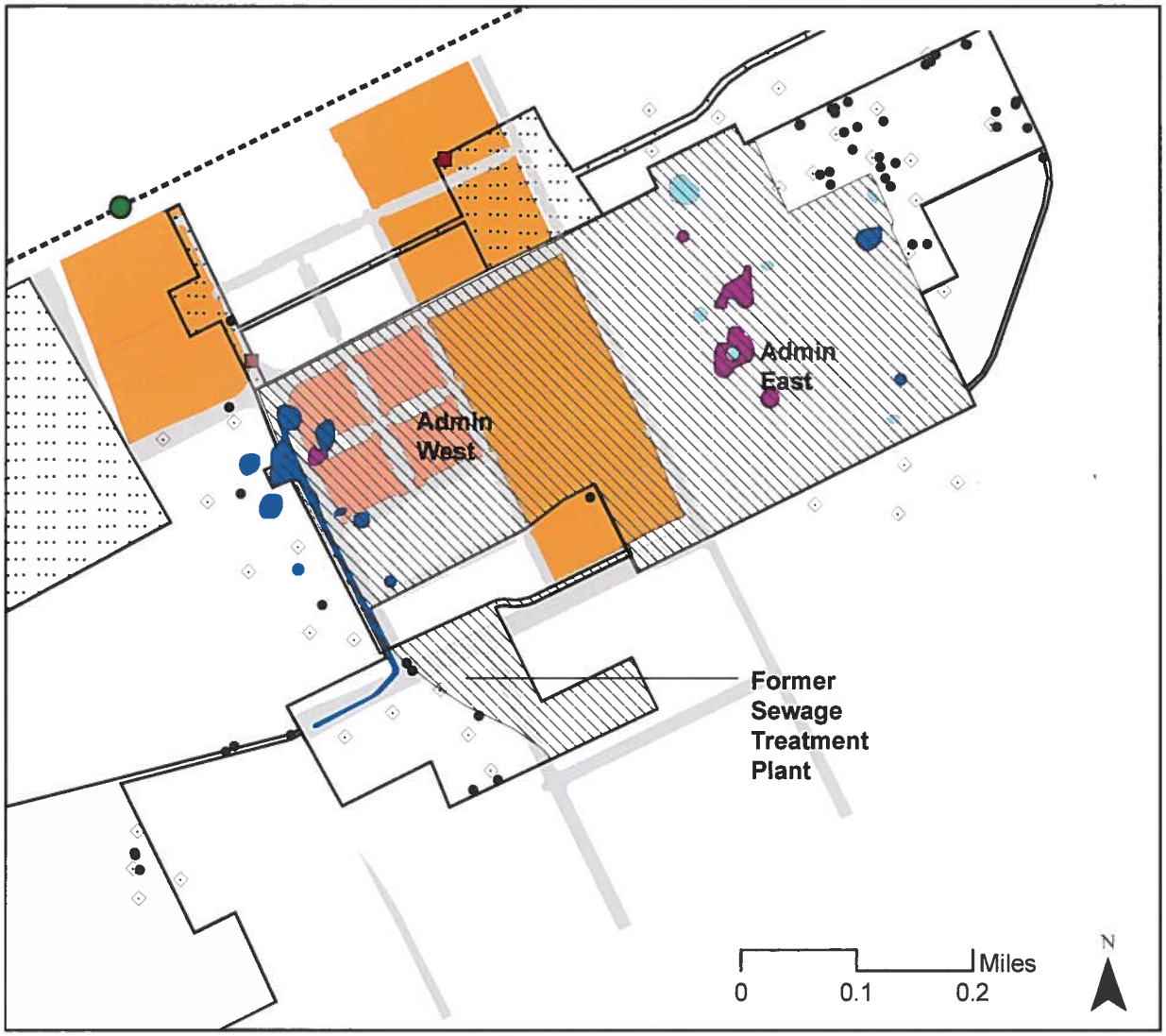
- Aerojet Boundary
- Light Rail

Other Operable Units

- OU5 Perimeter Groundwater *(Soil Medium)*
- OU7 Island
- OU9 Central

Recommended Remedial Alternatives and Proposed Residential Land Use Areas

Administration Area



Key

OU 6 Remedial Considerations (Administration Area)

OU6 Management Areas / Open Space Areas
(Management areas containing source sites and open space areas, based on Figure 1-1; Final BOU FS, Sept. 2012)

Remedial Areas for Capping
(Alternative 3 in BOU Proposed Plan to address soil impacts)

Remedial Areas for Excavation
(Alternative 4 in BOU Proposed Plan to address soil impacts)

Remedial Areas for Soil Vapor Extraction
(Alternative 4 in BOU Proposed Plan to address soil vapor impacts)

Institutional Controls for Land Use / Development
(to restrict property use (e.g., prohibit residential use) or to establish management controls (e.g., vapor barriers) that would allow unrestricted use, or to prevent areas from returning to habitat over time)

Soil
Soil Vapor

Sampled Locations Not Retained for Alternatives Evaluation
(Soil and Soil Vapor Sample locations, based on Figures 1-24 and 1-25; Final BOU FS, Sept. 2012)

Proposed Easton Place Development (Uses with residential component)

CMU

High Density Residential

Major Road

General Features

Aerojet Boundary

Light Rail

OU 5 Remedial Considerations (Soil Medium)

OU5 Perimeter Groundwater *(Soil Medium)*

Soil Hot Spots

EPA
United States
Environmental Protection
Agency

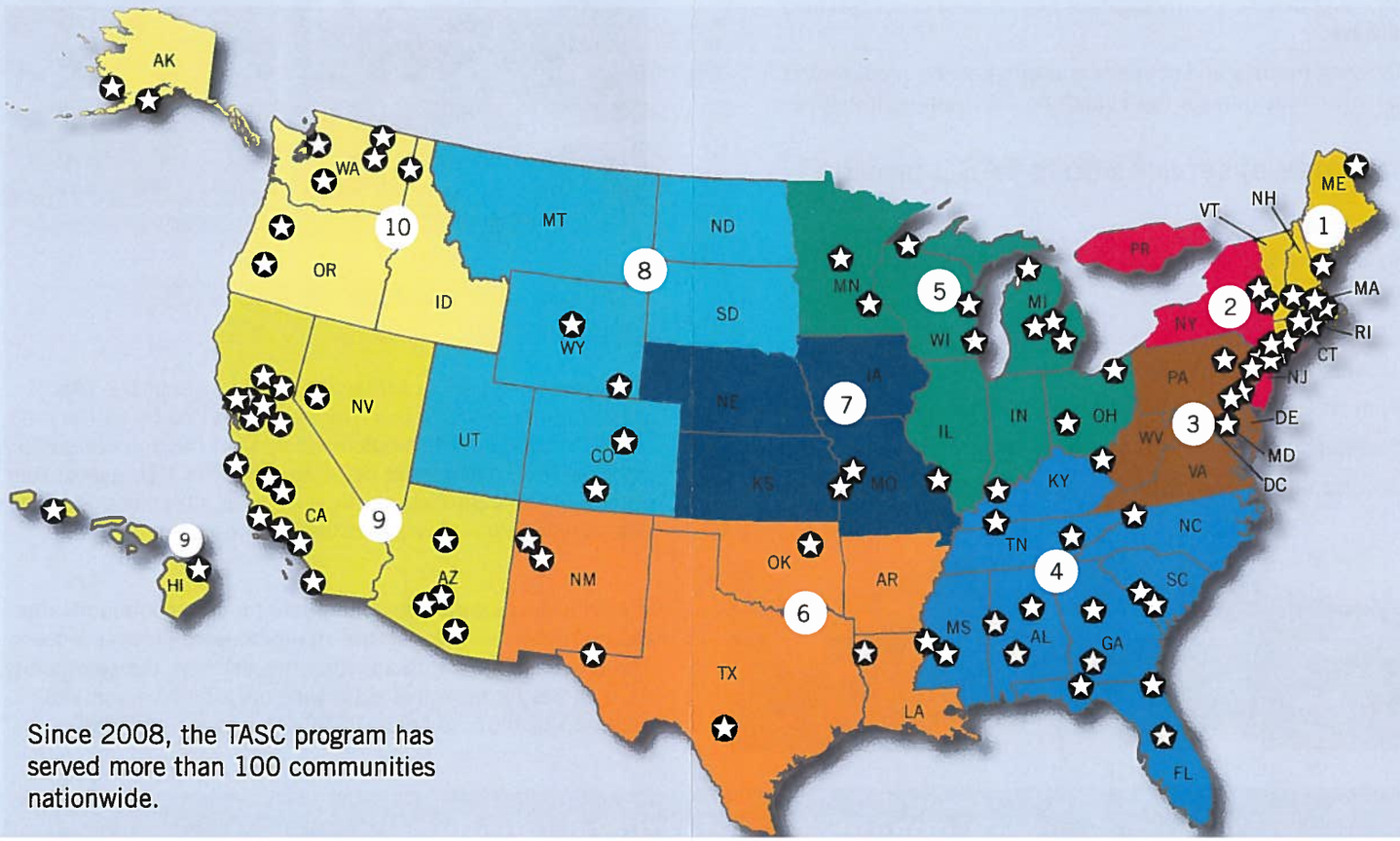
EPA-540-K-08-001
July 2013

TASC

Technical Assistance Services for Communities

- TASC is a national EPA program that provides technical assistance services to communities.
- The program's goal is to help people understand complex environmental issues and ensure meaningful community involvement in environmental decision-making.
- This pamphlet provides more information about the TASC program. It also describes how to access the program's services, which are provided at no cost to communities.

For communities interested in TASC services, more information is available on the EPA's website at www.epa.gov/superfund/community/tasc.



Since 2008, the TASC program has served more than 100 communities nationwide.

Technical Assistance and the EPA

As part of supporting healthy communities and advancing environmental protection, the EPA works closely with communities addressing environmental issues to make sure they have access to the technical assistance services they need. Sometimes, a community may need supplemental assistance to fully address its environmental concerns and engage in the decision-making process. The purpose of the TASC program is to meet such needs.

Technical assistance under the TASC program refers to services focused on increasing community understanding of the science, regulations and policy related to environmental issues and EPA actions. These services support community efforts to participate substantively and meaningfully in addressing those issues and EPA actions that affect them.

Technical Assistance Services for Communities

How can TASC help my community?

The TASC program benefits **people** by:

- Helping them understand complex environmental issues.
- Explaining technical findings and answering questions.
- Supporting their active role in protecting healthy communities and advancing environmental protection.

The TASC program assists **communities** by:

- Providing opportunities for environmental education.
- Bringing diverse groups together and helping them get more involved.
- Offering training and supporting environmental employment opportunities through the Superfund Job Training Initiative.

What types of services does TASC provide?

- Community trainings.
- Review and analysis of data and technical reports on behalf of communities.
- Educational presentations.
- Technical assistance needs assessments.
- Support for the formation of Community Advisory Groups.
- Facilitation of community meetings.
- Development of community outreach materials.

Who are the experts that provide the technical assistance?

The TASC program provides services through a national EPA contract. Under the contract, a contractor provides a dedicated team of technical assistance specialists to communities throughout the United States and U.S. territories.

How can my community get TASC assistance?

If you are interested in contacting the EPA about the TASC program, please locate your state and EPA Region on the map on the other side of this guide and contact the appropriate EPA regional TASC coordinator listed on the EPA's Web pages. Your regional TASC coordinator will review your situation and answer any questions you have about the TASC program.

If a TASC project may be appropriate for your community, the representative will explain the straightforward request process. The process begins with a written request from the community. All requests for technical assistance must be reviewed and approved by the EPA before TASC services are provided.