Message

From: MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]
Sent: 4/23/2018 2:39:55 PM
To: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]; Keller, Lynn [Keller.Lynn@epa.gov]; Bradfish, Larry [Bradfish.Larry@epa.gov]; Black, Stewart@Waterboards [Stewart.Black@Waterboards.ca.gov]; Lancaster, David@Waterboards [David.Lancaster@Waterboards.ca.gov]; Alasti, Isabella@DTSC [Isabella.Alasti@dtsc.ca.gov]
CC: Fennessy, Chris [christopher.fennessy@rocket.com]
Subject: Re: ARAR Table for FS/RAP for Area 40

Thanks Alex.

From: MacDonald, Alex@Waterboards <Alex.MacDonald@waterboards.ca.gov>
Sent: Saturday, April 21, 2018 12:26:16 PM
To: Keller, Lynn; Bradfish, Larry (Bradfish.Larry@epa.gov); Black, Stewart@Waterboards; MacNicholl, Peter@DTSC; Lancaster, David@Waterboards; Alasti, Isabella@DTSC
Cc: Fennessy, Chris
Subject: ARAR Table for FS/RAP for Area 40

I have taken the compilation provided by Chris Fennessy and modified it by moving some of the ARARs as discussed:

Each of three ARAR categories has a subsection listed as State-listed to provide those ARARs the State has provided, but EPA may not necessarily agree with. Those we believe should be included, and must be there for the RAP. The ARARs that came primarily from the OU 6 process are provided as agreed-upon ARARs by all parties and are listed first in each category.

Peter supplied the DTSC ARARs and I have included them in the table - they are highlighted in a light greenish color and all were placed in the State-only sections as I did not see them in the previous tables and do not know if USEPA agrees with them or not.

There are several that may be able to be eliminated - 100-year floodplain as an example. The PCB ARAR has been eliminated as PCBS are not an issue at Area 40.

It should be kept in mind that some ARARs are needed for facilities that may take and treat perchlorate contaminated soils from Area 40 on Aerojet property. Regional Board believes they are needed for the cleanup areas themselves and they have already been included in the State-only ARARs sections.

We should get a resolution on this for Aerojet by this Friday (27th) so that Aerojet can finalize the FS and get the Draft RAP out to the public on time (1 May).

Alex