Message

From: MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]
Sent: 10/11/2016 4:59:02 PM
To: Fennessy, Christopher [christopher.fennessy@Rocket.com]
CC: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]; Keller, Lynn [Keller.Lynn@epa.gov]
Subject: Aerojet Area 40 Final HHERA and Draft FS - HERO Review of RTCs

Hi Chris,

On a separate but related matter in terms of the document (Area 40 HHERA), HERO staff recently provided the following response to the RTCs incorporated into the Final HHERA Report:

Valerie Hanley, HERO Human Health Toxicologist;

I have reviewed the RTC's and the parts of the HHRA updated as a result of the RTCs for Area 40. I do not believe I have reviewed these RTC's previously. I'm not overly satisfied with their response to my comment #2. Their response missed the mark altogether. The point of my comment was that in the absence of a LUC residential exposures should be considered and I wanted them to remove language regarding planned future use that excluded residential exposure. They responded to this comment in the opposite way than I intended. If LUCs are to be placed in all of these areas (and I believe they are?) then their response as written is acceptable if they add in the language that indicates LUCs will be in place preventing residential exposure. Please see my initial comment, their response to my comment, and my response to their response below. I understand that the current document is already "Final". I'm ok with them not further updating the document but I want my comment noted as I think it's important. Please let me know if you have any further questions.

My comment:

HERO notes that in the absence of land use restrictions there is a potential for land to be redeveloped for residential use and any future remediation decisions should be based on residential risks unless a land use covenant is in place restricting land use. Consequently, HERO recommends removing throughout the discussion in the Risk Summary section of the document statements such as:

"As shown by the future use map, this area is currently planned to be a [park (recreational)]; therefore, while this area requires further analysis in the FS, as long as this area is developed as a [park], chemicals in soil will not pose a risk to [future residential users]."

HERO acknowledges that all locations are being carried forward into the Feasibility Study (FS), regardless of planned future land use. However, HERO does not concur with language that implies the potential for contamination to stay in place based on planned future uses. Please keep this under consideration as Area 40 moves into the FS stage.

Their Response:

The report includes 14 locations in Sections 5.2.4 through 5.2.9, where the

text is similarly worded as above. These 14 sentences will be edited similar to

the example below:

"As shown by the future use map, this area is currently planned to be a [park

(recreational)];Further analysis will be conducted for this

area in the FS, and potential corrective actions will be assessed based

on potential risk for park users and not future residential users."

My official response to their comment:

HERO is not satisfied with the revision to Sections 5.2.4 through 5.2.9 as detailed in the Aerojet Response to Comments presented in Appendix A-3. HERO's initial comment was meant to indicate that all areas should be compared to residential screening values in the absence of a LUC. The updated language would be acceptable if it is further modified to indicate that LUCs will in fact be put in place in these areas.

From: Fennessy, Christopher [christopher.fennessy@Rocket.com]
Sent: Tuesday, October 11, 2016 8:47 AM
To: Keller, Lynn
Cc: MacNicholl, Peter@DTSC; MacDonald, Alex@Waterboards
Subject: RE: Aerojet Area 40 Final HHERA and Draft FS - EPA Status

Hi Lynn – This is very concerning. The Area 40 RI and Risk Assessment were prepared with the current toxicity information. All Agencies and their respective teams have reviewed this data and provided comments. All Agencies have accepted the responses. How does the vapor intrusion evaluation at other areas within the site have an impact on Area 40? I don't understand the need to hold this document until the scope and extent of the investigation for rest of the site is completed. Please explain.

I need a firm schedule for submittal of comments on this document. Please advise.

Chris

Christopher M. Fennessy, P.E.
Aerojet Rocketdyne, Inc.
Engineering Manager, Site Remediation
11260 Pyrites Way, Suite 125

Rancho Cordova, CA 95670
Ph: 916-355-3341
Fax: 916-355-6145
Email: Christopher.Fennessy@Rocket.com

From: Keller, Lynn [mailto:Keller.Lynn@epa.gov]
Sent: Tuesday, October 11, 2016 7:50 AM
To: Fennessy, Christopher
Cc: MacNicholl, Peter@DTSC; MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov)
Subject: [EXTERNAL] Aerojet Area 40 Final HHERA and Draft FS - EPA Status

Hello, Chris.

Due to the unknown vapor intrusion requirements throughout the Aerojet site at this time, Dan Stralka (my toxicologist) recommended that the Area 40 Final HHERA be held until we can determine the scope and extent of the investigation needed, and ensure the HHERA is sufficient.

Likewise, I need more time on the FS comments to give our VI group a chance to review it for VI issues. Also, my radiological support person just retired, so I need to give the new contact some time to review the FS and ensure there are no rad concerns.

Thank you,
Lynn

Lynn M. Keller, EI, CMP
US EPA Region 9 RPM
75 Hawthorne St, SFD 7-1
San Francisco, CA 94105
415.947.4162