



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 4 2000

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the Aerojet Superfund Site, Western Groundwater Operable Unit (OU-3)

FROM: Bruce K. Means, Chair
National Remedy Review Board

A handwritten signature in cursive script, appearing to read "Bruce K. Means".

TO: Keith Takata, Director
Superfund Division
EPA Region 9

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed Superfund cleanup action for the Aerojet Superfund Site's Western Groundwater Operable Unit (OU-3). This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

The Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control response costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions prior to their being issued for public comment. The board reviews all proposed cleanup actions that exceed its cost-based review criteria.

The NRRB review evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, state/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate regional decision maker. The region will then include these recommendations in the Administrative

- Pre-decisional; not for distribution -

Record for the site before it issues the proposed response action for public comment. While the region is expected to give the board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of response options, may influence the final regional decision. The board expects the regional decision maker to respond in writing to its recommendations within a reasonable period of time, noting in particular how the recommendations influenced the proposed cleanup decision, including any effect on the estimated cost of the action. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

Overview of the Proposed Action

The Aerojet site covers 8,500 acres in Rancho Cordova, California. Since the early 1950's the site has been used primarily for the development of rocket propulsion systems to support national defense and civilian rocket uses. Aerojet's industrial activities have included rocket manufacturing and testing along with chemical manufacturing. Groundwater, surface water, and soils have been contaminated with many different chemicals. The NRRB reviewed the Region's proposed remedy for OU-3, which covers contaminated groundwater on the western side of the site. Perchlorate, volatile organic compounds (VOCs), and Nitrosodimethylamine (NDMA) comprise the chemicals of principal concern in this OU. Groundwater contamination in this area has migrated off the site and as a result, affected drinking water supply wells have been shut down. The region's proposed cleanup action for OU-3 includes containing groundwater contamination and restoring it to levels that are protective and comply with ARARs.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for this proposal and discussed related issues with EPA Site Manager Charles Berrey and Alexander MacDonald of the California Regional Water Quality Control Board on August 22, 2000. Based on this review and discussion the board offers the following comments:

- The board recommends that the region clearly document in the ROD how the California State Water Resources Control Board Resolution Number 92-49 will affect contaminant-specific restoration levels, especially for VOCs and perchlorate. The board questions why aquifer restoration levels for VOCs are established below maximum contaminant levels (MCLs). Based on the presentation to the board, these lower-than-MCL VOC levels are being set pursuant to CA 92-49 (considered by the region to be an ARAR for this site) because they are expected to be achieved as a result of the groundwater extraction necessary to meet the perchlorate cleanup level (4 ppb). However, as in situ perchlorate technologies develop, and as toxicological studies on perchlorate are completed, the region may revise the remedy for perchlorate (e.g. extraction strategy, restoration level). If this were to occur, it will be important to understand how these changes might affect the original rationale for VOC restoration levels. Therefore, it is important that the ROD clearly document the bases for VOC restoration levels and their link to the perchlorate remedy. Further, the board recommends that the region re-evaluate the cleanup levels for the VOCs (to the extent they fall below MCLs), should the approach to perchlorate remediation change.

- The board notes that the OU3 remedy depends upon containing the up-gradient contamination sources. Any delays in establishing an operational and functional containment system will only increase an already lengthy restoration time frame. The board encourages the region to expedite the cleanup efforts in these source areas.
- Given the number of drinking water wells close to the migrating plume, it is likely that some wells will become contaminated before the lengthy remedial action is complete. Since options for providing alternate water supplies in this area are few, the ROD should consider this issue directly and provide a contingency for an alternate water supply to quickly replace affected drinking water wells.
- The board supports the aggressive cleanup approach in alternative 4C and believes the region should consider the PRP's concern of downward contaminant migration during the design and implementation of the alternative.

The NRRB appreciates the region's efforts to work closely with the state, PRP and community groups at this site. We encourage Region 9 management and staff to work with their regional NRRB representative and the Region 1/9 Accelerated Response Center in the Office of Emergency and Remedial Response to discuss any appropriate follow-up actions.

Thank you for your support and the support of your staff in preparing for this review. Please give me a call at 703-603-8815 should you have any questions.

cc: S. Luftig
L. Reed
T. Fields
B. Breen
J. Woolford
C. Hooks
R. Hall
OERR Regional Center Directors