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December 8, 2022

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DRAFT ENVIRONMENTAL IMPACT REPORT FOR WHITE ROCK NORTH MINE –
DATED NOVEMBER 2022 (STATE CLEARINGHOUSE NUMBER: 2022110169)

Dear Ms. Inman:

The California Department of Toxic Substances Control (DTSC) is providing comments on the County of Sacramento Planning and Environmental Review Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for White Rock North Mine (PLNP2021-00216 and SCH #2022110169). The proposed project consists of aggregate mining on an approximately 2,125-acre portion of the Aerojet Rocketdyne Facility in Sacramento County. The project proponent, Granite Construction Company (Granite), proposes to mine and transport up to 25 million tons of material over a period of approximately 20 years. The mined materials are planned to be transported off-site by a new conveyor connecting to an existing aggregate processing plant which is operated by Teichert under separate permit.

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Aerojet-General Corporation Superfund Site Background

Aerojet Rocketdyne, Inc. (Aerojet) and its subsidiaries have operated the approximately 8,500-acre facility in Sacramento County from the 1950s; operations primarily included solid rocket motor manufacturing and testing, liquid rocket engine manufacturing and testing, and chemical manufacturing. These operations resulted in the release of unknown quantities of hazardous substances/materials, including trichloroethene (TCE), perchlorate, and N-nitrosodimethylamine (NDMA), resulting in impacted soil and groundwater. Aerojet discontinued rocket motor component manufacturing and testing activities at this location in 2019.

The Site, Aerojet-General Corporation, was added to the National Priorities List (NPL) in 1983. In 1989, Aerojet, the United States Environmental Protection Agency (USEPA), the California DTSC, and the California Central Valley Regional Water Quality Control Board (RWQCB) entered into a Partial Consent Decree (PCD), obligating Aerojet to perform Remedial Investigation (RI)/Feasibility Study (FS) at the Site and take specific interim obligations. The PCD was later modified in 1998 and 2002. The 1989 PCD established procedures for completion of the Sitewide RI/FS in three phases: Scoping Phase, Phase I RI/FS, and Phase II RI/FS. Sitewide preliminary characterization (Scoping Phase) was completed in the 1990s. The 2002 modification to the PCD allowed for an Operable Unit (OU) approach to the RI/FS, resulting in the formation of multiple OUs. Approximately 5,900 acres of the Aerojet Rocketdyne Facility are currently included in the Aerojet-General Corporation Superfund Site (Site) and undergoing investigation, monitoring, and remediation under the various OUs.

DTSC Review of the Provided Documents

The DTSC reviewed the NOP as well as the Granite, 2022, Project Description for the White Rock North Mine Project, Revised July 2022 (Project Description), viewed online at:

<https://planningdocuments.saccounty.net/ViewProjectDetails.aspx?ControlNum=PLNP2021-00216>

The NOP was provided for agency comment on the scope and content of environmental information pertinent to the proposed project. The NOP includes a subsection on *Hazards and Hazardous Materials*, which states: “The area of the project site is within the Aerojet Superfund remediation project area. Specific areas that contain hazardous materials sites will be identified in the vicinity of the proposed excavation area. Project compatibility with any existing hazardous materials sites will be examined. In addition, potential mining-related impacts of the Project regarding the potential spill of hazardous materials will also be examined.”

The Project Description includes the following: “Granite has coordinated extensively with Aerojet’s remediation team in developing this application to ensure that mining will not conflict with or impede the ongoing clean-up activities at the site. Areas that have been identified as containing environmental constraints related to the Superfund order have been excluded from mining under the proposed Project. In addition, Granite proposes no uses, such as settling or process water ponds, that would discharge waters in a manner that would affect the groundwater plume or impede Aerojet’s remediation activities.”

The NOP includes a Site Vicinity Map with the planned project boundary and location of conveyor connection. Based on DTSC review of the planned project boundary and comparison to Aerojet Superfund Site maps, the following observations are made:

- The proposed mining area includes large portions of the Superfund Site OUs 8 and 9. OU-8 (Eastern OU) completed a Final RI/FS Sampling and Analysis Plan (SAP) in 2009; the SAP RI fieldwork is not currently scheduled to begin until 2024. OU-9 (Central OU) completed a Draft RI/FS SAP in 2008; the SAP RI fieldwork is not currently scheduled to begin until 2025. However, the regulatory agencies may require Aerojet to begin RI efforts at OU-8 and OU-9 sooner than the current schedules.
- The proposed mining area includes Hogout source areas 50F, 51F, and 57F, and Thermal Treatment Area (TTA) source area 11G of the Island Operable Unit

(IOU, or OU-7). OU-7 RI is currently ongoing with a Baseline Ecological Risk Assessment in progress.

- Several Resource Conservation and Recovery Act (RCRA) units have been referred to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) to be addressed under OU-7, OU-8, and OU-9 cleanup activities.
- Several septic tanks identified during previous RI/FS activities that require additional investigation are also being addressed under OUs 8 and 9. Thirty-two septic tanks were assigned to OU-8 source areas, and 55 septic tanks were assigned to OU-9 source areas to address potential releases and cleanup under CERCLA.
- The proposed mining area also encompasses and/or is adjacent to Perimeter Groundwater Operable Unit (PGOU, or OU-5) remedial operations, including active monitoring wells, extraction wells, and groundwater extraction and treatment system (GET) AB.

DTSC Comments for Consideration of Environmental Information Pertinent to the Proposed Project

As described above, the NOP and Project Description indicate that the mining will not conflict with or impede the ongoing remedial activities at the Site, and that areas identified as potential hazardous materials sites will be/have been excluded from the proposed mining activities. The proposed mining area boundary includes large portions of OUs 8 and 9, and two source area management areas within OU-7, which still require completion of remedial investigation, risk characterization, and remedy determination. Additionally, multiple RCRA units and septic tanks have been referred to CERCLA to be addressed under these OUs within the proposed mining boundary. The proposed surface mining area overlays contaminated groundwater plumes undergoing monitoring and remediation in accordance with the PGOU Groundwater interim remedy.

DTSC provides the following comments on the proposed project:

1. The land within the proposed project boundary is included in and subject to land use restrictions pursuant to the PCD. The proposed mining operations must not violate any restrictions or requirements as described in the PCD or any applicable current or future Land Use Covenants recorded for the Site.
2. While potential contaminated areas have been identified within these OUs during the Sitewide Scoping Phase in the 1980s and 1990s, the vertical and lateral extent of contamination within these OUs have not been fully characterized. RCRA units and septic tanks that have been deferred to CERCLA since the Scoping Phase to be addressed under these OUs also require evaluation for cleanup. Mining and soil disturbance activities conducted within these OUs that have not had remedial investigation and risk assessment completed and remedy identified could potentially put mine workers and nearby communities at risk to exposure from contaminated materials; potentially impact end user health and safety from mined material; and/or have impacts on the future remedial actions not yet planned for these areas.

Should the proposed mining project planning activities proceed, DTSC recommends that the specific areas planned for soil disturbance within the proposed project boundary be defined and assessed as having no evidence of soil contamination that would pose risks to human health or the environment prior to soil disturbance or mining activities being conducted. Samples should be collected from areas the mining company intends to mine or disturb to verify and reduce these risks. DTSC also recommends that appropriate caution be used, and contingency plans be in place should unknown soil contamination be encountered during these mining activities.

3. The mining operations must not impede or interfere with the schedule or implementation of the cleanup process for the Site.
4. The mining operation must not in any way introduce new contamination or spread or exacerbate existing contamination in soil and groundwater. Any person

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that causes new contamination or exacerbates the existing contamination would be held jointly, severally, and strictly liable for investigating and remediating such contamination or potential contamination.

Should you have any questions or comments regarding this matter, please contact Susan Scudder at (916) 255-3601, or Susan.Scudder@dtsc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Peng'.

Juan Peng, Ph.D., P.E.

Supervising Hazardous Substances Engineer
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cc: Ms. Susan Scudder, Project Manager – DTSC
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