

Central Valley Regional Water Quality Control Board
18/19 April 2024 Board Meeting

Response to Comments
for the
Aerojet Rocketdyne, Inc.
Tentative Amending Waste Discharge Requirements

The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested persons regarding the tentative Order amending Waste Discharge Requirements, National Pollutant Discharge Elimination System (NPDES) Permit CA0083861 for Aerojet Rocketdyne, Inc. (Discharger) Groundwater Extraction and Treatment (GET) Systems, ARGET, GET E/F, GET HA, GET J, GET KA, GET LA, GET LB, GET AB, White Rock GET, Sailor Bar Park GET, Golden State Water Wells, and Low Threat Discharges (Facility).

The tentative amending Order was issued for a 30-day public comment period on 13 January 2023 with comments due by 13 February 2023. The Central Valley Water Board received public comments regarding the tentative amending Order by the due date from the City of Sacramento. Some changes were made to the proposed amending Order based on public comments received.

The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

CITY OF SACRAMENTO COMMENTS

1. Item 4 – Waste Discharge Requirements, Section I. Facility Information

The City of Sacramento expressed concerns about the total flow increase from the addition of permitted discharges from Golden State Water Company supply well Arden Cordova 25 (Well AC-25) due to water quality impacts during low flow periods and requests a re-evaluation of total discharge and contaminant load to the Lower American River during the next permit renewal.

RESPONSE: Central Valley Water Board staff concur and will evaluate this request during the Order's renewal. It should also be noted that the Discharger provided the following information with their original amendment request dated 11 July 2022:

The proposed AC-25 well location, 10400 Coloma Rd, Parcel 057-0020-034, has been reviewed by the California State Water Resources Control Board, Division of Drinking Water (DDW) and was found to be acceptable. Once several conditions presented in DDW's site location review letter dated 18 May 2022 are incorporated into the design and/or operation of the well, DDW will take no exception to the proposed location. Approval for use of the proposed well as a public water source will depend on the analysis of water quality samplings

demonstrating compliance with all drinking water maximum contaminant levels after well testing has been completed.

2. Item 7 – Waste Discharge Requirements, Section IV. Effluent Limitations and Discharge Specifications

The City of Sacramento notes that Discharge Point 011 is no longer in use and requests Discharge Point 011 be moved to the list of discharge points no longer in use.

RESPONSE: Central Valley Water Board staff concur. The current permit (Section IV.A.12) states that Discharge Point 011 is no longer used since discharges from the Chettenham Well Facility no longer occur. Therefore, remaining references to Discharge Point 011 throughout the current permit are considered typographical errors and have been removed.

3. Item 11 – Attachment B, Maps

The City of Sacramento requests the maps to be updated to include missing outfalls, receiving water monitoring locations, and remove outfalls and monitoring locations that are no longer in use.

RESPONSE: Central Valley Water Board partially concur. An updated map has been added to Attachment B that reflects more current operations than Attachments B-1 and B-2 in current Order R5-2020-0051-001. Changes to the Order at this time are limited to the specific amendment requests from the Discharger, namely changes to wells AC-6 and AC-25 and various typographical errors in the permit. Central Valley Water Board staff agree that further updates to well, outfall, and monitoring locations such as those suggested by the City of Sacramento, may be needed and plan to make these changes during the next permit renewal.

4. Item 23 – Attachment F, Fact Sheet, Section II. Facility Description

The City of Sacramento requests addition of operation and discharge details of the use of AC-25 to the Facility Description. The City of Sacramento requests that the text be expanded to include language similar to AC-18 to clarify the operation and discharge of AC-25.

RESPONSE: Central Valley Waterboard staff concur and have added additional information to the Facility Description for Well AC-25 to the amended permit and the amending Order.

5. Item 29 – Attachment F, Fact Sheet, Section IV. Rationale for Effluent Limitations and Discharge Specifications

The City of Sacramento notes that Well 4665 is no longer in use and requests that reference to Well 4665 be removed and requests additional description of the influent chloroform concentrations at AC-25.

RESPONSE: Central Valley Water Board staff partially concur. Updates to the status of Well 4665 throughout the Order will be made during the next permit renewal since Well 4665 changes are substantial and outside the scope of this amendment. An updated description of influent chloroform concentrations at Well AC-25 has been added to the amended permit and the amending Order.

6. Item 30 - Attachment F, Fact Sheet, Section IV. Rationale for Effluent Limitations and Discharge Specifications

The City of Sacramento requests clarification for the removal of AC-6's flow from Table F-7.

RESPONSE: Central Valley Waterboard staff clarify that Well AC-6 will no longer be in use as a discharge point to surface water; therefore, Well AC-6 flow does not need to be included in Table F-7.

7. Item 31 - Attachment F, Fact Sheet, Section IV. Rationale for Effluent Limitations and Discharge Specifications

The City of Sacramento requests clarification for the revision to the effluent limitations for chloroform at Discharge Point 004 in Table F-11.

RESPONSE: Central Valley Waterboard staff clarify that the effluent limitations for chloroform at Discharge Point 004 have not changed, but Table F-11, Summary of Final Effluent Limitations, has been revised to be consistent with the effluent limitations for chloroform at GET HA, as shown in Table F-7 and described in Table F-7 Notes.