

Responses to City of Sacramento Comments on Aerojet Rocketdyne Inc., Sacramento Facility, NPDES permit.

Number corresponds to number shown on City's comment letter.

1. As the storm water retention basins are connected, the water within the basins has been mixed. Sampling of two of the four discharge points is sufficient to assess the water quality of the discharge. Historical sampling has not shown a significant water quality difference between the discharge points. It should also be kept in mind that the two flows that fill the ponds – Buffalo Creek and the Administration Ditch - are sampled on a monthly basis and sampling takes place in the receiving water downstream during the time of the discharge to Buffalo Creek.
2. Table 5 provides effluent limitations for the Order. There are only daily maximum limitations as the discharges are infrequent. Section IV.D.2 of the fact sheet deals with monthly/annual averages which are not applicable.
3. The request for notification will be added. If this is of concern, then the City should make similar requests to other industrial sites with storm water permits that are in the American River watershed.
4. Section X.D of Attachment E lists the requirements of the submittal of the Annual Operations report. Section X.C of Attachment E provides requirements if the Discharger is required to submit EPA-required forms and/or submit the monitoring data electronically. Aerojet submits the SMRs as required by Section X.B of Attachment E and need only submit the same information in a different format under Section X.C. if requested.
5. The table was determined to be redundant as all the information is supplied in Section IV.C of Attachment F, commencing on page F-20. The table of contents and labeling of the attachments will be corrected.
6. The detection of perchlorate occurs from time to time in Buffalo Creek, but has never been found in the discharges from the impoundments to Buffalo Creek. It is believed some of the the concentrations are due to seepage of groundwater to the creek. In the past it had also been traced to the leakage from a pipe carrying water from one of the GET facilities. That leakage has been repaired. The Superfund process evaluates the impacts to surface water and this issue will be examined in that process. During sampling conducted under Aerojet's permit, concentrations of perchlorate have not been detected in Buffalo Creek leaving the Aerojet facility.
7. With the new boilerplate, the requested information is provided in Attachment F. The table was kept in from the previous version of the permit to help the reader understand the permit.
8. This was an error transferred from the Aerojet Groundwater Extraction and Treatment permit that had just been revised. It will be eliminated.
9. The reference is correct.
10. Coliform has been eliminated from Section V.A.2 as it is not applicable to this discharge. Monitoring is not required for coliform.
11. RL is reporting limit and this has been added to the definition in question.

12. The definition is correct.
13. The definition is correct.
14. A definition has been added and is the same value as reporting level.
15. The Source of Drinking Water definition has been revised.
16. The "etc." has been removed.
17. The "etc." has been removed.
18. The reference has been eliminated.
19. As the storm water retention basins are connected, the water within the basins has been mixed. Sampling of two of the four discharge points is sufficient to assess the water quality of the discharge. Historical sampling has not shown a significant water quality difference between the discharge points. It should also be kept in mind that the two flows that fill the ponds – Buffalo Creek and the Administration Ditch are sampled on a monthly basis.
20. Sampling is only required if there is flow at the monitoring point – going past the monitoring point. There have been times previously when Aerojet was sampling a puddle every month even with no flow entering or leaving the puddle.
21. The reference has been added.
22. These definitions are supplied in the boilerplate for NPDES permits and need to be applicable to a range of facility types and discharges. If there are no average annual limits than the Discharger can ignore that requirement as not applicable to them.
23. The June SMR would contain the calculated values for annual averages of pollutants during the period July 1 to June 30. Table E-6 informs the discharger to report data that is collected on an annual basis in the December SMR.
24. Facility is equal to plant and the term facility will replace plant to be consistent with the rest of the permit.
25. Samples of the ponds are collected prior to discharge from them to Buffalo Creek.
26. The text has been corrected.
27. Requested corrections have been made.
28. The section has been deleted as it is not applicable to this facility.
29. The first paragraph has been deleted from the tentative order and from the boilerplate.
30. The three footnotes have been added.
31. The discussion of MUN is found in IV.C.3.d.iv.c.
32. See response No. 2, above.
33. The recommended addition has been made.
34. The suggested edits were made.
35. The suggested edit has been made.
36. As the storm water retention basins are connected, the water within the basins has been mixed. Sampling of two of the four discharge points is sufficient to assess the water quality of the discharge. Historical sampling has not shown a significant water quality difference between the discharge points. It should also be kept in mind that the two flows that fill the ponds – Buffalo Creek and the Administration Ditch are sampled on a monthly basis.
37. This reference is not required.
38. The title has been revised.
39. See Response 36.

40. Already found in II.E of Attachment E.
41. MRL has been replaced by PQL.