

Central Valley Regional Water Quality Control Board
16/17 April 2026 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements and Tentative Time Schedule Order for
Aerojet Rocketdyne, Inc.
Groundwater Extraction And Treatment (GET) Systems, ARGET, GET EF, GET HA,
GET J, GET KA, GET LA, GET LB, GET AB, WRND GET, Sailor Bar Park GET,
Cooling Tower 20019, Golden State Water Wells and Low Threat Discharges
Sacramento County

At a public hearing scheduled for 16/17 April 2026, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements (NPDES No. CA0083861) and Tentative Time Schedule Order for the Aerojet Rocketdyne, Inc. (Discharger), Groundwater Extraction And Treatment Systems, ARGET, GET EF, GET HA, GET J, GET KA, GET LA, GET LB, GET AB, WRND GET, Sailor Bar Park GET, Cooling Tower 20019, Golden State Water Wells and Low Threat Discharges (Facility). This document contains responses to written comments received from interested persons and parties in response to the tentative Orders. Written comments from interested parties were required to be received by the Central Valley Water Board by 4 March 2026 in order to receive full consideration. Comments were received prior to the deadline from:

1. Aerojet Rocketdyne, Inc. (Discharger) (received 4 March 2026)
2. City of Sacramento (received 4 March 2026)

Written comments from the above interested parties are summarized below, followed by the response of Central Valley Water Board staff.

DISCHARGER COMMENTS

Tentative Waste Discharge Requirements (hereinafter Order) Comments:

DISCHARGER COMMENT #1 – Self-Monitoring Report Due Dates

Modify the due date for self-monitoring reports (SMRs) from the 1st day of the second calendar month following the month of sampling to the 15th day of the second calendar month following the month of sampling. The Discharger cites time constraints related to the sample collection date, laboratory analysis time, data validation, and report preparations as supporting evidence to revise the SMR due dates.

RESPONSE #1:

Central Valley Water Board staff concur and the monthly SMR due date presented in Attachment E – Monitoring and Reporting Program (MRP), Table E-25 Monitoring Periods and Reporting Schedule of the proposed Order has been revised to reflect the 15th day of the second calendar month following the month of sampling.

DISCHARGER COMMENT #2 – GET HA Flow

The GET HA system is limited by two ion exchange pairs, each capable of 1,500 gallons per minute (gpm) for a total of 3,000 gpm or 4.3 million gallons per day (MGD). Correct the maximum daily design flow of the GET HA facility from 3.9 MGD to 4.3 MGD throughout the tentative Order.

RESPONSE #2:

Central Valley Water Board staff concur and have updated the GET HA flow throughout the proposed Order to 4.3 MGD.

DISCHARGER COMMENT #3 – Influent Flow Monitoring

Clarify why the influent is monitored for flow when compliance with discharged flow is determined at the effluent monitoring points at all Discharge Points.

RESPONSE #3:

Central Valley Water Board staff clarify that compliance with the flow prohibition is determined at the effluent monitoring points and have removed flow monitoring from all influent monitoring points in Attachment E – Monitoring and Reporting Program. Effluent flow monitoring has been retained.

DISCHARGER COMMENT #4 – Minor Editorial Changes

The Discharger submitted minor comments and clarifications on the tentative Order, including editorial changes, cross-references, and typographical corrections.

RESPONSE:

Central Valley Water Board staff concur and have revised the proposed Order accordingly.

Tentative Time Schedule Order (hereinafter TSO) Comments:

DISCHARGER COMMENT #1 – Alternatives Analysis Compliance Date

Modify the due date of the Alternatives Analysis from 31 May 2027 to 31 May 2028. The Discharger anticipates that the compilation of information needed to fully explore and report alternatives for compliance with final effluent limitations for N-Nitrosodimethylamine (NDMA) will take up to two years to complete.

RESPONSE #1:

Central Valley Water Board staff concur and the due date for the Alternatives Analysis listed in Table 3, Time Schedule Tasks and Compliance Dates, of the proposed TSO has been revised to 31 May 2028. The due date for the first Annual Progress Report listed in Table 3 of the proposed TSO has also been removed in response to the due date of the previous compliance task (i.e. the Alternatives Analysis) being extended by one year.

CITY OF SACRAMENTO COMMENTS

Tentative Order Comments:

CITY OF SACRAMENTO COMMENT #1 – Per- and Polyfluoroalkyl Substances (PFAS)

On 14 May 2025 the United States Environmental Protection Agency (U.S.EPA) adopted final Primary Maximum Contaminant Levels (MCLs) for six PFAS (PFOA, PFOS, PFHxS, PFNA, and HFPO-DA as contaminants with individual MCLs, and PFAS mixtures containing at least two or more of PFHxS, PFNA, HFPO-DA, and PFBS) in drinking water. The final rule requires public water systems to complete initial monitoring for these PFAS and compliance with these MCLs by 2029.

The City of Sacramento treats surface water at two facilities: the E.A. Fairbairn Water Treatment Plant on the American River and the Sacramento River Water Treatment Plant just downstream of the confluence of the American and Sacramento Rivers. Both facilities are located downstream of the current surface water discharge locations for Aerojet's treated groundwater. The City of Sacramento cites source control of PFAS as the only certain way to protect public health and the beneficial uses of the receiving water.

PFAS was detected in the influent of GET EF and GET AB and the Discharger currently

monitors PFAS in the influent and effluent of GET EF and GET AB. The tentative Order also added PFAS effluent monitoring at WRND GET since PFOA was detected in the effluent above the drinking water MCL. The City of Sacramento requests 1) clarification from the Regional Board on why PFAS were not included in this tentative order and when the Regional Board will begin to implement the PFAS Notification Levels and MCLs that exist in drinking water into this NPDES permit; and 2) addition of PFAS monitoring to the receiving water monitoring requirements for all GET facilities and to the effluent and receiving water characterization study.

RESPONSE #1:

Thank you for your comment and concern regarding PFAS and PFOA. Central Valley Water Board staff are considering the presence of these materials in surface waters, identifying their potential sources, and evaluating potential treatment alternatives, feasibility, cost, and available regulatory guidance for wastewater discharges. This work is being conducted by various agencies, including U.S. EPA and State Water Resources Control Board, and staff at the Central Valley Water Board. Central Valley Water Board staff would like to partner with the City of Sacramento in reviewing any PFOS/PFOA data the City of Sacramento has collected upstream of the described drinking water intakes. This information, along with effluent data collected under the proposed permit, will provide information regarding the potential impact of the discharge on downstream drinking water sources (e.g., American River, Sacramento River).

Since 2016, Aerojet has been analyzing certain water samples collected from GET system influent locations, GET effluent locations, remedial extraction wells, and monitoring wells for PFAS. Additionally, Aerojet has reviewed their records to identify potential PFAS release areas and has begun planning for source area PFAS investigations in response to the 23 January 2025 USEPA letter requesting a site-wide remedial investigation for PFAS. Central Valley Water Board staff will be reviewing the results of the remedial investigation and will consider the findings in future NPDES permit renewals.

Effluent monitoring was retained for those discharge points that already had PFAS monitoring in previous orders (GET EF and GET AB). Effluent monitoring was added to WRND GET based on an initial comparison showing PFOA detected above the MCL. Quarterly for one year PFAS monitoring of the effluent and receiving water has also been added to the characterization monitoring requirements for the next permit term. Testing requirements in monitoring tables where PFAS sampling is required have been updated to state samples shall include perfluorooctanoic acid (PFOA), perfluorooctane

sulfonic acid (PFOS), perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), hexafluoropropylene oxide dimer acid (HFPO-DA), and perfluorobutane sulfonic acid (PFBS).

Data collected under this permit will inform whether additional studies, requirements, and/or limits should be considered in future permit updates. While the Central Valley Regional Board is not implementing PFAS effluent limits at this time, effluent monitoring has been added to WRND GET as noted above. As additional information and regulations about these emerging contaminants develop, Central Valley Regional Board staff will revise the permit as appropriate.

CITY OF SACRAMENTO COMMENT #2 – Perchlorate and Volatile Organic Compounds (VOCs) Effluent Monitoring

The tentative Order reduced perchlorate and VOC monitoring from monthly to quarterly at ARGET, GET EF, GET HA, GET J, GET KA, GET LB, Sailor Bar Park GET, GET AB, and WRND GET due to having no reasonable potential. The City of Sacramento points out that perchlorate and VOCs have been detected in the influent and effluent at these facilities, concentrations are dependent on the reliability of the respective treatment units for these constituents, and concentrations vary greatly month to month. The City of Sacramento is concerned with how reliably perchlorate and VOC mass loadings to the Lower American River can be determined at the reduced monitoring frequency. The City of Sacramento requests for monthly perchlorate and VOC effluent monitoring be reinstated in the proposed Order.

RESPONSE #2:

Central Valley Water Board staff do not concur. Monitoring for perchlorate and VOCs has been reduced because the effluent concentrations did not show reasonable potential to cause or contribute to an instream excursion above the respective criteria for perchlorate and VOCs at ARGET, GET EF, GET HA, GET J, GET KA, GET LB, Sailor Bar Park GET, GET AB, and WRND GET based on effluent data from April 2022 to March 2025. Though effluent concentrations may fluctuate between samples, the concentrations did not exceed criteria. Furthermore, since perchlorate and VOCs no longer have reasonable potential at these discharge points, it is reasonable to require less frequent monitoring since the data shows that treatment at these facilities are successfully working to reduce the concentrations of perchlorate and VOCs in the effluent. Therefore, effluent monitoring has been reduced for these constituents in order

to focus monitoring efforts on the constituents that are currently detected in the effluent above the applicable criteria.

CITY OF SACRAMENTO COMMENT #3 – Administrative Civil Liability (ACL) R5-2021-0530

Attachment F – Fact Sheet section II.E of the tentative Order presents a summary of compliance and violations that occurred during the term of Order R5-2020-0051-003. The City of Sacramento requests the addition of ACL R5-2021-0530 to Fact Sheet Section II.E for violations at GET EF for acetaldehyde and GET AB for NDMA from 1 January 2020 through 31 May 2021.

RESPONSE #3:

Central Valley Water Board staff concur and have added a summary of ACL R5-2021-0530 to Fact Sheet section II.E.

CITY OF SACRAMENTO COMMENT #4 – Unauthorized Discharges

On 11 July 2024 an unauthorized discharge from a pipeline break resulted in discharge of untreated wastewater to land with runoff to Alder Creek, tributary to the American River. On 18 October 2025 another unauthorized discharge occurred due to an influent pipe leak resulting in discharge of untreated wastewater to land. The City of Sacramento requests that a summary of these unauthorized discharges be added to Fact Sheet section II.E Compliance Summary. The City of Sacramento also requests addition of a requirement for the Discharger to develop and submit an overall asset management program including a proactive leak prevention program to assess aging infrastructure replacement before leaks occur.

RESPONSE #4:

Central Valley Water Board staff partially concur. Central Valley Water Board staff concur with adding a summary of the two unauthorized discharges to Fact Sheet section II.E. The proposed Order has been updated to add these descriptions.

Central Valley Water Board staff do not concur with adding requirements to the proposed Order for an asset management program; however, the proposed Order has been modified to update and include leak and spill prevention, identification, and response measures to the existing Operation and Maintenance (O&M) Manuals for each GET facility as required in Waste Discharge Requirements (WDR) section

VI.C.4.a. A one-time technical report has been added to WDR section VI.C.2 and Technical Reports Table, Table E-26, of the proposed Order to submit the updated O&M Manuals that include the new leak and spill measures to the Central Valley Water Board for review by 31 December 2026. After which, the Discharger may continue to update the O&M Plans as needed with documentation in the GeoTracker database as currently done.

CITY OF SACRAMENTO COMMENT #5 – NDMA

The City of Sacramento has the following comments related to NDMA in the tentative Order:

- a. The City of Sacramento requests that the interim effluent limitation for NDMA contained in the tentative TSO be added to the tentative Order including the applicable supporting rationale in the Fact Sheet of the tentative Order.
- b. The City of Sacramento requests that Fact Sheet section IV.C.3.b.vii.(a) of the tentative Order include the Department of Drinking Water Notification Level and the Office of Environmental Health Hazard Assessment Public Health Goal for NDMA as credible water quality objectives that must also be met for the protection of public health.

RESPONSE #5:

Central Valley Water Board staff have the following responses to Discharger Comment 5a and 5b below:

- a. Central Valley Water Board staff do not concur. Since a separate TSO will be issued for compliance with final effluent limitations for NDMA, the details of the compliance schedule are not required to be included in the proposed Order.
- b. Central Valley Water Board staff do not concur. Constituents often have more than one associated criterion; however, only the lowest applicable criteria used to determine reasonable potential for that constituent is discussed in the proposed Order. The proposed Order includes the applicable and most stringent criteria for NDMA of 0.00069 µg/L based on the California Toxics Rule, which established this priority pollutant level for

the protection of human health from consumption of water and aquatic organisms.

Tentative TSO Comments:

CITY OF SACRAMENTO COMMENT #1 – Interim Effluent Limitations

The City of Sacramento states that the interim effluent limitations contained in the tentative TSO is an anti-backsliding issue and will allow for degradation during the term of the tentative TSO. The City of Sacramento believes that effluent limitations at each GET facility should be evaluated separately due to the uniqueness of the influent and treatment system. The City of Sacramento does not agree with the method used to calculate interim effluent limitations for NDMA and believes that the current effluent limitations contained in Order R5-2020-0051-003 based on treatment performance at each GET facility are more appropriate interim effluent limitations. The City of Sacramento requests that the interim effluent limitations for NDMA at ARGET, GET EF, GET KA, GET LB, Low Threat Discharges, and GET AB be set at the current effluent limitations contained in Order R5-2020-0051-003.

RESPONSE #1:

Central Valley Water Board staff do not concur. The purpose of the TSO is to allow the Discharger time to investigate alternatives and evaluate methods to achieve compliance with final effluent limitations for NDMA. Standard procedures were used to calculate interim effluent limitations for NDMA so that 99.9% of data will lie within 3.3 standard deviations of the mean and the Discharger will not incur mandatory minimum penalties for exceeding interim effluent limitations while carrying out the requirements of the TSO. The Discharger has exceeded performance-based effluent limitations at ARGET, GET EF, and GET AB during the term of Order R5-2020-0051-003, so there is evidence to believe that the Discharger may exceed performance-based limitations during the term of the TSO. For consistency with how the water quality-based effluent limitations were calculated in the tentative Order, one interim effluent limitation was calculated for all discharge points with reasonable potential to cause or contribute to an exceedance of the applicable NDMA water quality criteria in the receiving water, which satisfies the procedures and goals of the TSO. This interim effluent limitation accounts for any temporary increase in the discharge due to installation, testing, and calibration of new or improved treatment technology to achieve compliance with final effluent limitations for NDMA which are significantly lower than the current effluent limitation.

STAFF REVISIONS

Tentative Order Revisions:

Central Valley Water Board staff made various edits and clarifications to the proposed Order to fix editorial and typographical errors.

STAFF REVISION #1 – Treated Wastewater

The proposed Order has been revised to clarify that the wastewater treated and discharged at the Facility is sourced from extracted groundwater for consistency with wastewater treatment regulations. Therefore, the description that the wastewater is sourced from extracted groundwater has been added and the use of the phrase “treated groundwater” has been changed to “treated wastewater” throughout the proposed Order.

STAFF REVISION #2 – Whole Effluent Toxicity Reopener Provision

Central Valley Water Board staff revised WDR section IV.C.2.g.i and the corresponding section in Attachment F to use an “or” instead of an “and”.

STAFF REVISION #3 – Compliance Determination for NDMA Effluent Limitations

Central Valley Water Board staff added the following to compliance determination language to WDR section VII for clarity on how compliance with NDMA effluent limitations should be determined:

- B. N-Nitrosodimethylamine (NDMA) Average Monthly Effluent Limitations (section IV.A).** NDMA shall be analyzed using a test method with a laboratory reporting level no greater than 0.002 µg/L. Compliance with the average monthly effluent limitation (AMEL) for NDMA shall be determined based on the reporting level. If the reporting level is greater than the AMEL for NDMA, then the Discharger shall be deemed out of compliance with the AMEL if the monthly average is greater than or equal to the reporting level. If the reporting level is equal to the AMEL for NDMA, then the Discharger shall be deemed out of compliance with the AMEL if the monthly average is greater than the reporting level. If the reporting level is less than the AMEL for NDMA, then the Discharger shall be deemed out of compliance with the AMEL if the monthly average is greater than the AMEL. When calculating the monthly average, non-detect samples shall be counted as one-half the method detection level.

STAFF REVISION #4 – Table F-17

Central Valley Water Board staff removed 3.0 µg/L and a reference to a table note from the Maximum Daily Effluent Limitation for trichloroethylene at Discharge Point 002, inadvertently copied over from Order R5-2020-0051-003, and updated the listing for 1,1-Dichloroethylene to 1,1-Dichloroethane at Discharge Point 008 to fix a typo.

Tentative TSO Revisions:

STAFF REVISION #1 – Table 1 GET AB Effluent Limitation

Central Valley Water Board staff changed the Average Monthly Effluent Limitation shown in Table 1 for GET AB from 0.00096 µg/L to 0.00069 µg/L to fix a typo.

STAFF REVISION #2 – Finding 4

Central Valley Water Board staff added an antidegradation analysis and dilution/mixing zone study to the suggested compliance methods in Finding 4 of the proposed TSO.