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SENT VIA ELECTRONIC MAIL

May 4, 2026

Julie Newton
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RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WHITE ROCK NORTH MINE DATED MARCH 18, 2026, STATE CLEARINGHOUSE NUMBER [2022110169](#)

Dear Julie Newton,

The Department of Toxic Substances Control (DTSC) is providing comments on the County of Sacramento Draft Environmental Impact Report (DEIR) for the White Rock North Mine project (Project). The Project seeks a Special Planning Area Implementation Permit to conduct aggregate mining across an approximately 2,136-acre portion of the Aerojet-General Corporation Superfund Site (Aerojet Superfund Site, or the Site) in Sacramento County, California. The Site is currently undergoing investigation and cleanup under the oversight of the United States Environmental Protection Agency (USEPA), with support from the Central Valley Regional Water Quality Control Board (CVRWQCB) and DTSC (collectively, the Agencies).

DTSC is concerned that mining on this portion of the Aerojet Superfund Site at this stage in the investigation could result in risks to human health and releases to the environment.

The Project proposes to mine and transport up to 25 million tons of sand and gravel, over roughly 20 years, from within three operable units of the Aerojet Superfund Site. Material would be excavated from existing mine tailing piles generated by historical gold dredge mining conducted from the late 1800s to 1950s. Aggregate would be transported off site for processing via a conveyor system connecting into the existing Teichert processing facility.

DTSC previously reviewed the November 2022 Notice of Preparation (NOP) for the DEIR and submitted comments to the County on December 8, 2022. The DEIR references DTSC's prior comments on pages 1-2, 2-26, 9-1, and 14-6. Those comments focused on how the proposed project may impact or be impacted by the Aerojet Superfund Site and concerns regarding incomplete characterization in areas proposed for mining.

Aerojet-General Corporation Superfund Site

The Aerojet Superfund Site is located south of Folsom Boulevard and east of the Folsom Canal in Sacramento County, spanning portions of Rancho Cordova, Folsom, and unincorporated Sacramento County. Aerojet Rocketdyne, Inc. (Aerojet) conducted solid rocket motor manufacturing and testing, liquid rocket engine manufacturing and testing, and chemical manufacturing, beginning in the 1950s. These activities released hazardous substances including trichloroethene (TCE), perchlorate, and N-nitrosodimethylamine (NDMA) to soil, groundwater, and soil vapor. The site was listed on the National Priorities List (NPL) in 1983, and a Partial Consent Decree was issued in 1989 requiring Aerojet to conduct remedial investigation (RI) and feasibility study (FS) work.

Sitewide preliminary characterization ("scoping phase") was completed in the 1990s, followed by ongoing operable unit (OU)-specific investigation and cleanup overseen by USEPA, DTSC, and CVRWQCB. Following completion of RI/FS for each OU, USEPA issues Records of Decision (RODs) and corresponding orders requiring Aerojet to implement cleanup activities. **The proposed mining footprint overlaps with the Aerojet Superfund Site Island Operable Unit (OU-7), Eastern**

Operable Unit (OU-8), and Central Operable Unit (OU-9), which have not completed RI/FS work. OU-7 is furthest along with a draft data gap sampling plan under review. A RI sampling plan for OU-8 was finalized in 2008; however, the plan was not fully implemented and requires updating prior to OU-8 RI continuing. OU-9's draft 2009 sampling plan was not finalized or executed.

DTSC appreciates that the DEIR considered our earlier NOP comments. However, as described in the following comments, DTSC remains concerned with the proposed plan to conduct surface mining in areas that are still undergoing Superfund investigation and cleanup. **These areas were preliminarily evaluated during the 1990s scoping phase. The characterization, including evaluation of emerging contaminants, has not been completed. Risks to human health and the environment therefore remain insufficiently defined and DTSC is concerned that mining activities will result in further releases of hazardous substances into the environment.**

General Comments on the DEIR

1. The DEIR relies on a 100-ft buffer around "known locations" where chemicals may exceed "defined cleanup levels", and around existing remedial infrastructure. DTSC is concerned that these constrained areas will be based on insufficient site characterization data and therefore may not adequately protect workers or the environment. The scoping phase soil investigations were preliminary and were not intended to define the full extent of contamination at each operable unit. While additional RI sampling has been conducted in OU-7 and, to a lesser extent, in OU-8 since the scoping phase completed, Aerojet has not yet conducted further investigations of potential source areas in OU-9, and OU-9 is the first phase planned for mining. As a result, the DEIR overstates the sufficiency of existing data to identify and avoid areas of potential contamination. Mining in areas of potential contamination may result in spreading contamination and poses risks of exposure to workers mining and processing the material. DTSC

recommends additional sampling and characterization be required to ensure mining can be safely performed in these OUs.

2. A remedial investigation for per- and polyfluoroalkyl substances (PFAS) has begun at the Aerojet Superfund Site, but no PFAS soil sampling has been collected within these operable units. The DEIR does not address PFAS or describe how Aerojet or the project proponent will ensure mining does not occur in PFAS-impacted areas. The proposed mining area includes locations identified in Aerojet's initial PFAS desktop evaluation as potentially high priority for investigation, including Aerojet's AEROSAFE site in OU-8 and other areas where PFAS-containing firefighting foam was documented to have been used. Because no PFAS soil sampling has been conducted in these OUs, the presence and extent of PFAS-contaminated soil are unknown. Mining material contaminated by PFAS may spread PFAS contamination off-site, resulting in additional releases to the environment, and may pose human health risks to those handling the mined material.

Specific Comments on the DEIR

1. Section 9, Hazardous Materials. Environmental Setting.
 - a. Page 9-2, last paragraph. The DEIR states that areas "regulated for ongoing remediation" would not be disturbed. This is inaccurate. All of OUs 7, 8, and 9 remain under regulatory oversight for remedial investigation and cleanup. These OUs still require RI/FS and RODs to outline all clean up requirements after the RI/FS completes a full characterization of each OU. All these activities would be under USEPA regulatory oversight with DTSC and CVRWQCB regulatory support.
 - b. Page 9-7, fourth paragraph. The DEIR states "No SVOCs [semi-volatile organic compounds] were detected in soil" in the OU-7 Hogout Area and references the 2007 Final Supplemental Remedial Investigation/Feasibility Study Field Sampling Plan for Island

Operable Unit, Aerojet Superfund Site (FSP). This is a partial quotation from that document; the full sentence states that contaminants of potential concern were “identified for the SVOC chemical group due to elevated reporting limits; however, no SVOCs were detected in soil.” Due to the elevated reporting limits, an assessment of whether SVOCs were present in soil at concentrations that could pose a risk to human health could not be made at that time. The DEIR’s partial quotation is therefore misleading. The data collected in this report provided insufficient information to determine SVOC presence and the DEIR should not mischaracterize the report conclusions.

- c. Pages 9-11 and 9-18. The DEIR states that a ROD is the “last action” of a Superfund site. This is incorrect. The ROD identifies the selected remedy, after which additional activities may include pre-design investigations, pilot studies, remedial design, remedy implementation, long term monitoring, and operation and maintenance.
- d. Page 9-11, OU-9 section. The DEIR provides no meaningful description of OU-9 remedial investigation activities or soil data. Reference to the Central Disposal Area (CDA) groundwater monitoring program is not appropriate for characterizing OU-9 soils or associated health risks. CDA groundwater monitoring is limited in scope and is not conducted as part of the OU-9 RI. Contaminant concentrations at the CDA groundwater are not sufficient by themselves to indicate concentrations in OU-9 soil. Since “almost half of the proposed project” is proposed in OU-9 where the potential source areas have not been investigated, the project may encounter or mobilize contaminated mass. Additional testing would be required before any mining is conducted in any specific area of each OU to confirm that there are no hazardous substances/materials present in each area.

2. Section 9, Hazardous Materials. Regulatory Setting.
 - a. Page 9-13. DTSC section. The DEIR states “The DTSC administers the state and federal Superfunds for cleanup of major hazardous waste contamination sites.” The DEIR should clarify that USEPA, not DTSC, is the lead agency for federal Superfund site oversight. While RCRA allows states to regulate hazardous waste management at the state level under the state’s equivalent of RCRA, CERCLA does not have the same state authorization process, although DTSC may serve as lead agency under specific agreements or contracts with USEPA.
 - b. Page 9-14, first paragraph. The Department of Health Services no longer exists.
 - c. Page 9-14, third paragraph. The USEPA is the lead agency for the Aerojet Superfund Site. DTSC and the CVRWQCB serve as supporting agencies.
 - d. Page 9-15, second paragraph. DTSC (not the Agency for Toxic Disease and Substance Control [ATSDR]) is the successor agency to the Department of Health Services for PCD notification and approval requirements.
 - e. Page 9-15. Imminent and Substantial Endangerment and Remedial Action Order section. The 1994 Imminent and Substantial Endangerment Determination and Consent Order (I&SE Order) does not apply to the Aerojet Superfund Site. The I&SE Order pertains to the McDonnell Douglas Inactive Test Site which is a separate state site (not a federal Superfund site/NPL site) located adjacent to the south of the Aerojet Superfund Site. McDonnell Douglas is not a responsible party for the Aerojet Superfund Site.
 - f. Page 9-18, first two paragraphs. The I&SE Order does not apply to the Aerojet Superfund Site and does not supplement the PCD.

McDonnell Douglas is not a responsible party for the Aerojet Superfund Site and is not subject to the PCD.

3. Section 9, Hazardous Materials. Impacts and Analysis.
 - a. Page 9-22, first paragraph. As noted above, the 1994 I&SE Order does not apply to the Aerojet Superfund Site.
 - b. Page 9-22, second paragraph. The CDA groundwater monitoring in OU-9 is ongoing where source areas are upgradient, not downgradient, from the “Carve out” lands.
 - c. Page 9-23, first paragraph. The DEIR states 100-foot buffers will be established around “all known locations where concentrations of chemicals exceed defined cleanup levels...” Until the RI is completed, we will not know locations where concentrations of chemicals exceed proposed cleanup levels. No cleanup levels have been established for OUs 7, 8, and 9. Human health risk assessments have not been conducted for OUs 8 or 9, and there is insufficient data collected to date in these OUs to evaluate human health risk.
 - d. Page 9-23, second paragraph, states: “Aerojet has completed site investigations to determine the location and limits of historical contamination, but these areas still require completion of remedial investigations, risk characterization and determinations for remedy/cleanup through the appropriate regulatory agencies.” This is incorrect. Aerojet has not completed site investigations. The scoping phase investigation was preliminary and did not delineate contaminant extent. Emerging contaminants, including PFAS, have not been assessed.
4. Section 9, Hazardous Materials. Impacts and Analysis. Mitigation Measures, starting on page 9-29.

- a. Mitigation Measure HAZ-1: Worker Health and Safety Plan. The first bullet of HAZ-1 notes minimum training requirements for on-site workers “such as 40-hour HAZWOPER trained”. DTSC emphasizes that Cal/OSHA requirements regarding training for working on an uncontrolled hazardous waste site, including an NPL site, need to be met.
- b. Mitigation Measure HAZ-2: Soil Sampling and Air Monitoring.
 - i. Please clarify whether a project-specific sampling and analysis plan will be provided to the regulatory agencies (USEPA, RWQCB, and DTSC) for review and approval before soil disturbance work occurs.
 - ii. HAZ-2 pertains only to soil disturbance work conducted for construction of the conveyor and roads/grading, not for the mining work. **Because contamination is not fully characterized, DTSC recommends that soil sampling and air monitoring also be required for mining operations.**
 - iii. HAZ-2 includes bullets listing next steps the PCD coordinator and/or the operator shall perform following review of sample results. Please clarify whether these bullet items are inclusive lists, or whether only some of the actions shall be conducted for each scenario.
- c. Mitigation Measure HAZ-3: Precautionary Measures – Soil Management.
 - i. For soil management on the Superfund Site, the Soil Management Plan should be reviewed by the regulatory agencies and approved by USEPA.
 - ii. Bullet #2 states: “Profile - Soils will be profiled, using established laboratory analytical methods, for the chemicals

identified in the most recent OU Sampling and Analysis Plan (SAP) corresponding to the location of excavated soils.”

Reliance on the 2008 OU-8 sampling plan is inadequate due to its age and the need to address emerging contaminants. There is no approved OU-9-specific SAP. Soil profiling requirements should be updated and documented in the Soil Management Plan for regulatory review.

- d. Mitigation Measure HAZ-5: Contamination Buffers. DTSC remains concerned that the “most up-to-date” investigations in many areas are outdated or insufficient to reliably identify constrained areas.

Additional characterization is needed before exclusion zones can be defined and fenced.

DTSC strongly encourages site characterization of each OU prior to any mining activity and reiterates that the proposed project must not in any way introduce new contamination or spread or exacerbate existing contamination in soil and groundwater at the Aerojet Superfund Site. **Any party that causes or exacerbates the contamination could potentially be held liable for the contamination.** As noted in DTSC’s December 8, 2022, NOP comments, soil sampling should be conducted in areas proposed for mining or disturbance to verify conditions and reduce risks to human health and the environment.

DTSC appreciates the opportunity to review and comment on the DEIR for the White Rock North Mine project. Thank you for your efforts to protect California’s communities and the environment from the harmful effects of hazardous substances. Should you have any questions or comments regarding this matter, please contact Susan Scudder at (916) 255-3601, or Susan.Scudder@dtsc.ca.gov.

Julie Newton

May 4, 2026

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Sincerely,

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

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

Unit Chief

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cc: (via email)

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