Message

From: Chesnutt, John [Chesnutt.John@epa.gov]
Sent: 2/16/2021 6:57:46 PM
To: Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]
CC: Herrera, Angeles [Herrera.Angeles@epa.gov]; Praskins, Wayne [Praskins.Wayne@epa.gov]
Subject: RE: HPNS building radiological discussion - placeholder

Thanks Yolanda. I can send to CDPH and copy DTSC.

Meanwhile, Angeles and I will talk with EM after 430 today to see if he wants to push back on CDPH to keep the Feb 22 agency only meeting.

John

From: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Sent: Tuesday, February 16, 2021 10:43 AM
To: Chesnutt, John <Chesnutt.John@epa.gov>
Cc: Herrera, Angeles <Herrera.Angeles@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>
Subject: RE: HPNS building radiological discussion - placeholder

Regarding a chronology of communications on this topic, my suggested response is below. The Navy's letter and emails were previously sent to CDPH (i.e., we are not sending anything from the Navy that hasn't been shared already).

Based on the Navy's recent response, it also wants information from CDPH. Therefore, the meeting needs to be scheduled at a future date that allows CDPH to be available and prepared, which will be in March.

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Since September 2018 the Navy and EPA have been in correspondence on the Navy's Five-Year Review (FYR), where the Navy reviews the protectiveness of the remedy. Below is a list of *recent* correspondence relating to the long-term protectiveness evaluation of the radiological remediation goals (RGs) of current, onsite buildings for a future residential scenario.

- **October 2019 -** The Navy provides EPA and the public with a *draft* FYR evaluation. The Navy used RESRAD Build (RRB) in the public report and subsequently provided EPA staff with some BPRG calculator runs via email. EPA began the HQ consultation and enlisted the expertise of the US Army Corps of Engineers to help fill gaps in the Navy's evaluation.
- **August 2020** – The RPM provided EPA comments on the Navy's *draft* FYR addendum on the building RGs. We were unable to fully understand the methodology used by RRB, concluding "we cannot concur with the Navy's conclusion that the radiological building RGs remain protective of human health or support the use of RRB as part of the evaluation of HPNS building RGs." Additionally, EPA provided proposed BPRG values that could be adopted as RGs.
- **August to November 2020** - EPA and Navy technical staff meet to discuss the Navy's protectiveness evaluation of building radiological RGs using RRB.
- **December 2020 to Present – Navy's BRAC Director and EPA's Superfund Director correspond on the Navy's evaluation of the protectiveness of the building radiological RGs.**
  - **December 11, 2020** - Laura Duchnak sent Enrique Manzanilla a letter requesting EPA to reconsider the Navy's RRB evaluation on the building RGs (attached), ccing DTSC and CDPH staff. The Navy made unsubstantiated claims that EPA's proposed BPRG values were much lower than background levels and not technically implementable. The Navy noted it "may need to consider pausing all ongoing remediation work…" CDPH staff sent a brief response to the Navy on December 21, 2020 (attached).

- **December 22, 2020** - Enrique responded in a letter, asking the Navy to substantiate these claims; reiterating our request for the Navy's response to concerns EPA identified in our August letter regarding how RRB may underestimate cancer risks for a future residential use; and suggesting a meeting with the HPNS FFA-signatories.
- **January 11, 2021** - Laura responded in a letter to restate the Navy's claims on background levels and technical feasibility (attached). The Navy also provided two numbers to address our request to substantiate background levels for HPNS buildings.
- **January 15 – February 11, 2021** - Laura and Enrique responded via emails. Attached is the email string with the latest attachment from the Navy.

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Yolanda Sanchez
U.S. EPA || Community Involvement for Superfund
Desk: 415-972-3880

-----Original Message-----
From: Chesnutt, John <Chesnutt.John@epa.gov>
Sent: Friday, February 12, 2021 4:43 PM
To: Herrera, Angeles <Herrera.Angeles@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Subject: FW: HPNS building radiological discussion - placeholder

See my message to DTSC below. Argh. CDPH is concerned they will need more time before an agencies only meeting. I tried to tell Chris Pace that he's overthinking it and there's little to review, and that we want to keep moving.

Angeles, let's talk about whether Enrique should push back to DTSC/CDPH and therefore try to stick with Feb 22, esp. since Grant has confirmed and that was the only slot he had that whole week - hence having to move it to the week of March 1. If we don't push back and just move it to March 1 week, there's no doubt we could take advantage of the extra prep time for the ultimate DRC meeting. EM would just need to tell Laura that the State can't meet now, particularly since they are overwhelmed with TI hearings (which the Navy isn't helping with bc they refused to attend).

Yolanda, Chris Pace did say he would appreciate it if we could gather all the communications on this starting with Wayne's letter to our back and forth with Laura, so he's sure to know the state of play. I told him Sheetal and Anthony have all that, but he said he wants to make sure they have everything. Could you help collate that. Thx.

John

-----Original Message-----
From: Chesnutt, John
Sent: Friday, February 12, 2021 4:35 PM
To: Pettijohn, Julie@DTSC <Julie.Pettijohn@dtsc.ca.gov>; Singh, Sheetal (CDPH-EMB) <sheetal.singh@cdph.ca.gov>
Subject: RE: HPNS building radiological discussion - placeholder

Julie (and Sheetal), I just spoke with Chris Pace and he would like to push this agency only meeting from Feb 22 to the week of March 1 so CDPH would have more time to review the info and prepare. I told him Enrique is feeling great pressure to also have the meeting with the Navy the week of Feb 22 (but it would have to be the week of March 1 anyways). But if we push our agencies' meeting to the week of March 1, then the DRC meeting would likely be the week of March 8. So before you look for dates for Grant to meet with us the week of March 1 instead of Feb 22, let me touch

base with Enrique on Tuesday and see if he is comfortable telling the Navy we will need another week to prepare. But I know you all have been super busy with TI, so I understand you all only have so much bandwidth right now.

John

-----Original Message-----
From: Pettijohn, Julie@DTSC <Julie.Pettijohn@dtsc.ca.gov>
Sent: Wednesday, February 10, 2021 7:44 AM
To: Chesnutt, John <Chesnutt.John@epa.gov>; Singh, Sheetal (CDPH-EMB) <sheetal.singh@cdph.ca.gov>
Subject: FW: HPNS building radiological discussion - placeholder

HI,
I sent the two placeholder meetings that we discussed yesterday.
Mr. Cope only accepted the Monday meeting 2/22 at 4pm. See note about Wednesday meeting.
Just wanted to keep you in the loop.

Julie Pettijohn

-----Original Appointment-----
From: Cope, Grant@DTSC <Grant.Cope@dtsc.ca.gov>
Sent: Wednesday, February 10, 2021 6:15 AM
To: Pettijohn, Julie@DTSC
Subject: Declined: HPNS building radiological discussion - placeholder
When: Wednesday, February 24, 2021 9:00 AM-10:00 AM (UTC-08:00) Pacific Time (US & Canada).
Where: TBD

Sorry, but I have a budget hearing at the same time.