Message

From: Praskins, Wayne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F47BC0A2C2E42A98347D59CD1A98B19-WPRASKIN]
Sent: 11/16/2020 10:07:08 PM
To: Hays, David C Jr CIV USARMY CENWK (USA) [David.C.Hays@usace.army.mil]
Subject: RE: HPNS eval

Dave –

Thanks for your continued efforts to try to find a solution. Yes, the Navy has told us to expect a letter sometime soon. Will share when we get it.

Do you have a few minutes to talk tomorrow (Tues) or Wednesday?

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From: Hays, David C Jr CIV USARMY CENWK (USA) <David.C.Hays@usace.army.mil>
Sent: Friday, November 13, 2020 8:00 AM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>
Cc: Clements, Julie A CIV (USA) <Julie.A.Clements@usace.army.mil>; Rankins, Jonathan E CIV USARMY CEMVS (USA) <Jonathan.E.Rankins@usace.army.mil>; Walker, Stuart <Walker.Stuart@epa.gov>
Subject: HPNS eval

Wayne, hope all is well. I wanted to let you know I think I may be a step closer to helping resolve some of the HPNS RG issues. FYSA: As modeled by the Navy the "dust" fraction is actually much less than 20%. RESBLD multiplies the removable fraction by the air fraction (and other factors) to determine a dust activity. In the simplest form removable of 0.2 times air fraction of 0.1 = 0.02 original activity. An order of magnitude reduction in what we should be using in the BPRG calc input. Additionally this fraction is adjusted by the source lifetime, so potentially a 1/26th per year relationship. I say potentially because the other assumed factors (air exchange rates, room size, number of compartments, decay, ingrowth, etc.) impact actual concentrations and thus dose/risk from RESBLD. I have started looking at differences in modeling inputs to determine how close we can get BPRG and RESRAD accordingly and if risks from BPRG are within the risk range. I also think the BPRG air model should be used if the Navy insists on modeling dusts (RESBLD provides an air concentration in the output report but unfortunately not a dust concentration). Still crunching numbers but wanted to let you know.

From conversations with Craig Bias he believes as footnoted in the initial action memo the 20% removable fraction was only meant for release of wastes and equipment (not meant for buildings) so may be being misapplied.

Craig mentioned that the DON sent or is sending EPA a letter defending the assumption of no dusts? I would be interested in seeing that if appropriate to share?

I have some other thoughts on resolving the issue as well, if we want to discuss at some point, but all related to the conceptual site model which the Navy seems reluctant to change?

Have a great weekend
Dave