Message

From: Sanchez, Yolanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=473C34AE73994A4A8ACAFE6F03E0BAEB-SANCHEZ, YOLANDA]
Sent: 10/14/2021 12:05:34 AM
To: Elizabeth Basinet [elizabeth@barrettresourcegroup.com]
CC: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) [derek.j.robinson1.civ@us.navy.mil]; 'Koenig, Kellie/SDO' [Kellie.Koenig@jacobs.com]; Egan, Jamie [jamie.egan@jacobs.com]; Henderson, Kim/SDO [Kimberly.Henderson@jacobs.com]; Praskins, Wayne [Praskins.Wayne@epa.gov]; juanita.bacey@dtsc.ca.gov
BCC: Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]
Subject: RE: Navy CAC slides for comment

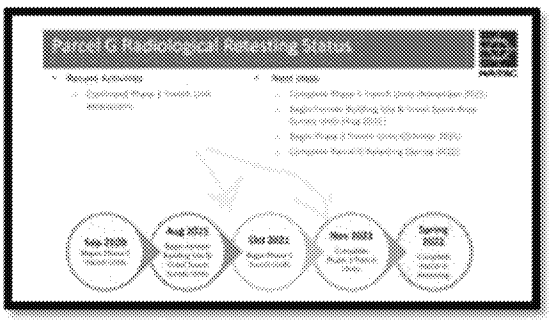
Thank you, Liz. In reviewing this side deck, I went back and reviewed the May 2021 presentation. (First of all, the presentation from May 2021 is *really* great!) My comments are based on what a member of the public would expect on "updates" from that time (see slide below). I also spoke with Wayne, so I'm including him in the email chain.

We have a meeting with Derek on October 20 to discuss this upcoming presentation. So, I'm hoping we could see a revised version around that time (maybe). Thank you!

Slide 1:
Suggest the first line by "Recent Phase 1 Activities" as all three bullets relate to Phase 1.

It seems the communication goal is to report issues that impacted the fieldwork schedule. I can understand the communication goal. However, the information is incomplete.

- See screen shot below from the last presentation with a schedule of Phase 1 ending in November 2021.
- It would be appropriate to add the pause in work from Jan-May, both due to the rainy season and contracting issues. That 4-month+ pause seems to be one of the more impactful fieldwork schedule issues. That should be noted, as it doesn't seem the Navy included that delay in its May 2021 report out.
- It would be appropriate to add the Navy's decision to re-analyze the previously analyzed soil samples, as that is adding to a delay in the fieldwork schedule.
- To be clear, it was CDPH's request to do additional sampling and the Navy chose to oblige. So, the best way to communicate that would be: "The Navy and regulatory agencies determined to do additional sampling." Or strike the bullet entirely. Or replace with a bullet on what the information the additional samples would provide.



"Modified workplan to add more samples to future sampling events" is really hard to understand. What is actually being communicated? To fully understand that, the public needs to understand the soil sampling scheme (bias and non-bias soil samples taken from the RSY pads). Most people don't understand that level of detail. How about something much more simple: "Take additional soil samples."

Slides 2-3:
Discussing this with the Navy. We are a little unclear about what data the date August 27, 2021.

Slide 4:
Please clarify the abbreviation in the title Strontium-90 (sr-90)

We recommend striking the bullet "extremely challenging for the lab to accurately detect." That's already the title of the text box. This sentence is repetition in an already busy slide. Plus, you might be sending a (false) hidden message that the Navy cannot accurately detect the levels of sr-90 in the soil.

We *strongly* recommend striking the language the sr-90 data "do not meet data quality objectives of the Navy work plan." EPA does not understand what this statement means and the Navy has not provided any information to verify it. I understand Wayne asked this question on Tuesday, but didn't receive a response at the time and is waiting for more information. If the Navy includes this, we will be in a position to publicly disagree.

Please unpack the acronym "HRA." We understand the Navy will be testing for sr-90 in all trenches in all retesting Parcels. Why don't we just say that? Adding information about the HRA opens a topic the Navy has been criticized about or a topic that many community members might not understand. Plus, the way it is written makes it seem like something is being unsaid or hidden.

What is meant by "retesting criteria"? I don't think that is a term used previously and it's really confusing. How about "what is the Navy looking for?" Then, levels above the remedial goal of 0.331 pico curies per gram of soil (spell it out).

- We recommend striking the language on "Navy RESRAD and Navy PRG." This brings up details that are super hard to understand and acronyms that aren't being explained.
- We *strongly* recommend striking the language about "EPA's acceptable risk rate." I think this might be a typo. It's not a rate; it's a range. To be clear, it's EPA's acceptable *cancer* risk range. Either way, people don't understand what it means to be "lower" than the cancer risk range described in the NCP. Many people do not easily hear the concept "acceptable cancer" without getting scared or frustrated.
- We recommend a statement like: This RG is *very* protective of human health. If the Navy wants to add more information, perhaps something like: as it is about 100 times more protective than EPA's cancer risk range used to make cleanup decisions.

Per our conversation at the BCT meeting, we recommend the Navy consider striking the last two sub bullets on re-analyzing the samples, as this will bring up more questions than answers.

Yolanda Sanchez | U.S. EPA, Region 9 | Community Involvement for Superfund | Desk: 415-972-3880

From: Elizabeth Basinet <elizabeth@barrettresourcegroup.com>
Sent: Tuesday, October 12, 2021 3:32 PM
To: juanita.bacey@dtsc.ca.gov; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Cc: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1.civ@us.navy.mil>; 'Koenig, Kellie/SDO' <Kellie.Koenig@jacobs.com>; Egan, Jamie <jamie.egan@jacobs.com>; Henderson, Kim/SDO <Kimberly.Henderson@jacobs.com>
Subject: Navy CAC slides for comment

Nina and Yolanda,
Please find attached slides from the Navy's presentation to the CAC on 25 Oct.

Please provide any comments no later than 10/19/21 in order for the Navy to finalize the presentation.

Thank you
Liz

Elizabeth Basinet
619-261-4003
elizabeth@barrettresourcegroup.com