Message

From: Sanchez, Yolanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=473C34AE73994A4A8ACAFE6F03E0BAEB-SANCHEZ, YOLANDA]
Sent: 9/24/2021 12:15:23 AM
To: Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) [thomas.l.macchiarella.civ@us.navy.mil]; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) [derek.j.robinson1.civ@us.navy.mil]
CC: Chesnutt, John [Chesnutt.John@epa.gov]; Praskins, Wayne [Praskins.Wayne@epa.gov]; Yogi, David [Yogi.David@epa.gov]
BCC: Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]
Subject: RE: HPNS Timely Topic
Attachments: TimelyTopicStrontium-90 Final 9.23.21_ysEdits.docx

Thomas,
John asked me to share edits/comments on the Navy's draft Timely Topic (attached). As a clarification, EPA is referenced three times in the Timely Topic: when describing fed/state "input"; suggesting agreeance by reg agencies on background; and our lab method.

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From: Chesnutt, John <Chesnutt.John@epa.gov>
Sent: Thursday, September 23, 2021 5:08 PM
To: Lansdale, Lawrence L CIV USN (USA) <lawrence.l.lansdale.civ@us.navy.mil>; Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA) <kimberly.a.ostrowski.civ@us.navy.mil>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.l.macchiarella.civ@us.navy.mil>
Cc: Herrera, Angeles <Herrera.Angeles@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Subject: RE: HPNS Timely Topic

Lawrence, Kim, and Thomas:

Thanks for you all reaching out to us with your draft communication. We appreciate your desire to get something out there. I offer some general thoughts below, and my staff will provide your staff with a markup shortly today, if they haven't already. EPA strongly suggests the Navy rewrite this Timely Topic to be focused solely on strengthening the quality of the strontium-90 data through improved laboratory methods, rather than getting into background issues and more. If the Navy does not revise certain statements, EPA may feel compelled to publicly issue our own clarifying statement.

From a technical perspective, we have serious concerns about some language:

- The Navy should not be making statements about background levels being established in agreement with federal agencies, beyond what was agreed to in the memo-to-the-file. In its background study, the Navy determined many different background levels, including background threshold values. EPA did not agree with many of the background levels and some of the background threshold values.
- A background threshold level for strontium-90 determined by the Navy has not been agreed to by the regulatory agencies.
- The previous strontium-90 results are valid data. It's inaccurate to suggest the data were not precise enough. EPA has been clear that in the absence of convincing evidence, we cannot support using the new data to supersede existing results.

From a communications perspective, we have some concerns:

- It's not appropriate to use an ambiguous statement that the regulatory partners "provide input." It seems the Navy is reaching for cover.
- It's unclear how including a discussion on background is helpful. It's providing complex concepts that don't seem to add value. When communicating tricky, scary topics to the public, more concepts lead to mistrust and confusion.
- It reads as if the Navy is suppressing data results it doesn't like in regards to strontium-90 data.
- This document is written at a high grade level. The nature of the subject matter (radiological contamination), already stresses people out. In addition, we all understand the public mistrusts information from the Navy (and the federal government). So, having clear language written at a lower grade level is important. Writing at a high grade level with jargon leads people to mistrust the message. Our markup will highlight some areas that could be reworded.
- It seems as if the communication goal is to discredit data the Navy has already collected. We are concerned that's not the most appropriate communication goal.
- By focusing on the low tiny/fractional levels to measure, the background levels, and protecting public health, people are going to ask why the Navy wasn't using these better laboratory methods all along.

If you'd like to discuss these issues and our markup before you finalize the document tomorrow, please reach out to Angeles and/or I. We are both in tomorrow morning, but likely out in the afternoon.

Thanks, John

From: Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.l.macchiarella.civ@us.navy.mil>
Sent: Thursday, September 23, 2021 1:00 PM
To: Chesnutt, John <Chesnutt.John@epa.gov>
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Subject: HPNS Timely Topic

Hi John,
Please find the attached Timely Topic that we plan to post tomorrow. The only reference to EPA is mention of a lab method.
Have fun at the EMEC.
-Thomas.

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