Message

From: Adams, Glenn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C79E328CD4484265B012DFA81663F5E7-ADAMS, GLENN]
Sent: 10/18/2021 3:41:46 PM
To: Pat Flood [Pat.Flood@tn.gov]; Steven Stout [Steven.Stout@tn.gov]; Randy Young [Randy.Young@tn.gov]
CC: Amoroso, Cathy [Amoroso.Cathy@epa.gov]
Subject: RE: in stream water qualtiy values

LoL, no tone issue at all.

From: Pat Flood <Pat.Flood@tn.gov>
Sent: Monday, October 18, 2021 11:32 AM
To: Adams, Glenn <Adams.Glenn@epa.gov>; Steven Stout <Steven.Stout@tn.gov>; Randy Young <Randy.Young@tn.gov>
Cc: Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Subject: RE: in stream water qualtiy values

Yup, all fair points, Glenn. Sorry for the tone of my email, I shouldn't send them when I'm tired and cranky (well, tired anyway. I'm ALWAYS cranky!).

TN Department of Environment & Conservation

Patrick J. Flood, P.E. | Senior Advisor
Bureau of Environment
William R. Snodgrass Tennessee Tower, 2nd Floor
312 Rosa L. Parks Ave., Nashville, TN 37243
p. 615-532-0792 c. 615-202-8471
Pat.Flood@tn.gov
tn.gov/environment

We value your feedback! Please complete TDEC's Customer Service Survey.

From: Adams, Glenn <Adams.Glenn@epa.gov>
Sent: Monday, October 18, 2021 7:20 AM
To: Pat Flood <Pat.Flood@tn.gov>; Steven Stout <Steven.Stout@tn.gov>; Randy Young <Randy.Young@tn.gov>
Cc: Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Subject: [EXTERNAL] RE: in stream water qualtiy values

Randy and Pat,
Thanks for your response. Pat, while I agree this might stall things for a minute, I'm not sure EPA has an option without altering the Admin's Decision on the dispute and if it gets altered, it would have other great impacts too. The other point is that we know DOE can meet these levels they just don't want to commit to these low numbers and set a precedence. They have not provided any real technical reasons to adjust the values for the 6 rads of concern. We are still giving them that option.
Thanks,
Glenn

From: Pat Flood <Pat.Flood@tn.gov>
Sent: Friday, October 15, 2021 9:48 PM
To: Adams, Glenn <Adams.Glenn@epa.gov>; Steven Stout <Steven.Stout@tn.gov>; Randy Young

<Randy.Young@tn.gov>
Cc: Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Subject: RE: in stream water qualtiy values

Hey Glenn –

Sorry for the late response. TDEC was basically accepting of the EIT proposal (Option 3) that was sent to the ELT, so we will obviously be supportive of this proposal as well as it is more stringent and more protective than Option 3 (as Randy points out elsewhere, thank you). That said, my concern is that DOE will be much less accepting of this proposal, and I am further concerned their unwillingness to accept this proposal may result in delay in getting the EMDF up and running. Although I don't care about the timing of the EMDF coming on line, per se, the EMDF delay will result in delays in performing WEMA remediation, and the result of this will be additional mercury, and lots of it, seeping into East Fork Poplar Creek. I wonder if this is a situation where we are making the perfect the enemy of the good, in that discussions regarding levels of radiological discharges necessary to limit already low additional cancer rates (normally a good discussion to have) are now preventing us from addressing some pretty bad mercury contamination. Not really what I went into the business to accomplish.

TDEC will be supportive of this proposal, as we were supportive of Option 3 (with much less enthusiasm for Option 3). If there is a way to implement this proposal without there being a delay, TDEC would be VERY supportive. Again, Randy points out elsewhere that there are ways for DOE to accommodate this proposal and keep things moving along. TDEC would support that (I think we are on record as liking secondary treatment). Ultimately this will likely be resolved between DOE's and EPA's HQs; TDEC will support all sufficiently protective options but would be most in favor of those options that are most protective.

Sorry if this is rambly and incoherent, it's late and has been a long day. Please let me know if you have any questions or would like to discuss. Thanks.

Pat.

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From: Adams, Glenn <Adams.Glenn@epa.gov>
Sent: Friday, October 15, 2021 9:00 AM
To: Pat Flood <Pat.Flood@tn.gov>; Steven Stout <Steven.Stout@tn.gov>; Randy Young <Randy.Young@tn.gov>
Cc: Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Subject: [EXTERNAL] FW: in stream water qualtiy values

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As you know, DOE provided EPA and TDEC with a proposed option for determining risk-based instream water quality values but we do not think it is acceptable to meet the Administrator's Decision on the dispute. The attachment is what Region 4 SEMD would like provide DOE as a resolution to the issue. We know DOE will not like it, but we do think it meets the requirements of the Administrator's Decision on the dispute. Please feel free to reach out to Cathy and I with any questions, thoughts or comments. We have sent this to our HQ and will meet with them early next week. I'd like to be able to tell them that TDEC is in agreement with our counter proposal, so please let us know what you think about this.

The attachment summarizes the counter proposal to DOE in the first page and then includes some additional information that will hopefully provide enough detail into what we have been working on for the past number of months to inform our response to DOE's proposal.
Thanks,
Glenn