Message

From: Adams, Glenn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C79E328CD4484265B012DFA81663F5E7-ADAMS, GLENN]
Sent: 1/4/2021 1:22:18 PM
To: Amoroso, Cathy [Amoroso.Cathy@epa.gov]
Subject: FW: ORR

FYI

From: Adams, Glenn
Sent: Monday, January 4, 2021 8:13 AM
To: Chaffins, Randall <Chaffins.Randall@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>
Subject: RE: ORR

Carol,
I agree with Randall that the RA would probably like a side by side comparison and I assume the attorneys will provide that for her. I just finished reading thru the complete document and it looks like there were definitely some wording changes from the last draft version that I saw. From the programs standpoint, it looks like the most significant points are that the NRC regs pushed by DOE and the CWA regs pushed by R4 and TDEC are all ARARS but the most protective (minimum of 10e-5 risk) will be used. The decision is also direct that site-specific risk and assumptions should be used to develop the numeric values. It also stated that those values may be calculated at the point exposure may occur but that they will be enforced at the point of discharge. The decision also requires DOE to collect fish tissue data in Bear Creek for rads in "consultation with EPA and TDEC and in accordance with the ORR FFA."

The two biggest lifts for the team will be developing a plan for fish data in Bear Creek and then agreeing with DOE on site specific assumptions to be used in calculating risk-based effluent limits.

I hope this helps,
Glenn

From: Chaffins, Randall <Chaffins.Randall@epa.gov>
Sent: Monday, January 4, 2021 7:17 AM
To: Monell, Carol <Monell.Carol@epa.gov>; Adams, Glenn <Adams.Glenn@epa.gov>
Subject: RE: ORR

Carol, I've also just read the summary. I think it would be good to do a side-by-side comparison with the RA's decision so we know how things changed from then. Happy New Year!

From: Monell, Carol <Monell.Carol@epa.gov>
Sent: Sunday, January 3, 2021 6:30 PM
To: Adams, Glenn <Adams.Glenn@epa.gov>; Chaffins, Randall <Chaffins.Randall@epa.gov>
Subject: ORR

I've read only the summary of the dispute decision. If you have thoughts to share before senior staff meeting, let me know. We will discuss later as well.

Thanks!

Carol