



## Response to the 2022-06-02 Kimberly Gettmann Memorandum

These are comments on Kimberly Gettmann's June 2, 2022, Memorandum, "Update to the Standardized Risk Assessment Methodology (SRAM) for the Resident with Garden Scenario, SSFL."<sup>1</sup>

### Land Use Scenarios

Page 1 of the subject memorandum states,

*"When assessing a contaminated site, residential land use is one of the standard exposure scenarios used to evaluate human health."*

*"A resident with garden exposure scenario is an extension of the residential exposure scenario and assumes the resident will also consume home grown produce."*

*"This exposure scenario assumes a greater frequency and duration of exposure that results in more stringent cleanup goals."*

*"Of the hundreds of sites DTSC has evaluated, a resident with garden exposure scenario has only been utilized a few times, including for the Former McClellan Air Force Base in Sacramento."*

*"The resident with garden exposure scenario at SSFL is more stringent than the assessment conducted by the Air Force at McClellan because the SSFL assessment assumes one hundred percent of the home-grown fruits and vegetables consumed by the residents are grown onsite in contaminated soils, whereas the assessment conducted at the Former McClellan Air Force Base only assumed ten percent of the total dietary intake of produce is grown onsite in contaminated soils"*

[Underlines added for emphasis.]

Ms. Gettmann's memorandum confirms Meredith Williams' prepared comments during the June 2, 2022, virtual meeting, that the resident 100% garden land use scenario is not "widely" or "commonly" used. So why is SSFL singled out for a cleanup goal that DTSC applies hardly anywhere else? The simple answer is that it is what Dan Hirsch wants.

Ms. Gettmann's memorandum references McClellan AFB as an example of a 10% residential garden land use scenario. In reality, McClellan AFB uses institutional controls and deed restrictions for the majority of its potential release locations (PRL). The McClellan Record of

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<sup>1</sup> DTSC, Memo from Kimberly Gettmann to Meredith Williams, "Updates to the Standardized Risk Assessment for the Resident with Garden Exposure Scenario, SSFL", June 2, 2022. Available at <https://dtsc.ca.gov/wp-content/uploads/sites/31/2022/06/2022.06.02-RBSL-changes-2022-Memo.pdf>. Accessed June 7, 2022.



Decision (ROD)<sup>2</sup> refers to deed restrictions 42 times and refers to institutional controls 149 times. Deed restrictions include restrictions on land use. Institutional controls include prohibition on residential use (See Section 1.4 on Selected Remedies). Why does DTSC forbid use of similar remedies for SSFL?

### Radionuclide Cleanup Goal

For those PRLs where a radionuclide cleanup goal and excavation is proposed, McClellan uses a cleanup goal for radium-226 (the only ROPC) of background (0.78 pCi/g) plus a  $10^{-4}$  risk level for a resident with no garden (1.21 pCi/g).<sup>3</sup>

$$0.78 + 1.21 = 1.99 = 2.0 \text{ pCi/g} = \text{gross cleanup goal}$$

The McClellan 1.21 pCi/g ( $10^{-4}$  residential risk level) is consistent with the  $1.28 \times 10^{-2}$  pCi/g ( $10^{-6}$  RBSL for resident with no garden) in Exhibit 5, Attachment 3, page 152, of the Settlement Agreement.<sup>4</sup> Therefore McClellan does not use the 10% garden produce consumption as alleged by Ms. Gettmann.

The McClellan ROD radiological cleanup goal is not background but is a risk-based goal of  $10^{-4}$  residential-no-garden risk in excess of background.

If DTSC believes that my assessment of the McClellan AFB cleanup is incorrect, please provide a written response with appropriate citations.

### Exposure Duration

Page 2 of the subject memorandum states,

“The RBSLs are considered to be protective for humans over a lifetime exposure ...”

That is misleading. In reality, the EPA default exposure duration for chemicals and radionuclides is currently 26 years, not a lifetime. The excess lifetime cancer rate (ELCR) is calculated over a lifetime, but the exposure duration is 26 years. Any ingested or inhaled radionuclides that may

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<sup>2</sup> Department of the Air Force, “Follow-on Strategic Sites Record of Decision - McClellan Air Force Base”, Section 2.8.3 “Basis of Cleanup Levels” and Table 80. July 1, 2014. Available at [https://www.philrutherford.com/McClellan/ROD\\_2014-04.pdf](https://www.philrutherford.com/McClellan/ROD_2014-04.pdf). Accessed June 8, 2022.

<sup>3</sup> Noblis, “Air Force Real Property Agency Position On Radiation Background Levels and Cleanup Goals at the Former McClellan Air Force Base”, Section 4 and Table 4-1, October 2010. Available at [https://www.philrutherford.com/McClellan/S1693\\_Position\\_Paper\\_on\\_Radiation\\_Background\\_Levels\\_McClellan\\_Oct2010.pdf](https://www.philrutherford.com/McClellan/S1693_Position_Paper_on_Radiation_Background_Levels_McClellan_Oct2010.pdf). Accessed June 8, 2022.

<sup>4</sup> DTSC, “Settlement Agreement”, May 9, 2022. Available at [https://www.envirostor.dtsc.ca.gov/public/deliverable\\_documents/2026541471/SSFL%20DTSC-Boeing%20Settlement%20Agreement%20%28Final%29.pdf](https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/2026541471/SSFL%20DTSC-Boeing%20Settlement%20Agreement%20%28Final%29.pdf). Accessed June 8, 2022.



remain in the body beyond the 26-year exposure duration could continue to result in internal exposure beyond 26 years.

### **Prior Questions**

These comments are in addition to my previous comments and questions on the Settlement Agreement submitted to DTSC before the June 2, 2022, virtual meeting.<sup>5,6</sup> The same questions were asked in the Q&A option in the virtual meeting. These were not even acknowledged, let alone answered. When will DTSC respond?

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<sup>5</sup> Rutherford, Email to Grant Cope & Steven Becker, "Settlement Agreement", May 31, 2022. Available at [https://philrutherford.com/SSFL/Settlement Agreement/Settlement Agreement Email to DTSC 2022-05-31.pdf](https://philrutherford.com/SSFL/Settlement%20Agreement/Settlement%20Agreement%20Email%20to%20DTSC%202022-05-31.pdf). Accessed June 8, 2022.

<sup>6</sup> Rutherford, "Opposition to the DTSC-Boeing Settlement Agreement", May 23, 2022. Available at [https://www.philrutherford.com/SSFL/Settlement Agreement/DTSC-Boeing Settlement Agreement.pdf](https://www.philrutherford.com/SSFL/Settlement%20Agreement/DTSC-Boeing%20Settlement%20Agreement.pdf). Accessed June 10, 2022.