Compilation of Email Communications
2-24-22 to 4-25-22

News Coverage from SONGS Press Event with DOE Secretary Jennifer Granholm and Representative Mike Levin

From: Manuel Camargo
Sent: Monday, April 25, 2022 5:05 PM
To: David G. Victor; Daniel T. Stetson; McNicholas, Martha; Michelle Anderson; Mike Balsamo; Lisa Bartlett; Garry Brown; Jim Desmond; Chris Duncan; Rob Howard; Sam Jammal; Scott Kibbey; Marni Magda; Val Macedo; Ted Quinn; John Taylor; Mel Vernon; Michael Villar; Laura Ferguson; Kristal Jabara; Mike Frost; Mark Riddlebarger; Mike Sappingfield; Ken Schultz; Diep, Tyler; Christian. Abueg; Junior Macedo
Cc: Lorraine Quinn Sandstrom; Doug Bauder; John Dobken; Liese Mosher; Vincent J Bilovsky; Amy F Pressler; James Peterson
Subject: News coverage from press event at SONGS with DOE Secretary and Rep. Levin

Dear CEP Members and Alternates,

SCE hosted Energy Secretary Jennifer Granholm and Representative Mike Levin for a press event at SONGS last Thursday, April 21, to address the offsite disposition of spent nuclear fuel. Edison International CEO Pedro Pizarro provided welcoming remarks and CEP members David Victor, Rob Howard, Captain Mel Vernon, and LiUNA Local 89 representative Valentine Macedo Jr. "Junior" all were present. SONGS was prominent in the resulting broadcast and print coverage (see below), and David is quoted in some stories.

We applaud the DOE's recent work in this space and Rep. Levin's support for federal funding to facilitate the effort.

Feel free to share this new coverage with those in your networks who are interested in advancing solutions to offsite storage/disposal of spent fuel.

Best regards,

Manuel

Manuel C. Camargo Jr.
Principal Manager for Strategic Planning
SONGS/SCE
Mobile: 213-361-3661

San Diego CBS-News 8: https://www.cbs8.com/article/news/local/energy-secretary-visits-san-onofre-discuss-solutions-nuclear-waste-storage/509-ed1502e9-cd04-422e-a931-7f6a2e368443
KNSD-San Diego: https://www.nbcsandiego.com/videos/energy-secretary-tours-san-onofre-nuclear-plant/2926999/
KUSI-TV San Diego: https://app.criticalmention.com/app/#clip/view/754707c6-85c8-4b4b-aef1-252afb6ad0f0?token=84dcb5e5-76a3-4717-9833-613c7ef0d2a9
KGTV-San Diego: https://app.criticalmention.com/app/#clip/view/3ec54a5a-d5d4-46f8-aa38-31f06a616b85?token=27391322-9454-42c4-99f0-4ad3faca5db7

Orange County Register:

Rewards await communities willing to host America's nuclear waste

Column: U.S. Secretary of Energy tours San Onofre. 'We're looking forward to resolving this decades-long deadlock,' she says



Pedro J. Pizarro, CEO of Edison International, U.S. Secretary of Energy Jennifer Granholm and U.S. Rep. Mike Levin, from left, take a tour of the ISFSI (Independent Spent Fuel Storage Installation) at the shuttered San Onofre Nuclear Generating Station south of San Clemente, CA on Thursday, April 21, 2022. (Photo by Paul Bersebach, Orange County Register/SCNG)

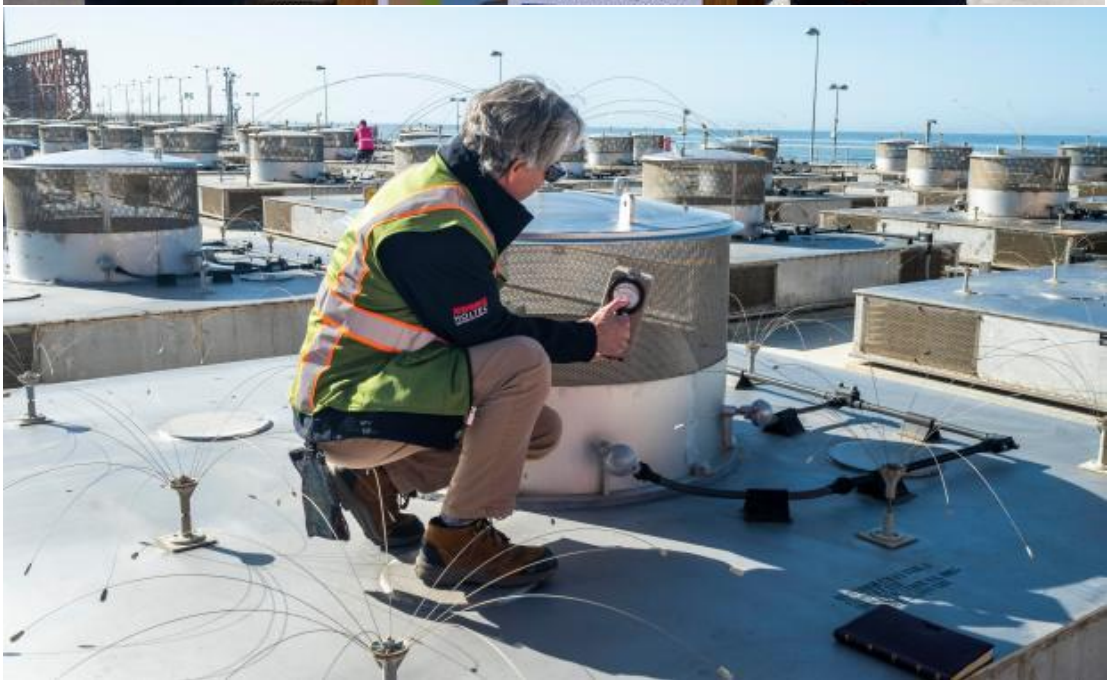
By **TERI SFORZA** | tsforza@scng.com | Orange County Register
PUBLISHED: April 21, 2022 at 5:45 p.m. | UPDATED: April 21, 2022 at 5:50 p.m.

Yucca Mountain is dead (again), the secretary of the U.S. Department of Energy said.

Several communities are intrigued by the possibility of hosting America's nuclear waste, at least temporarily (but she wouldn't say where these communities are).

And reprocessing highly radioactive waste — common in France and Japan, but never done here for fear of nuclear material falling into dangerous hands — could shrink its volume and extract uranium for the next generation of nuclear reactors (which must be part of America's carbon-free future).

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Decommissioning
San Onofre
Nuclear Generating Station
- 



Pedro J. Pizarro, CEO of Edison International, U.S. Secretary of Energy Jennifer Granholm and U.S. Rep. Mike Levin, from left, speak to the media following a tour of the ISFSI (Independent Spent Fuel Storage Installation) at the shuttered San Onofre Nuclear Generating Station south of San Clemente, CA on Thursday, April 21, 2022. (Photo by Paul Bersebach, Orange County Register/SCNG)

The blue Pacific shimmered through rippling waves of hot air, like the view over a car's roof on a hot summer day, as Secretary of Energy Jennifer Granholm leaned forward to feel the heat emanating from a waste vault vent at San Onofre Nuclear Generating Station on Thursday, April 21.

She was flanked by U.S. Rep. Mike Levin, D-San Juan Capistrano — who has made getting the waste off San Onofre's quake-prone coast a high priority — and by Pedro J. Pizarro, CEO of Edison International, which would dearly love to be relieved of babysitting duty for 3.6 million pounds of the deadly stuff for the next several decades.

A gaggle of journalists watched the trio tour the "concrete monolith" where dry waste is entombed at the San Onofre Nuclear Generating Station. Granholm dropped little news bombs as she made the case that the Biden Administration is serious about pushing past the national paralysis on nuclear waste disposal, which can be traced back some 50 years.

"This administration is saying, 'enough,'" said Granholm. "The Department of Energy is committed to getting this right."

Deadlock

How, exactly? In November, the DOE began a fresh push to find communities willing to host temporary storage sites in what it calls a "consent-based approach."

"We want to work with communities that want to work with us, and there are communities that want to work with us," Granholm said.

This kinder, gentler approach worked wonders in Finland, Canada and Sweden; in addition to getting new jobs and economic opportunities, volunteer communities will be compensated for the service they're providing to the entire nation, which could involve new federal research facilities.

"We're looking forward to resolving this decades-long deadlock," Granholm said.

The DOE asked for public input on the consent-based effort — which started under President Barack Obama, was shelved under President Donald Trump, and revived under Biden (illustrating, perhaps, part of the problem) — and has received hundreds of comments in response, clocking in at more than 1,600 pages.

There's much worry that poor communities and people of color will carry the load for the rest of the nation.

There's deep disbelief that any community will volunteer for temporary hosting duties while the nation continues to dither on permanent storage.

And there's a great deal of distrust in the DOE itself, which spent more than $10 billion on moribund Yucca Mountain without accepting a single *ounce* of the waste it was contractually obligated to start collecting in 1998.
Meanwhile, some $43 billion languishes in the Nuclear Waste Fund — paid by electricity consumers for this phantom permanent storage — while taxpayers have forked over another $9 billion to repay utilities like Edison for the costs of building dry storage on site.

Officials say taxpayers could be on the hook for another $30 billion to $50 billion before a solution emerges.

"Communities never signed up to host long-term storage," Granholm said as the heat rippled behind her. "We have to move."

Progress

Nuclear energy furnishes 20% of the nation's power and is an important piece of the no-carbon puzzle, she said. To that end, the infrastructure package provides $6 billion to help aging plants remain productive, and another $2.5 billion help develop the next generation of reactors.

But we must figure out what to do with the waste, she said.

It's not exactly a mystery: Highly radioactive waste gets buried in deep salt beds, or in deep bore holes. Scientists have known that for generations. The technology exists.

America's problem is not a technical one, but a political one.

"We know what we have to do, we know we have to do it, and we even know how to do it," said the now-decade-old Blue Ribbon Commission on America's Nuclear Future. "Rather the core

difficulty remains what it has always been: finding a way to site these inherently controversial facilities … in a manner that allows all stakeholders, but most especially host states, tribes and communities, to conclude that their interests have been adequately protected and their well-being enhanced — not merely sacrificed or overridden by the interests of the country as a whole."

Making progress on temporary storage will make the push for permanent storage easier, the secretary said.

Levin said we have made progress already. He helped secure some $40 million to restart the consent-based process and, with events like this one, is trying to keep it in the public eye.

"Nuclear waste does not belong here," Levin said. "We must get it off our coast as quickly and safely as possible."

It won't happen overnight, he said. But we have to start; doing nothing is not an option.

"Here's the bottom line: The community I serve wants to see results," Levin said. "We are finally making real progress after years of inaction."

Others might quibble, but David Victor, professor at UC San Diego and chair of San Onofre's volunteer Community Engagement Panel, was hopeful.

Reprocessing, long a third rail in American nuclear politics, will likely get a push from Russia's growing pariah status; it's one of the world's greatest suppliers of uranium, and will presumably be boycotted by Western powers. Reprocessing would reduce the volume of high-level waste that needs permanent disposal, and get more use out of uranium that's now slated for the trash heap.

Ideally, Congress would decouple the searches for temporary and permanent disposal, so they're not tethered together. There'd be several different sites for storage, not just one. There'd be changes to the law, allowing Nuclear Waste Fund money to pay for shorter-term storage. There'd be a separate agency to focus solely on disposal, with a stable source of funding, to insulate it from the sturm und drang of politics.

A tall order, to be sure. "But I'm more optimistic about this than I've been in a long time," Victor said.

# # #

San Diego Union-Tribune:

Feds say they'll pay towns willing to take nuclear waste from sites like San Onofre

U.S. Energy Secretary Jennifer Granholm tours San Onofre and talks up potential interim storage sites.

BY ROB NIKOLEWSKI
APRIL 21, 2022 4:15 PM PT

U.S. Department of Energy Secretary Jennifer Granholm said Thursday the federal government will send

dollars to cities and towns willing to step forward and accept the nuclear waste that has stacked up over the years at commercial power plants across the country.

"We know that those communities will have to be compensated for their willingness, as a service to the nation, to be able to house one of these" storage sites, Granholm told reporters after taking a tour of the San Onofre Nuclear Generating Station, the now-shuttered power plant that hugs the Pacific Ocean and stores some 3.55 million pounds of radioactive spent fuel.

When asked how much money would go to communities willing to host a site, Granholm said, "That's to be decided."

Rep. Mike Levin, D-San Juan Capistrano, accompanied Granholm on a one-hour tour of the plant, known as SONGS for short, and said the country faces a "serious and growing spent nuclear fuel crisis."

"The communities I serve want to see results when it comes to removing the waste from our region," said Levin, whose district includes SONGS, "and while we have much more work to do before this waste is gone for good, we are finally making real progress."

Granholm's remarks come five months after the Department of Energy announced formal steps in what is sure to be a long process to find potential "consolidated interim storage" locations to take waste from commercial plants until the federal government finds a permanent underground repository.

Granholm said her department has "gotten a lot of expressions of interest from communities" but did specifically name them.

"I am confident that we are going to get a community or several communities that are interested," Granholm said.



Department of Energy Secretary Jennifer Granholm tours the San Onofre Nuclear Generating Station with Rep. Mike Levin, D- Sam Juan Capistrano.
(Nelvin C. Cepeda/The San Diego Union-Tribune)

Under the Nuclear Waste Policy Act of 1982, the federal government has a legal responsibility to dispose of the roughly 89,0000 metric tons of waste that has accumulated at nuclear power plants in 35 states.

A giant underground repository was near completion at Yucca Mountain in southern Nevada but in 2010, the Obama administration halted the project, following years of opposition from Silver State lawmakers, including former Senate Majority Leader Harry Reid.

With Yucca off the table for all intents and purposes, focus has shifted to finding interim facilities. To avoid a repeat of Yucca, the federal government is now taking a "consent-based" approach to communities that may be attracted to hosting a storage facility by the prospect of more local jobs and economic growth.

David Victor, chairman of the SONGS Community Engagement Panel, said Granholm's announcement that federal money will be tied to a potential interim storage site is crucial.

"It's been implicit that there was going to be funding attached but it's never been articulated as part of a strategy," Victor said. Feedback received by the Department of Energy in recent months, Victor said, made it clear "that this has to come with direct support to communities."

But the road will likely be a long and bumpy one.

The Nuclear Regulatory Commission in September approved a license for a proposed interim storage facility run by a private sector partnership in the West Texas town of Andrews. The joint company could take as much as 40,000 metric tons of spent fuel for up to 40 years. But the project has run into opposition from authorities in the Lone Star State, including Republican Gov. Greg Abbott, who tweeted, "Texas will not become America's nuclear dumping ground."

Another site — this one in southeastern New Mexico — is awaiting licensing approval from the NRC. A partnership between a local group and nuclear company Holtec International proposes to store as many as 10,000 canisters and boost the area's economy. But New Mexico Gov. Michelle Lujan Grisham has come out against the project, saying, "the risks for New Mexicans, our natural resources and our economy are too high."

One of the concerns for communities considering building an interim storage facility is whether they will get stuck with the waste for decades, should the federal government not find a permanent site.

"We're taking it one step at a time," Granholm said. "The interim storage is the first step. We have got to work with Congress on the permanent storage. If this is done right and we will do it right, it makes the conversation about permanent easier."



One of 73 canisters containing fuel assemblies of radioactive waste that have been lowered onto a dry storage facility at the San Onofre Nuclear Generating Station.
(Nelvin C. Cepeda/The San Diego Union-Tribune)

At SONGS, 73 canisters loaded with spent fuel assemblies dating back to when the nuclear plant supplied electricity to Southern California have been lowered into vertical cavities at a storage facility on the north end of the facility. Another 50 canisters of waste rest horizontally nearby.

Levin has helped secure two tranches of $20 million each via legislation on Capitol Hill to move consent-based siting along. He recently reintroduced legislation with Rep. Darrell Issa, R-San Marcos, that would give priority to remove spent fuel from decommissioned plants like SONGS that are located in areas with large populations and seismic hazards.

Levin acknowledged the process will take years before waste can be removed from sites like SONGS.

“It’s not going to happen overnight but we’ve got to start,” Levin said. “Doing nothing is not an option. Waiting for others to act is not an option.”

There are some signs of hope in other countries.

Finland is scheduled to open its own permanent disposal site next year. Sweden is expected to construct one before the decade is out, France has plans to have a geologic repository in the 2030s and Canada has narrowed its search down to two potential host communities.

"We are looking at best practices from elsewhere because this issue of local communities having justifiable concerns is not new," Granholm said. She also said the Department of Energy is open to looking at recycling commercial waste, as countries like France do.

# # #

San Clemente Times:

Efforts to Move Nuclear Fuel Out of SONGS Continue as Government Officials Note Progress
April 22, 2022
By C. Jayden Smith

Rep. Mike Levin and U.S. Department of Energy Secretary Jennifer Granholm met with Southern California Edison officials Thursday, April 21, at the San Onofre Nuclear Generating Station (SONGS) to review the decommissioned facility's safety measures.

While there has not been tangible movement since DOE closed its request for information regarding the consent-based siting process to store the nation's spent nuclear fuel (SNF), the government figures left assured that Edison was properly containing its radioactive waste.

After their tour concluded, Levin voiced his gratitude for the work Edison has done to safely decommission SONGS and asserted that the fuel no longer belongs near the invaluable Pacific Coast and the surrounding communities, nor on land leased from the U.S. military.

He added that nationwide efforts were necessary to address the spent nuclear fuel currently housed in roughly 80 locations across 34 states.

"The current system of spent nuclear fuel storage is not sustainable, particularly for sites that no longer have operating reactors and could be developed for other and better uses," said Levin. "It's also a violation of the promise codified decades ago that the federal government would take title to the waste in return for ratepayers' contributions to the nuclear waste fund."

Movement in terms of funding from Congress and actions by DOE, such as Granholm prioritizing the establishment of a storage location, encouraged the congressman that there is progress on the matter.

Granholm emphasized the importance of continuing to utilize nuclear energy and addressing the tension created by years of inaction in communities that continue to harbor the SNF. Those tensions have resulted in settlements costing the government a total of nearly $9 billion, she said.

Other indications of change include the development of a comprehensive plan that details the logistics of transportation and infrastructure that will make interim and permanent storage possible.

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Southern California Edison officials guided Rep. Mike Levin and Jennifer Granholm, secretary for the U.S. Department of Energy, through its San Onofre nuclear power plant Thursday, April 21. In a press conference, the government leaders reiterated their prioritization of moving the spent nuclear fuel out of the facility. Photos: C. Jayden Smith

Touching on the consent-based siting process—an approach to identify storage sites by working with the nearby towns—the secretary mentioned that communities have expressed a willingness to work with DOE, though she didn't disclose which.

"We know that housing these operations is not for everybody, but they do bring jobs, they do bring economic opportunities, and some communities find that interesting," Granholm said. "We have a process, and we will align our goals with the needs and concerns of interested

communities. We're going to build our relationships with potential host communities on a foundation of trust from the get-go."

The RFI received 220 responses, some of which were from members of local stakeholders such as the SONGS Task Force and SONGS Community Engagement Panel. The department's next steps are to produce a report summarizing conclusions from the responses, produced by the Office of Nuclear Energy, and update the consent-based siting process draft, as well as forming a subcommittee on the subject comprising nationwide experts.

"There's a lot of work ahead, but we are really eager to dive in alongside of our community partners," said Granholm.

Levin defended his stance that a crisis regarding SNF does exist in the United States and that Edison was doing well to keep the San Onofre site safe, saying that the two concepts were not mutually exclusive.

He pointed to other sites around the country that he said were in "far worse shape" than SONGS, and also noted that the present canisters containing the waste were not intended to sit at the facility forever.

Interim storage is the first step of solving any problems related to nuclear fuel, and will make the conversation about a permanent solution easier, according to Granholm. Once an ideal location is identified, discussions of related topics such as recycling the waste can then occur.

However, such a location has yet to be determined, especially for a permanent repository.

"We know we can do the interim (site) and we know we can do that utterly safely," she said. "We want to make sure that (regarding) permanency, (having) the exact right geology and learning from the countries that have created permanent options is a lot of the research that's being done."

Recycling a significant proportion of the fuel is not financially viable, nor legal, since President Jimmy Carter issued an executive order in April 1977 that indefinitely banned its reprocessing.

Granholm said that the department will have to work with Congress to reverse the ban, even as she agreed that a better use of time would involve efforts to recycle and reuse the fuel, as France and other countries do.

# # #

Reuters:

U.S. Energy Secretary unsure if Michigan, California nuclear plants will seek subsidies

Nichola GroomApril 21, 20225:13 PM PDTLast Updated 2 hours ago

LOS ANGELES, April 21 (Reuters) - U.S. Energy Secretary Jennifer Granholm said on Thursday she was unsure if two nuclear power plants with previous plans to shut will apply for subsidies the Biden administration launched this week as part of its policy to fight climate change.

The administration on Tuesday opened applications until May 19 for the first round of a $6 billion credit program included in last year's bipartisan infrastructure bill that seeks to stop nuclear power plants from shutting. read more

In the first round, the Energy Department is giving priority to plants that had filed plans to shut. Those plants include Entergy Corp's (ETR.N) Palisades plant in Michigan, and PG&E's (PCG.N) Diablo Canyon plant in California.

Granholm said this week the administration is "using every tool available" to get the country powered by clean energy by 2035, a goal of President Joe Biden's, including by prioritizing the existing nuclear power fleet.

Granholm, speaking to reporters in Los Angeles on Thursday, pointed to Palisades as a plant that is scheduled to close but also added "I don't know if they will apply or not." The plant could shut as soon as May 31.

Entergy spokesperson Michael Bowling said in a statement that the company has been contacted by government officials about possibly operating the Palisades facility beyond its May closing date and had also held talks with potential buyers of the plant. But, he said, Palisades' permanent shutdown remained on schedule.

Regarding Diablo Canyon, Granholm said "we'll see what happens, but I'm not sure that the community of Diablo Canyon is on board" with applying for funding that would reverse the shutdown of its two reactors, planned in 2024 and 2025.

Community members had previously had concerns about earthquakes, nuclear waste, and the use of water to cool the plant.

PG&E indicated this week the nuclear credit program would not change its plan immediately. "As a regulated utility, we are required to follow the energy policies of the state," said PG&E spokesperson Suzanne Hosn about the DOE program this week. "At this time, the state has not changed its position regarding the future of nuclear energy in California."

The U.S. nuclear power industry's 93 reactors generate more than half of the country's carbon-free electricity, according to the Department of Energy. But 12 reactors have closed since 2013 in the face of competition from renewable energy and plants that burn plentiful natural gas.

If no nuclear plants that plan to shut apply in the first round it could be an inauspicious start for the program.

"None of these reactors seem like a good fit to us," the nonpartisan ClearView Energy Partners said in a research note this week about the Michigan and California plants.

Additional Reporting by Timothy Gardner; Editing by Aurora Ellis

# # #

No attachment. Direct links provided in text.
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Fall Injury at SONGS

From: Manuel Camargo
Sent: Thursday, April 14, 2022 7:27 PM
To: David G. Victor; Daniel T. Stetson; Martha McNicholas; Michelle Anderson; Mike Balsamo; Lisa Bartlett; Garry Brown; Jim Desmond; Chris Duncan; Rob Howard; Sam Jammal; Scott Kibbey; Marni Magda; Val Macedo; Ted Quinn; John Taylor; Mel Vernon; Michael Villar; Laura Ferguson; Kristal Jabara; Mike Frost; Mark Riddlebarger; Mike Sappingfield; Ken Schultz; Diep, Tyler; Christian Abueg
Cc: Lorraine Quinn Sandstrom; Doug Bauder; John Dobken; Liese Mosher; Vincent J Bilovsky
Subject: For awareness: Injury at SONGS

Dear CEP Members and Alternates,

As Doug mentioned during the CEP member consultation meeting tonight, we are saddened to report that a worker at SONGS sustained an injury earlier this week. On April 11, a contract employee was injured while performing dismantlement activities near an open space in the floor, requiring hospitalization. We wish our colleague a speedy recovery. The worker was wearing fall protection which prevented a more serious injury.

Our decommissioning contractor, SONGS Decommissioning Solutions, immediately stopped work. A stand down of work remains in place so the incident can be further evaluated. Following completion of that evaluation, additional safeguards will be put in place to prevent a reoccurrence.

Safety is a core principle in our decommissioning of SONGS. We will pick up the conversation about worker safety at the upcoming CEP meeting.

Sincerely,

Manuel C. Camargo Jr.
Principal Manager for Strategic Planning
SONGS/SCE

No attachment.
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What Should America Do With Its Nuclear Waste?

From: Manuel Camargo
Sent: Monday, April 11, 2022 5:36 PM
To: David G. Victor; Daniel T. Stetson; Martha McNicholas; Michelle Anderson; Mike Balsamo; Lisa Bartlett; Garry Brown; Jim Desmond; Chris Duncan; Rob Howard; Sam Jammal; Scott Kibbey; Marni Magda; Val Macedo; Ted Quinn; John Taylor; Mel Vernon; Michael Villar; Laura Ferguson; Kristal Jabara; Mike Frost; Mark Riddlebarger; Mike Sappingfield; Ken Schultz; Diep, Tyler; Christian Abueg
Cc: Lorraine Quinn Sandstrom; Doug Bauder; John Dobken; Liese Mosher; Vincent J Bilovsky
Subject: FYI: Article on Spent Fuel from Washington Post Magazine

Hello all,

For your information, attached is an article from the Washington Post magazine about the disposition of spent nuclear fuel here in the United States. Marni Magda, David Victor, and Rob Howard are quoted and SONGS is featured prominently.

Sincerely,

Manuel C. Camargo Jr.
Principal Manager for Strategic Planning
SONGS/SCE

Attachment #1 – What should America Do with Its Nuclear Waste? Washington Post Magazine article by Rebeca Tuhus-Dubrow, April 11, 2022.
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Update in Spent Fuel Pool Water

From: David G. Victor
Sent: Thursday, April 7, 2022 10:43 PM
To: Manuel Camargo; Daniel T. Stetson; Martha McNicholas
Cc: Ronald Pontes; Doug Bauder
Subject: (External):Re: (External):Update in spend fuel pool water

Manuel

Thanks for your note.

I think we should include Mr Blanch's note and attachment in the next batch of emails that we circulate to the CEP on a regular basis.

David

From: Manuel Camargo <Manuel.Camargo@sce.com>
Date: Thursday, April 7, 2022 at 5:42 PM
To: David G. Victor, Daniel T. Stetson, Martha McNicholas
Cc: Ronald Pontes, Doug Bauder

Subject: FW: (External):Update in spend fuel pool water

David, Dan, and Martha,

David and I (and others, as you can see below) received this email from Paul Blanch this morning, which includes an assessment of liquid batch releases from the Indian Point nuclear plant in NY. I don't know the back story here or why Lochbaum performed his assessment, but as you will see, he found that the releases were conducted in a manner to ensure radiation doses to the public were "far below" federal limits. Blanch indicated we should feel to distribute this information.

SONGS has a batch release planned for March 25 (subject to change) and, as per our commitment, we will conduct a 48-hour notification. In fact, Ron Pontes (copied) already has been in contact with Katie Day at Surfrider and Dan is going to use his boat and piloting skills to help the Surfrider team take ocean water samples that will be shipped to the Woods Hole Institution for analysis.

Dan – As we discussed briefly, you are free to share this material with Katie given her interest in batch releases.

Let me know if you have questions.

Thanks,

Manuel

From: Paul Blanch
Sent: Thursday, April 7, 2022 8:26 AM
To: Old Nuke; Paul M. Blanch; Lampert Mary; James Lampert; Richard Webster; Bart Ziegler; r johnson; Amy Rosmarin; Sandra Galef; Kevin Kamps; Manna Jo Greene; Stephen Kent; cathy iwane; Charles Langley; Anthony Leshinskie; Donna Gilmore; Dave Lochbaum; David G. Victor: Hering R. Sr.; Nina Babiarz
Subject: (External):Update in spend fuel pool water

***** EXTERNAL EMAIL - Use caution when opening links or attachments *****

***** EXTERNAL EMAIL WITH ATTACHMENT - BE CAREFUL NOT TO OPEN IF THIS DOCUMENT IS NOT EXPECTED OR TRUSTED *****

The following is Dave's and the position of Oldnuke which are consistent with my position, sometimes critics of the nuclear industry.

We all realize this is not a popular position to take at this time

Feel free to distribute this document with the enclosure.

Hello:

Attached is a slideshow I prepared last month about the releases of radioactively contaminated liquids from Indian Point between 2005 and 2019 (most of these years being before Holtec got involved.)

The 2nd slide shows the volumes of water released from Indian Point - some as clean as it was before being withdrawn from the Hudson River and some not so clean. The "dirtiest" of the water was the Processed Waste, with something like an average release of 3.3 million gallons per year over this period.

Slide 13 is from the annual report for 2019, the last year both reactors at Indian Point operated. The releases to the river were small fractions of the federal limit.

Slide 15 is data compiled from the annual reports showing the total whole body dose to a member of the public from inhalation of airborne releases and consumption of water/fish from liquid releases. The worst year had a total dose that was 0.0078% of the federal limit.

Other studies show that the release of radioactive materials to the air and water from permanently shut down reactors being decommissioned is a small fraction of the amounts released from operating reactors - with the sole exception of tritium in gaseous form. My suspicion is that evaporation from spent fuel pools is the primary source of this release. But the gaseous tritium released from decommissioning reactors remains lower than the amount released from operating reactors - not just as much lower as the other waste streams.

I personally cannot reconcile Mobile Chernobyl with Mobile Nirvana. Many groups and individuals oppose the shipment of spent fuel in casks by truck or rail due to the potential for an accident harming lots of people, hence Mobile Chernobyl. Yet many of the same groups and individuals advocate the

shipment of radioactively contaminated water by truck or rail with apparently zero chances of leaks, spills, and accidents en route, hence Mobile Nirvana.

The water tankers are considerably less robust than spent fuel casks, yet somehow they are seemingly immune to accidents.

Likewise, some groups and individuals oppose thin-walled canisters for storing spent fuel and advocate thick-walled canisters instead.

A spent fuel transport cask has thick walls.

A radioactive water tanker has thin walls.

Both the discharge to the river option and the transport to Idaho option can be conducted successfully. Both can be messed up.

History has shown the discharge of radioactively contaminated water to the Hudson River to be a reliable way of managing the risks to the public from the radioactive materials in the water. I therefore prefer a tried and true method to one relying on every truck and railcar avoiding every leak, spill, and accident.

In my opinion, the prime risk from the discharge to the river option involves inadequate sampling of the tank or container before its release. The contents within a stagnant tank can settle with highly radioactive particles collecting on the bottom. Containers are supposed to be recirculated for awhile before a sample is drawn for analysis. This results in the sample analysis accurately reflecting the radioactive concentrations in the container to determine the release flow rate and associated dilution flow rates. With lack of proper mixing pre-sampling, that analysis may underpredict the hazard. But the backstop for this scenario, should it happen, is the radiation detector in the discharge line. If more radioactively is in the water being discharged than expected, the radiation detector will flag the "surprise" and cause the discharge flow to be halted.

Such controls provide better risk management than would should a tractor trailer crash in route or railcar tanker derail en route. In that scenario, luck would be needed to prevent the spilled radioactive water from flowing somewhere it can harm members of the public.

Thanks,
Dave Lochbaum

FROM OLDNUKE WITH HIS POSITION TO Publically DISTRIBUTE

My answers are below. We will probably not agree on the bottom line but the fact that we are still talking shows my respect for your concerns. My answers, while not agreeing with your perspective, are hopefully objective and respectful.

What is your rationale?
My fundamental rationale is that the risks are so small as to be far, far lower than other risks from everyday life.
Is the allowable dose based on updated science?
The allowable dose is based on old science, updated science and new science, but not junk science.
Is it safe enough?

It is definitely safe enough when compared to the risks encountered in every day life. But it is not perfectly safe; the risk is not zero. If the criteria is zero risk, why is this a reasonable and appropriate criteria?
What assumptions go into the calculations? Impact on children, women?
It would take far too many words to list all the assumptions. Essentially, the health impacts are so small as to be not measurable. Women and children are indeed more sensitive to health effects from radiation exposure. This is known and accounted for in the science. The effects on women and children are not more than 10 times the effects on men; usually more like 2 times the effects on men. But 10 x 0.000000001 is only 0.00000001 which does not raise the risk from Tritium exposure to any significant level.
Doesn't NRC support LNT?
The NRC does not "support" LNT (aka believe it is an accurate measure if calculating health impact). The NRC has adopted LNT for all its dose impacts on people because it is highly conservative (over-predicts health effects) and is easy to calculate. It is easier to regulate using LNT models. If your projected risk is low using LNT dose calculations, you can be certain your actual risk is lower. And yes, I have seen the studies that postulate that low doses of radiation are actually more impactful than high doses. The scientific evidence just does not support those studies. They just are some scientist's approach to getting attention from his/her peers and getting funding.
Economic impact on business considered?
There would be no economic impact on business from absorbed doses. The adverse perceptions are created by people who tell half of the story and scare members of the public who haven't taken the time to thoroughly understand the issue. Under the best circumstances, the industry and NRC would address these scare tactics by publicly answering the concerns with real science. Unfortunately, the NRC often does not engage well in the dialog and people walk away thinking that the activists must truly have a point. Why else would the NRC refuse to address the points raised by the activists. They just continue to say "all is well…we are the experts" and it sounds like they can't refute the activists' message so the public concluded that the activists must know something that the NRC does not.
What are businesses in area?
I have spent a fair amount of time at Pilgrim. The area is basically a collection of small, suburban, seashore New England towns with low population densities, much like where I live. There are many sea-related businesses, including fishing, tourism, hotels, restaurants and small manufacturing businesses, but it is not an industrial area (like I grew up in in Cleveland Ohio). So the good news is that you don't have to contend with the levels of chemical pollution that would be present in an industrial area.
Largest aquaculture in state is here/ filter feeders like oysters, mussels, clams that are sold all over country- just Duxbury harbor planted this year 7. million oyster seedlings.
Consumer perception when hear 1 million gallons of rad liquid waste dumped in waters? Perception is key. Realtors joined campaign because customers already lost!
Your oyster beds are somewhat similar to the oyster growing and harvesting industry where I live in Niantic Bay and Mystic. The effect of discharging 1 million gallons of very low level Tritium contaminated water into trillions of gallons that already contain 3.2 pCi/ liters of naturally occurring Tritium is simply not measurable. The only actual health threat to humans would come from drinking many gallons of tritiated water on a daily basis. Nobody drinks seawater. From the NRC web page:

- Humans receive approximately 50 percent of their annual radiation dose from natural background radiation, 48 percent from medical procedures (e.g., x-rays), and 2 percent from consumer products. Doses from tritium and nuclear power plant releases account for less than 0.1 percent of the total background dose (NCRP, 2009). As an example,

drinking water for a year from a well with 1,600 picocuries per liter of tritium (comparable to levels identified in a drinking water well after a significant tritiated water spill at a nuclear facility) would lead to a radiation dose (using EPA assumptions) of 0.3 millirem (mrem). That dose is:

- **at least 2,000 to 5,000 times** lower than the dose from a medical procedure involving a full-body CT scan (e.g., 500 to 1,500 mrem from a CT scan)
  1,000 times lower than the approximate 300 mrem dose from natural background radiation
  50 times lower than the dose from natural radioactivity (potassium) in your body (e.g., 15 mrem from potassium)
  12 times lower than the dose from a round-trip cross-country airplane flight (e.g., 4 mrem from Washington, D.C., to Los Angeles and back)

0.3 mrem comes from drinking 2 liters of water every day for a year, not swimming in it or eating seafood caught in those waters. The dose from swimming or eating seafood would be far, far less than 0.3 mrem per year. Even if the old science models underestimate the dose effects by a factor if 10, it is still so far below the risks from everyday life that it can be discounted.
Tourism a big business too. Moms
Want kids to swim ?
Perception, perception, perception!
Perception is indeed the big issue. But perception of threats which are just not significant risks should be in line with the science, not hype. If you want to keep scaring people, there will indeed be a negative effect on tourism, moms and kids who want to swim. But the cause of the negative effect is the hype, not the actual risk.
Does NRC consider location discharge on a site specific basis?
Yes
Cape Cod Bay is semi- enclosed as are smaller bays tides bring water. Woods Hole Oceanographic Inst water circulation scientist showed currents and that discharges NOT flushed out but stay here a long time.
It doesn't matter. Background amounts of Tritium are already in the water from natural causes. Adding a tiny additional fraction to what is already there does not increase risk or health effects by any measurable amount.
Contaminants will get into sediment. Filter feeders?
Filter feeders do not filter out Tritium. Tritiated water is chemically indistinguishable from regular water. The filter feeder suck it in and spit it out. It does not get trapped in the organism. "Contaminants" that are ionic or particulate compounds can get trapped in sediments. Tritium is not ionic nor is it a particulate. It does not get trapped or concentrated. It diffuses into and out if the sediments just like water. It does not concentrate in sediments, filter feeders or anything else.
Tritium- NRC forgets about organically bound tritium- how convenient.
The NRC does not forget. From the NRC web page:

- Tritium is almost always found as tritiated water and primarily enters the body when people eat or drink food or water containing tritium or absorb it through their skin. People can also inhale tritium as a gas in the air.
- Once tritium enters the body, it disperses quickly and is uniformly distributed throughout the soft tissues. Half of the tritium is excreted within approximately 10 days after exposure. **About 10 percent of the dose from any tritium exposure comes from the**

small fraction of the exposure that the body retains as organically bound tritium (ICRP-30, 1979).

- Everyone is exposed to small amounts of tritium every day, because it occurs naturally in the environment and the foods we eat. Workers in federal weapons facilities; medical, biomedical, or university research facilities; or nuclear fuel cycle facilities may receive increased exposures to tritium.

https://www.nrc.gov/reading-rm/doc-collections/fact-sheets/tritium-radiation-fs.html

The science shows Organically Bound Tritium (OBT) is just not risk significant. OBT is nothing more than T2O that is ingested by organisms (along with much higher amounts of H2O) and incorporated into the organism's cells. The additional dose from organically bound Tritium is very, very, very small. The academic papers that I have read all say that OBT will increase absorbed (already tiny) doses by about 10%. Essentially, this is 10% of an incredibly small dose. OBT does not alter the total absorbed dose by any significant amount and therefore does not present a significant risk to the body or ecosystem.

I just started but have work to do. Suggest you do the same on this subject.

I lived this topic at Indian Point for 5 years, and 7 years before that at Millstone. Dave Lochbaum has recently provided his perspective on Tritium at Indian Point. I agree with his assessment.

I have read many academic papers that raise red flags about how "more dangerous" Tritium can be, but they never give you the bottom line - how much more, what is the new-science dose projection from Tritium? But they make the same points over and over;

- *Tritium doses are greater than the old science predicts.*
- *Tritium causes internal cellular damage.*
- *Tritium is more dangerous than generally recognized.*

These studies are not useful because after saying that there are effects that have not been accounted for in the old science, they always stop short of saying what the revised dose estimates and health impacts actually are. They scare people but they don't answer that basic question, so what does it all mean in terms of risk?

Cheers from Oldnuke

Attachment #2 – Indian Point Radioactive Liquid Effluents, by David Lochbaum, March 12, 2022
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Tuler and Webler Nuclear Waste Consent Based Siting Report

From: David G. Victor
Sent: Thursday, March 31, 2022 6:42 AM
To: Manuel Camargo; Daniel T. Stetson; McNicholas, Martha
Subject: (External): FW: Final report on consent-based siting

***** EXTERNAL EMAIL - Use caution when opening links or attachments *****
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Manuel

Probably useful to include the attached in next CEP circular.

David

From: Tuler, Seth
Date: Thursday, March 31, 2022 at 6:37 AM
To: Tuler, Seth, Thomas Webler
Subject: Final report on consent-based siting

Hello,

We are attaching our final report on consent-based siting. Thank you again for your input as we completed this study. We hope that this work will be helpful in your continued work on how to manage the nuclear waste inventory in the US.

Please feel free to send this to others that may be interested.

Take care,

Seth and Tom
****
Seth Tuler
Associate Professor
Co-Director, Global La
b
Co-Director, Boston Project Center
Department of Integrative and Global Studies, Global School
Worcester Polytechnic Institute
Worcester, MA 01609

Attachment #3 – Tuler and Weber Nuclear Waste Consent Siting Report, by Dr. Seth Tuler and Dr. Thomas Webler, March 2022
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Complete Set of Responses to DOE RFI on Consent-Based Siting

From: Manuel Camargo
Sent: Tuesday, March 29, 2022 4:02 PM
~~~~~~

Compilation of Email Communications

2-24-22 to 4-25-22

To: David G. Victor; Daniel T. Stetson; McNicholas, Martha; Michelle Anderson; Mike Balsamo; Lisa Bartlett; Garry Brown; Jim Desmond; Chris Duncan; Rob Howard; Sam Jammal; Scott Kibbey; Marni Magda; Val Macedo; Ted Quinn; John Taylor; Mel Vernon; Michael Villar; Laura Ferguson; Kristal Jabara; Mike Frost; Mark Riddlebarger; Mike Sappingfield; Ken Schultz; Diep, Tyler; Christian Abueg
Cc: Lorraine Quinn Sandstrom; Doug Bauder; Amy F Pressler; Lorraine Quinn Sandstrom; James Peterson; Liese Mosher; John Dobken
Subject: Now Available: Complete Set of Responses to DOE RFI on Consent-Based Siting

Hello CEP Members,

In case you are not already aware, the US Department of Energy has made available all 220 responses to its request for information on consent-based siting for federal consolidated interim storage facilities for spent fuel. Please see below.

Best regards,

Manuel



Responses to RFI

On Dec. 1, 2021, DOE issued a Request for Information (RFI) on using a consent-based siting approach to identify sites for interim storage of spent nuclear fuel. The comment period closed on March 4, 2022. DOE received 220 submissions in response to the RFI. The complete set of those responses is now available here on the energy.gov/consentbasedsiting web page.

Our team is working hard to analyze the responses and will publish a report of our findings in the coming months.

If you didn't get a chance to respond to the RFI, please stay engaged! We will have many more opportunities for feedback and public participation. We'll share information about future consent-based siting activities in this newsletter and on energy.gov/consentbasedsiting.

Consent-Based Siting

U.S. DEPARTMENT OF ENERGY | Office of NUCLEAR ENERGY

You received this message because you are subscribed to updates from Department of Energy - Office of Nuclear Energy. Get this as a forward? Sign up to receive updates.

For more information on consent-based siting, please visit energy.gov/consentbasedsiting.

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This email was sent to manuel.camargo@sce.com using govDelivery Communications Cloud on behalf of: Department of Energy - Office of Nuclear Energy · 1000 Independence Ave, SW Washington, DC 20585

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No attachment.

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SONGS "Hot Work" (Cutting) NRC Non-Cited Violation

From: Manuel Camargo
Sent: Friday, March 18, 2022 4:01 PM
To: David G. Victor; Daniel T. Stetson; McNicholas, Martha; Michelle Anderson; Mike Balsamo; Lisa Bartlett; Garry Brown; Jim Desmond; Chris Duncan; Rob Howard; Sam Jammal; Scott Kibbey; Marni Magda; Val Macedo; Ted Quinn: John Taylor; Mel Vernon; Michael Villar; Laura Ferguson; Kristal Jabara; Mike Frost; Mark Riddlebarger; Mike Sappingfield; Ken Schultz; Diep, Tyler; Christian Abueg
Cc: Lorraine Quinn Sandstrom; Doug Bauder
Subject: For Awareness: SONGS "hot work" (cutting) non-cited violation

Hello CEP Members,

I write to make you aware that the NRC issued SCE a non-cited violation related to "hot work" at SONGS (basically, cutting metal components with a torch as part of dismantlement work). This is a severity level four violation, with four as the lowest in a range of one through four. Attached for reference is the relevant inspection report, which will be posted to the www.SONGScommunity.com website.

The matter at issue was the presence of combustible material including non-covered wood and a plastic bag within 35 feet of hot work being performed at SONGS in mid-February. Wood planks were not covered with fire blankets as required to prevent sparks from potentially igniting the wood. SCE entered the issue into its corrective action program and took immediate actions. The NRC determined the safety significance of the issue to be low, and because the violation was not willful or repetitive, the violation was treated as a low-level non-cited violation.

We reviewed the NRC finding with our decommissioning contractor and workers, and SCE will continue, in our oversight role, to ensure adherence to all procedures is maintained. In its inspection report, the NRC reaffirmed the site's fire brigade staffing and training program, as well as available resources to extinguish any fires, should they occur, are satisfactory.

Safety is a core principle of SONGS decommissioning. More information on how we protect against fires during dismantlement work is available HERE.

Provided for your awareness.

Sincerely,

Manuel C. Camargo Jr.
Principal Manager for Strategic Planning
SONGS/SCE

Attachment #4 – SONGS NRC Inspection Report, NCV ML22068A233, March 14, 2022
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News Coverage of DOE RFI Responses Including CEP

From: David G. Victor
Sent: Monday, March 14, 2022 6:02 PM
To: Manuel Camargo; Daniel T. Stetson; Martha McNicholas
Cc: Doug Bauder; Lorraine Quinn Sandstrom; Amy F Pressler; John Dobken
Subject: (External):Re: News coverage of DOE RFI responses including CEP

***** EXTERNAL EMAIL - Use caution when opening links or attachments *****
Thanks so much. lets include this in the next circular. D

From: Manuel Camargo
Date: Monday, March 14, 2022 at 6:00 PM
To: David G. Victor, Dan Stetson, Martha McNicholas
Cc: Doug Bauder, Lorraine Sandstrom, Amy F Pressler, John Dobken
Subject: News coverage of DOE RFI responses including CEP

All,

Trade publication *California Energy Markets* ran a story about local responses to the DOE's RFI including the response from the CEP. Attached for your awareness is the article.

Best,

Manuel

Manuel C. Camargo Jr.
Principal Manager for Strategic Planning
SONGS/SCE

Attachment #5 – News Coverage of DOE RFI Responses Including CEP, California Energy Markets (CEM) article by Abigail Sawyer, March 11, 2022
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Action for Spent Fuel Solutions Now (ASFSN) Coalition Response to DOE RFI on Consent Based Siting

From: David G. Victor
Sent: Friday, March 4, 2022 1:23 PM
To: Jessica Luternauer; Lorraine Quinn Sandstrom; Manuel Camargo
Subject: (External):Re: ASFSN Response to RFI on Consent-Based Siting

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Thanks. By copy I ask Manuel to make sure we include this in the next circular to the CEP.

All best
David

From: Jessica Luternauer
Date: Friday, March 4, 2022 at 1:22 PM
To: David G. Victor
Subject: RE: ASFSN Response to RFI on Consent-Based Siting

Hi David,

Attached is the final coalition response that was submitted this morning. Should you have any questions or need anything further, please let me know.

Thank you,

Jessica

From: David G. Victor
Sent: Thursday, March 3, 2022 9:02 AM
To: Jessica Luternauer
Subject: Re: ASFSN Response to RFI on Consent-Based Siting

Thank you. I will wait for the final and then include that. All best. D

Sent from limited typing device

On Mar 3, 2022, at 8:35 AM, Jessica Luternauer wrote:

Hi David,

Yes, please feel free to share with the CEP. I will send you the final version this afternoon as well.

Thank you,

Jessica

From: David G. Victor
Sent: Wednesday, March 2, 2022 4:44 PM
To: Jessica Luternauer
Subject: Re: ASFSN Response to RFI on Consent-Based Siting

Thanks so much Jessica. May I circulate this to the whole CEP—they will be interested (and we are submitting our own comments)? Thx. David

From: Jessica Luternauer
Date: Wednesday, March 2, 2022 at 3:27 PM
To: Garry Brown, Dike Anyiwo, Tom Isaacs, Val Macedo, Jerry Sanders, David G. Victor, Captain Mel Vernon, Kevin Barrios, Rachel Norton, Aaron McCall
Cc: James Peterson; Manuel Camargo; Amy Pressler; Chris Wahl
Subject: ASFSN Response to RFI on Consent-Based Siting

Good afternoon,

As discussed during our last Advisory Council meeting, we are preparing to submit a response to the Department of Energy's RFI on consent-based siting. Attached for your awareness are the coalition's comments, which are currently pending final Executive Board approval and will be submitted Friday morning.

Thank you again for your input and support. We look forward to discussing additional ways for ASFSN to engage on this issue and will be reaching out in the coming weeks to schedule our next meeting. Should you have any questions in the meantime, please don't hesitate to contact me.

Thank you,

Jessica

Jessica Luternauer
Senior Vice President
Southwest Strategies LLC

401 B Street, Suite 150 • San Diego, California 92101
Connect with us online: | www.swspr.com

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Attachment #6 – Action for Spent Fuel Solutions Now (ASFSN) DOE RFI Response, March 4, 2022
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Action for Spent Fuel Solutions Now (ASFSN) Coalition Response to DOE RFI on Consent Based Siting

From: David G. Victor
Sent: Tuesday, March 1, 2022 6:15 PM
To: Manuel Camargo
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Subject: (External): FW: A4NR Comments to DOE waste questions

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Manuel

Can you pls include attachment in next CEP circular

Thx
David

From: Rochelle Becker
Date: Tuesday, March 1, 2022 at 4:51 PM
To: David G. Victor
Subject: A4NR Comments to DOE waste questions

Hi David,

Manuel sent me the transcript of the SONGS CEP meeting on radioactive waste storage. On 2/22/22 A4NR filed our comments with the DOE and I thought I would share (see attached.)
The transcript will be most helpful in our decommissioning testimony for PG&E.
Thank you both for promptly sending the video link and transcript.

In Peace
Rochelle

Rochelle Becker, Executive Director
Alliance for Nuclear Responsibility
PO 1328
San Luis Obispo, CA 93406
www.a4nr.org

Attachment #7 – Alliance for Nuclear Responsibility (A4NR) Comments to the DOE re RFI, February 23, 2022
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Finland Built This Tomb to Store Nuclear Waste

From: David G. Victor
Sent: Thursday, February 24, 2022 4:11 PM
To: tom isaacs
Cc: Manuel Camargo; Amy F Pressler; James Peterson; Daniel T. Stetson; McNicholas, Martha
Subject: (External): Re: Finland built this tomb to store nuclear waste. C…

*** EXTERNAL EMAIL - Use caution when opening links or attachments ***

Thanks so much. Let's include a PDF this article in the next CEP circuit or.

Sent from limited typing device

> On Feb 24, 2022, at 3:24 PM, Tom Isaacs wrote:
>
> Hi all,
>
> The latest issue of Science magazine contains a lengthy but quite well written article on the Finnish program. I think it is particularly well down (FYI, I was interviewed extensively by the author). The link is below.
>
> Best,
>
> Tom
>
> https://urldefense.proofpoint.com/v2/url?u=https-3A__www.science.org_content_article_finland-2Dbuilt-2Dtomb-2Dstore-2Dnuclear-2Dwaste-2Dcan-2Dit-2Dsurvive-2D100000-2Dyears&d=DwIFAg&c=-35OiAkTchMrZOngvJPOeA&r=B6uvJwEgPHiOV_koXkpRA8biyZ5ySmHR1NOo0Oq_Q8M&m=odRcPM1nLNePBEnL8-hTWmidFOFVMQGR6ma5mz--o1hlkGdkOIa0KnS1vpsM0Z4E&s=ezLG-sngVUnsMOGMXSgl1JOc2EQC8hRG-it6qa9h7r0&e=
>
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> Sent from my iPhone

No attachment. Direct links provided in text.
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SONGS Granted Minimus Waiver by Coastal Commission for Remedial Work

From: David G. Victor
Sent: Thursday, February 24, 2022 4:09 PM
To: Manuel Camargo
Cc: Steve Carlson; McNicholas, Martha
Subject: (External): Re: (External):Next CEP circular

* EXTERNAL EMAIL - Use caution when opening links or attachments *****

Thanks so much. This is a great helpful contact. All best

Sent from limited typing device
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Compilation of Email Communications
2-24-22 to 4-25-22

On Feb 24, 2022, at 4:07 PM, Manuel Camargo wrote:

David,

I write in response to your question from yesterday regarding the de minimus waiver. Two points:

1. The aerially deposited lead (ADL) came from automobiles and can be found along most roadways. Recall that the phase out of leaded gasoline started in the mid-1970s and was banned altogether in the early 1990s.
2. With respect to the PCE contamination, although we do not know for sure, we suspect that it may have originated from a small leak in a waste water transfer pipe located below the El Camino Real roadway. The piping is no longer in service and will be removed as part of the remediation of the PCE contamination.

Let me know if you have any follow-up questions on this matter.

Best regards,

Manuel

From: David G. Victor
Sent: Wednesday, February 23, 2022 12:10 PM
To: Manuel Camargo; Steve Carlson; McNicholas, Martha
Subject: (External): Next CEP circular

***** EXTERNAL EMAIL - Use caution when opening links or attachments *****
Manuel

Next CEP circular we should include a cop of the de minimus waiver you were granted by Coastal Commission Jan 25th of Jan for the remedial work. Where did the lead and PCE come from?

Thx
David

No attachment.
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