

From: <Beach.John@epamail.epa.gov>
To: Laura Behjan <lmagelni@simivalley.org>
Date: 11/15/2006 4:23: PM
Subject: Re: Request for EPA Review

Laura

Thank you for your e-mail requesting that EPA assist the City of Simi Valley with their decision on the Runkle Canyon development. USEPA is not able to fulfill your request that we conduct an independent review of data and reports relating to strontium 90 (Sr-90) and advise whether development of the site poses a public health risk. The review and conclusions you are requesting require extensive time and resource commitments. Since December 2003, the U.S. Environmental Protection Agency's (USEPA) role at the SSFL site has been to provide logistical support for the SSFL Workgroup meetings. USEPA's role is limited because we do not have an oversight or regulatory role at SSFL. Resources that once supported SSFL activities have since been redirected to matters where we do have direct authority. Although we are not able to fulfill your request, we are able to provide you with a simple comparison of the reported Sr-90 levels to our Preliminary Remediation Goals (PRGs).

At the March 2005 SSFL Workgroup meeting, we received a table (attached) presenting 126 measurements of Sr-90 in soil collected from the location of the proposed Runkle Canyon development. Based on EPA's PRG of 0.23 picocuries per gram for Sr-90 in residential soil, all of the Sr-90 measurements reported in that table appear to fall within or below our "protective cancer risk range" of 10^{-4} (one-in-ten-thousand) to 10^{-6} (one-in-one million). PRGs are useful, but limited, tools for supporting risk-based decision-making. Information on the development, appropriate use, and limitations of PRGs is available from our website: <http://epa-prgs.ornl.gov/radionuclides/>.

At the Runkle Canyon site:

- 9 samples had reported activities (concentrations) less than the PRG (corresponding to a cancer risk of lower than 10^{-6})
- 62 samples had reported activities between one and ten times the PRG (corresponding to a cancer risk between 10^{-5} and 10^{-6})
- There were an additional 35 samples in which no activity was detected, but the detection limit was between one and ten times the PRG (corresponding to a cancer risk between 10^{-5} and 10^{-6})
- 6 samples had reported activities between ten and 100 times the PRG (corresponding to a cancer risk between 10^{-4} and 10^{-5})
- No samples had reported activities greater than 100 times the PRG (corresponding to a cancer risk of lower than 10^{-4})

Our comparison of the SR-90 data to the PRGs does not include any judgement about the quality or adequacy of the data or provide any decision or judgement regarding the appropriateness of proposed or future land uses at Runkle Canyon. We hope this information is useful to you and the Simi Valley City Council. Please contact me if you have questions.

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(See attached file: Runkle Data Table 3-05.pdf)

**Runkle Ranch - Simi Valley, California
Strontium 90 / Radiation Survey Samples (1998-2003)**

Total Residential Samples = 52
 Total Permanent Open Space Samples = 74
 Total Samples = 126

Report Name and Date	Sample Name	Sample Date	Soil Samples		Radiation		Location on Specific Plan
			Strontium Reading (pCi/g)	Average	Survey (uR/hr)	Average	
OST - 550 Acre/715 Acre February 5, 1999	OST: S - 1	1/2/23/98	0.86				Permanent Open Space
	OST: S - 1	1/2/23/98	0.25				Permanent Open Space
	OST: S - 2	1/2/23/98	0.83				Permanent Open Space
4=Permanent Open Space	OST: S - 3	1/2/23/99	0.41	0.59			Permanent Open Space
Foster Wheeler - 550 Acre October, 1999	Foster Wheeler: GP-01-M	06-07/02/99	1.36				Residential
	Foster Wheeler: GP-02-M	06-07/02/99	1.13				Permanent Open Space
	Foster Wheeler: GP-03-M	06-07/02/99	0.85				Permanent Open Space
32=Residential 26=Permanent Open Space	Foster Wheeler: GP-04-M	06-07/02/99	0.85				Permanent Open Space
	Foster Wheeler: GP-05-M	06-07/02/99	0.65				Residential
	Foster Wheeler: GP-06-M	06-07/02/99	1.48				Residential
	Foster Wheeler: GP-07-M	06-07/02/99	1.34				Residential
	Foster Wheeler: GP-08-M	06-07/02/99	0.66				Residential
	Foster Wheeler: GP-09-M	06-07/02/99	0.83				Residential
	Foster Wheeler: GP-10-M	06-07/02/99	0.14				Residential
	Foster Wheeler: GP-11-M	06-07/02/99	1.10				Residential
	Foster Wheeler: GP-12-M	06-07/02/99	0.71				Residential
	Foster Wheeler: GP-13-M	06-07/02/99	1.17				Residential
	Foster Wheeler: GP-14-M	06-07/02/99	1.37				Residential
	Foster Wheeler: GP-15-M	06-07/02/99	1.13				Permanent Open Space
	Foster Wheeler: GP-16-M	06-07/02/99	1.18				Residential
	Foster Wheeler: GP-17-M	06-07/02/99	1.07				Residential
	Foster Wheeler: GP-18-M	06-07/02/99	0.29				Residential
Foster Wheeler: GP-19-M	06-07/02/99	0.15				Residential	
Foster Wheeler: GP-20-M	06-07/02/99	1.43				Permanent Open Space	
Foster Wheeler: GP-21-M	06-07/02/99	0.71				Residential	
Foster Wheeler: GP-22-M	06-07/02/99	0.84				Residential	
Foster Wheeler: GP-23-M	06-07/02/99	0.85				Residential	
Foster Wheeler: GP-24-M	06-07/02/99	1.21				Permanent Open Space	
Foster Wheeler: GP-25-M	06-07/02/99	1.05				Permanent Open Space	
Foster Wheeler: GP-26-M	06-07/02/99	0.73				Residential	
Foster Wheeler: GP-27-M	06-07/02/99	1.09				Residential	
Foster Wheeler: GP-28-M	06-07/02/99	1.07				Residential	
Foster Wheeler: GP-29-M	06-07/02/99	5.13				Permanent Open Space	
Foster Wheeler: GP-30-M	06-07/02/99	1.56				Permanent Open Space	
Foster Wheeler: GP-31-M	06-07/02/99	0.63				Residential	
Foster Wheeler: GP-32-M	06-07/02/99	0.51				Residential	
Foster Wheeler: GP-33-M	06-07/02/99	0.81				Residential	
Foster Wheeler: GP-34-M	06-07/02/99	1.47				Residential	
Foster Wheeler: GP-35-M	06-07/02/99	0.79				Permanent Open Space	

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	Foster Wheeler: GP-36-M	06-07/02/99	1.17				Permanent Open Space
	Foster Wheeler: GP-37-M	06-07/02/99	1.16				Residential
	Foster Wheeler: GP-38-M	06-07/02/99	1.88				Residential
	Foster Wheeler: GP-39-M	06-07/02/99	0.77				Residential
	Foster Wheeler: GP-40-M	06-07/02/99	2.95				Residential
	Foster Wheeler: GP-41-M	06-07/02/99	1.37				Permanent Open Space
	Foster Wheeler: GP-42-M	06-07/02/99	1.79				Permanent Open Space
	Foster Wheeler: GP-43-M	06-07/02/99	0.67				Permanent Open Space
	Foster Wheeler: GP-44-M	06-07/02/99	6.38				Permanent Open Space
	Foster Wheeler: GP-45-M	06-07/02/99	0.54				Permanent Open Space
	Foster Wheeler: GP-46-M	06-07/02/99	1.12				Permanent Open Space
	Foster Wheeler: GP-47-M	06-07/02/99	0.91				Residential
	Foster Wheeler: GP-48-M	06-07/02/99	0.76				Residential
	Foster Wheeler: GP-49-M	06-07/02/99	0.81				Residential
	Foster Wheeler: GP-50-M	06-07/02/99	1.08				Permanent Open Space
	Foster Wheeler: GP-51-M	06-07/02/99	1.15				Permanent Open Space
	Foster Wheeler: GP-52-M	06-07/02/99	12.34				Permanent Open Space
	Foster Wheeler: GP-53-M	06-07/02/99	0.90				Permanent Open Space
	Foster Wheeler: GP-54-M	06-07/02/99	1.65				Permanent Open Space
	Foster Wheeler: GP-55-M	06-07/02/99	0.77				Permanent Open Space
	Foster Wheeler: GP-56-M	06-07/02/99	1.40				Permanent Open Space
	Foster Wheeler: GP-57-M	06-07/02/99	1.29				Permanent Open Space
	Foster Wheeler: GP-58-M	06-07/02/99	1.29	1.916	Perm Open Avg:		Permanent Open Space
	Foster Wheeler: GP-59-M	06-07/02/99	1.06	0.983	Residential Avg:		Permanent Open Space
				1.401	Total Avg:		
Harding ESE - 715 Acre							
November 3, 2000	Harding: SS-1	09/07/00	0.436				Permanent Open Space
	Harding: SS-2	09/07/00	0.387				Permanent Open Space
	Harding: SS-3	09/07/00	3.638				Permanent Open Space
	Harding: SS-4	09/07/00	0.523				Permanent Open Space
	Harding: SS-5	09/07/00	1.792				Permanent Open Space
	Harding: SS-6	09/07/00	4.756				Permanent Open Space
	Harding: SS-7	09/07/00	1.038				Permanent Open Space
	Harding: SS-8	09/07/00	1.935				Permanent Open Space
	Harding: SS-9	09/07/00	0.209				Permanent Open Space
	Harding: SS-10	09/07/00	-0.031				Permanent Open Space
	Harding: SS-11	09/07/00	0.013				Permanent Open Space
	Harding: SS-12	09/07/00	-0.159				Permanent Open Space
	Harding: SS-13	09/07/00	0.257				Permanent Open Space
	Harding: SS-14	09/07/00	-0.204				Permanent Open Space
	Harding: SS-15	09/07/00	-0.323				Permanent Open Space

17=Permanent Open Space

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			Strontium Reading (pCi/g)	Average				
	Harding: SS-16	09/07/00	0.686			21.2		Permanent Open Space
	Harding: SS-17	09/07/00	-0.241		0.865	17.4		Permanent Open Space
Miller Brooks - 715 Acre October 19, 2000	Miller Brooks: MB-2	09/13/00				16.6		Permanent Open Space
	Miller Brooks: MB-3	09/13/00				20.6		Permanent Open Space
	Miller Brooks: MB-4	09/13/00				27.2		Permanent Open Space
	Miller Brooks: MB-5	09/13/00				20		Permanent Open Space
	Miller Brooks: MB-6	09/13/00				28.1		Permanent Open Space
	Miller Brooks: MB-7	09/13/00				18.6		Permanent Open Space
	Miller Brooks: MB-8	09/13/00				20.8		Permanent Open Space
	Miller Brooks: MB-9	09/13/00						Permanent Open Space
	Miller Brooks: MB-10	09/13/00						Permanent Open Space
	Miller Brooks: MB-11	09/13/00						Permanent Open Space
	Miller Brooks: MB-12	09/13/00				19.7	20.782	Permanent Open Space
Miller Brooks - 550 Acre September 17, 2003	Miller Brooks: MBE-1	3/13/03	2.1					Residential
	Miller Brooks: MBE-2	3/13/03	ND-2.4		Non-detected at level 2.4			Residential
	Miller Brooks: MBE-2-3	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-2-7	3/13/03	ND-2.2					Residential
	Miller Brooks: MBE-3	3/13/03	ND-2.2					Residential
	Miller Brooks: MBE-4	3/13/03	ND-2.0					Residential
	Miller Brooks: MBE-4-3	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-4-7	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-5	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-5-3	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-5-7	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-6	3/13/03	2.2					Permanent Open Space
	Miller Brooks: MBE-7	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-7-3	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-7-7	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-8	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-8-3	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-8-7	3/13/03	ND-2.4					Residential
	Miller Brooks: MBE-12	3/13/03	ND-2.0					Residential
	Miller Brooks: SS-14A	3/13/03	ND-2.8					Permanent Open Space
	Miller Brooks: SS-15A	3/13/03	ND-2.8					Off Property
Miller Brooks - 715 Acre September 17, 2003	Miller Brooks: MBE-1 A	3/14/03	ND-2.2		Non-detected at level 2.2			Permanent Open Space
	Miller Brooks: MBE-2 A	3/14/03	ND-2.2					Permanent Open Space

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Strontium 90 / Radiation Survey Samples (1998-2003)

Total Residential Samples = 52
 Total Permanent Open Space Samples = 74
 Total Samples = 123

Report Name and Date	Sample Name	Sample Date	Soil Samples		Average	Radiation Survey (uR/hr)	Average	Location on Specific Plan
			Strontium Reading (pCi/g)					
12=Permanent Open Space	MillerBrooks: MB= 3 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 4 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 5 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 6 A	3/14/03	ND-22					Permanent Open Space Off Property
	MillerBrooks: MB= 7 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 8 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 9 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 10 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 11 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 12 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 13 A	3/14/03	ND-22					Permanent Open Space
	MillerBrooks: MB= 9	3/14/03	ND-20					Residential
MillerBrooks: MB= 10	3/14/03	ND-20					Residential	
MillerBrooks: MB= 16 A	3/14/03	ND-28					Permanent Open Space	
MillerBrooks: MB= 17 A	3/14/03	ND-28					Permanent Open Space	

Non-detected at level 2.0