

Alicia Diehl - Fwd: RE: Radionuclide Counting Error

From: Alicia Diehl
To: Regner, Gary
Date: 10/30/2007 12:16 PM
Subject: Fwd: RE: Radionuclide Counting Error

fyi

>>> "Bennett, Anthony (TCB)" < > 10/30/2007 9:56 AM >>>
 The discussions occurred during the three year period of time we were trying to adopt the rad rule. Rads were not actually targeted. It was discussed that EPA was not in favor of the counting error adjustment and that would add additional violations. Other errors have never been considered. But then none of the others report the error as part of the analysis results.

Tony

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From: Alicia Diehl [mailto:ADIEHL@tceq.state.tx.us]
Sent: Tuesday, October 30, 2007 9:52 AM
To: Bennett, Anthony (TCB)
Subject: RE: Radionuclide Counting Error

Tony -

Awesome - I really appreciate your help. Can you recall, when those discussions occurred, why were rads targeted and not other chemicals, which also have accuracy ranges, like inorganics?

Thanks,
 Alicia

>>> "Bennett, Anthony (TCB)" > 10/30/2007 9:38 AM >>>
 Alicia

1) What is the CFR reference that y'all used to determine that it was necessary to use counting error when performing compliance for radionuclides? There is no CFR reference. I believe that there may have been some EPA guidance on not subtracting, but can't remember back that far for sure. This has been the practice in

Texas since day one of radionuclide monitoring. This option was thoroughly discussed with the Commissioners and the ED staff when the reg was being adopted. We were directed to maintain the current methodology for subtracting the counting error at that time. There may be even a discussion in the adoption preamble. In addition, Susan Jablonski was involved in this discussion as well.

(2) In your opinion, what are the pros and cons of that method, and what could be the impact to PWSs if TCEQ reevaluated the current implementation procedures? The pro is a much easier calculation of compliance. The cons are - 1) not what the Commissioners directed in the adoption of the rad rule, 2) will result in probably an additional 25% increase in non compliance (at one time I had numbers from the data), 3) Health Physicists will argue with you that at 95% confidence, that the correct number is somewhere within that range, 4) If asked in court if the results on an analysis says 6 +/- 2 pCi/l could mean that the actual level is as low as 4, you would have to say "Yes".

Please let me know if you need anything else.

Tony

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From: Alicia Diehl [mailto:ADIEHL@tceq.state.tx.us]
Sent: Tuesday, October 30, 2007 9:21 AM
To: Bennett, Anthony (TCB)
Subject: Radionuclide Counting Error

Tony:

Two questions:

- (1) What is the CFR reference that y'all used to determine that it was necessary to use counting error when performing compliance for radionuclides?
- (2) In your opinion, what are the pros and cons of that method, and what could be the impact to PWSs if TCEQ reevaluated the current implementation procedures?

Thanks,
Alicia

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