TETRA TECH

Preston Hopson
General Counsel and Secretary

March 2, 2018

Mr. Enrique Manzanilla
Superfund Region 9 Division Director
Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Manzanilla:

Ed Sussenguth, Tetra Tech's Corporate Sponsor for the USEPA Response Assessment and Evaluation Services (RAES) Program, has asked me to provide you with information regarding a project conducted at Hunters Point Naval Shipyard (HPNS) in San Francisco by our subsidiary, Tetra Tech EC, Inc. (TtEC). As one of over 30 wholly-owned subsidiaries of Tetra Tech, Inc., TtEC provides construction remediation services. TtEC is not part of the services that will be provided by Tetra Tech to the USEPA on the RAES Program, and no TtEC staff were proposed for this project nor will they be involved with any of the work.

We understand that you are aware of recent media attention regarding HPNS and TtEC's role at the site. Unfortunately, the media reports have grossly exaggerated and misinterpreted a specific incident at the HPNS project site. We would like to take this opportunity to provide you with the relevant facts surrounding TtEC's work referenced in the media.

TtEC was awarded its first contract by the U.S. Navy for remediation of chemically contaminated soils at HPNS in January 2002 and in March 2003 began remediation of soils that also contained low levels of radiation. Over the course of nine contracts with 27 task orders spanning 15 years, TtEC, with the assistance of several subcontractors, has remediated over 300,000 cubic yards of contaminated soils.

After 10 years working at the site, in 2012, TtEC management became aware that some soil samples collected for remediation of soils with low level radiological contamination did not appear to be representative of the sampling area. TtEC immediately initiated a comprehensive root cause investigation and found that out of 158 sampling locations, field workers may have collected soil samples from 12 locations other than where they had reported, and 7 additional locations appeared suspect. TtEC immediately self-reported this potential issue to the Navy and the Nuclear Regulatory Commission (NRC), and initiated re-sampling and evaluation of the area of potential concern. After completing the corrective actions, the Navy concurred with the results.

At the same time, the NRC conducted its own investigation and determined that the two workers had collected samples from locations other than reported, and on July 28, 2016 issued Tetra Tech a Notice of Violation (NOV), however assessed no fine or penalty. No restriction, suspension or qualification of any license, certification, or registration occurred, and TtEC's NRC Radioactive Material License remains in effect.

Following these events, TtEC voluntarily implemented multiple corrective actions, which included additional training of site personnel with a focus on proper collection, control and custody of samples, increased quality control oversight of the sampling activities, increased data evaluation of the sample results, and disciplinary action. In addition, the field workers involved in the questionable sampling were removed from the project site. Since the implementation of these corrective actions by January 2013, there has been no indication or evidence that the sampling protocol has not been followed.

In 2016, a former subcontractor employee who last worked at the site in 2012 alleged that data from additional sites may have been compromised. Because of these allegations, the Navy initiated a study to further examine historic data collection efforts at HPNS and has announced plans for additional confirmation sampling. We understand that there has been a preemptive release by a political action group, Greenaction, of purported draft reports commissioned by the Navy regarding the data collection.

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However, the Navy has not officially issued any definitive reports, either draft or final. The purported draft reports and media stories focus on the variability of data collected by TtEC at these remediation sites and correlate this variability with a potential for data manipulation. However, this variability can be attributable to multiple factors. HPNS is not a naturally-existing site; it is man-made and built on fill from dredging and numerous other sources that are highly variable, so there is every reason to suspect that the soil conditions would be variable. Furthermore, the listed authors of the purported draft reports are competitors of TtEC that have a clear conflict of interest, one of whom has recently been fined for data fraud at the same site.

The former subcontractor's allegations and the inflammatory media reports have not been substantiated and Tetra Tech believes they are without merit, and will vigorously defend itself against these claims. However, under TtEC's contract requirements with the Navy, all media inquiries must be directed to their Public Affairs Officer, so TtEC has not been able to comment publicly on these claims.

Tetra Tech is a global environmental and civil engineering firm with over 16,000 employees. We conduct more than 60,000 projects each year and have supported USEPA's Superfund programs since the early 1980s. With 50-plus years in the consulting and engineering business, including a 36-year history with USEPA, Tetra Tech has demonstrated that our quality assurance programs and technical performance exceed expectations.

Under the RAES contract, we are implementing a strong quality management system that is carried out through all aspects of each Task Order, whether it is conducting Removal Site Evaluations at abandoned uranium mines on the Navajo Nation or evaluating remedial options as part of an Engineering Evaluation/Cost Analysis. Our staff are committed to ensuring that all data are collected, managed, evaluated, and reported consistent with USEPA's quality system.

We look forward to supporting US EPA and the Navajo Nation EPA to address the legacy of uranium mining on and near the Navajo Nation. Please feel free to contact me if you have any additional questions.

Respectfully submitted,
TETRA TECH, INC.

Preston Hopson
Senior Vice President, General Counsel and Secretary

Cc: Ms. Autumn Roe, Contracting Officer, Environmental Management Division,
U.S. Environmental Protection Agency
Bill Brownlie, Tetra Tech Chief Engineer and Director of Quality Programs