Message

From: LEE, LILY [LEE.LILY@EPA.GOV]
Sent: 10/14/2017 5:58:35 AM
To: Brooks, George P CIV [george.brooks@navy.mil]
CC: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO [derek.j.robinson1@navy.mil]; thomas.macchiarella@navy.mil; Edwards, Zachary L CIV SEA 04 04N [zachary.edwards@navy.mil]; Slack, Matthew L CIV SEA 04 04N [matthew.slack@navy.mil]; Henderson, Kim/SDO [Kimberly.Henderson@CH2M.com]; Hay Scott [shay@cabreraservices.com]; kira.sykes@ch2m.com; juanita.bacey@dtsc.ca.gov; Singh, Sheetal (CDPH-EMB) [sheetal.singh@cdph.ca.gov]; Jue, Tracy (CDPH-EMB) [tracy.jue@cdph.ca.gov]; Amy Brownell (amy.brownell@sfdph.org) [amy.brownell@sfdph.org]; Bob Burns <reburns@ngtsinc.com> (reburns@ngtsinc.com) [reburns@ngtsinc.com]; Christina Rain [crain@langan.com]; Karla Brasaemle (kbrasaemle@techlawinc.com) [kbrasaemle@techlawinc.com]; Kappelman, David [Kappelman.David@epa.gov]; jdawson@techlawinc.com; donna.j.getty [donna.j.getty@leidos.com]; Chesnutt, John [Chesnutt.John@epa.gov]; Fairbanks, Brianna [Fairbanks.Brianna@epa.gov]; Janda, Danielle L CIV [danielle.janda@navy.mil]
Subject: EPA draft review of Parcel G Trench Units in Radiological Data Evaluation Findings Report
Attachments: Parcel G Trench Unit NFA TU067_to_TU204 EPA Review DRAFT 10-13-2017 to Navy.xlsx

Dear Pat,

Thank you for providing for review the draft *Radiological Data Evaluation Findings Report for Parcels B and G Soil,* Former Hunters Point Naval Shipyard, San Francisco, California, September 2017. I appreciate that it represents a great deal of hard work. The City has told us its priority is Parcel G, so we started with that before reviewing Parcel B. Thomas stated that the Navy's priority is to get an indication of which locations are higher vs. lower priority for resampling. As I promised last Thursday, attached is an early indication of prioritization. This draft spreadsheet for trench units in Parcel G shows observations we have noted thus far. The second column with an "overall score" indicates the following determinations:

- 2 = Sufficient evidence has already been found in the form, the FRED database, and/or other sources to conclude the resampling is necessary in this trench unit before EPA can conclude that the record supports that the ROD requirements have been met.

- 1 = More review is needed before EPA can conclude whether more resampling is necessary. More review may include, for example, further statistical tests to be run and completed soon.

- 0 = No indications have been found thus far for particular concerns in this trench unit. However, as the Navy wrote in Section 1.3 of this draft report, "Because it is impossible to determine whether every instance of potential data manipulation or falsification has been identified, the Navy recommends additional surveys and sampling beyond the areas with evidence of data manipulation. Additional soil sampling locations will be selected in coordination with the regulatory agencies." (Section 1.3, p. 1-2)

For now, EPA plans to prioritize fill units for resampling in correspondence with the priority of the source trench units for resampling. We will update the attached spreadsheet and submit other comments as our review continues. A more formal and thorough set of written comments will come later. Please contact me at any time at 415-947-4187 if you would like to discuss these draft comments further.

Lily

Lily Lee
Cleanup Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St. (SFD-8-3)

San Francisco, CA 94105
Tel: 415-947-4187, Fax: 415-947-3518
For information on Superfund in general: www.epa.gov/region9/superfund
For information on Hunters Point Naval Shipyard: www.epa.gov/superfund/hunterspoint