UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, California 94105

March 26, 2019

Laura Duchnak, Director
Base Realignment and Closure Program Management Office
U.S. Department of Navy
33000 Nixie Way, Building 50, Suite 207
San Diego, California 92147

Dear Ms. Duchnak:

Thank you for your March 15, 2019, letter. EPA has been reviewing and preparing comments on the Navy's draft final *Parcel G Removal Site Evaluation Work Plan, Former Hunters Point Naval Shipyard* (Site), dated November 2, 2018 (*Work Plan*), and the Navy's draft *Five-Year Review* for this Site, dated July 9, 2018. In response to your letter, we request a meeting the week of April 15, 2019, to discuss our comments on the *Work Plan* in accordance with the Federal Facilities Agreement (FFA), Section 7.7(e). We should also discuss the implications of your March 15 letter for the draft *Five-Year Review*. We recommend including the California Department of Toxic Substances Control (DTSC) and the California Department of Public Health (CDPH), our regulatory partners at this site.

As part of the routine Five-Year Review process, we have had discussions at the staff level for over two years about evaluating the protectiveness of the Record of Decision (ROD) Remedial Goals (RGs) using the current version EPA's Preliminary Remediation Goal (PRG) Calculator. Your March 15, 2019 letter proposed to use RESRAD, a tool maintained by the Department of Energy, in lieu of the PRG Calculator. Both tools assess risks to human health from exposure to radiation. EPA can consider use of other tools to assess risks to human health from exposure to radiation after consultation with our headquarters office, in accordance with EPA Guidance.[1]

If you would like to pursue use of RESRAD, I encourage you work with my team to start this consultation as soon as possible. This consultation must include full disclosure of your proposed RESRAD assumptions to facilitate efficient, thorough analysis. However, this process will likely be lengthy. From a practical perspective, switching to RESRAD at this juncture will likely delay field work. In addition, the use of RESRAD would need to be integrated into the protectiveness evaluation of the *Five-Year Review*, which would further delay that report.

We and the public want answers as soon as possible about the nature and extent of potential radiological

1 For guidance on this approach, see Q10 and Q16 in the guidance document "Radiation Risk Assessment at CERCLA Sites: Q & A," June, 2014.

contamination at the Site. EPA is working on an overall approach to moving forward with the *Work Plan* and *Five-Year Review* in a manner that effectively balances the stakeholders' collective interests in public transparency, scientific integrity, and an efficient process, while allowing the Navy to begin retesting as soon as possible. I look forward to discussing this approach in our upcoming meeting.

Sincerely,

Enrique Manzanilla
Director, Superfund Division

cc: Ms. Meredith Williams, California Department of Toxic Substances Control
Dr. Karen Smith, California Department of Public Health