Message

From: Clancy, Maeve [Clancy.Maeve@epa.gov]
Sent: 11/14/2018 12:30:43 AM
To: Herrera, Angeles [Herrera.Angeles@epa.gov]
CC: LEE, LILY [LEE.LILY@EPA.GOV]; Chesnutt, John [Chesnutt.John@epa.gov]; Lane, Jackie [Lane.Jackie@epa.gov]; Fairbanks, Brianna [Fairbanks.Brianna@epa.gov]
Subject: Revised Linda Parker Pennington Email

Hi Angeles,

Please see below for your response to Linda Parker Pennington. This response has been revised to change Tetra Tech's name to Tetra Tech EC Inc. throughout and to update language on the response to question 5a. (EPA has stated that the Work Plan ~~will~~ should use cleanup standards that are protective using the current version of EPA's radiological health risk model. In addition, any radiological material found above those standards be removed from the site for proper disposal.)

Please let me know if you'd like to see any additional changes. Thanks!

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cc: fredjordan@fejordan.com; hage.christopher@epa.gov; tomas.aragon@sfdph.org; anthony.chu@cdph.ca.gov; Chesnutt, john
bcc: clancy, maeve; lee, lily; lane, jackie

Dear Ms. Parker Pennington,

Thank you for taking the time to meet with Christopher Hage and me on October 23, 2018. We appreciated hearing your frank perspective as a homeowner at the SF Shipyard since June 2015. We share many of the concerns you raised. EPA is committed to ensuring the cleanup is complete and the community is involved throughout the process. As follow up from that meeting and your subsequent email, our responses to your questions are below. Many of your questions relate to the health and safety survey of Parcel A. The State of California Department of Public Health (CDPH) is the lead on that work. CDPH has provided answers for the questions relevant to them.

1. When will soil samples from private backyard areas be tested?

   CDPH was requested to perform a radiation health and safety scan for the outdoor publicly accessible areas of Parcel A-1. CDPH stated that soil sampling in private backyard areas is beyond the scope of this survey. Scanning is the most effective method for detecting discrete (i.e., not uniformly distributed) radiation sources. This scanning was recently completed and did not detect evidence of unsealed radioactive materials that could have potentially harmed public health and safety. We understand CDPH will be submitting a report on this in the coming weeks.

2. When will samples of the residue on our windows and windowsills be tested for contamination?

   CDPH has said it is in the process of completing planning for the window dust testing and has already begun working with the Home Owners Association who will notify the residents of scheduling options for their home dust survey tests.

3. When will we be assured that the soil underneath our homes is safe and not containing toxins above an acceptable level? That includes the soil immediately surrounding our homes and under garages that are several feet below street level?

CDPH has told us that they have completed the outdoor Parcel A-1 radiation scan. The scan included scanning the soil surrounding the housing units. CDPH has also noted that considerable excavation and grading of soil, use of some of that soil as fill, and import of clean soil has occurred throughout Parcel A-1 prior to construction of the housing units. CDPH believes that this soil movement has created a blend of fill material such that the soil in the outdoor areas is likely to be similar to what is present below the residences. Using state-of-the-art, highly-sensitive calibrated instruments that were appropriate for performing these gamma scans, the scan detected only potassium-40, a naturally occurring radioactive isotope that is found in plants, animals, and our bodies, and one navy deck marker on the outer boundary of the site. Based on this scan, no radiation that could be harmful to health and safety was found, and to-date CDPH has not recommended the need for further scanning. CDPH will issue a final survey report in the coming weeks.

4. What is the background level that is being used as the baseline to determine acceptable levels of toxicity, both the one used in previous testing by Tetra Tech, and the background now being used for retesting of Parcel A?

   Tetra Tech EC Inc. was involved in the survey of only one building (Building 322) in Parcel A. The building was demolished and the soil below that building underwent a final status survey with the results reported in the *Final Status Survey and Results (2004)*. There is not one level that was used to determine background as radiation occurs everywhere emanating from many naturally occurring radioactive isotopes or man-made sources. Instead, reference area (or building) data are collected from similar but non-impacted areas (or buildings) and are compared to the final status survey results to verify that they were comparable.

   The radiation scan of Parcel A-1 that CDPH conducted was not part of the overall re-testing effort that is currently underway for Hunters Point Naval Shipyard. It was a radiation health and safety survey to determine if Parcel A-1 residents were being exposed to harmful levels of radiation. CDPH has shared that no one single background level can be used as naturally occurring radioactive materials (NORM), such as different kinds of concrete, asphalt, landscaping soils, and decorative river rocks, and their presence and amount all serve to distort any one single background level. To account for this, multiple measurements are taken for these NORM over an area with similar NORM. These measurements are averaged and adjusted for statistical variability to generate an accurate "action level" for that particular area, which, if exceeded, was investigated with additional equipment to identify the radionuclide(s) that were the source of the elevated measurements.

   At Parcel G, EPA will disregard all previous background measurements taken by Tetra Tech EC Inc. New reliable background measurements will be collected under stricter oversight by regulatory agencies and others. Some of these locations will be outside the current Hunters Point Naval Shipyard boundaries.

5a. What is the cleanup plan if unacceptable radiation or other toxic substances are found at unacceptable levels?

   At Parcel A, according to the CDPH Work Plan, if levels of radiation are found, the Navy will perform a radiological characterization of the anomalous area and determine their next steps in conjunction with CDPH. When the deck marker was found, Navy took immediate steps to remove it and evaluate the surrounding soil for residual contamination. EPA was onsite when it was excavated, observed its removal, and analyzed the data collected to ensure that the public was not exposed to harmful levels of radiation from this object and that there is no contamination in the residual soil. We anticipate following a similar procedure if anything is found during the indoor dust scans or the scan of Parcel A-2.

For Parcel G, the Navy is inviting regulatory and public review and comment of its draft Work Plan for retesting and cleanup. Please see the latest information about this process at the Navy's website: https://www.bracpmo.navy.mil/brac_bases/california/former_shipyard_hunters_point.html. EPA has stated that the work plan should use cleanup standards that are protective using the current version of EPA's radiological health risk model. In addition, any radiological material found above those standards be removed from the site for proper disposal. Both recommendations are consistent with EPA national guidance and with past practice at this and many other Superfund sites nationwide.

5b. And further, how do we ensure the health safety of those currently living and working at the Shipyard through a cleanup process?

EPA and our regulatory partners are taking a number of steps to ensure the health and safety of all nearby residents and workers today and into the future.

Any concerns about cleanup standards or data falsification would not impact the health of current residents in Parcel A or the surrounding community. The areas under question are enclosed under protective covers (such as pavement, clean soil, or building foundations) or inside locked buildings in secured parts of the site outside of Parcel A (the residential area). Independent radiological monitoring of dust, groundwater, ground surfaces, and fence lines have shown that health-based standards are met, and independent third-party contractors routinely conduct in-person observations of current radiological cleanup work.

As described in the response to question #3, CDPH has completed their scan of Parcel A-1 and the only anomaly they found that was not naturally occurring was the deck marker. EPA has carefully studied the potential health effects of the deck marker and we do not believe that it would have posed a health risk if it had been left in place. In addition, radiation readings during and after removal indicated no residual contamination in the soil. As also described above, CDPH will soon begin sampling windowsill dust in SF Shipyard homes. Furthermore, CDPH is scanning Parcel A-2, located adjacent to the SF Shipyard development, and slated for development in the future. EPA, CDPH, the California Department of Toxic Substances Control (DTSC), and the Navy will evaluate results from the Parcel A-1, A-2, and dust scans, make decisions on how to proceed, and discuss any follow-on scanning or testing efforts with the City and Parcel A residents.

In order to protect Parcel A residents and the surrounding community during work on other parcels at the HNPS site, EPA as part of the cleanup team with DTSC and the Navy, have been actively involved in the development of the new work plans designed to address the uncertainty that now surrounds the site and to reassure the residents of their safety. EPA has stepped up our oversight activities, and the regulatory agencies all plan to have staff on site during the planned retesting. The regulatory agencies will also independently take and analyze samples alongside the Navy to ensure the integrity of the data and restore public confidence in the clean-up.

EPA remains committed to protecting Parcel A residents and the larger Bayview-Hunters Point community from exposure to radiation. We continue to direct resources to Hunters Point and we have a team of technical experts focused on this project. We are committed to working hard, together with the Navy and our State regulatory partners, to ensure that Hunters Point Naval Shipyard is clean and safe. Please feel free to contact me at 415-972-3144 with any additional questions or concerns. Or you can contact John Chesnutt, Manager, Pacific Islands and Federal Facilities Section, at 415-972-3005 or chesnutt.john@epa.gov. For further information about the health and safety scan at Parcel A, please contact CDPH at RHBHuntersPointParcelAScan@cdph.ca.gov.

Sincerely,

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