Message

From: Fairbanks, Brianna [Fairbanks.Brianna@epa.gov]
Sent: 10/3/2018 11:53:53 PM
To: Calvino, Maria Soledad [Calvino.Maria@epa.gov]; Manzanilla, Enrique [Manzanilla.Enrique@epa.gov]; Miller, Amy [Miller.Amy@epa.gov]
CC: LEE, LILY [LEE.LILY@EPA.GOV]; Chesnutt, John [Chesnutt.John@epa.gov]; Herrera, Angeles [Herrera.Angeles@epa.gov]; Harris-Bishop, Rusty [Harris-Bishop.Rusty@epa.gov]; Zito, Kelly [ZITO.KELLY@EPA.GOV]
Subject: RE: Due today 10/3 - Legal Review - responses to Media Inquiry from the Verge

This looks fine to me.

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From: Calvino, Maria Soledad
Sent: Wednesday, October 03, 2018 4:36 PM
To: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>; Miller, Amy <Miller.Amy@epa.gov>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>
Cc: LEE, LILY <LEE.LILY@EPA.GOV>; Chesnutt, John <Chesnutt.John@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Harris-Bishop, Rusty <Harris-Bishop.Rusty@epa.gov>; Zito, Kelly <ZITO.KELLY@EPA.GOV>
Subject: Due today 10/3 - Legal Review - responses to Media Inquiry from the Verge
Importance: High

Dear Brianna,
Many thanks to you, Angeles, John Chesnutt, Kelly Zito, Jackie Lane, and Lily for your reviews and comments. Below is a revised version for your further legal review.

Dear Enrique and Amy,
Kelly and Angeles asked me to send this draft language below in response to The Verge inquiry. If anyone has further comments, please send them to both me, Lily and Brianna.

Q1. I understand that the EPA told the Navy in 2017 that 90 percent of the work TetraTech did in Parcel B was suspect, and 97 percent in Parcel G was not reliable, as well. Is my interpretation of those numbers, from this letter correct?
https://www.peer.org/assets/docs/epa/4_9_18_EPA_comment_summary.pdf?eType=EmailBlastContent&eId=71b47782-14d8-4693-82ec-e9c827dd7ce4

> **Response:** EPA, DTSC, and CDPH found signs of potential falsification, data manipulation, and/or data quality concerns that call into question the reliability of soil data in 90% of the total suspect soil survey units in parcel B and 97% of suspect survey units in Parcel G. Please see this link to EPA's findings from our independent review of Parcels B and G soil testing data: https://semspub.epa.gov/work/09/100006302.pdf

Q2. Is that the latest assessment? Have those numbers been updated? For example, have other parcels been assessed by the EPA?

Response: Here is a link to EPA's evaluation of soil testing data from Tetra Tech EC Inc. in Parcels D-2, UC-1, UC-2, and UC-3: https://semspub.epa.gov/work/09/100006302.pdf

Q3. CDPH says that EPA conducted "conducted a radiological survey of Parcel A in 2002." (https://www.cdph.ca.gov/Programs/CEH/DRSEM/CDPH%20Document%20Library/RHB/Environment/Final%20Hunters%20Point%20-%20Parcel%20A1%20-%20Summary.pdf). **Can you tell me more about that survey? How was it conducted, and what were the results? Why, then, are folks asking for Parcel A to be checked again — and how did the scan miss material like that radium-painted dock marker reportedly found at parcel A?** (https://www.sfchronicle.com/bayarea/article/Radioactive-object-found-near-homes-at-Hunters-13228476.php)

Response: In 2002, EPA conducted a radiological scanner van survey of Parcel A and navigable roads on other parts of the shipyard. All of the anomalies detected during the scan were attributable to natural occurring sources at levels consistent with what would normally be found in the environment. The radiological scanner van survey gave information related to certain types of potential radiological exposures closer to the surface; it did not address all types of radiation potentially present or deeper locations of contamination. The scanner van survey is also subject to other limitations listed in the attached report, e.g. only limited locations were accessible, asphalt would have shielded some gamma radiation, etc.

The deck marker was found at the bottom of a hillside, near the boundary of Parcel A, not in the area that EPA previously scanned. In addition, after the Navy transferred Parcel A to the City/County of San Francisco, considerable earthmoving changed the surface of the property. The areas that EPA originally scanned are no longer the surfaces where current residents live.

Q4. Why are the EPA's numbers re: unreliable work so much larger than the Navy's? Is the shipyard safe for the community living in Parcel A, or the rest of the Bayview Hunters Point community living next door?

Response: In regards to the discrepancy in the percentages, EPA's assessment of the data included looking more closely for signs of potential data quality problems in addition to signs of potential falsification. For example, EPA recommended resampling when data were missing or when different data collection methods did not produce consistent results.

Based on the work done and history of the site, we do not believe anyone living or working at Hunters Point faces any health risk. For the entire site, over the past decades, EPA and the state have been monitoring radiological conditions on an ongoing basis to ensure the safety of the surrounding community. For example, we have been reviewing radiological data collected by a variety of contractors from air monitors (both upwind and downwind), groundwater samples, and fence line scans. Environmental regulators have also done independent radiological testing in some locations, such as hand scans, collecting swipe samples, and analyzing duplicate soil samples in independent laboratories.

On Parcel A, the State of California Department of Public Health (CDPH) has almost completed new gamma scans in the location where current residents live and has thus far not found harmful levels of radiation that could expose residents. CDPH did find one Navy ship's deck marker. Due to its location and level of radiation, the object was not causing harm to residents or workers.

The concerns we have about Tetra Tech EC Inc. would not impact the health of current residents in Parcel A or the surrounding community. The areas under question are enclosed under protective covers or inside locked buildings in secured parts of the site. We believe that these measures, routine monitoring described above, and other protections, including dust controls, are protecting the community as our investigation and clean-up activities proceed.

Q5. What are the EPA's concerns about the Navy's plans to retest the site, and is the EPA satisfied the Navy is addressing those concerns?

Response: Here are links to EPA's comments on Navy drafts of Work Plans to retest the site on March 26, 2018, (https://semspub.epa.gov/work/09/100009179.pdf) and August 14, 2018, (https://semspub.epa.gov/work/09/100009276.pdf). The Navy expects to release a revised Work Plan for Parcel G in October 2018. EPA will review that draft to evaluate the Navy's responses to our comments.

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