Message

From: Calvino, Maria Soledad [Calvino.Maria@epa.gov]
Sent: 8/16/2018 6:12:08 PM
To: Fairbanks, Brianna [Fairbanks.Brianna@epa.gov]; LEE, LILY [LEE.LILY@EPA.GOV]; Chesnutt, John [Chesnutt.John@epa.gov]
Subject: RE: OPA comments: Desk Statement on EPA Comments on Parcel G Workplan

That's okay, we can always refer them to the letter or address it if the specific question comes up. Here's the final statement (incorporates Kelly's minor edits):

Desk Statement on EPA Comments on Parcel G Workplan
8-16-2018

The U.S. Environmental Protection Agency is committed to ensuring the Bayview-Hunters Point community is protected from exposure to radiation and that the Hunters Point Naval Shipyard (HPNS) Superfund site can be safely used for work, recreation, and residential purposes. The Navy is the lead agency on cleanup at this site, and EPA and its state regulatory agency partners, including the California Department of Toxics Substances Control (DTSC), oversee and enforce Navy compliance with Superfund law and other requirements to ensure the cleanup protects human health and the environment. The site's Federal Facilities Agreement among the Navy, EPA, and state regulators sets out a procedure in which the Navy proposes draft plans and reports for regulators' comments.

Based on the high degree of potential falsification and data quality problems found on the HPNS site related to radiological work by Tetra Tech EC Inc., EPA, DTSC, ~~CDPH~~ California Department of Public Health (CDPH) and the Navy agree that comprehensive retesting is necessary. Retesting will start with Parcel G. In March 2018, EPA, DTSC, and CDPH proposed a scientifically driven retesting strategy that, if followed, is designed to provide confidence to regulators and stakeholders regarding when Parcel G would be suitable for redevelopment. In June 2018, the Navy proposed its draft *Parcel G Removal Site Evaluation Work Plan, Former Hunters Point Naval Shipyard* to regulators and the public for comment. EPA's August 2018 comments on the June draft reinforce EPA and state's March proposal for a multi-phased approach to retest every trench, building site and building. After the Navy's workplan is finalized, field work can begin as soon as possible for retesting Parcel G. In the future, the Navy will also retest other parcels. The results of retesting will be an important step toward restoring confidence about progress toward future safe reuse of the property.

EPA's review comments, which we sent to the Navy on August 14, 2018, can be found here.

Soledad Calvino
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From: Fairbanks, Brianna
Sent: Thursday, August 16, 2018 9:17 AM
To: LEE, LILY <LEE.LILY@EPA.GOV>; Calvino, Maria Soledad <Calvino.Maria@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>
Subject: RE: OPA comments: Desk Statement on EPA Comments on Parcel G Workplan

I agree that we don't need to reference the dispute process in the desk statement.

Brianna Fairbanks

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75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3907

From: LEE, LILY
Sent: Thursday, August 16, 2018 8:56 AM
To: Calvino, Maria Soledad <Calvino.Maria@epa.gov>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>
Subject: RE: OPA comments: Desk Statement on EPA Comments on Parcel G Workplan

Dear Soledad,

Thanks. These are good edits. To answer your questions:

1 – In case of a dispute, the FFA agreement has dispute resolution procedures. The cover letter references the potential for invoking dispute at the end, so I don't think it is necessary to put that into the desk statement, since Enrique reminded us in general that the letter can speak for itself. We didn't ask him specifically about including this topic in the desk statement, so that is my individual opinion. I'm also cc'ing John & Brianna in case they have a different perspective.

2 – It is probably simpler for the reader to refer to the individual file. The entire collection has 19 documents in it, so this is more straightforward to use: https://semspub.epa.gov/work/09/100009276.pdf

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From: Calvino, Maria Soledad
Sent: Thursday, August 16, 2018 8:50 AM
To: LEE, LILY <LEE.LILY@EPA.GOV>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>
Subject: OPA comments: Desk Statement on EPA Comments on Parcel G Workplan
Importance: High

Hi Lily and Brianna,
Kelly made some minor changes, in red strikethrough. she also had a question – all caps in blue. Can you help address?
Also, any preference on whether we link to the specific letter/comments or to the whole collection?
Hopefully we can finalize this morning!

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From: Calvino, Maria Soledad
Sent: Thursday, August 16, 2018 8:32 AM
To: Zito, Kelly <ZITO.KELLY@EPA.GOV>; Glenn, William <Glenn.William@epa.gov>
Subject: Ready for review: Desk Statement on EPA Comments on Parcel G Workplan
Importance: High

Hi Kelly,
Here's the latest version of the desk statement, which has been approved all the way up to Enrique. Still waiting on the SF Examiner responses.
Let me know if you have any comments. Thank you,

Desk Statement on EPA Comments on Parcel G Workplan
Draft Version 3, 8-15-2018

The U.S. Environmental Protection Agency ~~remains~~ is committed to ensuring the Bayview-Hunters Point community is protected from exposure to radiation and that the Hunters Point Naval Shipyard (HPNS) Superfund site can be safely used for work, recreation, and residential purposes. The Navy is the lead agency on cleanup at this site, and EPA and its state regulatory agency partners, including the California Department of Toxics Substances Control (DTSC), oversee and enforce Navy compliance with Superfund law and other requirements to ensure the cleanup protects human health and the environment. The site's Federal Facilities Agreement among the Navy, EPA, and state regulators sets out a procedure in which the Navy proposes draft plans and reports for regulators' comments.

Based on the high degree of potential falsification and data quality problems found on the HPNS site related to radiological work by Tetra Tech EC Inc., EPA, DTSC, ~~CDPH~~ California Department of Public Health (CDPH) and the Navy agree that comprehensive retesting is necessary. Retesting will start with Parcel G. In March 2018, EPA, DTSC, and CDPH proposed a scientifically driven retesting strategy that, if followed, is designed to provide confidence to regulators and stakeholders regarding when Parcel G would be suitable for redevelopment. In June 2018, the Navy proposed its draft *Parcel G Removal Site Evaluation Work Plan, Former Hunters Point Naval Shipyard* to regulators and the public for comment. EPA's August 2018 comments on the June draft reinforce EPA and state's March proposal for a multi-phased approach to retest every trench, building site and building. After the Navy's workplan is finalized (THIS RAISES A QUESTION – WHAT IF THE NAVY DISREGARDS OUR COMMENTS? IN OTHER WORDS, SHOULD WE ALLUDE TO MEDIATION?), field work can begin as soon as possible for retesting Parcel G. In the future, the Navy will also retest other parcels. The results of retesting will be an important step toward restoring confidence ~~to residents and workers~~ about progress toward future safe reuse of the property.

EPA's review comments, which we sent to the Navy on August 14, 2018, can be found here [links to collection, if we want to send them to the letter directly, then we can use this link instead: here]

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