Message (Digitally Signed)

From: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO [derek.j.robinson1@navy.mil]
Sent: 1/5/2018 2:25:16 PM
To: LEE, LILY [LEE.LILY@EPA.GOV]; Janda, Danielle L CIV [danielle.janda@navy.mil]; Edwards, Zachary L CIV SEA 04 04N [zachary.edwards@navy.mil]; Slack, Matthew L CIV SEA 04 04N [matthew.slack@navy.mil]
CC: Singh, Sheetal (CDPH-EMB) [sheetal.singh@cdph.ca.gov]; juanita.bacey@dtsc.ca.gov; Karla Brasaemle (kbrasaemle@techlawinc.com) [kbrasaemle@techlawinc.com]; jdawson@techlawinc.com; Amy Brownell (amy.brownell@sfdph.org) [amy.brownell@sfdph.org]; Chesnutt, John [Chesnutt.John@epa.gov]
Subject: RE: Questions about radiological objects - followup to 12/7/17 call
Attachments: 01_Historical_Shorelines.pdf; smime.p7s

Hi Lily,

Sorry for not sending this map earlier. This was developed by ERRG from a compilation of historical photos and has been used in our documents. The 1946 line was included in the Parcel D-1 RACR, Parcel E ROD, and IR 7/18 ROD and RACR.

This is all I committed to sending, because this is all I have. I have seen old aerial photos in the past, but would probably have to contact ERRG to get those. As this map has been vetted/accepted in several past decision documents, I assume that the photos are not needed for this discussion.

Derek

-----Original Message-----
From: LEE, LILY [mailto:LEE.LILY@EPA.GOV]
Sent: Thursday, January 04, 2018 5:24 PM
To: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO; Janda, Danielle L CIV; Edwards, Zachary L CIV SEA 04 04N; Slack, Matthew L CIV SEA 04 04N
Cc: Singh, Sheetal (CDPH-EMB); juanita.bacey@dtsc.ca.gov; Karla Brasaemle (kbrasaemle@techlawinc.com); jdawson@techlawinc.com; Amy Brownell (amy.brownell@sfdph.org); Chesnutt, John
Subject: [Non-DoD Source] RE: Questions about radiological objects - followup to 12/7/17 call

Dear Derek,

As I had stated before, we are also interested in implications for other parcels on the site. The Navy committed on December 7 at a conference call to send maps, aerial photos, and other background information. We still have not received these. Please send them in advance of the next BCT meeting so we have time to review them before we talk about this topic at the next BCT meeting.

Thanks.

Lily

-----Original Message-----
From: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO [mailto:derek.j.robinson1@navy.mil]
Sent: Monday, December 18, 2017 7:36 AM
To: LEE, LILY <LEE.LILY@EPA.GOV>; Janda, Danielle L CIV <danielle.janda@navy.mil>; Edwards, Zachary L CIV SEA 04 04N <zachary.edwards@navy.mil>; Slack, Matthew L CIV SEA 04 04N <matthew.slack@navy.mil>
Cc: Singh, Sheetal (CDPH-EMB) <sheetal.singh@cdph.ca.gov>; juanita.bacey@dtsc.ca.gov; Karla Brasaemle (kbrasaemle@techlawinc.com) <kbrasaemle@techlawinc.com>; jdawson@techlawinc.com; Amy Brownell (amy.brownell@sfdph.org) <amy.brownell@sfdph.org>; Chesnutt, John <Chesnutt.John@epa.gov>
Subject: RE: Questions about radiological objects - followup to 12/7/17 call

Hi Lily,

Thank you for the email.

I believe that intent of your list of questions is to better understand the RACR for Parcel D-1 and have provided information below to this end. If there is another reason, please let me know.

The conceptual site model for Parcel D-1 includes the potential for radiological items (buttons/dials/etc.) in fill areas made from dredge material placed after 1946. This CSM was included in decision documents for IR7/18 and Parcel E, but was omitted from Parcel D-1 for some reason. These are the three parcels where this issue affects our CSM (Parcel E-2 is a disposal area, so the 1946 dredge line doesn't appreciably affect our CSM). The Parcel D-1 RACR includes the fill figure you are requesting, as do the decision documents for Parcel E and IR 7/18.

Our CSM for post 1946 dredge materials at Hunters Point includes radiological items that would have been discarded over the side of a ship and later dredged up and used to create land at HP. Please remember

that the whole surface of Parcel D-1 was scanned. This means that the potential from items that could still be located on Parcel D-1 would have to be deeper than the upper 18". Dredge material that contains these items is the only reasonable site model where appreciable items could remain on Parcel D-1. There is no guarantee that any items are left, just a potential.

This also means that the items that could remain would be consistent with items found in dredge soil. The list of items in the Parcel D-1 RACR is the list that is relevant. Items found from disposal areas in Parcel E-2 or other, should not be considered as relevant.

All future plans for scanning are included in our CERCLA documents.

Please feel free to call me if you have any further questions.

Best Regards,

Derek J. Robinson, PE
BRAC Environmental Coordinator
Navy BRAC PMO West
33000 Nixie Way; Bldg 50
San Diego CA 92147
Desk Phone: 619-524-6026

-----Original Message-----
From: LEE, LILY [mailto:LEE.LILY@EPA.GOV]
Sent: Friday, December 15, 2017 3:18 PM
To: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO; Janda, Danielle L CIV; Edwards, Zachary L CIV SEA 04 04N; Slack, Matthew L CIV SEA 04 04N
Cc: Singh, Sheetal (CDPH-EMB); juanita.bacey@dtsc.ca.gov; Karla Brasaemle (kbrasaemle@techlawinc.com); jdawson@techlawinc.com; Amy Brownell (amy.brownell@sfdph.org); Chesnutt, John
Subject: [Non-DoD Source] Questions about radiological objects - followup to 12/7/17 call

Thank you for the conference call December 7, 2017, regarding radiological objects. The information you provided was helpful. I am following up with a written version of questions. After we review your responses, let's have another discussion. I requested this item be on the Jan BCT meeting, but I discovered that is cancelled, so maybe we can schedule a call just for this topic separately instead in January.

1. What do you know already about the locations of sediment used for fill? What does the 1946 shoreline look like for all of HPNS? Please provide any relevant maps, aerial photos, or other relevant information.
2. What could be other reasons for the rad objects to be at the Shipyard? Sloppy handling practices?
3. How much do you already know about the extent of rad objects found? By Tetra Tech? By other consultants? Please provide list of all the rad objects and corresponding locations (maps would be best, but location within a site or a parcel might be enough) discovered at HPNS by Tetra Tech and other contractors. In a quick search for documentation about rad objects found at HPNS, we found none of the Tetra Tech EC reports provide information about the rad objects found, other than the number of objects in some cases. For example, for the original PCB Hot Spot removal action, the text notes: "Five hundred thirty-three cubic yards of soil, firebrick, and materials were placed in roll-off bins as LLRW. Further, 40 discrete gamma-emitting devices (point sources) and 19 pieces of radioactively contaminated debris were removed during soil screening. These point sources were transferred to the Army contractor in compliance with the DON LLRW Disposal Program and properly stored i
n Building 406 pending isotopic identification and disposal." Since these objects were evaluated for disposal purposes, it is likely that RASO and/or the Army Corps of Engineers contractor has information about the devices. We found one table listing rad objects (from the second PCB Hot Spot removal action), attached.
4. What is the typical range of activity levels for rad objects found at HPNS? Attached is a description of a Navy deck marker, found on www.RadioactiveThings.com <http://www.RadioactiveThings.com>. It claims to have an exposure rate of 200 mR/hr. Have objects similar to this been found at HPNS? If not, what would be the likelihood of finding such objects?
5. Can you overlay maps of the 1946 shoreline, locations where rad objects have been found, current parcel boundaries, and future land uses?
6. On a BCT Tour years ago, when the portal monitor alarmed, a rad device was found in the soil on the top. Doug showed the regulators on the tour. When did that happen? How often were radiological objects found in material in trucks due to the portal monitor?
7. Please note that the 7/2017 Greenaction NRC petition includes an allegation that a button was found by a Shaw contractor in backfill that had supposedly been cleared by Tetra Tech EC, Inc. (See pp. 24-26 of the attached Exhibit A, Declaration from former worker Bert Bowers). This declaration did not give any information about the location of the source or destination of this fill.
8. I understand that surface rad scanning been done in locations known to be disposal areas where rad objects might be found, e.g. Parcel B -IR 7/18, Parcel E-2, and Parcel D-1, and portions of Parcel E (e.g. IR-2). Scanning is planned for Parcel E. Were other areas already scanned? Or have plans for future scanning?

Thank you again.

Lily