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

March 26, 2018

George ("Pat") Brooks
U.S. Department of the Navy
33000 Nixie Way, Bldg 50
San Diego, CA 92147

Dear Mr. Brooks:

Thank you for providing for review the *Draft Work Plan, Radiological Survey and Sampling,* Former Hunters Point Naval Shipyard, San Francisco, California ("Work Plan"), February 2018. The U.S. Environmental Protection Agency (EPA) reviewed this report in detail with a technical team including national experts in health physics, geology, and statistics.

The site has a history of radiological activity, and the radiological data evaluation process in 2017- 2018 found widespread signs of potential falsification and data quality concerns in all parcels where Tetra Tech EC Inc. conducted radiological work. Given these conditions, the actions proposed in the draft Work Plan would not be sufficient to demonstrate protection of human health and the environment to an extent that would allow for EPA approval of property transfer of affected parcels. More extensive sampling and analysis needs to be done to address potential exposure to workers and future residents due to the uncertainty regarding the potential extent of contamination. Attached are EPA comments that address the deficiencies in the draft Work Plan and propose additional measures to be taken to address data falsification and data quality concerns.

EPA understands that the Navy is also drafting Task Specific Plans for its work on specific parcels, and that the Navy will send the plan for Parcel G for review soon. In anticipation of this forthcoming draft, EPA is also submitting the attached recommendations in advance to inform the development of this draft. The previous data collected by Tetra Tech EC Inc. has significant uncertainty. Full excavation and scanning targeted at the survey units associated with the greatest potential for contamination will be crucial to address this uncertainty and demonstrate that the clean-up standards set in each Record of Decision have been met. As we wrote in December 2016, "EPA recommends using a health-risk based approach to prioritize areas of concern based on factors that should include, but not be limited to, historical records of activities, current or future exposure based on land uses, sampling results already collected, and combination of highest risk radionuclides."

Attached please find the following:

Attachment 1 – EPA Review of the Draft Work Plan
- 1.1 General and Specific Comments
- 1.2 Statistician's Memo dated March 15, 2018

Attachment 2 – EPA Recommendations for Task Specific Plan for Parcel G
- 2.1 Main Text
- 2.2 Statistician Evaluation of Parcel G Resampling and Confidence, with attached Memo dated February 22, 2018

We look forward to working with the Navy to revise the draft Work Plan, to develop Task Specific Plans for individual parcels, and to begin the sampling component of the radiological assessment effort as soon as possible. If you would like to discuss any of these comments, please contact me at 415-972-3005 or chesnutt.john@epa.gov. You may also contact Lily Lee, Remedial Project Manager, on my staff at 415-947-4187 or lee.lily@epa.gov.

Sincerely,

John Chesnutt
Manager, Pacific Islands and Federal Facilities Section
Superfund Division

Attachments

cc: Janet Naito, DTSC
Sheetal Singh, CDPH
Alec Naugle, California Regional Water Quality Control Board
Amy Brownell, San Francisco Department of Public Health