Message

From: LEE, LILY [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D6085A744F9347E6836C54C0E85B97B2-LLEE06]
Sent: 11/9/2018 11:32:35 PM
To: Karla Brasaemle [kbrasaemle@techlawinc.com]; jdawson@techlawinc.com
Subject: Fwd: Hunters Point Press Coverage--SF let shipyard cops work amid tons of toxic dirt, told them they were safe - San Francisco Chronicle
Attachments: www.sfchronicle.com_bayarea_article_SF-let-shipyard-cop.pdf; ATT00001.htm

FYI

Sent from my iPhone

Begin forwarded message:

From: "Clancy, Maeve" <Clancy.Maeve@epa.gov>
Date: November 9, 2018 at 11:00:46 AM PST
To: "Chesnutt, John" <Chesnutt.John@epa.gov>, "Lane, Jackie" <Lane.Jackie@epa.gov>, "Yogi, David" <Yogi.David@epa.gov>, "Maier, Brent" <Maier.Brent@epa.gov>, "Harris-Bishop, Rusty" <Harris-Bishop.Rusty@epa.gov>, "Calvino, Maria Soledad" <Calvino.Maria@epa.gov>, "Fairbanks, Brianna" <Fairbanks.Brianna@epa.gov>, "Benson, Michele" <Benson.Michele@epa.gov>, "Herrera, Angeles" <Herrera.Angeles@epa.gov>, "Manzanilla, Enrique" <Manzanilla.Enrique@epa.gov>, "LEE, LILY" <LEE.LILY@EPA.GOV>
Cc: "Azad, Ava" <Azad.Ava@epa.gov>, "Young, Dianna" <Young.Dianna@epa.gov>
Subject: Hunters Point Press Coverage--SF let shipyard cops work amid tons of toxic dirt, told them they were safe - San Francisco Chronicle

FYI.

Posted online this morning.

SF let shipyard cops work amid tons of toxic dirt, told them they were safe - San Francisco Chronicle
https://www.sfchronicle.com/bayarea/article/SF-let-shipyard-cops-work-amid-tons-of-toxic-13375196.php

Excerpt focused on EPA (towards the end of the article, starting below picture of Dan Hirsch):

"You cannot tell the police based on this that they are OK," Hirsch said. "And frankly, the environmental people at the Department of Public Health should have caught this."

For one thing, the reports appear to show few specific measurements of airborne alpha or beta particles, the types of radioactive substances that pose the most risk if inhaled. In columns labeled "% DAC alpha" and "% DAC beta," the data sheets listed percentages and less-than signs instead of precise values.

More concerning, according to Hirsch, was the reference to "DAC."

DAC stands for Derived Air Concentration, a safety standard used for workers in the nuclear power industry, who are legally allowed to receive higher doses of radiation than the rest of the population — doses linked to significantly increased

risks of cancer. According to the EPA's shipyard rules, if the level of airborne contamination at a soil yard is less than 10 percent of the DAC limit, the air is safe for shipyard workers to breathe.

But the EPA's rules are far more rigorous when it comes to protecting the rest of the population. For a cop at a Superfund site — or a crime-lab employee, or a member of the public— the EPA's usual limits are up to 10,000 times stricter than what the agency allows for shipyard workers. While the DAC standard might have made sense for cleanup workers, Hirsch said, it wouldn't have protected anyone else who might have breathed that air.

Asked why the EPA allowed such high limits for airborne contamination next to a busy city office building, agency spokeswoman Soledad Calvino said that dust-control measures by the Navy and Tetra Tech would have protected the police. She also shared details of a calculation performed by EPA staff, purportedly showing that the air was safe for police to breathe. The EPA performed this calculation recently in response to questions from The Chronicle, not years ago, when the soil yard was operating.

The calculation is based on a string of optimistic assumptions about the wind, the contents of the soil, the management of Tetra Tech's soil yard and the way people at 606 spent their days. For instance, the EPA assumes that the wind mostly blew across RSY2 "in the opposite direction from Building 606," and concludes that police were exposed to air from the yard for just 7.2 minutes per day. The EPA also claims that nearby soil pads processed soil for only 40 days per year. But the wind at Hunters Point is unpredictable, work at the soil yard took place year-round and many cops trained outdoors for hours each day, multiple days per week. Also, the EPA calculation does not account for plutonium-239, a known contaminant at the shipyard that is toxic at lower levels than other radioactive substances.

Regardless of what Tetra Tech's air samples showed in summer 2007, the information the company gave to the city was only a snapshot. And the yard next to the police was in constant flux.

Maeve Clancy
EPA Region 9
Remedial Project Manager
Superfund Division (SFD-8-3)
415-947-4105, clancy.maeve@epa.gov