Message

From: Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]
Sent: 2/17/2021 4:28:48 PM
To: Chesnutt, John [Chesnutt.John@epa.gov]; Praskins, Wayne [Praskins.Wayne@epa.gov]
CC: Yogi, David [Yogi.David@epa.gov]; Clancy, Maeve [Clancy.Maeve@epa.gov]
Subject: EPA Response | RE: Hunters Point Buildings Radiological Rework (2/11/2021 email)
Attachments: 2021-02-16_EMresposneToLDDraft.docx; 11 FEB 2021 DRAFT HPNS Building Rad Release Response.docx

John/Wayne,
Please see my draft response (attached). I was shooting for short, but also felt the need to respond to some words in Laura's email below.

(Maeve – FYI only – the Navy's "11 FEB 2021 DRAFT" attachment speaks to CDPH's dust wipe sampling risk assessment.)

Yolanda Sanchez
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Desk: 415-972-3880

From: Duchnak, Laura S CIV USN COMNAVFACENGCOM DC (USA) <laura.duchnak@navy.mil>
Sent: Thursday, February 11, 2021 4:51 PM
To: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Cc: Lansdale, Lawrence L CIV USN (USA) <lawrence.lansdale@navy.mil>; Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA) <kimberly.ostrowski@navy.mil>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Cope, Grant@DTSC <Grant.Cope@dtsc.ca.gov>; Seward, Terry@Waterboards <Terry.Seward@waterboards.ca.gov>; Chu, Anthony@CDPH <anthony.chu@cdph.ca.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.macchiarella@navy.mil>
Subject: RE: Hunters Point Buildings Radiological Rework

Enrique,

I hope all is well. The attached document includes the detailed technical information requested in your email below.

I am concerned that the latest round of questions are not going in a direction that leads to a path forward. The BPRG calculator includes assumptions that over-estimate risk for Hunters Point, specifically, that contaminated dust exists on building surfaces for 26 years after remediation is complete and radiological activities that could cause contaminated dust have ceased. We have conducted our own risk assessment of the remedial goals and concluded that the HPNS goals are protective. The CDPH scan of Parcel A includes a risk assessment that supports those conclusions. It is only when the BPRG calculator is used with the unrealistic dust assumption that the resulting risk values appear problematic.

The Navy began talking in earnest with EPA about building remedial goals in June 2019 and officially requested EPA consultation in October 2019. The EPA enlisted ACOE to assist in this evaluation. The result we have received from EPA in the 15 months of consultation is a set of suggested cleanup goals that our experts indicate are not achievable and not indicative of risk. Considering that building radiological remediation is being conducted across the country, I would like to refocus the discussion to using industry standard processes and remedial goals to perform retesting if that is what it is going to take for a path forward.

The Navy is ready to proceed with building retesting and wants to hold a meeting to discuss resolution. With the current EPA position, progress on the HPNS building evaluation continues to be delayed. While the soil the rework is ongoing into 2022, it is imperative that we being making progress on the building rework to keep on schedule. I know we can find a workable approach and I look forward to our upcoming meeting.

Best Regards,

Laura

From: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Sent: Wednesday, February 03, 2021 1:01 PM
To: Duchnak, Laura S CIV USN COMNAVFACENGCOM DC (USA) <laura.duchnak@navy.mil>
Cc: Lansdale, Lawrence L CIV USN (USA) <lawrence.lansdale@navy.mil>; Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA) <kimberly.ostrowski@navy.mil>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Cope, Grant@DTSC <Grant.Cope@dtsc.ca.gov>; Seward, Terry@Waterboards <Terry.Seward@waterboards.ca.gov>; Chu, Anthony@CDPH <anthony.chu@cdph.ca.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Subject: [Non-DoD Source] Hunters Point Buildings Radiological Rework

Hello Laura,

Thank you for the concrete scan data provided in your January 22, 2021, email and the dust swipe sampling data Derek provided to Wayne last week. You provided the data in support of the Navy's view that some of the proposed BPRG values EPA provided in August are below background levels and are not technically implementable.

After reviewing the submittals, we are unclear how the data support the Navy's view.

- Many of the dust swipe sampling data are reported as zero (i.e., no radioactivity detected). Based on the Minimum Detectable Activities (MDAs) reported in the Navy submittal, we can conclude that background levels were less than the MDAs and may be as low as zero. We cannot tell if background levels are higher than the proposed BPRG values.
- The 16.7 MDA reflects a 1-minute count time. I understand that the Navy could generate data with a lower MDA with no change in instrumentation by increasing the count time. For comparison, the CDPH used a 10-minute count time in their 2019 Parcel A dust sampling and achieved an MDA of 1.6 to 2.3.
- The Navy used field instrumentation to analyze the dust swipes. I understand that the Navy could generate data with a lower MDA by using a fixed laboratory.
- The dust swipe sampling data were collected on concrete. I understand background levels may differ in other types of building materials (e.g., sheet rock, wood, etc.).
- The concrete scan data provide a measure of the total radioactivity (fixed plus removable) in concrete in a unimpacted building. I understood the Navy statement that some of EPA's proposed BPRG values were below background levels to refer to dust.

Given the continued deficiencies in supporting information provided by the Navy, before we meet with the HPNS Federal Facility Agreement (FFA) signatories, I want to confer with our experts at EPA headquarters, our fellow HPNS FFA state regulatory partners, and our colleagues at the California Department of Public Health (CDPH). **We anticipate a late February meeting with the all HPNS FFA signatories should provide us with time to coordinate.**

It is important to achieve a protective radiological remedy for buildings. Currently, the Navy's fieldwork on the Parcel G radiological retesting for soil is scheduled through May 2022. We believe we can move this conversation forward in a timeframe that is appropriate with the scheduled soil fieldwork, and I look forward to meeting with you to advance this important conversation.

Best Regards,

Enrique Manzanilla
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