DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING SYSTEMS COMMAND
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE
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Ser BPMO/034
December 11, 2020

Mr. Enrique Manzanilla
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street, SDF-8
San Francisco, CA 94105-3901

Dear Mr. Manzanilla:

Thank you for your agency's letter of August 20, 2020 that reviewed the Department of the Navy's (DON's) "Evaluation of Radiological Remedial Goals for Buildings at Hunters Point Naval Shipyard (HPNS)" prepared as part of the Five-Year Review. We also received a follow-up email from Mr. Praskins on August 20, 2020 that proposed using the Building Preliminary Remediation Goal (BRPG) calculator and included cleanup levels for buildings.

Several technical exchanges between DON staff and EPA Region 9 (EPA) personnel over the past few months have brought greater clarity regarding EPA's reluctance to support use of RESRAD for risk evaluation at HPNS. Following these extensive technical discussions and the evaluation of the risk estimating tools, the DON has determined the tool proposed by the EPA (BPRG calculator) includes assumptions that are inconsistent with, and not supported by, the conceptual site model for HPNS. Specifically, the BRPG calculator evaluates risk assuming that a contaminated layer of dust will remain on building surfaces for 26 years after remediation is complete and site activities have ceased. With remediation complete and no known sources of contamination remaining at HPNS, this assumption is not consistent with current or future site conditions. The RESRAD evaluation prepared by the DON does not contain this assumption and is a more appropriate tool for risk evaluations at HPNS.

Similarly, the DON's radiological experts have completed a technical review of the BPRG screening values that the EPA provided and find the proposed values not technically implementable. The BPRG screening values that the EPA proposed are below background levels, which are indistinguishable from building materials, and cannot be detected with state of the art instrumentation. Of specific concern are the proposed removable-contamination values for radium (1.2 dpm/100cm^2) and thorium (4.2 dpm/100cm^2). The DON appreciates the EPA's continued efforts to adjust site specific assumptions in your BPRG evaluation; however, after a year of discussions, those efforts have not resulted in a workable model to be applied beyond an experimental level or suitable to be employed in the field. Continuing to try to modify the BPRG evaluation, particularly when the RESRAD Build evaluation is refined, complete and appropriate, will cause unnecessary and unacceptable delays in the remediation effort.

For more than 15 years, RESRAD Build has been the tool that the DON, EPA Region 9, and the California Department of Public Health have used to develop and evaluate building

radiological remediation goals at HPNS and many other installations. RESRAD Build has proven that it can successfully evaluate radiation exposure and associated risks, and model how radiation may reach an exposed individual or group. It is the most extensively tested, verified, and validated tool used for the science of radiological risk assessment and radiological cleanup. The DON and other State and Federal agencies trust RESRAD Build to develop and evaluate remedial goals for radiological cleanup at installations across the country. More importantly, RESRAD Build can evaluate risk at HPNS consistent with the conceptual site model. DON is fully confident in our evaluation of remedial goals using RESRAD Build and has contracts in place to initiate building retesting immediately.

The DON does not have a viable path forward for remediation of the buildings at HPNS using the cleanup values provided by the EPA. Remediation using the proposed BPRG values would require the DON to demolish all subject buildings, including useable, non-radiologically impacted buildings, at a cost of $300M or more, depending on the waste characterization. It will also delay progress for many years, impacting the City of San Francisco's development efforts. Until this issue is resolved, the DON may need to consider pausing all ongoing remediation work in order to assess how our collective inability to move forward with resurveying the buildings impacts the remaining property cleanup and transfers. The DON requests that the EPA reconsider evaluation of building remedial goals using RESRAD Build to allow the rescanning of buildings to proceed. This work has been contracted, planned, and mobilization could start in January 2021.

Sincerely,

Laura Duchnak

LAURA DUCHNAK
Director

Copy to: (via email)
Nina Bacey, California Department of Toxic Substances Control
Terry Han, California Department of Public Health
Tina Low, Regional Water Quality Control Board
Amy Brownell, San Francisco Department of Public Health