Message

From: Chesnutt, John [Chesnutt.John@epa.gov]
Sent: 8/13/2020 6:11:18 PM
To: Praskins, Wayne [Praskins.Wayne@epa.gov]; Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]
Subject: FW: Read aheads for tomorrow's call on Hunters Pt rad consultation
Attachments: draft email on HPNS Building RG Eval_rev1.docx

Here's what I forwarded to Angeles and Enrique.

From: Chesnutt, John
Sent: Thursday, August 13, 2020 11:11 AM
To: Herrera, Angeles <Herrera.Angeles@epa.gov>
Cc: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Subject: Read aheads for tomorrow's call on Hunters Pt rad consultation

Angeles, Per our discussion, here's some information that would be useful read aheads for tomorrow's call between Enrique, Dana, Greg, and yourself. Suggest you forward to that group as soon as possible. I'm including Enrique now so he has it sooner than later. This includes the attached draft email (that will likely go out in the form of a formal letter) to the Navy as a result of the consultation, as well as links to and an excerpt from two letters that Enrique sent to the Navy that relate to the building reuse and consultation.

Thanks, John

Here are two main points from our April 11, 2019 letter:
"Additionally, if the Navy works to test and clean up current, onsite buildings that will ultimately be demolished for redevelopment, that would be also be a waste of government resources. The rework for the buildings should apply the most realistic re-use scenario; therefore, we recommend EPA and the Navy engage in discussions with the City/County of San Francisco on their residential re-use plans for current onsite buildings. In addition, EPA and the Navy should engage in discussions with the State of California regarding its regulatory framework for approving the transfer of buildings to the City/County for redevelopment or demolition."

"We can consider RESRAD after a comprehensive consultation with our headquarters office to ensure consistency with Superfund regulations and guidance. This consultation would also require complex technical evaluations. For example, any tool should be applied in a manner that fully addresses the long-term risks associated with long-lived radionuclides, such as Radium 226 and Thorium 232. The length of this process will depend on the Navy providing its draft RESRAD and draft PRG Calculator assessments, with comprehensive technical inputs and explanations. In addition, use of a different tool would need to be completed in full transparency with the public."

Also our March 27, 2019, letter on the use of RESRAD is appropriate to cite.