Message (Digitally Signed)

From: Duchnak, Laura S CIV USN COMNAVFACENGCOM DC (USA) [laura.duchnak@navy.mil]
Sent: 2/12/2021 12:50:43 AM
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
Attachments: 11 FEB 2021 DRAFT HPNS Building Rad Release Response.docx; smime.p7s

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
Director, Superfund and Emergency Management Division
US EPA Region 9 - Pacific Southwest
(415) 972 3843

From: Duchnak, Laura S CIV USN COMNAVFACENGCOM DC (USA) <laura.duchnak@navy.mil>
Sent: Wednesday, January 27, 2021 3:00 PM
To: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Cc: Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Lansdale, Lawrence L CIV USN (USA) <lawrence.lansdale@navy.mil>; Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA)

<kimberly.ostrowski@navy.mil>; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.macchiarella@navy.mil>; Wochnick, Heather M CIV USN (US) <heather.wochnick@navy.mil>; Hellman, David H CIV USN COMNAVFACENGCOM DC (USA) <David.Hellman@navy.mil>; Gonzalez, Jennifer S CTR (USA) <jennifer.gonzalez.ctr@navy.mil>
Subject: RE: Hunters Point Buildings Radiological Rework

Enrique,

Derek sent the additional dust swipe data and information to Wayne yesterday. My assistant, Jenn, will reach out to Maria and the other FFA members to arrange our meeting. I look forward to our discussions and finding a way forward.

Thanks, Laura

From: Duchnak, Laura S CIV USN COMNAVFACENGCOM DC (USA)
Sent: Friday, January 22, 2021 10:30 AM
To: 'Manzanilla, Enrique' <Manzanilla.Enrique@epa.gov>
Cc: Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Lansdale, Lawrence L CIV USN (USA) <lawrence.lansdale@navy.mil>; Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA) <kimberly.ostrowski@navy.mil>; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>; Macchiarella, Thomas L JR CIV NAVFAC HQ, BRAC PMO <thomas.macchiarella@navy.mil>; Wochnick, Heather M CIV NAVFAC HQ, BRAC PMO <heather.wochnick@navy.mil>; Hellman, David H CIV NAVFAC HQ, BRAC PMO <david.hellman@navy.mil>
Subject: RE: Hunters Point Buildings Radiological Rework

Enrique,

As requested, please see the attached table that includes data from concrete scans performed at the concrete background area located in Building 400.

In conversations with your staff since receipt of your email, we clarified that EPA also wanted additional dust swipe data. Our contractor collected dust swipe samples from the same concrete area and we will forward that information by early next week, along with the minimum detectable concentration data from the samples and instrument calibration information. The minimal detectable concentrations can be compared directly to the BPRG remedial goals for removable contamination to confirm that they are not achievable.

I will coordinate a meeting with the FFA signatories the first week in February to allow your staff enough time to evaluate the data tables being sent next week. Please let me know if you need more time.

Best regards, Laura

From: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Sent: Friday, January 15, 2021 12:06 PM
To: Duchnak, Laura S CIV USN COMNAVFACENGCOM DC (USA) <laura.duchnak@navy.mil>
Cc: Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Lansdale, Lawrence L CIV USN (USA) <lawrence.lansdale@navy.mil>; Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA) <kimberly.ostrowski@navy.mil>; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>
Subject: [Non-DoD Source] FW: Hunters Point Buildings Radiological Rework

Laura,

Thank you for your January 11, 2021, letter and your team reaching out to suggest times to move this important discussion forward.

You and your staff have stated that the BPRGs EPA provided in August are below the background range of common building materials expected in HPNS buildings. In my December letter, I asked the Navy to provide information supporting this statement. In response, you provided average and maximum values from a concrete background area at HPNS. We certainly appreciate this information. To evaluate the Navy's conclusion that EPA's BPRGs are below background, my team needs to see the underlying data (i.e., the data the Navy used to generate the average and maximum values included in your letter, and additional data the Navy may have collected on background levels of radionuclides in other materials used in HPNS buildings). I would like my team to have the opportunity to review this information prior to a meeting, as this information could help frame our discussion and point us toward a solution to achieve a protective radiological remedy for buildings.

In my December 22, 2020, letter, I also proposed we convene with all signatories of the HPNS Federal Facility Agreement. Please confirm that our state partners will be invited when we convene.

Once you confirm that our partners have been invited to the discussion and provide a timeline for when my team will be provided the background information for buildings, we can schedule a meeting with the FFA parties. I look forward receiving this information and to the follow-up discussion.

Enrique

From: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>
Sent: Monday, January 11, 2021 12:32 PM
To: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Cc: Duchnak, Laura S CIV USN COMNAVFACENGCOM DC (USA) <laura.duchnak@navy.mil>; Hellman, David H CIV USN COMNAVFACENGCOM DC (USA) <David.Hellman@navy.mil>; Lansdale, Lawrence L CIV USN (USA) <lawrence.lansdale@navy.mil>; Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA) <kimberly.ostrowski@navy.mil>; Chu, Anthony@CDPH <anthony.chu@cdph.ca.gov>; Cope, Grant@EPA (Grant.Cope@calepa.ca.gov) <Grant.Cope@calepa.ca.gov>; Terry.Seward@waterboards.ca.gov; grant.colfax@sfdph.org; sally.oerth@sfgov.org; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.macchiarella@navy.mil>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>; Rongone, Marie <Rongone.Marie@epa.gov>
Subject: Hunters Point Buildings Radiological Rework

Hello Enrique,

I am submitting the attached letter on behalf of Laura Duchnak.

Best Regards,

Derek J. Robinson, PE
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BRAC Environmental Coordinator
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