UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

December 22, 2020

Laura Duchnak, Director
Base Realignment and Closure Program Management Office
U.S. Department of Navy
33000 Nixie Way, Building 50, Suite 207
San Diego, California 92147

Subject: Response to Navy letter regarding the evaluation of the radiological remediation goals for buildings at the Hunters Point Naval Shipyard Superfund site

Dear Ms. Duchnak:

Thank you for your letter dated December 11, 2020 about the Navy's evaluation of the radiological building remediation goals (RGs) at the Hunters Point Naval Shipyard Superfund Site (HPNS) and the use of the RESRAD BUILD (RRB) and Building Preliminary Remediation Goal (BPRG) calculators as part of the evaluation. In your letter, you ask that EPA reconsider its position on the use of RRB at HPNS in order to allow the Navy to begin radiological retesting of buildings as soon as January 2021.

We described the results of our initial evaluation of the Navy's use of RRB in an August 20, 2020 letter. In our letter, we indicated a lack of confidence in the risk estimates, making it uncertain the RGs would be protective of future residents of the current, onsite buildings. At this time, we cannot support the use of RRB for the retesting of these buildings without a clear and defensible explanation of the choices underlying the Navy's RRB risk estimates.

While EPA remains open to the use of RRB at HPNS, many of the concerns in our August letter remain unresolved. We ask the Navy to respond to those concerns, particularly user-defined parameters (e.g., ingestion rates, use of the indirect/secondary rather than the direct ingestion option) of RRB that may underestimate cancer risks associated with the future residential use of these onsite buildings. Also, your letter makes several statements which require more substantiation, especially those related to background levels of radiation expected in the HPNS buildings and whether lower RGs are technically implementable, referring to the sensitivity limits of the radiation scanning equipment used during retesting. We ask the Navy to provide information supporting these statements.

To support your desired January 2021 timeline, we ask the Navy to provide the above requested information as soon as possible. This information will enable EPA to properly reconsider whether the Navy's RRB analysis adequately demonstrates the protectiveness of the radiological building RGs at HPNS for future residential use.

Your response will inform our ongoing consultation with our colleagues in EPA's Office of Land and Emergency Management. I also propose we convene with all signatories of the HPNS Federal Facility Agreement, at the Dispute Resolution Committee level, to benefit from their input and observations at this critical juncture of the radiological retesting effort.

I look forward to discussing these issues with you and your staff next month. I wish you and your staff all the best in this holiday season.

Sincerely,

ENRIQUE MANZANILLA

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Enrique Manzanilla
Director, Superfund and Emergency Management Division

cc: Grant Cope, California Department of Toxic Substances Control
Terry Seward, Regional Water Quality Control Board
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Sally Oerth, Office of Community Investment and Infrastructure