From:	Duchnak, Laura S CIV USN COMNAVFACENGCOM DC (USA)
To:	Manzanilla, Enrique
Cc:	lawrence.lansdale@navy.mil; Herrera, Angeles; Chesnutt, John; Praskins, Wayne; Sanchez, Yolanda; Yogi, David; Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA); Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA); Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA); Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA); Wochnick, Heather M CIV USN (USA)
Subject:	RE: HPNS building RGs
Date:	Wednesday, September 1, 2021 2:03:54 PM
Attachments:	RE_ HPNS building RGs.pdf

Enrique,

Thank you for your email. The Navy's proposal was sent to Wayne by Paul Stoick on 20 August and then discussed with EPA staff the following week. Generally, the EPA was requesting that Navy data be able to verify the "removable fraction" and "contaminated areas" remaining after remediation are appropriate to indicate protectiveness. Paul's email specified that the current work plan approach is effective in satisfying EPA's needs to prove certain assumptions. The email also referred to the specific Tables in the work plan which show the planned minimum detectable concentrations (MDCs). The follow-on discussion was intended to draw from EPA whether the planned MDCs were in fact suitable for EPA, or if EPA has different MDCs to be met. The email with the proposal is attached. I have asked the team to clarify that this the proposal and ensure all the regulatory agencies have received it.

I want to reinforce that the Navy went to great lengths to use defensible inputs in our risk assessment. We modified the default RESRAD inputs to be consistent with the EPA Exposure Factor Handbook values and certain default values from the BPRG calculator for our evaluation. The Navy's assessment confirmed that the current RGs are protective. The Navy has also consulted with RASO and other experts to ensure that the data collected is sufficient to meet our protectiveness standards. This means that future work should verify that the RGs have been met to show protectiveness.

Again, the Navy is open to further discussion on these topics. If EPA needs other information than what is planned in our work plan, such as different MDCs, please convey the levels and rationale as soon as possible and we will be happy to discuss.

Thank you for sharing the information regarding the recent listening session. The cleanup levels and process being applied at Hunters Point are driving a cleanup that is lower than any other successful radiological cleanup that BRAC Staff, RASO, or our radiological contractors are aware of. The current project is retesting past cleanup work to levels that far exceed what is defined by MARSSIM guidance. We appreciate your continued efforts to move retesting forward to allow for productive reuse of property at HPNS and I look forward to our next DRC level discussion.

Regards,

Laura

From: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Sent: Thursday, August 26, 2021 3:20 PM
To: laura.duchnak@navy.mil
Cc: lawrence.lansdale@navy.mil; Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Yogi, David <Yogi.David@epa.gov>
Subject: [Non-DoD Source] HPNS building RGs

Hello Laura,

We look forward to receiving a proposal from the Navy, which we anticipated this week (about 2 weeks from our discussion). I know our staff had a discussion earlier today. I hope the proposal is as detailed as possible, identifying proposed changes from the Parcel G workplan, and clearly explaining how the Navy intends to use the retesting data to show that every building is safe for residential use. I understand that the radiologically impacted buildings at HPNS vary a lot in size and radiological use history, and that this range of conditions makes it challenging to demonstrate that every impacted building is safe for residential use. I hope the Navy proposal clearly explains the basis for the sensitivity of the measurements to be made during retesting. I understand that this is a key factor in how useful the data will be in verifying that the HPNS buildings can be safely occupied.

During the August 12 call, you said the Navy is directing its contractor to mobilize, and the contractor will be ready to begin retesting buildings in about two months. For the next two months, you committed to continue working with EPA on how retesting data can be used to verify that the buildings can be safely occupied as residences.

EPA will work with the State to review the Navy proposal. If, after consulting with the State, EPA concurs with the Navy's proposed approach we will provide our approval for the Navy to proceed with the retesting. If we conclude that the Navy's proposed approach poses a risk that the data will be insufficient to demonstrate that every HPNS building is safe for residential use, we will of course communicate that conclusion to the Navy.

I wanted to relay that EPA's Deputy Assistant Administrator Carlton Waterhouse hosted a listening session with external groups interested in the site, including Public Employees for Environmental Responsibility, Committee to Bridge the Gap, the Bayview Hunters Point Community Advocates (a community-based group), and local university professors. Participants stated that the site's radiological remediation goals are outdated and not protective, contamination is more widespread than the site conceptual model assumes, the remedy is inconsistent with unrestricted use called for in Proposition P, and the current community involvement approach is inadequate. In our response, we plan to inform these groups of the Navy's commitment to perform an evaluation of its community outreach and involvement program, as a response to our August 27, 2020 letter.

I look forward to reviewing your proposal. Let me know if you have any questions.

Enrique

Enrique Manzanilla
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