Hunters Point Naval Shipyard Superfund Site
Meeting with OLEM, PEER, and Others on Rad Remediation Goals for Buildings
August 24, 2021

In the 45-minute presentation, Dan Hirsch had six requests of EPA on the following topics:

1. Soil Cleanup Standards
2. Building Cleanup Standards
3. (More) Comprehensive Testing and Retesting
4. Sandblast Grit
5. Genuine & Meaningful Community Involvement
6. Oversight Failures

In Mr. Hirsch's own words, the six requests were:

"ASK #1: Fix the Soil Cleanup Standards
Direct that the soil cleanup standards for Hunters Point be corrected so they are set at 10^-6 for unrestricted residential use, based on the EPA PRG calculator using the EPA defaults and consistent with Prop P.

Comments a scientifically rigorous process to include the garden pathway in EPA's national Regional Screening Levels for toxic chemicals, parallel to how it has been done in its radionuclide PRGs.

ASK #2: Repair the Building Cleanup Standards
Assure EPA does not capitulate to the Navy regarding the cleanup standards for buildings. The Navy must be required to clean up contaminated buildings to the levels set in the BPRG calculator for 10^-6 risk. EPA should insist on CERCLA 120(a)(2) being complied with and EPA CERCLA Guidance fully followed.

ASK #3: Fundamentally Overhaul the Testing and Retesting for Contamination
Measure for all radionuclides of concerns, with detection limits capable of measuring concentrations at the PRG and BPRG 10-6 limits, using background locations offsite that cannot have been impacted by HPNS activities, with sampling – not scanning – of the whole site, and at multipole depths.

ASK #4: Initiate a Comprehensive Site-Wide Testing of the Entire Site for Radioactive Sandblast Grit & Prepare Comprehensive Remediation Plans for All That is Found
This must be based on actual sampling, at various depths, and laboratory measurements for radium, thorium, uranium, and the full range of other radionuclides of concern.

[It cannot be merely a quick-and-dirty gamma scan of the surface that could only detect a highly radioactive discrete source like a deck marker, such as the Navy is doing.]

ASK #5: Establish a Mechanism for Genuine & Meaningful Community Oversight of the Cleanup and to Assure Accountability of the Agencies

Cleanup and testing/retesting need to be overseen by a community/independent expert panel. Use as a model the Santa Susana Field Laboratory community-overseen EPA radiation survey and the community/independent expert panel that oversaw epidemiological studies. Rely on existing on-the-ground EJ community groups such as the SouthEast Community Council.

ASK #6: Top-to-Bottom Review of Oversight Failures

Undertake a top-to-bottom review of EPA oversight failures that contributed to the unprecedented environmental scandal at HPNS and the breakdown of the HPNS cleanup more broadly."

External Meeting Participants

Jeff Ruch	Pacific Director, Public Employees for Env Responsibility (PEER)
Daniel Hirsch	President, Committee to Bridge the Gap Former Director, Program on Environmental and Nuclear Policy, UC Santa Cruz
Dr. Robert Gould	President, Physicians for Social Responsibility SF Bay Area
J. Michelle Pierce	Executive Director Bayview Hunters Point Community Advocates
Dr. Kim F. Rhoads	Associate Professor, Epidemiology & Biostatistics, UCSF Director, Office of Comm Engagement, Helen Diller Family Cancer Center
Annemarie Charlesworth	Director, Community Engagement Core UCSF EaRTH Center
Dr. Tracey Woodruff	Director, UCSF Environmental Research and Translation for Health (EaRTH) Center
Alex Dodd	

EPA Internal Meeting Participants

OLEM Immediate Office

Carlton Waterhouse
Barry Breen
Nick Hilosky

Region 9

John Chesnutt	Superfund Federal Facilities Section Manager
Yolanda Sanchez	HPNS Communications Lead, Office of Public Affairs
Wayne Praskins	HPNS Remedial Project Manager for Radionuclides

OLEM's Federal Facilities Restoration and Reuse Office (FFRRO)

Greg Gervais	Director, FFRRO
Mary Cooke	Physical Scientist

OLEM's Office of Superfund Remediation and Technology Innovation (OSRTI)

Dana Stalcup	Deputy Director, OSRTI
Brigid Lowery	Division Director, Assessment and Remediation Division
Stuart Walker	OSRTI National Radiation Expert