Message

From: Praskins, Wayne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F47BC0A2C2E42A98347D59CD1A98B19-WPRASKIN]
Sent: 9/23/2021 1:09:18 AM
To: Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA) [paul.t.stoick.civ@us.navy.mil]; juanita.bacey@dtsc.ca.gov; Han, Terry@CDPH [terry.han@cdph.ca.gov]
CC: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) [elizabeth.a.roddy3.civ@us.navy.mil]; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) [derek.j.robinson1.civ@us.navy.mil]; Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA) [matthew.liscio@navy.mil]; Chesnutt, John [Chesnutt.John@epa.gov]
BCC: Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]
Subject: RE: HPNS Parcel G Draft Field Change Request - Sr-90 Method Update

Paul –

In Tuesday's call the Navy asked for agency feedback by COB today on its proposed Field Change Request (FCR) #6 on the Parcel G work plan. As originally drafted, the FCR proposed: i) changes to the laboratory analytical method for strontium-90 in soil (larger sample mass and longer ingrowth period), ii) new decision criteria for interpreting results generated when a sample is recounted or additional aliquots from a sample are analyzed, and iii) reanalyzing all of the Parcel G soil samples previously analyzed for Sr-90 using the improved laboratory method.

The Navy explained on Tuesday that in response to feedback from the agencies the Navy intends to drop the proposed decision criteria. We support this change. We also support the proposed changes to the laboratory method to reduce the minimum detectable concentration and uncertainty in the Sr-90 results.

The proposed FCR does not describe how the results generated by reanalyzing previously collected Parcel G soil samples will be used in relation to the existing results. We do not object to reanalyzing previously collected samples but would not support, in the absence of convincing evidence, using the new data to supersede existing results. Before any new data are generated, we ask for the opportunity to provide input on Navy plans for comparing new and existing data, including plans for any statistical tests.

Wayne Praskins | Superfund Project Manager
U.S. Environmental Protection Agency Region 9
75 Hawthorne St. (SFD-7-3)
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From: Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA) <paul.t.stoick.civ@us.navy.mil>
Sent: Wednesday, September 15, 2021 11:14 AM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>; juanita.bacey@dtsc.ca.gov; Han, Terry@CDPH <terry.han@cdph.ca.gov>
Cc: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) <elizabeth.a.roddy3.civ@us.navy.mil>; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1.civ@us.navy.mil>; Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA) <matthew.liscio@navy.mil>
Subject: RE: HPNS Parcel G Draft Field Change Request - Sr-90 Method Update

Wayne/Nina/Terry,

I'm attaching a table Aptim has developed to show the number of results reported above the RG to date. There are 12 systematic, 3 biased, and 8 field duplicate or lab replicate (QC) results. A general observation is that the detects are also occurring in the QC samples, which is should not be expected.

Please note the data has not been validated, but I hope this will help with an understanding of the larger trend of what the Sr-90 data results are showing.

V/r,
Paul

From: Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA)
Sent: Tuesday, September 14, 2021 13:52
To: 'Praskins, Wayne' <Praskins.Wayne@epa.gov>; Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>; 'Han, Terry@CDPH' <terry.han@cdph.ca.gov>
Cc: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) <elizabeth.a.roddy3.civ@us.navy.mil>; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1.civ@us.navy.mil>; 'Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA)' <matthew.liscio@navy.mil>
Subject: RE: HPNS Parcel G Draft Field Change Request - Sr-90 Method Update

Wayne/Nina/Terry,

As a follow-up from our call, to clarify, the FCR is proposing to analyze all previous Sr-90 samples using the new laboratory method procedure. This would involve taking a new aliquot from the original sample material that was retained by the laboratory. The basis for this is for a consistent evaluation of all Sr-90 results using the improved method with reduced uncertainty.

I also wanted to clarify that the included decision criteria is a draft proposal, and we are open to agency feedback on decision criteria or procedures to mitigate potential false positives. The Navy is pursuing to incorporate the field change request as soon as practical, and is requesting feedback by the end of this week. This will allow efficient use of the concurrent review of the Navy QAO.

V/r,
Paul

From: Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA)
Sent: Tuesday, September 14, 2021 09:50
To: Praskins, Wayne <Praskins.Wayne@epa.gov>; Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>; Han, Terry@CDPH <terry.han@cdph.ca.gov>
Cc: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) <elizabeth.a.roddy3.civ@us.navy.mil>; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1.civ@us.navy.mil>; Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA) <matthew.liscio@navy.mil>
Subject: HPNS Parcel G Draft Field Change Request - Sr-90 Method Update

Wayne/Nina/Terry,

As discussed over the last couple of months, the Navy contractor has drafted a field change request to update the Sr-90 Method. In general, the current laboratory method has a higher uncertainty due to the sample preparation procedure. The higher uncertainty interferes with evaluating very low Sr-90 concentrations associated with the Sr-90 Remedial Goal. The updated method preparation procedure includes a larger aliquot size (2.5 grams) and 14-day ingrowth which should lower measurement uncertainty. The full Standard Operating Procedure (SOP) is attached to the Field Change Request.

In addition, the Field Change Request includes decision criteria for confirming samples results, consistent with Work Plan Section 5.3.2. Confirmation of sample results with elevated activity will include the following:

- Sr-90 results will immediately (to the maximum extent practical) be recounted by the laboratory.
- If the recounted sample is below the RG, then the initial result will be considered a false positive.

- If a recount of the sample is not possible, or the recount sample result exceeds the RG, two (2) additional aliquots will be collected from the sample and analyzed for Sr-90.
- If the results of both of the additional aliquots are below the RG, then the original result will be considered a false positive. If either one of the two additional aliquot results is above the RG, then the sample will be considered an exceedance.

The draft field change request is pending Navy Quality Assurance Officer signature to be finalized.

Please let me know if you have any questions or feedback. We can also discuss this afternoon.

Thanks!

V/r,
Paul Stoick, P.E.
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Lead Remedial Project Manager - Hunters Point
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