Hunters Point Press Responses April 1, 2018 – May 4, 2018

Q1: Do you still maintain that the EPA's 2002 scanner van results are meaningful? Was it reasonable for the EPA to rely in part on the scanner van results in its decision to approve the transfer of Parcel A to San Francisco? (In a 2016 fact sheet on Parcel A, the EPA listed the 2002 scanner van survey as one reason that led to the EPA's approval of the transfer.

The scanner van technology is a "first look" at locating gamma emitting radionuclide contamination at or near the surface and is often used to prioritize more soil sampling for further radioanalyses. The results of the scanner van are one line of evidence that EPA relied on in investigating questions brought up regarding Parcel A, but it is not the only source of information.

Q2: It's our understanding that there will now be resampling of parcels, and that Parcel A is not included. Given the allegations from the whistleblowers, and concerns about the inadequacy of the 2002 EPA scanner van survey of Parcel A, should a comprehensive soil survey for radiation now be conducted on Parcel A? If not, why not?

Historically, the majority of Parcel A was used for residences and administrative offices, not industrial activities. The only radiological materials found at Parcel A were sandblast grit and firebricks; these have since been removed. Former Buildings 322, 816, and 821 had potential for radiological contamination. The Navy scanned all three buildings and did not find radiological contamination above required cleanup levels. Buildings 322 and 816 were demolished and removed. Building 821 is located on Crisp Road, not in the developed portion of Parcel A. No other sources of radiological contamination were identified during the investigation or cleanup of Parcel A.

EPA understands that Tetra Tech EC Inc. did not do any radiological work at Parcel A except at Building 322, which was demolished and removed many years ago. In addition, following the removal of Building 322, an EPA health physicist conducted an independent scan of the area to confirm that the former building site was clean. The EPA health physicist did not detect any radiological contamination (attached is the memo documenting his work). Because the site was clean, it was transferred without restriction.

Q3: Specifically, have you followed up on the claim of Anthony Smith that he found a hot cesium sample on Parcel A? Should that specific location on Parcel A be tested for radiation and/or remediated?

EPA took seriously Mr. Smith's claim, and multiple EPA staff have conducted field visits to the location that Mr. Smith indicated. This location was actually on Parcel UC-2, adjacent to Parcel A. In 2012, after Mr. Smith's reported sample collection occurred, the Navy contractor Engineering / Remediation Resources Group removed all soil down to a depth of two feet below the surface (unless bedrock was encountered at a more shallow depth) and replaced it with clean soil at this location as part of placement of a "durable cover" required across the entire site. The

new clean soil came from outside the shipyard and was tested for radiological and chemical contamination before it was imported.

Q4: We have been told by a former Hunter's Point technician that he took a walk near the site in February of this year and observed the site through binoculars for an hour. He said he saw a dump truck digging up loads of wet slushy material from the shoreline at the border of Parcel E/Parcel F, then driving the material to a hillside on or near Parcel A and dumped the material on the hill. Our source says there was no radiation control of the truck as it moved from a potentially contaminated part of the site (Parcel E/F) to Parcel A. Are you aware of any similar breakdowns in radiation protocol at the site right now? Have you investigated any such breakdowns?

This is the first we have heard of this information, so we cannot respond at this time. We will look into this further based on the information you have already provided. If there are any additional details to share about this event, individuals can contact EPA's cleanup project manager Lily Lee at 415-947-4187 and [HYPERLINK "mailto:lee.lily@epa.gov"].

Q5: Has EPA followed-up with the Navy -- is it requiring the Navy to re-take samples on 90 percent and 97 percent of those parcels to see if additional cleanup is needed before land transfer?

EPA is pleased that the Navy will be resampling the impacted parcels and relying on these new data to determine where additional cleanup may be needed. EPA's input, which is based on our independent review of the data, will help inform where the resampling will be done. The final plan for resampling is not yet complete, though the Navy has committed to resampling 100% of the survey units previously sampled by Tetra Tech.

Q6: Is EPA investigating the use of Tetra Tech in cleanup contractors elsewhere, either in Region 9 or across the country? If so, can you offer details on when that investigation was launched and what it entails?

Any ongoing investigation by EPA would be of a confidential nature and therefore not something we could discuss.

Q7: Does EPA have any explanation for the discrepancy between EPA and the Navy over the review of sampling? Why such a difference in findings?
EPA's assessment of the data included looking more closely for signs of potential data quality problems in addition to signs of potential falsification. For example, EPA recommended resampling when data were missing or when different data collection methods did not produce consistent results.

Q8: Did the EPA look at the soil results for areas where people are currently living/working on the property? (e.g. the artists studios in Parcel B, the new homes that were most recently built?)

The Navy transferred Parcels D-2, UC-1, and UC-2 to San Francisco in 2015, and construction on new projects within these parcels is only allowed with a specific work plan approved by the regulatory agencies. As part of the review process for any new construction proposals, EPA and its state regulatory partners assess any potential concern about radiological exposure and any other hazardous contaminants.

For example, EPA reviewed the draft workplan for the new artists' building, part of which is located on Parcel UC-2, before construction started. We researched the locations closest to the artists' building where Tetra Tech EC Inc. had done trench and other radiation cleanup work. None of the radiological work that is in question lies within the boundaries of the artists' building work. Therefore, EPA has no concern about radiological exposure—or any other hazardous contaminants—associated with construction of the artists' building.