



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

June 20, 2019

Lawrence Lansdale
Environmental Director
Base Realignment and Closure Program Management Office
Department of the Navy
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Re: *Parcel G Removal Site Evaluation Work Plan* Partial Approval

Dear Mr. Lansdale:

The U.S. Environmental Protection Agency (EPA) has reviewed the revised text of the Draft Final *Parcel G Removal Site Evaluation Work Plan* ("Parcel G Work Plan"), which includes the *Soil Reference Background Area Work Plan* ("Appendix C"), for the Hunters Point Naval Shipyard (HPNS) Superfund site in San Francisco, California, dated June, 2019. These Work Plans detail the Navy's plans to investigate radiological sites in Parcel G after an evaluation of previous data identified potential manipulation, falsification, and data quality issues with data collected at Parcel G (Navy, 2017, 2018).

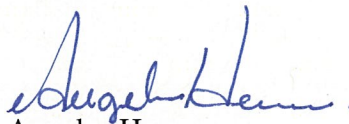
An important first step in this process is establishing reliable reference background values for concentrations of radionuclides in soil. The Navy has addressed all of EPA's comments and concerns relating to the planned soil reference background testing described in Appendix C. Therefore, EPA approves this portion of the Parcel G Work Plan.

For remaining portions of the Parcel G Work Plan, which address re-testing and, if needed, cleanup at Parcel G, my staff recently sent EPA comments that included recommendations for further discussion and more detailed clarification about EPA's understanding regarding some topics.

In addition, EPA's April 11, 2019, proposed path forward letter describes the other related processes underway, such as development of the *Parcel G Removal Site Evaluation Work Plan Addendum* and the *Five-Year Review*, which includes supplemental addenda about the long-term protectiveness evaluation for radionuclides in soil and buildings. Once these processes conclude and the Navy makes any necessary revisions to the Parcel G Work Plan, EPA can consider approval of the remaining portions of the Parcel G Work Plan. We expect future revisions of the Parcel G Work Plan and Work Plan Addenda be more clear, well-organized and consistent than the current versions. They should be revised to reflect all final agreements among the Navy and regulatory agencies in complete, stand-alone packages. This will help ensure transparency of the work.

EPA will continue working with the Navy and our state regulatory partners to ensure protectiveness, transparency, and accountability. Please contact me at 415-972-3144 or herrera.angeles@epa.gov if you would like to discuss these issues further.

Sincerely,

A handwritten signature in blue ink that reads "Angeles Herrera". The signature is fluid and cursive, with a period at the end.

Angeles Herrera
Assistant Director, Superfund Division

cc: Julie Pettijohn, California Department of Toxic Substances Control
Anthony Chu, California Department of Public Health
Dr. Grant Colfax, San Francisco Department of Public Health
Nadia Sesay, Office of Community Investment and Infrastructure
Terry Seward, Regional Water Quality Control Board