

Thank you for your query regarding Hunters Point Naval Shipyard (HPNS) Building 606.

Many of the questions you asked and sections of text you asked EPA to review are most appropriately handled by other agencies. We are providing you with background information that will help to clarify the facts related to Building 606 and EPA's role.

The Navy, as the former owner and operator of the HPNS, is the lead agency responsible for the investigation and cleanup of HPNS. EPA and its state regulatory agency partners oversee and enforce Navy compliance with the Comprehensive Environmental Response Compensation and Liability Act (commonly called the Superfund law) and other requirements to ensure the cleanup at HPNS protects human health and the environment.

As such, the Navy is responsible for drafting documents describing the nature and extent of any hazardous substances released on the site, such as the Environmental Baseline Assessments; evaluating the risks posed by those hazardous substances; and recommending what, if anything, needs to be done to address them prior to making a Finding of Suitability to Lease (FOSL). EPA is responsible for reviewing and evaluating these types of documents for accuracy, compliance with the Superfund law, and consistency with other site environmental documents that have been published.

In any case in which the federal government (here, the Navy) intends to lease a parcel on which hazardous substances are known to have been released or disposed of, the Superfund law requires the Navy to notify the lessee and potentially restrict the use of the property to mitigate any residual risk the contaminants could pose. In this case, EPA confirmed that the 2008 FOSL required such a notice to future lessees of Building 606 and appropriately restricted the use of the property, consistent with the Superfund law.

EPA believes the workers in Building 606 are protected from potential radiological and volatile organic compound contamination. The surface soil beneath the building has been excavated and removed to a depth of 5.5 feet. In addition, an 8 - 12" concrete slab provides protective shielding from potential radiation. Building 606 also has a vapor barrier and ventilated crawl space in place to protect building occupants from potential volatile organic compounds.

The attached map shows that the location of the single sample showing elevated levels of 1,4-dichlorobenzene is not close to Building 606. It also shows four detections of benzene in three locations. Two of the locations are adjacent to Building 606, not under it, and one is beneath the parking lot. Benzene was not found in the groundwater monitoring well in the vicinity.

The Navy's Human Health Risk Assessment, which was performed related to volatile organic compounds, was based on extremely conservative assumptions. For example, it assumes that someone would be in contact directly with the chemical in soil, but in fact, Building 606 has a vapor barrier and ventilated crawl space. It also assumes that each chemical would be present in a uniform concentration over a widespread area, but in fact, most sampling locations did not show elevated levels of chemicals. Third, it assumes that each chemical would never reduce its volume, but in fact, nearly twenty years have passed since the original tests, and the chemicals are "volatile," which means that they can easily turn into a gas form and blow away, thus reducing their volume.

Regarding Buildings 507 and 508, please see attached Figure 5-1 from the Final Status Survey Report for Building 503. It shows that Buildings 507 and 508 overlap only with the southeast and southwest

corners of the parking lot, not with Building 606. For reference, here is a link to the document about the excavation of the soil from underneath Building

503. https://www.envirostor.dtsc.ca.gov/public/final_documents2?global_id=38440005&doc_id=60320254

As for questions about the prior work done by Tetra Tech EC Inc., EPA's focus right now is on working with the Navy and other regulatory agencies to create a sampling approach and plan for Parcels G. As we move forward, we will assess proposed retesting at all parcels where Tetra Tech EC Inc. did radiological work.