

Radioactive Fugitive Dust

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Categories

🕒 Tuesday 16 August 2016 08:08:38 PM

■ Air ■ Solid Waste

Description:

I personally took a tour of the naval hunters point shipyard, sponsored by the U.S. Navy. On this tour of the base the naval personnel pointed out a pile of unscreened potentially radioactive soil in parcel D, that was approximately 25+ feet high. This soil was uncovered, there was no visible water suppression system in place. From my perspective the soil was dry and was subject to be blown all over the shipyard and into surrounding communities. In my view this would be an issue of concern for the Bay Area Air Quality Management District. For the DTSC regulatory agency of the state California. For the California Department of Public Health. For the Federal Environmental Protection Agency . For the San Francisco Department of Public Health. The U.S. Navy at hunters point shipyard is using a standard of 25 millirem per year the equivalency of the public receiving 12 additional chest x-rays each year, as acceptable levels for background exposure. A question that occurs what is safe levels for children with pre-existing health conditions? In addition according to the UC Santa Cruz preliminary study the U.S. Navy is using a 42-year-old regulatory guideline from the Atomic Energy Commission which no longer exists. EPA says the guideline is not to be used. Why is this still in use? The Navy says it is using EPA's preliminary recommendation goals as his cleanup standard, but is using them from 1991 a quarter of a century old rather than the current PRGs. Why is this being allowed by the regulatory agencies? The hunters point cleanup standard off for more lax then EPA's current remediation goals recommended. In some cases sometimes more than hundreds of times more lax! Why are the regulatory agencies looking the other way and allowing the Navy to use such low standards in the protection of human life in Bayview Hunters Point and the surrounding community? In my view what should concern the regulators of the following questions. What is the accumulative effect on residents living in the surrounding area of the shipyard? What would be the effects on the children have a long-term exposure to radiation levels? In the current property being sold at the previous shipyard parcel A apartments. In their disclosure statement of purchasing of the property, of background radiation levels disclose to them and the risk made apparent to them possible health effects? And finally why hasn't the US Navy and EPA in the state regulatory agencies, and the San Francisco Department of Public Health sat down with the University of Santa Cruz and citizens of this community to discuss any concerns or as was referred to us misinterpretations of the data by UC Santa Cruz at this time? It is been several months since the UC Santa Cruz research team presented their preliminary findings to this task force what is the delay in getting to the truth? If there's a problem of misinterpretation of the data that needs to be addressed. If on the other hand it is a failure of institutions that have oversight on the clean up to utilize the highest standards of cleanup to be employed here at Hunters Point than that is an issue that must be addressed at once, without any delay. The residents were buying these new apartments are doing so in good faith in believing that their apartments and condos are safe to live in. Those residents

who bought their condos and living in the adjacent property have a right to know what is taking place in a right for safe and healthy life. I am asking that all agencies responsible for the oversight an additional independent agency step in to see what is taking place are has not taken place. Additional concern is over that Tetra Tech alleged violations of handling of nuclear waste at the shipyard. We need to know how the Navy and the regulatory agencies are going about investigating the alleged conduct of Tetra Tech according to the KRON TV report where identified radioactive soil was re-buried on previously classified as clean sites. The radioactive soil was buried in trenches that war 3 feet deep which cannot be detected by a surface scan. Surface scans only go from 6 to 12 inches under the soil for detecting radiation levels. What methods are being use in the investigation of this allegation of inappropriate dumping of radioactive soil on the Naval base at Hunters Point Shipyard? What independent University or institution is investigating this phenomena? There should be no financial ties or working relationship with Tetra Tech, in my opinion this would constitute a conflict of interest and could not provide an objective evaluation on the possibility of radiation contamination. What methods are being employed? Is a step out method with core samples being utilized to evaluate the base. Given the allegation that this could be anywhere throughout the base is our screening process of the entire base utilizing the step out method and core samples? As in all procedures who is responsible for the cost? The U.S. Navy or the contractor?

Location Name:

Hunter's Point Shipyard, San Francisco, CA, United States

Bayview Hunters Point - IV AN

Response to anonymous complaint received by Dick Hansen Rodriguez of the Bay Area Air Quality Management District on Radioactive Fugitive Dust, on Tuesday 16 August 2016 08:08:38 PM

Thank you for your correspondence. The complaint hits on several topics. My response below focusses on two of the main concerns that are also a responsibility of my position with the Navy.

1. Regarding dust control –

Dust control and prevention are a very important part of our environmental work at Hunters Point. The procedures for handling soil and soil stockpiles are specified in our work plans. These procedures include dust monitoring and using a sprayed on “tackifier” to prevent dust from coming off of soil piles. Spray-on tackifier can be clear or green in color and creates a crust that prevents dust particles from escaping.

The specific complaint regarded a stockpile that was visible during the tour of Hunters Point and was awaiting radiological testing. The stockpile was uncovered and could have potentially been a source of dust for the local community. As I was the person hosting this tour and from the complaint description, I am aware of the stockpile in question and understand that this stockpile has been treated with tackifier for dust suppression. This is evident by the green hue of the stockpile. There was also a dust monitor being used to monitor this pile.

Our Construction Site Officer regularly oversees site activities. I asked him on to make a confirmation stop at this pile and dust monitor. On August 17, 2016, he inspected the pile and confirmed that dust suppression measures are being followed. In addition, a Bay Area Air Quality Management District representative visited the site on the 17th and confirmed that dust suppression techniques were being used appropriately.

2. Regarding comments made by UC Santa Cruz personnel Mr. Daniel Hirsch –

Mr. Hirsch was correct that a 1991 Nuclear Regulatory Commission regulation was identified as a requirement in the Navy’s 2007 radiological document and continues to be a requirement in current documents. Other standards, including the Environmental Protection Agency (EPA) standard, were also included in our 2007 radiological document and are requirements for our work. The Navy’s environmental work is in compliance with all applicable regulations, including EPA standards.

Please contact me if you have any further questions.

Derek J. Robinson, BRAC Environmental Coordinator for Hunters Point

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