



EPA UPDATE

Citizens Advisory Committee –
Environmental & Reuse
Subcommittee

April 27, 2026

WHAT IS EPA DOING?

- **Daily presence:** EPA Remedial Project Managers/EPA contractor on site on workdays, verify controls, and provide real-time feedback; stop-work authority when warranted.
- **Data quality:** Observe field activities; require duplicate samples and blanks; independently verify data through EPA split samples; mandate corrective actions for QA issues.
- **Air monitoring:** Review real-time PM-10 and lab results; confirm action levels; monitor dust suppression and schedule adjustments.
- **Document oversight:** Review/approve all CERCLA deliverables; require revisions to meet FFA and risk-based standards before work proceeds.
- **Accountability:** Track commitments and deadlines; document findings in formal correspondence; use FFA tools to address deficiencies.



*EPA celebrated the completion of the Superfund Job Training Initiative at Hunters Point in February. Currently, **11** graduates are employed with **6** working on-site.*

EPA'S ROLE

All federal facilities on the Superfund NPL are required to enter into a Federal Facility Agreement (FFA) with EPA and the state. The FFA is an agreement between:

- **U.S. Navy** – the responsible party
- **EPA** – the lead regulator, and
- **the State of California** – DTSC and the RWQCB.

The FFA Requires:

- Enforceable schedules and milestones.
- EPA review/concurrence on key decisions.
- Dispute resolution.
- Full data and records access.
- Site access for oversight.
- QA/QC requirements.
- Community involvement.
- Long-term stewardship.

HPNS TEAMS AND ROLES

U.S. Navy is the lead agency for the HPNS cleanup.



The Navy hires contractors to perform remedial work, site investigations, community engagement, etc.



Regulatory agencies include EPA (federal) and DTSC, RWQCB, and CDPH (state).



DTSC
Department of Toxic
Substances Control



**State Water
Resources
Control Board**



The property will be transferred to the City and County of San Francisco.



- Board of Supervisors
- SF Department of Public Health
- Office of Community Investment & Infrastructure



Real-Time PM-10 Monitors

- Real-time PM-10 monitors pull air in and use light (like a tiny laser) to count and estimate the amount of dust-sized particles floating in the air every second.
- Site personnel receive alerts when the PM-10 action level is exceeded.
- Real-time data is used daily to make decisions about site operations.



Filter-Based Monitors

- Filter-based air monitors pull in large volumes of air through a filter, and contaminants are trapped on a filter.
- These monitor parcel-specific contaminants like radionuclides, particulate matter (PM), metals and asbestos.
- Each monitor runs for a defined sampling period, from a few hours to several days, to collect contaminants.
- After the sampling period ends, the filters are collected, sealed, and shipped to an accredited laboratory for analysis using EPA approved methods.



On-Site Radioactivity Scan

- Before shipping, operators scan the filters on-site with sensitive instruments for radioactivity.
- This scan ensures that samples are safe to transport and that the Navy is aware of any potentially high levels right away.
- If a filter shows high radioactivity before shipping, then the sample is safely stored on-site and the Navy will notify EPA, the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB).



Laboratory Analysis

- Once at the laboratory, the filters are analyzed for site-related contaminants.
- Analysis can take weeks to months because HPNS samples require complex preparation and count times to reach very low detection limits, along with rigorous quality checks.
- Once final, the laboratory reports results to the Navy's contractor who sends them to the Navy. The Navy shares results with EPA, DTSC and RWQCB.



Data Review

- Filter-based sample results are reviewed. Any result above the action level requires further investigation by the Navy.
- Samples exceeding an action level may require additional testing and a review of laboratory and cleanup activities.
- Data is posted to the site's webpage here: www.bracpmo.navy.mil/BRAC-Bases/California/Former-Naval-Shipyard-Hunters-Point/Documents/#air-monitoring.

Parcel G Air Monitoring Stations During Rework and Building Demolition:

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- Service Layer Credits: Source: Esri, Maxar, Earthstar, GeoGraphics, and the GIS User Community
- U.S. Department of the Navy
BRAC PMO West
San Diego, California
- FIGURE 1
PARCEL G
AIR SAMPLING AND DUST
MONITORING LOCATIONS
(AUGUST 2024)
- INVESTIGATION, SURVEY, AND REPORTING AT PARCEL G
HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CA

PLUTONIUM-239 EXCEEDANCE

November 2024: A Navy contractor sends air filter samples from the site to the laboratory for testing. As part of the shipping process, the samples are scanned on-site and do not show elevated levels of radioactivity.

November 2024--March 2025: The laboratory receives the samples and analyzes them for radionuclides. The laboratory sends the results to the Navy's contractor.

March 2025: The Navy receives the air monitoring results from their contractor. The results show that one sample exceeded the action level for Pu-239.

April 2025--October 2025: The Navy reviews the test results and contacts the laboratory. The Navy's laboratory accreditation program performs an audit of the laboratory's processes. The laboratory reanalyzes the sample and Pu-239 is not detected.

October 2025: The Navy shares the laboratory results and evaluations with EPA, the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB).

November 2025: EPA asks experts from NAREL to review the laboratory's data and work practices. NAREL meets with the Navy's Radiological Affairs Support Office (RASO) to discuss the results of their review.

PLUTONIUM-239 EXCEEDANCE

EPA's NAREL reviewed the laboratory's data analysis and concluded that the sample result was very likely caused by a laboratory error for the following reasons:

1. Contamination was also detected on field blank samples.
2. The on-site scans for radioactivity did not detect the plutonium contamination before the samples were transported to the laboratory.
3. Plutonium was not detected in the reanalysis of the sample.
4. There were problems identified with laboratory QA/QC practices.

EPA's Review of Air Monitoring Data at Hunters Point Naval Shipyard

April 2026

In November 2024, the U.S. Navy found plutonium-239 (Pu-239) in an air filter sample taken from Parcel C of the Hunters Point Naval Shipyard site. Pu-239 is an identified radionuclide of concern for this site. The sample result was above the site's action level for Pu-239. EPA scientists reviewed the data. EPA's National Analytical Radiation Environmental Laboratory (NAREL) found that the detection was very likely caused by a laboratory error and is not from the site.

What does it mean to exceed an action level?

An action level is a pre-set, health-protective threshold for a contaminant in air, soil or water which triggers review if exceeded. At Hunters Point, these thresholds are intentionally set conservatively to protect on-site workers and nearby residents. Even if a contaminant at Hunters Point is at an action level, people will be safe if exposed 24/7 for one year or longer. Exceeding an action level means a test result is higher than that threshold. It doesn't automatically mean there is an immediate health risk, but it prompts follow-up, such as more sampling, a review of work practices or changes to the cleanup, if needed.

How did the Navy and EPA respond to the elevated detection?

- November 2024
A Navy contractor sends air filter samples from the site to the laboratory for testing. As part of the shipping process, the samples are scanned on-site and do not show elevated levels of radioactivity.
- November 2024 to March 2025
The laboratory receives the samples and analyzes them for radionuclides. The laboratory sends the results to the Navy's contractor.
- March 2025
The Navy receives the air monitoring results from their contractor. The results show that one sample exceeded the action level for Pu-239.
- April 2025 to October 2025
The Navy reviews the test results and contacts the laboratory. The Navy's laboratory accreditation program performs an audit of the laboratory's processes. The laboratory reanalyzes the sample and Pu-239 is not detected.
- October 2025
The Navy shares the laboratory results and evaluations with EPA, the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB).
- November 2025
EPA asks experts from NAREL to review the laboratory's data and work practices. NAREL meets with the Navy's Radiological Affairs Support Office (RASO) to discuss the results of their review.
- January 2026
Based on NAREL's review, EPA and the Navy conclude that the sample result was likely caused by a laboratory error.

Under the site's Federal Facilities Agreement, the Navy is the lead agency responsible for the investigation and cleanup of the Hunters Point Naval Shipyard site. EPA is the lead regulatory agency and works with DTSC and RWQCB to ensure the Navy complies with regulations and follows guidance, as appropriate. Since this event, the Navy, EPA and DTSC have developed notification protocols that have improved communication.

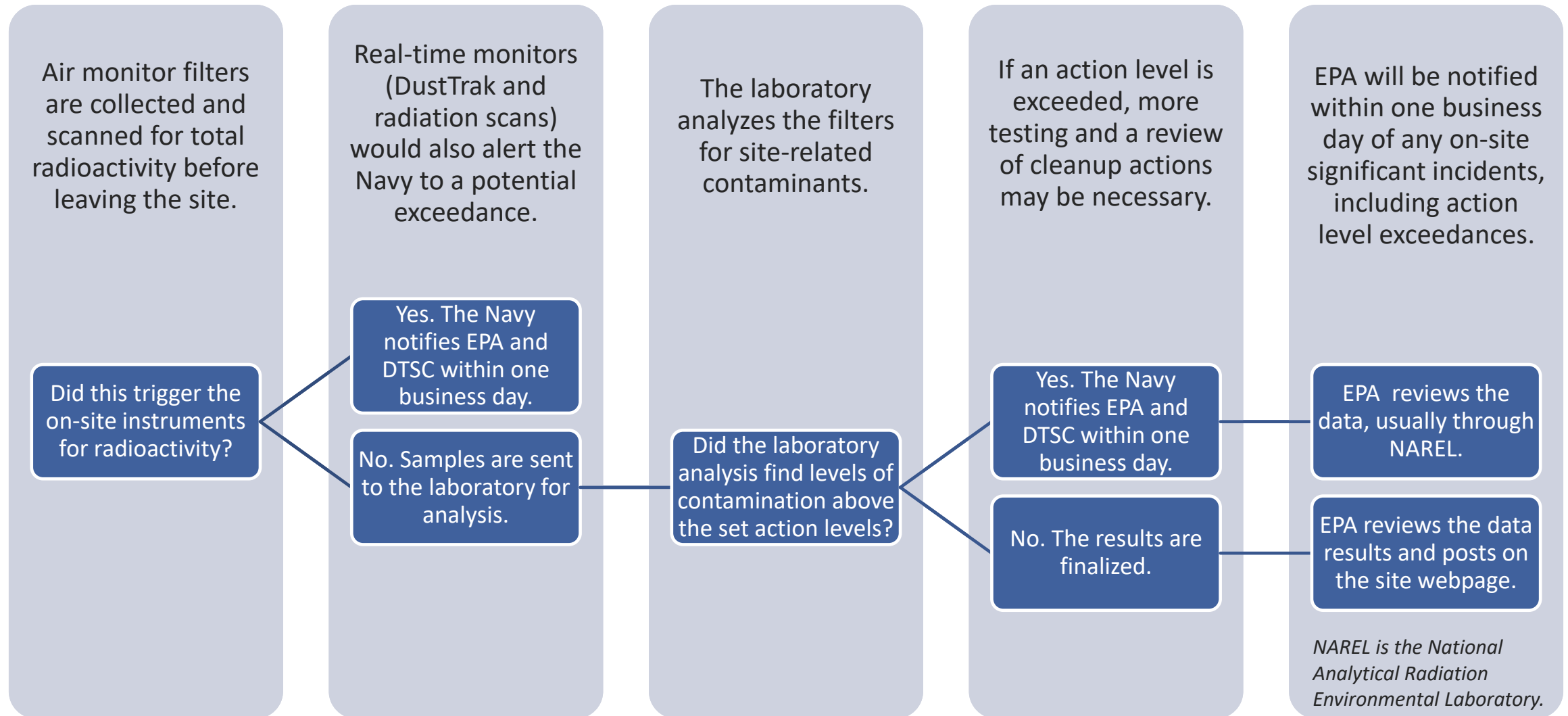
What caused the high result?

Both RASO and NAREL concluded that laboratory contamination is the likely cause for the Pu-239 result for the following reasons:

- All air filter samples were scanned for radioactivity before being sent to the laboratory and none showed elevated readings. The reported Pu-239 result was well within the range that field equipment measures, so if present, this result would have been detected before leaving the site. No scans showed elevated radioactivity, indicating that the contamination happened after the sample left the site.
- Contamination was detected on field blanks. A "field blank" is a clean, contaminant-free sample that is handled exactly like the site samples but without exposure to site air. When field blanks are positive at the lab, it points to contamination during handling or lab analysis, not from the site location.
- Issues with laboratory practices. RASO and NAREL identified problems with how the laboratory prepared samples and read instrument results. This led to skewed analyses and calculations which, in turn, led to biased results.

EPA's fact sheet with more information on the November 2024 Pu-239 exceedance is available at tonight's meeting.

NOTIFICATION PROCESS EXAMPLE



Parcel B and C Soil Data Quality Issue

- In March 2026 the Navy notified EPA that one of the labs they used for radiological air and soil sample analysis was employing an inappropriate quality control method. The Navy has indicated that this impacts approximately 700 air and soil samples.
- The soil samples that are implicated will be retested by another lab. The Navy maintains a sample archive on-site for the purpose of reanalysis if any data quality issues are found.
- All air samples are consumed by the analysis process and are not available for reanalysis.
- A review from NAREL indicates that the QC method likely overestimated results. EPA has reviewed PM-10 data for the time period in question. **EPA does not believe that this represents a risk to on-site workers or the public.**

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