



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING SYSTEMS COMMAND
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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SAN DIEGO, CA 92147

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Ser BPMOW/225
November 07, 2025

Susan Philip, MD, MPH
Health Officer for the City and County of San Francisco
San Francisco Department of Public Health (SFDPH)
San Francisco, CA 94103

Dear Dr. Philip:

I am responding to your October 30, 2025, letter regarding the environmental cleanup work at the former Hunters Point Naval Shipyard (HPNS). As we discussed during our meeting on October 31, 2025, there was no public health or worker risk associated with the single plutonium-239 (Pu-239) sample collected from ambient air monitoring. The Department of the Navy's (DON) Base Realignment and Closure Program Management Office (BRAC PMO) overseeing the work is committed to the safety and health of the community during all phases of the environmental program and we take this responsibility very seriously. We appreciate SFDPH's November 03, 2025, statement affirming that no immediate action is required to protect public safety.

As part of the DON's ongoing commitment to the health and safety of the Bayview Hunters Point community, we have constant real-time dust management and monitoring and ambient air sampling during all field work. We implement the Parcel C Dust Management and Air Monitoring Plan (DMP) to protect onsite workers and the local community. This plan, as with all work plans for HPNS projects, was subject to a rigorous multi-stage review process that included collaboration with the SFDPH, and final approval by the HPNS regulatory agencies: the United States Environmental Protection Agency (EPA), the California Department of Toxic Substance Control (DTSC) and the California Regional Water Quality Control Board.

The dust management portion of the DMP meets the requirements of the Bay Area Air Quality Management District (BAAQMD) (2015) Particulate Matter and Visible Emissions Regulation. DMP protective measures implemented by onsite workers include the following three elements to protect the workers and the surrounding residents from fugitive dust emissions: 1- air quality sampling for total suspended particulates, lead, manganese, PM10, and asbestos at the Parcel C perimeter, 2- real-time dust monitoring at the Parcel C perimeter and at daily work areas, and 3- radionuclides of concern air sampling and laboratory analysis from the Parcel C perimeter and at daily work areas. Real time dust monitoring is the first line of defense to determine whether additional dust mitigation measures are required. The standard turn-around time for laboratory analyses for radionuclides is four months.

Air monitoring action levels, as described in the DMP, are set conservatively low, by design, to protect onsite workers. If action levels are exceeded, the contractor is required to take actions to further mitigate fugitive dust to protect onsite workers and the local community. Exceeding an action level does not mean there is a risk to public health. The Pu-239 action level of 4.00×10^{-15} microcuries per milliliter ($\mu\text{Ci}/\text{mL}$), equates to an exposure of 10 mrem (assuming breathing it continuously for one year). The sample in question represents a one-week period.

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In March 2025 we were made aware by our contractor that one ambient air sample collected in November 2024 at a downwind air monitoring location in Parcel C reported Pu-239 at 8.16×10^{-15} $\mu\text{Ci/mL}$, above the project action level. From a public dose perspective, a person continuously exposed to this level of Pu-239 for the week that was collected, would have received a dose of less than 0.5 mrem. For perspective, a round-trip flight from San Francisco to New York results in an exposure of 4 mrem.

In accordance with the DMP, and the Health and Safety Plan, the Field Team responded by halting work for a safety standdown and enhancing dust control measures. Dust suppression enhancements included increasing the frequency of ground surface wetting and ensuring the ongoing use of biodegradable liquid polymer stabilizers on material stockpiles. Efforts were made to minimize on-site vehicle traffic where possible.

The documentation, including laboratory reports relevant to this specific sampling event, will be sent to you and the HPNS regulatory agencies in the next week.

I understand and acknowledge your concern regarding the delay in reporting. It is our goal to be timely and transparent and provide accurate data and relevant information. The Pu-239 result was a single outlier that could not be reproduced. The DON has taken more than 200 air samples since July 2023, and this outlier result is the only detection of Pu-239 to date. Pu-239 was not detected when the sample was retested in May 2025, and the result could not be attributed to any field work occurring onsite during that time period. These inconsistencies called into question the validity of the result. Between May and August, the DON and the laboratory further investigated the test results and conducted a methodical review of the laboratory's procedures and practices to ensure they complied with standards. A third party also conducted an analysis of the laboratory's performance. We understood this unconfirmed exceedance, if treated as legitimate, did not represent a potential exposure. Given these facts, we believed it was prudent to work with our experts to attempt to validate the authenticity of the result before communicating it publicly.

I recognize your need for earlier communication with your office, even while our respective technical staffs are working with uncertain or preliminary data. Our established monthly meetings with SFDPH provide an excellent opportunity to collaboratively develop more effective communication strategies.

As discussed in our October 31, 2025, meeting, we encourage SFDPH representatives to participate in the November 17, 2025, Hunters Point Shipyard Citizens Advisory Committee meeting, where we will share available information with the public. Your presence, along with U.S. EPA and the California DTSC, will help to provide facts and context to the community.

We value your engagement and encourage you to continue to communicate directly with us when concerns arise. We strive to provide timely and comprehensive responses to all inquiries.

Sincerely,

Anthony Megliola
Anthony Megliola
Director

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Copy to:

Mike Montgomery (EPA, Director of Superfund and Emergency Management Division);
Shamann Walton (District 10 Supervisor);
Thor Kaslofsky (OCII, Executive Director, Office of Community Investment and Infrastructure);
Anthony Chu (CDPH, Division of Radiation Safety and Environmental Management)