

# Memorandum

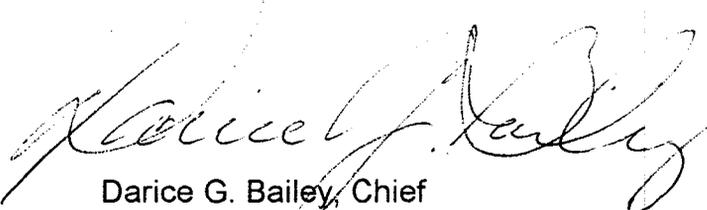
Date: October 6, 2000

To: Mr. Chein Kao  
Office of Military Facilities  
Department of Toxic Substances Control (DTSC), Region 2  
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Berkeley, California 94710

From: Environmental Management Branch  
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Subject: Department of Health Services (DHS) Review of *Final Radiological Removal Action Memorandum*, San Francisco, California, dated August 17, 2000.

Attached are DHS' comments on the subject document. This review was performed by Ms. Deirdre Dement, Associate Health Physicist in support of the Interagency Agreement between DTSC and DHS. If you have any questions concerning this report, or if you need additional information, please contact Ms. Dement (916) 324-1378.



Darice G. Bailey, Chief  
Waste Management Section

Attachment

cc: Mr. Richard G. Mach, Jr.  
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Department of Health Services (DHS)

Review of the *Final Radiological Removal Action Memorandum, Hunters Point Shipyard*, San Francisco, California, dated August 17, 2000.

October 6, 2000

DTSC Resource Planning Form # 459

The following comments are in response to the request from Mr. Chein Kao of Department of Toxic Substances Control to review the document listed above.

General Comments:

1. DHS did not receive responses from the Navy on the DHS' comments dated July 27, 2000. (See attached comments.)
2. The last statement in the first bullet of Section 5.1.2, Page 14, reads as, "The proposed removal sites will be excavated to a depth of 2 feet." The Navy must justify how no discrete sources will be left below the 2 feet excavation depth.

In order to release these sites from exclusive federal jurisdiction and transfer any parcels to the City of San Francisco, all discrete radiological sources must be removed. Transfer of the property without an unrestricted release would require licensure by the new owner. In addition to removal of all discrete radiological sources, it must be adequately shown how these sites do not exceed the approved residual contamination limits.