



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 21, 2000

Mr. Richard Mach
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
BRAC Office
1220 Pacific Highway
San Diego, CA 92132-5190

RE: Draft Work Plan for the Radiological Removal Action, Hunters Point Shipyard

Dear Mr. Mach:

EPA has reviewed the above referenced document. Overall, the draft work plan is satisfactory. However, EPA has two comments which should be addressed before the document is finalized:

1) Page 3, Section 4.0 & Table 1: There is no explanation or justification as to why the use of Commercial Scenario Decay-Corrected Preliminary Remediation Goals (PRGs) are appropriate as clean up levels for this work. The Navy should provide additional explanation. Did the Navy review the July 1997 Redevelopment Plan and confirm that all radiological cleanup sites to be addressed under this work plan are located in areas that are proposed for industrial reuse by the City of San Francisco? Please explain and revise the document accordingly.

2) Page 6, Item #4 and Page 12, Item #3: This document does not adequately explain the rationale for NOT analyzing "any sample with a dose rate exceeding 150% of the established background level." Is this correct? Please explain.

Should you have any questions about these comments, please contact Mr. Steve Dean at 415-744-2391 or me at 415-744-2409.

Sincerely,

A handwritten signature in cursive script, appearing to read "Claire", followed by a horizontal line.

Claire Trombadore
Remedial Project Manager

cc: Steve Dean, EPA
Sheryl Lauth, EPA

Chein Kao, DTSC
Deirdre Dement, DHS
Brad Job, RWQCB
John Chester, City of SF
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