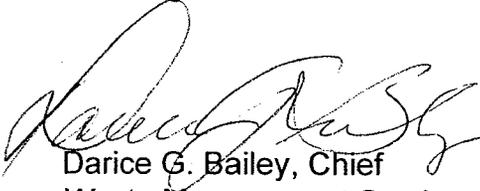


M e m o r a n d u mN00217.000560
HUNTERS POINT
SSIC NO. 5090.3

Date: December 19, 2001

To: Mr. Chein Kao
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200From: Environmental Management Branch
P.O. Box 942732
601 North 7th Street, MS 396
Sacramento, California 94234-7320
(916) 445-0498Subject: Department of Health Services (DHS) Review of *Final Basewide Radiological Removal Action Memorandum, Hunters Point Shipyard, San Francisco, California*, dated November 19, 2001

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.
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

Mr. Chen Kao
December 19, 2001
Page 2

Ms. Deirdre Dement
PO Box 942732
601 N. 7th Street MS 396
Sacramento, CA 94234-7320

Department of Health Services (DHS)

Review of the *Final Basewide Radiological Removal Action Memorandum, Hunters Point Shipyard*, San Francisco, California, dated November 19, 2001.

December 19, 2001
DTSC Resource Planning Form # 629

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 has repeatedly made comments, written and verbal, to the effect that the Navy must meet the State of California, Department of Health Services' criteria in order to transfer any parcels for unrestricted release. As DHS' release criteria and the methodologies required to demonstrate that these criteria have been met are much different from the US EPA's, DHS cannot "defer" to the US EPA as stated on page 7, Section II, C, 2.

DHS is unaware of a Final Status Survey Workplan approved for the sites that are being remediated. This is a potential problem if the number of samples collected for confirmation are unacceptable for DHS and additional samples will need to be collected. A total of 12 confirmation samples, as estimated on page 14 under "Estimated Costs," appears meager, and it is not apparent how this number was derived. A Final Survey would need to be made before areas are refilled with "clean" fill. The survey and number of samples will need adequate justification and must be deemed acceptable to DHS. Overlooking this step could be an expensive oversight, which could greatly increase the estimated costs shown on page 14 of this report and delay the completion of a transfer. The latest comment stressing this concern was sent via e-mail to Mr. Richard Mach, BRAC Environmental Coordinator and CDR Vincent Deinnocentiis of RASO dated November 15, 2001. This concern was made in response to the e-mailed report, "Status of Building 364 at Hunters Point – 9 Nov 2001" by David Horton, that stated in paragraph 1 that the sump area outside of building 364 had been "remediated, including backfilling". This is contrary to the February 8, 2001 response to DHS comments dated November 17, 2000 stating that the workplans would be changed to say that areas will not be backfilled until DHS and the EPA have concurred.