

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

101 WEBSTER STREET, SUITE 500

AKLAND, CA 94612

(510) 286-1255

August 19, 1993
File No. 2169.6031 (BMS)

Mr. Ray Ramos
Code T4E1
Western Division Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-0720

**Subject: Hunters Point Annex (HPA), Parcel B Data Presentation, July 27, 1993,
Radiologic Issues**

Dear Mr. Ramos:

Enclosed, please find the comments provided by the Department of Health Services (DHS) to the State Water Resources Control Board in support of the Interagency Agreement to provide technical oversight for radiologic issues at HPA. If there are questions about the content of the comments, please notify me and we will arrange a meeting as soon as possible.

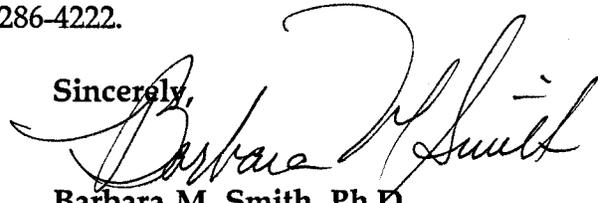
It should be noted that the DHS is to be directly and separately notified of any meeting where radiologic issues are to be presented or discussed, e.g., Technical Review Committee meetings (TRCs), and data presentations, such as those for Parcels A and B. Participation by DHS is essential in allowing the State to provide adequate comments on the investigation and clean-up at HPA. It should also be noted that the Navy will need to obtain DHS approval with respect to radiologic concerns before sites or parcels at HPA may be released to the public. This separate DHS approval requirement should be built into the development of proposed schedules and procedures for property release.

In addition, the Department of Toxic Substances Control (DTSC) Remedial Project Manager, Mr. Cyrus Shabahari, has requested the following information and notices so that these may be placed directly in the administrative record:

1. A copy of meeting minutes between DHS and Navy should be directly submitted to the DTSC.
2. All documents addressing radiologic investigations should be concurrently submitted to the DTSC.
3. The DTSC should be directly notified of technical meetings between the DHS and Navy.

Please direct your questions to me at (510) 286-4222.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barbara M. Smith', written in a cursive style.

Barbara M. Smith, Ph.D.
Remedial Project Manager

cc: Hunters Point Annex Radiologic Issues

Mr. Jim Sullivan, NAVSTATI
Ms. Roberta Blank, USEPA
Mr. Cyrus Shabahari, DTSC
Mr. Jack S. McGurk, DHS
Ms. Amy Brownell, SFDPH

DEPARTMENT OF HEALTH SERVICES

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AUG 17 1993

CALIFORNIA REGIONAL WATER
AUG 18 1993
QUALITY CONTROL BOARD

Ms. Barbara Smith
Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, CA 95612

Dear Ms. Smith:

Parcel B Data Presentation Meeting (Attachment 1, July 27, 1993), as requested in your Record of Communication, dated July 29, 1993, has been reviewed. The enclosed comments provided to you are in support of the Interagency Agreement between the State Water Resources Control Board and the Department of Health Services.

If you have any questions concerning these comments, please telephone me at (916) 323-1167 or Fil Fong at (916) 324-1378.

Sincerely,

A handwritten signature in cursive script that reads "Jack S. McGurk".

Jack S. McGurk, Chief
Environmental Management Branch

Enclosure

cc: Cyrus Shabahari, DTSC
John Adams, SWB
Steve Dean, EPA, Region 9, ORIA
Mike McClelland, WESTDIV

DHS Comments to "Parcel B Data Presentation Meeting (Attachment 1, July 27, 1993)"

General

For radiation issues at the Hunters Point Annex, Steve Dean, EPA, and Fil Fong, DHS, have and will meet with Mike McClelland, WESTDIV, and Dave Martinez, PRC. The radiation subgroup should be evaluating and reviewing the radiation concerns at these facilities and, by consensus and in coordination with the RPMs, recommending the course of action. Unfortunately, Mike McClelland is in training off-site and Steve Dean is at Washington, D.C. this week. Therefore, these comments should be considered as only part of the response from the radiation subgroup.

Drydock 4

These comments on Drydock 4 are based on the "Surface Confirmation Radiation Survey" (SCRS) report, dated November 3, 1992.

1. Background/Area of Concern:

The basis of the statement, "It has been speculated.....", is not known. If the speculation has some substance in fact, then the Navy should provide evidence or information of why Drydock 4 is suspected. If the speculation is not well founded and there were only guesses that nuclear powered vessels were drydocked at Hunters Point, then why limit the guesses only to Drydock 4? Why were not all the drydocks surveyed? If the speculation is based on stronger information and the Navy has a concern about Drydock 4, then the agencies should be provided with the source and rationale of the speculation. This was not provided in SCRS.

2. Field Investigation - First Bullet:

"Cursory survey" was reported here and SCRS. "Cursory" usually means superficial, not thorough. "Cursory survey" usually means initial or incomplete survey. Further, SCRS does not show a record of this "cursory survey" or any survey of Drydock 4. Please provide the documentation.

3. Field Investigation - Second Bullet:

The SCRS did state that the main drain sump sediment was sampled. However, the number of samples taken, and the sample identification for the samples taken at Drydock 4 were not reported in the SCRS. One of the "markers" radionuclides for fission products was stated here as cobalt-60. Cobalt-60 is not a fission product.

4. Results - First Bullet:

Cursory or incomplete surveys do not produce data results, sufficient to permit conclusions to be drawn. If a cursory survey was conducted of Drydock 4, no written record was provided to document these surveys. Were these cursory surveys conducted? If a concern of Drydock 4 does exist, the Navy must conduct a complete radiation survey and fully document the results of these surveys.

5. Results - Second Bullet:

The results of these sediment samples cannot be verified without providing the sample identification in the SCRS report. The sample identification must be provided in the SCRS report. The number of samples taken need also to be stated.

The SCRS, page 75, Section 5.7.4 stated that the "Results of liquid/sludge sampling in the main sump were not **conclusive**. The percent solids in the liquid/sludge sample matrix was not high enough to obtain low detection limits required for 226 Ra analysis." The statement provided in the second bullet is misleading. The SCRS reported the results of this testing was "not conclusive." Also, these samples were not analyzed for fission products as stated under Field Investigation, but only for 226 Radium.

6. Preliminary Conclusions/Recommendations:

The findings of the SCRS were based on undefined preliminary assessments and speculation about what radiological concerns are present at Drydock 4, on an unrecorded, incomplete radiation survey, on soil samples results that can not be confirmed, or reported to be inconclusive and on sediment soil analyzed not for fission products, but radium. All these flawed statements and findings have no credence for the preliminary conclusions/recommendations of no "further radiological investigation of Drydock 4." The Navy should be more aware of what was reported in the SCRS.

7. Further review of SCRS page 75, Section 5.7.4 reported that "the Navy provided documentation that showed Dry Dock 4 had previously been surveyed and released for unrestricted use." The Navy did not reference any documentation for this statement. Is there any basis for this last sentence?

IR-07 and IR-18:

1. Background/Areas of Concern:

This, again, places the speculation in the context of who speculated and how strong a speculation that the sand may contain long-lived particles from atomic weapon testing. Why involve the guess on fallout and complicate later the justification for radiological clearances? The SCRS reported higher radiation levels above background were measured within IR-18 to IR-07. This is sufficient rationale for this background discussion. (Then proceed to present the data and results to demonstrate that it is radium.)

2. Field Investigation - Third Bullet:

Why was the 15-foot trench work requested? What information was expected from this effort in 1993? (Figure 3 was not available to review the records of the gamma measurements.)

Based on the relatively low concentrations of radium detected in the earlier samples, it is questioned why radon measurements were conducted. The resources should be directed toward better soil characterization using soil analyses.

3. Results - Second Bullet

The Uranium Mill Tailing Radiation Control Act (UMTRCA) guidelines continued to be used as a standard in these discussions by the Navy. Gary Butner, DHS, in the technical meeting on HPA radiation issues on April 6, 1993 stated that the UMTRCA guidelines are not acceptable for remediation at HPA. (Dave Preston, PRC, however, did not record this discussion directed at RASO personnel in the minutes of this meeting.) In the meeting of the radiation subgroup on July 7, 1993 at Hunters Point, Steve Dean, EPA, and Fil Fong, DHS, both restated to Dave Martinez, PRC, that the UMTRCA guidelines are not applicable. Steve Dean emphasized that the specific policy guidance from EPA HQ was that UMTRCA standards should not be used as a standard for Superfund remediations. The standard in this case should not be on a yes-no number, but risk assessment based (e.g. CERCLA guidance for risk assessment). Delete all references to the UMTRCA guidelines.

4. Results - Fourth Bullet

What is meant by "visible radium?" What is the significance of "seeing" the radium?

5. Results - Bullets Four to Eight

All these bullets provided statements of the results, but there is no documentation to back up the statements. Where is the documentation of the record?

6. Preliminary Conclusions/Recommendation

The State agrees that further sampling and analysis are required to fully characterize this area of concern. It is recommended that further soil sampling be held in abeyance until the radiation subgroup partners can provide guidance about the most cost effective course of action to characterize IR-07 and IR-18.

In the July 7 meeting on HPA, Steve Dean mentioned the possibility of determining whether the material was contaminated with radioactive material or the radium is naturally occurring in this soil/sand. In the latter case, radiological clearances may be justified with no or minimal action.

As far as the standards for remediation is concerned, EPA and DHS are progressing toward developing radiological standards for remediation and base closures. Steve Book, Ph.D., of DHS has been specifically tasked to develop radiologic criteria on "how clean is clean" for DOD activities. The "Radioactive and Mixed Waste Process Action Team," chaired by Jim Cornelius, is scheduling this concern for discussion at the meeting of August 5, 1993. The author of this proposed position paper for the Navy should concentrate more on proper documentation of sampling, data and analyses and leave the decision-making process, based on the developing standards, to the Navy and the regulatory agencies.

Again, I have a problem with the process in which the Navy and their contractor(s) presented these radiation issues to the technical committee, and not to the radiation subgroup for review and recommendation. Also, there is no stated reason why such a short turnaround time is required for this position paper. There is no good reason why these presentations/discussions can not wait until Mike McClelland's next radiation issue meeting.