



San Francisco City and County
Department of Public Health
Environmental Health Section
Hazardous Waste Program

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HUNTERS POINT
SSIC NO. 5090.3.A

Gavin Newsom, Mayor
Mitchell H. Katz, Director of Health

Rajiv Bhatia, M.D., M.P.H.
Director of Environmental Health

April 13, 2010

Mr. Keith Forman
BRAC Environmental Coordinator
Hunters Point Shipyard
Southwest Division
Naval Facilities Engineering command
1455 Frazee Road, Suite 900
San Diego, CA 92108

Draft Final Radiological Addendum to the Remedial Investigation/Feasibility Study for Parcel E-2, Hunters Point Shipyard, dated March 2010

This letter contains comments from the City and Lennar.

General Comments

1. **Radionuclides in Groundwater:** The text in Sections 5, 6, and 8, where evaluation of radionuclides in groundwater is discussed, should be revised for clarity. The text currently states that conservative criteria are used. Please revise to state that as discussed in Section 5.1, radionuclides are present in groundwater above background activity levels indicating impacts to groundwater, but there is no risk to human health as future recreational users of Parcel E-2 will not be exposed to A-aquifer groundwater (A-aquifer groundwater is not a potential source of drinking water).

Also, the potential migration of radionuclides to surface water is not discussed. It is reasonable to assume that groundwater containing radionuclides above background may migrate to bay waters. As discussed in Section 8.1.3, risks to ecological receptors from radioactive chemicals were not evaluated because toxicological data are inadequate to support such an evaluation. Some qualitative discussion should be provided to assess potential risks based on radionuclide activity levels in groundwater.

In Section 5.3, the statement is made that "nonradioactive chemicals in groundwater within and in close proximity to the Landfill area require remedial option analysis" and in Section 8.1.3 the statement is made that "the estimated risk to ecological receptors from exposure to nonradioactive chemicals has prompted development of remedial alternatives that will also be protective of potential exposure of wildlife to radioactive chemicals". To address concerns related to migration of radionuclides to surface water, the statement should be added that because of potential migration of radionuclides to surface water, measures to mitigate migration of groundwater containing radionuclides above background to the bay are evaluated.

Specific Comments:

2. **Section 4.3, page 4-3, last paragraph:** There appears to be a typographical error where it is stated that ²²⁶Ra was reported in 1,118 of the 1,116 samples analyzed. Also, it would be helpful if additional information could be provided concerning the radioactive point source anomalies that were removed; i.e., did they represent soil in vicinity of fire bricks or radium dials or soil with specific characteristics.
3. **Section 11.2, page 11-4, third bullet, second sentence:** Please revise as indicated "A completion report describing the details of the implementation of the work plan, ~~the soil~~ sampling and analysis, *if required*, ~~the~~ off-site disposal *if required*, and the restoration of the integrity of the cover/cap....".
4. **Figure 9, Alternatives 3 and 4 Excavation Plan:** This figure seems to show fill thickness and planned cover in addition to a small area of excavation. If so, then this figure would be more appropriately titled "Alternatives 3 and 4 - Cover and Excavation Plan."
5. **Appendix E - Responses to Comments on the Draft Radiological Addendum to the Parcel E-2 RI/FS Report, Table 5, City and County of San Francisco Specific Comment 3:** There appears to have been a typographical error where the Navy reproduced City Specific Comment 3. On page 28 of 30 of Table 5, within text citing proposed Institutional Control language, there is an address, phone and fax number, which appears to represent a header from another document. Also, although the responses reference Section 11.4 of the Draft Final RI/FS, Section 11.2 of the RA should also be referenced in the response as it also includes a description of institutional controls.

Sincerely,



Amy D. Brownell, P.E.
Environmental Engineer

cc: Melanie Kito, Navy
James Whitcomb, Navy
Lara Urizar, Navy
Chris Yantos, Navy
Sarah Koppel, Navy
Hamide Kayaci, Navy
Simon Loli, Navy
Leslie Lundgren, CH2M Hill
Mark Ripperda, USEPA
Sarah Kloss, USEPA

Karla Brasemle, TechLaw
Ryan Miya, DTSC
Ross Steenson, RWQCB
Tiffany Bohee, Mayor's Office
Thor Kaslofsky, SFRA
Jeff Austin, Lennar
Jeff Fenton, Mactec
Dorinda Shipman, Treadwell Rollo
Saul Bloom, ARC Ecology