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Environmental Protection

## Department of Toxic Substances Control

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May 7, 2012

Mr. Keith Forman  
Department of the Navy  
1455 Frazee Road Suite 900  
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COMMENTS TO DRAFT WORK PLAN, TIME-CRITICAL REMOVAL ACTION FOR  
THE EXPERIMENTAL SHIP SHIELDING RANGE, PARCEL E-2, HUNTERS POINT  
NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Mr. Forman:

The Department of Toxic Substances Control (DTSC) has received and reviewed the Draft Work Plan, Time-Critical Removal Action for the Experimental Ship Shielding Range, Parcel E-2, Hunters Point Naval Shipyard, San Francisco, California dated April 18, 2012 (Work Plan). The California Department of Public Health's Environmental Management Branch (CDPH-EMB) has also received the Work Plan and any comments they have will be provided under a separate cover. Based on our review, DTSC has the following comments:

- (1) Section 3.2 – Radiological Removal Action Objective.
  - (a) Paragraph one. Please specify that the “wetlands design plan for Parcel E-2” is a document that is forthcoming and not a document that has already been provided and completed regulatory review / approval.
  - (b) Paragraph two. Please briefly describe how any detections of Cesium-137 (<sup>137</sup>Cs), Radium-226 (<sup>226</sup>Ra), and/or Strontium-90 (<sup>90</sup>Sr) exceeding the release criteria in any bottom and/or sidewall soil confirmation samples will be documented and carried forward to the final remedial action selected in the Parcel E-2 Record of Decision (ROD).
- (2) Section 4.2 – Site Preparation and Release Criteria. Paragraph one. Please clarify if a “Controlled Area” has already been established for Hunters Point Naval Shipyard (HPNS) or if one will be established specifically for this project.

- (3) Section 4.2.3 – Release Criteria for ROCs.
- (a) Administrative note. Please note that modifications to the Draft Time-Critical Removal Action Ship Shielding Action Memorandum and accompanying Appendix B, which includes the basis and calculations to establish the revised Cobalt-60 ( $^{60}\text{Co}$ ) release criterion, will need to be revised in order to be consistent with the  $^{60}\text{Co}$  release criteria provided in the Work Plan.
  - (b) Paragraph one, last sentence. Are there other radionuclides in addition to  $^{60}\text{Co}$ ,  $^{137}\text{Cs}$ ,  $^{226}\text{Ra}$ , and  $^{90}\text{Sr}$  that will be analyzed and may be encountered during the currently proposed removal?
- (4) Section 5.9 – Identification and Removal of Radioactive Material and Soil.
- (a) Paragraph three, last sentence. Please more clearly define what is meant when an excavation has “reached its boundary”. Does this excavation boundary refer to the buffer zone boundary, 1-foot depth boundary, investigation zone boundary, ship shielding range boundary, and/or any other boundary?
  - (b) Paragraph six. Please note that if any sandblast grit is encountered and left in place after completion of the current time critical removal action, follow-up investigations may be warranted to determine if other potential contaminants of concern, such as heavy metals, remain in place and need to be addressed as a component of the Parcel E-2 ROD implementation.
- (5) Section 5.11 – Construction of Radiological Screening Pads / Screening Yard.
- (a) Paragraph one. The text describes and references a “debris processing area” in Figure 2, but no such area appears to be presented in the figure. Please provide revision(s) to make the text and figure designations consistent.
  - (b) Paragraph two. Please briefly describe the criteria that will be used to determine if new radiological screening pads will be constructed within the Panhandle Area. In addition, please also describe how this criteria will be applied to identify how many, and over what approximate area they will be constructed (northeast or southwest of the ship shielding range).
- (6) Section 5.12 – Excavation of Experimental Ship Shielding Range
- (a) Paragraph three, second sentence. The text states that the Shielding Range berm is approximately 5 to 6 feet high and will be excavated in 12-inch lifts. However, the text in the previous paragraph states that both the Shielding Range berm and fan-shaped area will be excavated to 1 foot below ground surface. Please clarify if the entire Shielding Range berm (5 to 6 feet of soil/debris) will be removed or if only the top 12 inches of the berm is planned for removal.
  - (b) Paragraph three, last sentence. The Dust Mitigation Plan is referenced in the text. However, please summarize the dust monitoring and mitigation activities that will be implemented during excavation in the body of the Work Plan as well.
  - (c) Paragraph eight. Radiologically-surveyed soil will also need to be sampled and screened for all Parcel E-2 non-radioactive chemicals of concern prior to being designated as clean fill material suitable for use as backfill at HPNS. The same comment also applies to the first paragraph of Section 5.12.2 (Soil Stockpiles).

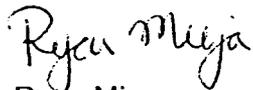
- (7) Section 5.13 – Final Conditions Survey of Experimental Ship Shielding Range. The text states that if elevated residual radioactivity is identified at the final excavation depth, the areas will be documented and reported to the Navy and RASO. Please also specify that any area where residual radioactivity exceeding the established release criteria is identified and left in place will need to be identified in the forthcoming Removal Action Completion Report and addressed further as a component of Parcel E-2 ROD implementation.
- (8) Section 5.15 – Site Restoration. Please specify the general type of seed mix that will be used to revegetate the disturbed areas upon completion of backfilling.
- (9) Section 6.1 – (Traffic Control) Analysis of Potential Impacts. Please specify that all trucks transporting wastes offsite will be required to be covered prior to leaving the HPNS site. In addition, please specify the required truck route between Highway 101 and HPNS in the text as well as on a map.
- (10) Section 7.0 – Waste Management Plan. Please specify anticipated locations to which California hazardous waste, low-level radiological waste, and low-level mixed waste will be transported for offsite disposal.
- (11) Section 9.4 – Project Schedule. The project schedule description provided in paragraph two should be updated accordingly along with Table 4.
- (12) Section 10.0 – Removal Action Completion Report (RACR). Additional components that will also be verified upon receipt of the draft RACR will include dust monitoring results, a summary and rationale for any implemented Work Plan modifications, photographic documentation, and soil sample laboratory reports.
- (13) Figure 2 – Construction Site Layout.
  - (a) While the figure does provide an approximate location of the “Radiologically Controlled Area” (RCA), please consider also including an approximate area for the larger “Controlled Area.”
  - (a) Please provide a brief explanation in the text (Section 4.2 or 4.2.3) for why the “EMS Radiological Bin Storage Area” is located outside of the proposed RCA boundary. Will only empty bins be stored in this area and full bins stored within the “Radiological Materials Storage Area”? Please clarify.
- (14) Editorial comments.
  - (a) Section 5.17. “Free-release surveys” (or criteria) should be changed to “Release surveys” (or criteria) so as not to be confused with radiological free release recommended by CDPH-EMB.
  - (b) Section 8.1, paragraph two, last sentence. “BuRRA Ows” should likely be changed to read “Burrows”.

Mr. Forman  
May 7, 2012  
Page 4

- (c) Section 9.1. The key project and regulatory contacts list is provided in Table 2 and not Table 8.
- (d) Figure 2. The feature for the soil stockpile area is not presented in the figure legend and should be added.
- (e) Table 2. DTSC's mailing address can have "Bldg. F, Suite 200" removed.

If you have any questions, please contact me at 510-540-3775 or by e-mail at [rmiya@dtsc.ca.gov](mailto:rmiya@dtsc.ca.gov).

Sincerely,



Ryan Miya  
Senior Hazardous Substances Scientist  
Brownfields and Environmental Restoration  
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E-mail distribution:

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Mr. Ross Steenson, Regional Water Quality Control Board, San Francisco Bay Region  
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