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MOFFETT FIELD
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

May 9, 1997

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity, West
900 Commodore Way, Bldg. 210
San Bruno, CA. 94066-2402

Re: *Draft Final OU1 Field Investigation Technical Memorandum*, dated April 9, 1997

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides the following comments. The radiological survey portion of the document was reviewed by Steve Dean of EPA's Technical Support Section. If you have any questions, please call me at 415-744-2385.

Sincerely,

Michael D. Gill

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: J. Chou (DTSC)
K. Eichstaedt (email)
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COMMENTS
Draft Final OU1 Field Investigation Technical Memorandum, dated April 9, 1997

1. Section 1.2.2, page 5, para 1. Please update the last two sentences in this paragraph that discuss the estimated amount of waste at Site 2 to be consistent with the OU1 Proposed Plan and Record of Decision.

2. Section 2.7.3, page 18, 19. Please include a summary of the trenching at Site 2 that occurred in September, 1996.

3. Section 2.8.1.2, page 20, last para. The text states: "Gross gamma counts were recorded for 1 minute count times at 1 meter above the ground surface.". For future reference, the best method to measure gamma counts is both at 1 meter and at the ground surface. Due to the inverse square law, which gamma emissions follow, much data can be gathered at the ground surface. By taking both measurements, a more complete picture of gamma emissions is shown. But no further measurement is required for this site.

4. Section 2.8.1.2, page 21, para 1. Please provide some detail in the text on the linear regression model used to approximate the relationship between the count rates and the exposure rates.

5. Section 2.8.2, page 24, para 1. The text states that the gamma count that exceeded the action level "...is believed not to be associated with the disposal of radioluminescent equipment containing radium-226". Was there any attempt to identify the gamma emitting radionuclide? We suggest that the Navy use portable gamma spectroscopy instrumentation to verify this claim. The results need to be more scientifically defensible than presented here and at the bottom of page 26.