

From: Konzen, Anthony CTR NAVFACHQ, BRAC PMO  
Sent: Monday, December 22, 2014 9:19 AM  
To: Hackett, John R  
Cc: Silva, Diane C CIV NAVFAC SW; Messer, Ulrika (ulrika.messer@CBIFederalServices.com)  
Subject: Treasure Island Site 12 SWDA Bigelow Court FSS Report (Contract N62473-10-D-0807 CTO 0010)  
- CDPH and DTSC Comments  
Importance: High

Hi John - Here are DTSC and CDPH comments on the Draft FSSR for Bigelow Court. Please prepare responses to comments and provide them to me for review. The DTSC comments are imbedded in the email below.

Regards,

Tony K.

Anthony D. Konzen, PG. CHG.  
PM, BRAC PMO  
Contracted Support to NAVY BRAC PMO  
1455 Frazee Road, Suite 900  
San Diego, CA 92108  
Ph: 619-532-0924  
Fax: 619-532-0983

-----Original Message-----

From: Sunga, Remedios@DTSC [mailto:Remedios.Sunga@dtsc.ca.gov]  
Sent: Friday, December 19, 2014 3:44 PM  
To: Konzen, Anthony CTR NAVFACHQ, BRAC PMO  
Cc: Forman, Keith S CIV NAVFACHQ, BRAC PMO; Clark, David J CIV NAVFAC SW; Zech, Myriam@Waterboards; Chris Glenn; bob.beck@sfgov.org; William Carson (william.carson@terraphase.com); Burke, NadiaHollan; Wright, Matthew (CDPH-DDWEM-EMB); Singh, Sheetal (CDPH-DDWEM)  
Subject: TI Site 12 SWDA Bigelow Court FSS Report - CDPH and DTSC Comments

Hi Tony,

Attached is CDPH's memorandum with comments on the Draft Final Status Survey Report, Non-Time Critical Removal Action for Bigelow Court Solid Waste Disposal Area, Installation Restoration Site 12, Former Naval Station Treasure Island dated November 2014. The following are additional DTSC comments on this document.

1. Section 10-Introduction, Page 1-1. Introduction. First Paragraph: Please change to "NTRCA" to "NTCRA" in the first sentence. The last sentence states "The Report presents the results of the radiological characterization at SWDA Bigelow Court, which demonstrate that residual radioactivity present is indistinguishable from background, and the site meets the requirements for radiological unrestricted release." Please clarify the boundaries of "the site" that are addressed by the Final Status Survey Report. The site addressed by the FSSR includes one large area and two small areas within the boundary of Bigelow Court Solid Waste Disposal Areas (SWDA) where excavation or remediation was

conducted as shown in the FSSR figures. Since areas around this site were impacted in the July 2014 Historical Radiological Assessment Technical Memorandum (HRASTM), unrestricted release of these areas is also required.

2. Section 2.1.2-Site Description, Page 2-1. This section states that SWDA Bigelow Court was partially covered by asphalt and is surrounded by uninhabited former Navy housing. Please revise this sentence since the surrounding housing units are now occupied.
3. Section 2.2-Previous Investigations and Removal Actions, Page 2-4. The last sentence states “The measurement was consistent with radiological objects found below the concrete foundation of Building 1321, which was demolished at SWDA Westside in 2013.” Please delete this sentence or discuss all the SWDAs covered by the NTCRA work plan.
4. Section 3.4.2.5-Step Five, Page 3-5. Please discuss why the remediated soil can be classified as Low Level Radioactive Waste “LLRW” or define LLRW.
5. Section 3.4.9-Sample Preparation, Page 3-8. Please discuss the basis for the 10 microrentgen per hour ( $\mu\text{R/hr}$ ) scan of the soil samples.
6. Section 4.1-Characterization Surveys, Page 4-1. Please discuss the rationale for using 12-inch lifts instead of 6-inch lift that was used for Building 233 FSS. Please show the locations of the four Radiological Survey Yard (RSY) in a figure.
7. Section 4.1.1-Radiological Surveys and Characterization Analyses, Page 4-1. Please define the “low level mixed waste” designation.
8. Section 4.4-Remedial Action Support Surveys, Page 4-5. Please explain why only three bounding samples were taken for Object 162 while four bounding samples were taken for the other two objects.
9. Section 5.1.2.1-Remediation and Current Conceptual Site Model Page 5-1. This section states “The SWDA Bigelow Court site has been remediated.” SWDA Bigelow Court has been remediated from chemical contamination; however, only three areas within the SWDA Bigelow Court boundary were remediated from radiological contamination. Please clarify that only portions of the SWDA Bigelow Court was radiologically remediated, and the remaining areas require a separate unrestricted radiological release. Please see Comment #1.
10. Section 5.3.2-Conclusions, Page 5-10. Please clarify that the offsite disposal of the excavated soil will be documented as part of the chemical remediation in the Post Construction Summary Report for Installation Restoration Site 12, SWDA Bigelow Court.

Thank you – Medi

Remedios V. Sunga  
Project Manager  
Department of Toxic Substances Control  
700 Heinz Avenue  
Berkeley, CA 94710  
(510) 540-3840