



Department of Toxic Substances Control

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Secretary for
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October 5, 2012

Mr. James B. Sullivan
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NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA –
DRAFT HISTORICAL RADIOLOGICAL ASSESSMENT SUPPLEMENTA TECHNICAL
MEMORANDUM

Dear Mr. Sullivan:

The Department of Toxic Substances Control (DTSC) received the draft Historical Radiological Supplemental Technical Memorandum (HRASTM) on August 6, 2012. DTSC appreciates the Navy's work in preparing the HRASTM that presents the additional research and findings of radiological information from naval operations at Treasure Island (TI). The HRASTM is an update to the 2006 Historical Radiological Assessment (2006 HRA) that incorporates new information and radiological work conducted at TI since 2006.

The following are DTSC comments on the HRASTM.

General Comments:

1. Information and Data since 2006 HRA. The HRASTM should discuss and provide all information and data that have been generated and gathered to date from the radiological activities at TI since 2006. The 2006 HRA indicated that radiological contamination in the Solid Waste Disposal Areas (SWDAs) was unlikely. However, the 2007 removal actions in the SWDAs found radiological contamination and several commodities. This new information should be incorporated in the HRASTM.

2. Final HRASTM. The HRASTM should be finalized with changes in the text, figures, and tables, as needed, in response to all comments, and not just attaching the Responses to Comments to the draft as an appendix.

Specific Comments:

3. Section 2.2.7-AOI7: Northern Housing Area of Interest, Pages 18-24. The soil removal action in 2007 at SWDAs 1207/1209 and 1231/1233 should be discussed in this section. The sampling data and a list of all commodities found at these SWDAs should also be included for reference. The discovery of radiological commodities during the 2007 removal action warranted the 2009 surveys at the Northpoint and Bayside housing areas. If wipe samples were collected during this surveys from residential buildings, the results of this sampling should also be incorporated in the HRASTM. The HRASTM should include all radiological findings from any buildings, soil/wipe samples, scans, and commodities found to date not previously provided in the 2006 HRA.
4. Section 2.2.8-AOI8: Southern Housing Area, Pages 24 and 25. The 2007 soil removal action at SWDAs A&B should be discussed in this section. The sampling data and a list of all radiological commodities found at these SWDAs should also be included for reference. The removal action findings prompted the California Department of Public Health (CDPH) to survey the areas surrounding the Radiological Controlled Area at SWDAs A&B.
5. Section 4.1-Radiologically Impacted Sites, Pages 28-33. The Bigelow Court SWDA should be included in the list of radiologically impacted sites. The reason for this is because it was classified as a SWDA in earlier investigations at Site 12 and as discussed on page 22 of the HRASTM.
6. Section 4.1.7-Former Storage Areas 30 and 31, Page 32.
 - 6.1 First Paragraph. The last sentence states that no radiological or other Installation Restoration Program (IRP) related work has been done at Site 30 or the areas north and south of the IR sites, since the 2006 HRA. Please clarify the meaning of "work" in this sentence since IR related work or activities have been completed at Site 30, i.e., Proposed Plan and Record of Decision.
 - 6.2 Second Paragraph. The second to the last sentence states that laboratory testing confirmed the presence of non-naturally occurring Ra-226, possibly from a deteriorated metal gauge. Please clarify whether a deteriorated metal gauge or any commodity was found in the area of elevated radiological readings.

7. Section 4.2-Radiologically Non-Impacted Sites, Pages 33 and 34. The radiological screenings at Site 33 was performed in early 2012 and the results of this survey should be discussed in the HRASTM. Site 33 is classified as not impacted based on the screening results as presented in the Radiological Characterization Report that is currently under review.
8. Section 6.1.2.7-Former Storage Area and Sites 30 and 31, Pages 55-56. Site 31, Page 56. The elevated radiological readings during the July 2010 soil excavation and the removal of soil with no commodities found in April 2011 should be discussed in this section. The HRASTM needs to incorporate all available data.
9. Figure 2-Newly Identified Radiologically Impacted Areas.
 - 9.1 Radiologically Impacted Sites. SWDAs A&B, 1207/1209 and 1231/1233 are shown in this figure but not identified in the Legend as radiologically impacted sites. In addition, Bigelow Court SWDA is not shown and Building 233 is not identified as impacted. Please clearly present both the new areas identified as impacted in this HRASTM as well as those identified in the 2006 HRA in different colors. The figure should denote all radiologically impacted areas identified in the 2006 HRA and the newly identified areas. The newly impacted areas should also include Bigelow Court SWDA and the paved compound at the rear of Buildings 342, 343 and 344 (see comments #6 and 11). The figure title should also be updated accordingly.
 - 9.2 Radiologically Impacted Site Boundaries. The current SWDA boundaries exclude the buildings where sidewall samples taken beneath the buildings showed radiological contamination. The boundaries should be adjusted to conservatively include the buildings. Building 233 impacted boundaries should also be adjusted as discussed at the BCT meetings based on the detection of radiological contamination along sewer lines. The Building 233 boundary includes surrounding areas beyond the building footprint.
10. Appendix A-References, HRASTM-27 Lic 04-0436002 Amend. This reference document states "The Radiac Instrument Maintenance Branch of Nuclear, Biological and Chemical Defense School is located near the corner of 5th Street and Avenue M on the Northeast side of Treasure Island (Fig. 1). It consists of numbered buildings 343, 344 and a portion of 342 and a paved compound of approximately 4,800 square feet which is enclosed by a 7' chain link fence (Figs. 2,3,4, and 5). . . The paved compound to the rear of the buildings (Fig. 5) is used to conduct outdoor monitoring exercises using sealed sources. Whenever sources are exposed in the compound a red warning light on the inside wall of Lab #3 is activated by staff personnel and personnel are restricted from that area." Based on these statements,

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the paved compound should be identified in the HRASTM as potentially impacted. Please also verify whether there is documentation indicating a release of sealed sources in any of these locations. This new impacted location should be shown in Figure 2.

Additional comments from CDPH are provided in the enclosed memorandum. Many of these comments pertain directly to the HRASTM, and the Navy should consider them the State's comments. Several of the comments or parts of the comments are related to future work or are not germane to the HRASTM. The Navy should address these comments in future documents. The comments that do not apply directly to the HRASTM and which the Navy should address in future documents are:

- Comment 3 – third and fourth sentences
- Comment 21 – second and third sentences
- Comments 7 and 14
- Comments 4, 5, 6, 8, 11, 12, 16, 18 and 23 should be addressed in the revised HRASTM if information is available. If not, they should be addressed in a future document.

If you have any questions or comments, please contact me at 510-540-3840 or rsunga@dtsc.ca.gov.

Sincerely,



Remedios V. Sunga
Project Manager
Brownfields and Environmental Restoration Program

Enclosure

cc: See next page

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cc: Email Distribution

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