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EDMUND G. BROWN JR.
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N60028_002804
TREASURE ISLAND
SSIC NO. 5090.3.A

DATE: April 4, 2016

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SUBJECT: Review *DRAFT RADIOLOGICAL WORK PLAN ADDENDUM Installation Restoration Site 30 Radiological Surveys at Various Areas Former Naval Station Treasure Island San Francisco, California*. Issued February 8, 2016. Received February 11, 2016.

Upon the request of the Department of Toxic Substance Control (DTSC), the Environmental Management Branch (EMB) of the California Department of Public Health (CDPH) has reviewed the *DRAFT RADIOLOGICAL WORK PLAN ADDENDUM Installation Restoration Site 30 Radiological Surveys at Various Areas Former Naval Station Treasure Island San Francisco, California*. Issued February 8, 2016. Received February 11, 2016. This review was performed in support of the Interagency Agreement between DTSC and CDPH.

If you need further assistance about this response please contact Matthew Wright of my staff at (916) 449-5687.



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The Environmental Management Branch (EMB) of the California Department of Public Health (CDPH) appreciates the opportunity to review the submitted document, Review *DRAFT RADIOLOGICAL WORK PLAN ADDENDUM Installation Restoration Site 30 Radiological Surveys at Various Areas Former Naval Station Treasure Island San Francisco, California*. Issued February 8, 2016.

General Comments:

1. Please note that CDPH-EMB utilizes Section 30256 in Title 17 of the California Code of Regulations (17 CCR 30256) to render a decision to concur with an unrestricted release. As a result, CDPH-EMB requires a final status survey report that compares the distribution of data from the former excavation site(s) with applicable reference area data and documents the remediation efforts. The final status survey should document and explain reasonable efforts that have been made to remediate the site.
2. CDPH-EMB notes that there significant differences between the Radiological Work Plans for the Northern and Southern TCRA's; even though they are same debris area. For example, the Northern TCRA radiological work plan calls for the excavation of fifty percent of the debris area boundary; along with soil samples and gamma scans of the resulting trench(s) exposed sidewall surfaces. The Northern TCRA's radiological work plan calls for a Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) Class 1 soil sampling survey of the bottom boundary of the fill area in the center of the designated debris area. Finally, the Northern TCRA calls for a registered geologist to confirm the boundaries of the debris area. The Southern TCRA calls for 18 perimeter samples and two center samples.

CDPH-EMB believes that since both TCRA's are of the same debris field and therefore the same site conceptual model applies; the investigation of Southern TCRA should equate to the investigation of the Northern TCRA.

Specific Comments:

3. Section 3.1 Permitting Requirements, page 3-2, paragraph two, sentence two, "The radiation protection program is implemented at NSTI in compliance with a series of standard operating procedures (SOPs) and Treasure Island Work

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Instructions (TIWIs; Shaw, 2012a)." Please include these documents as an appendix.

4. Section 7.3 Survey Instrumentation, page 7-2, paragraph three, sentence two, "Prior to use of the radiological survey instruments, calibration verification, physical inspection, battery check, and a source response QC check are performed daily in accordance with TIWI-12-01, "Operation and Use of Portable Instruments at Treasure Island," (Shaw, 2012a) and other applicable TIWIs." Please ensure that all applicable instrument QA/QC checks are performed at the end of the final survey performed so as to, "book end", that the final day's instrument(s) performance(s) were acceptable.
5. Section 7.5.5 Step Four-Define the Study Boundaries, page 7-4, paragraph one, and sentence one, "The lateral spatial boundary for this study is the southern TCRA excavation (Figure 5). The vertical boundary of the project area is the original excavation depths (3 to six 6 bgs) (Figure 5)." Please include a report from a registered geologist or professional engineer stating the debris area boundaries have been adequately defined.