

Cardinale, Louie CIV NAVFAC SW, PACO

From: Sunga, Remedios@DTSC <Remedios.Sunga@dtsc.ca.gov>
Sent: Tuesday, April 05, 2016 10:39
To: Cardinale, Louie CIV NAVFAC SW, PACO
Cc: Forman, Keith S CIV NAVFAC HQ, BRAC PMO; Clark, David J CIV NAVFAC SW; Zech, Myriam@Waterboards; Chris Glenn; bob.beck@sfgov.org; William Carson
Subject: [Non-DoD Source] TI Site 30 Rad Work Plan Addendum - CDPH and DTSC Comments
Attachments: Site 30 Rad Work Plan Addendum CDPH Comment Memo 4-4-2016.pdf

Hi Louie,

Attached is CDPH EMB's memorandum providing comments on the Draft Radiological Work Plan Addendum, Installation Restoration Site 30, Radiological Surveys at Various Areas, Former Naval Station Treasure Island, San Francisco, California dated February 2016. The following are additional DTSC comments.

1. Section 1.3-Project Schedule, Page 1-2 and Figure 3. Please update the project schedules.
2. Section 2.1-Site History and Description, Page 2-1. The second paragraph states that "The Navy has not conducted radiological investigation work at this site." The Navy has conducted soil sampling at Site 30 in 2015 as part of the radiological investigation at various area work plan and this is an addendum to that work plan.
3. Section 2.2.1-2002 Trenching and Excavation, Page 2-2. The last sentence in the first paragraph states "Two trenches, Trench 20 and Trench 48, exhibited dioxin concentrations that exceeded the project screening criterion for dioxin (19.5 nanogramas per kilogram)." Please delete 19.5 nanogram per kilogram. The screening levels discussed in the Site 30 ROD/Final RAP were the EPA residential PRG of 3.9 nanograms per kilogram (ng/kg), TI ambient concentration of 12 ng/kg and field screening concentration of 19 ng/kg. The 19.5 ng/kg concentration was DTSC's guideline for school property and cleanup that was used during the time critical removal action in 2002. The TI ambient level was selected as the remedial goal in the Site 30 ROD/Final RAP. Typo: Fourth paragraph for copper.

4. Section 2.2.2-Additional Excavations,Page 2-5. The discussion in this section is all related to Site 31 and this site is not a subject of this work plan. Please discuss the relevance of this discussion to Site 30.

5. Section 4.4-Environmental Protection Plan, Page 4-1. Waste management is addressed in the Waste Management Plan and not in the Environmental Protection Plan.

6. Section 6.2.2-Utility Survey, Page 6-1. This section states “Prior to commencing subsurface sampling and/or remediation activities, buried utilities will be identified . . .” Please clarify if the work will include remediation if radiological contamination is found during the soil sampling.

7. Section 6.3-Soil Borings, Page 6-2. This section states that the actual excavation depths are shown in Figure 5. This figure shows the previous excavation depths at Site 31 but not at Site 30. Please indicate the depth of debris removal at Site 30 in this figure.

8. Figure 5-IR Site 30 Sampling Plan. Please draw the boundaries of Sites 30 and 31 to show which excavation and debris areas are within each site.

Thank you – Medi

Remedios V. Sunga

Project Manager

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From: Wright, Matthew (CDPH-DDWEM-EMB)

Sent: Tuesday, April 05, 2016 10:01 AM

To: Sunga, Remedios@DTSC

Cc: Singh, Sheetal (CDPH-DDWEM)

Subject: DRAFT RADIOLOGICAL WORK PLAN ADDENDUM Installation Restoration Site 30 Radiological Surveys at Various Areas Former Naval Station Treasure Island San Francisco, California

Good Morning Medi,

Please find attached, "DRAFT RADIOLOGICDRAFT RADIOLODRAFT RADIOLOGICAL WORK PLAN ADDENDUM Installation Restoration Site 30 Radiological Surveys at Various Areas Former Naval Station Treasure Island San Francisco, California". Hard copy to follow.

Matthew Wright

Associate Health Physicist

CDPH-Division of Drinking Water & Environmental Management

Department of Defense Program

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From: EMB.Copier@cdph.ca.gov [mailto:EMB.Copier@cdph.ca.gov]

Sent: Tuesday, April 05, 2016 9:40 AM

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