



EPA

Department of
Toxic Substances
Control

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January 13, 1998

Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. George Kikugawa, Code 1831.2
900 Commodore Drive
San Bruno, CA 94066-2402

**WORK PLANS: NAVAL AIR STATION ALAMEDA, LANDFILL 1 AND 2
(IR SITES 1 AND 2) RADIOLOGICAL SURVEYS, SAMPLING AND
REMEDICATION (NOVEMBER 25, 1997); ALAMEDA NAVAL AIR
STATION, BUILDING 5 AND 400 CONTAMINATED DRAIN PIPING
REMOVAL (OCTOBER 1, 1997)**

Dear Mr. Kikugawa:

The Department of Toxic Substances Control, in conjunction with the Department of Health Services (DHS), has reviewed two work plans for remediation of radiological contamination at Alameda Naval Air Station, addressing surveys, sampling, and remediation at Landfills 1 and 2, and removal of contaminated drain piping at Buildings 5 and 400.

DHS has found the Buildings 5 and 400 work plan to be lacking in information on sampling and analysis, data validation, and laboratory quality assurance/quality control. DHS has found that the work plan for Landfills 1 and 2 is not consistent with the proposed action in the Draft Technical Work Document/Preliminary Draft Removal Action Plan, dated November 1997. Additionally, DHS has requested that the Navy provide a demonstration of how the numerical goals were determined in the Technical Work Document.

Mr. George Kikugawa
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Comments from DHS are enclosed. If you have any questions regarding this letter, please contact me at (510) 540-3814.

Sincerely,



Mary Rose Cassa, R.G.
Engineering Geologist
Office of Military Facilities

enclosures

cc: Ms. Anna-Marie Cook (SFD-8-2)
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Ms. Ann Klimek
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Naval Facilities Engineering Command
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DEPARTMENT OF HEALTH SERVICES REVIEW

ACTIVITY: *Review of Work Plan for Alameda Naval Air Station, Building 5 and 400 Contaminated drain piping removal (WP No. NASA-1), dated October 1, 1997 (DTSC/DHS Work Form #360)*

FACILITY: Alameda Point (formerly Alameda Naval Air Station), Alameda, CA

GENERAL COMMENTS:

DHS understands from the Navy that this document is for the removal of contaminated materials only, and verification that the release criteria was met will be covered in a separate document. DHS found the work plan to be lacking in information on sampling and analysis, data validation, and laboratory quality assurance/quality control. Therefore, DHS would not consider data generated under this work plan to be of sufficient quality for the final status survey unless more information is provided pertaining to sample collection and analysis. With this understanding, DHS has no further comments.

DEPARTMENT OF HEALTH SERVICES REVIEW

ACTIVITY: *Review of Work Plan for Alameda Naval Air Station, Landfill 1 and 2 (IR Sites 1 and 2) Radiological Surveys, Sampling and Remediation (WP No. NASA-2), dated November 25, 1997 (DTSC/DHS Work Form #360)*

FACILITY: Alameda Point (formerly Alameda Naval Air Station), Alameda, CA

GENERAL COMMENTS:

The purpose of this document does not appear to be consistent with the proposed action in the Draft Technical Work Document/Preliminary Draft Removal Action Plan, dated November 1997 (TWD). The proposed action for IR Sites 1 and 2 states: "Anomaly Removal: remove radiation anomalies at IR Sites 1 and 2 that pose an external radiation hazard." DHS understands from discussions with the Navy that this anomaly removal is to be accomplished in the interim until the final remedy is decided for the sites. DHS also understands that IR Sites 1 and 2 will remain under Navy control where access by the general public is limited. This document was reviewed with these discussions in mind, even though the text seems to report otherwise.

It should also be noted that DHS has requested that the Navy provide a demonstration of how the numerical goals were determined in the TWD. Without this demonstration, it is not completely clear how the anomaly removal would be accomplished. For example, does this anomaly removal involve both the removals of discrete sources as well as elevated contaminated soil?

Specific Comments

Page 5, Section 1.1: The purpose should be rewritten to more closely represent what was proposed in the TWD, and discuss the overall goal of this survey effort, in numerical terms.

Page 5, Section 1.1: Please define the term "100% scan survey".

Page 5, Section 1.1: Solid sampling for Ra-226 during the process would not be necessary to accomplish the goal of reducing the external radiation hazard as outlined in the TWD. If laboratory data is deemed necessary, then information on data validation, QA/QC, and sampling and analysis needs to be provided.

Page 5, Section 1.1: Since References 2.7, 2.8, etc., can contain contradictory recommendations, it should be specifically spelled out which document requirements are complied with.

Page 9, Section 5.1: In previous Alameda studies, six locations were extensively sampled and surveyed to be representative of background at Alameda. It is recommended that the background sampling be exactly as conducted at the suspect site. Please specify what background locations will be used. Why are 10 background readings recorded? Why is a preliminary walkthru scan performed to identify hotspots at a background location?

Page 9, Section 5.2: How will manual surveys be conducted? Describe how hand-held meter surveys and USRADs surveys will be correlated. How will area grids be established?

Page 9, Section 5.3: If anomalous areas are defined by the histograms, then what is the background data for? What exactly is done to determine what areas need further investigation? Who will review the histograms, using what criteria?

Page 9, Section 5.4: It is not clear why Nal readings "greater than twice background" was selected to determine when soil removal should occur. How does twice background relate to the USRADs histograms and the goal of removing anomalous areas that "pose an external radiation hazard"?

Page 10, Section 5.13: It is not clear why there would be any additional soil removal, sampling or surveys required.

Page 10, Section 5.14: After clean fill is in place, the final external radiation hazard should be measured to ensure the goal has been achieved.

Page 13, Figure 2: Does the boundary of the survey area extend east to Runway 13 and south to Runway 7, as requested by the DTSC letter dated April 21, 1997 (attached)? If no, why?

Page 14, Figure 3: Does the boundary of the survey area extend beyond the berm at the north east corner of the landfill, as requested by the DTSC letter dated April 21, 1997? If no, why?