

# Memorandum

Date: November 17, 2006

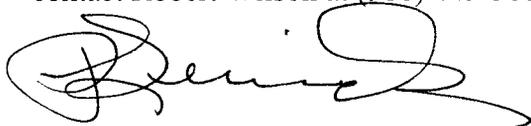
To: Dot Lofstrom, P.G.  
Senior Engineering Geologist  
Office of Military Facilities  
Department of Toxic Substances Control (DTSC)  
8800 Cal Center Dr.  
Sacramento, California 95826-3200

From: Environmental Management Branch  
P.O. Box 997413  
1616 Capitol Avenue, MS 7405  
Sacramento, California 95899-7413  
(916) 449-5688

Subject: Comments on the Draft Time-Critical Removal Action for Installation Restoration Sites 1, 2 and 32, Alameda Point, California, issued October 11, 2006. (DCN: ECSD-RACIV-06-0442)

Upon review of the subject document, DHS would like to submit comments to DTSC at this time. Please reference the attached sheets for general and specific comments related to the subject document review. This review was performed Robert Wilson (Associate Health Physicist), in support of the Interagency Agreement between DTSC and DHS.

If you have any questions concerning this review, or if you need additional information, please contact Robert Wilson at (916) 449-5688.



Penny Leinwander  
Senior Health Physicist

cc: Andrew Baughman  
Chemical Engineer/Remedial Project Manager  
Alameda NAS  
BRAC PMO West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108

Matthew Slack  
NAVSEADET RASO  
Building 1971  
Naval Weapons Station Yorktown  
Yorktown, VA 23691-0260

## California Department of Health Services Review

Activity: Review of the Draft Time-Critical Removal Action Work Plan for IR Sites #1, 2 and 32, Former Naval Air Station Alameda, Alameda Point, Alameda, California. (DCN: ECSD-RACIV-06-0442)

November 17, 2006

Page 1 of 2

---

### General Comments:

1. CDHS is aware that supplemental radiological characterization surveys at numerous locations within IR Sites #1, 2 and 32 will be forthcoming and these surveys could produce relevant information that may impact this TCRA Work Plan. If any additional survey information is to be incorporated into the TCRA Work Plan after the Work Plan is finalized, how will this information be addressed in the future? If radiological anomalies are located within the shoreline/rip-rap areas, sampling and removal techniques may differ from the procedures outlined in the current TCRA Work Plan due to differences in geometry and topography between the shoreline/rip-rap and landfill areas.
2. The removal approach specified within this document may not support unrestricted release of the sites at a later date.

### Specific Comments:

1. Section 5, Sub-section 5.6.4.3, pages 5-10 thru 5-12 inclusive:

Equation 5-4 for Minimal Detectable Count Rate (MDCR) for beta scans is shown to have a calculated result of "96.4 *cpm*". The following Equation 5-5 used to calculate the "scan MDC", applied the MDCR result of Equation 5-4 (96.4 *cpm*). On page 5-12, the calculation of the scan MDC equation indicates the MDCR as "86.4 *cpm*" instead of "96.4 *cpm*" as previously stated in the document. The result of the scan MDC calculation is based upon the "86.4 *cpm*" factor. Is "86.4 *cpm*" a result of a typographic error? The calculation may need to be refined to include the proper MDCR input.

On page 5-11, is the selection of the scan MDC for "structural surfaces" relevant for land area sites in IR #1, 2 and 32?

CDHS requests that all equations and calculations in Section 5 be reviewed for typographic errors and mathematic relevance.

2. Section 6, subsection 6.8.1, page 6-13, 2<sup>nd</sup> paragraph:

A section of the paragraph states: "Following removal of the source of elevated gamma activity, an additional 12 inches of soil in all directions from the source will also be removed." CDHS assumes that the term "in all directions" includes the 12 inches below the excavated area and a resurvey of the completed excavation area to ensure the complete removal of the source of elevated gamma readings.

The Navy may need to amend the "Depth" column of Table B.5-1 to reflect any changes in excavation requirements.

## California Department of Health Services Review

Activity: Review of the Draft Time-Critical Removal Action Work Plan for IR Sites #1, 2 and 32, Former Naval Air Station Alameda, Alameda Point, Alameda, California. (DCN: ECSD-RACIV-06-0442)

November 17, 2006

Page 2 of 2

---

3. Appendix B.

MARLAP guidance specifies that that one of the most important parameters for specifying data quality requirements is required method uncertainty. Please show calculations and provide your required method uncertainties for each radionuclide contaminant of concern in soil and water samples.

4. Appendix B, Table B.7-4:

Please provide the Navy's reasoning for a Measurement Performance Criteria in determining an RPD (Relative Percent Difference) value of <50% for soil for a field duplicate QC sample as noted in the Table B.7-4. The Navy may want to reference their Quality System Manual (QSM) and have a designated data validation company review the Navy's RPD for soil criteria in determining acceptance of that RPD value in meeting DQO.

CDHS is concerned that an RPD of 50% for field duplicates may not result in reproducible enough results to support project decisions.

5. Appendix D-4, section 4.6:

There is no mention of the validity of any previous survey work performed by a survey instrument that has failed an operational check at the beginning of next workday. There is lack of a post-survey operational check to "bookend" the initial operational check of the survey instrument. CDHS recommends that results of operational checks include the written entry of the source check readings in appropriate measurements.