

Department of Health Services (DHS)

Review of the *Draft Radiological Removal Action Memorandum, Hunters Point Shipyard, San Francisco, California, dated June 26, 2000.*

July 27, 2000

DTSC Resource Planning Form # 459

The following comments are in response to the request from Mr. Chein Kao of Department of Toxic Substances Control to review the draft document listed above.

General Comments:

1. DHS is concerned with the wording in this document that suggests that only the near surface or upper soil will meet the proposed cleanup criteria. If it cannot be shown that the subsurface soil also meets the proposed derived concentration guideline level (DCGLs), the State will not be able to release these sites for unrestricted use. The State's criteria for unrestricted release must be met to release these sites for unrestricted use.

Specific Comments:

1. Page 16, Section 5.1.2: Please explain whether radioactive sources would be left below the "upper soil level" at the proposed removal sites.
2. Page 19, Section 5.41: Alternative 2 would not comply with State requirements if all radiation sources are not removed during this removal action.
3. Page 21, Section 6.1.2: In order to meet the State's requirements for unrestricted release of property, all discrete sources of radiation must be removed. Any residual contamination must meet DCGLs approved by the State and not exceed a total effective dose equivalent (TEDE) of 25 millirem per year as stated in 10 CFR 20 Subpart E.
4. Page 22, Section 6.3: If the comments above are not adequately addressed or if these sites do not meet the State's unrestricted release criteria, the sites will require controls and restrictions.
5. Page 23, Section 7.0 Outstanding Policy Issues: See comments above.
6. Page E-1: Please verify that the ARARs are Chemical rather than Radiological and that 10 CFR 10.1402 is the correct citation rather than 10 CFR 20, Subpart E.

Memorandum

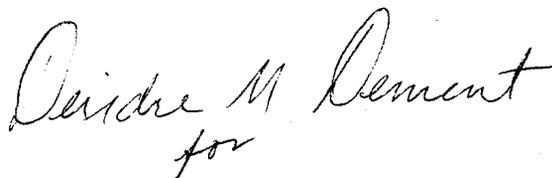
Date: July 27, 2000

To: Mr. Chein Kao
Office of Military Facilities
Department of Toxic Substances Control (DTSC), Region 2
700 Heinz Avenue, Suite 200
Berkeley, California 94710

From: Environmental Management Branch
P.O. Box 942732
601 North 7th Street, MS 396
Sacramento, California 94234-7320
(916) 445-0498

Subject: Department of Health Services (DHS) Review of *Draft Radiological Removal Action Memorandum*, San Francisco, California, dated June 26, 2000.

Attached are DHS' comments on the subject document. This review was performed by Ms. Deirdre Dement, Associate Health Physicist in support of the Interagency Agreement between DTSC and DHS. If you have any questions concerning this report, or if you need additional information, please contact Ms. Dement (916) 324-1378.



Darice G. Bailey, Chief
Waste Management Section

Attachment

cc: / Mr. Richard G. Mach, Jr.
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

Ms. Deirdre Dement
PO Box 942732
601 N. 7th Street MS 396
Sacramento, CA 94234-7320