



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

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HUNTERS POINT
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Ser 06CH.RM/0539
July 11, 2001

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Ms. Claire Trombadore (SFD 8-3)
U.S. Environmental Protection Agency, Region IX
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Mr. Brad Job
California Regional Quality Control Board, San Francisco Bay Region
1515 Clay Street, #1400
Oakland, CA 94612

Dear BCT members:

This letter presents the Navy's plan to complete the excavations and off-site disposal for soil associated with Installation Restoration (IR) site 7 (IR-07), Parcel B, Hunters Point Shipyard. The Navy plans to begin implementation of this plan on July 18, 2001. If you have any concerns with this proposal, please let me know at the meeting on July 17, 2001. Following is a discussion of the information to support the off-site disposal of the current stockpiled soils followed by the procedures to be followed to screen the remaining excavation material.

The Navy has completed the IR-07 soil stockpile characterization per the June 5, 2001, agreement with the Environmental Protection Agency. Enclosure (1) summarizes the results of these sampling activities. The results confirm that the radium-226 levels are within normal Hunters Point background levels. Based on the other, non-radiological, contaminants in the stockpiles, soil from excavation 7-4 is defined as Class 2 soil, which is scheduled to be disposed at Forward Landfill in Manteca, CA and soil from Excavation 7-5 is defined as Class 1 soil, which is scheduled to be disposed at ChemWaste Landfill in Kettleman, CA. The results presented in enclosure (1) have been forwarded to and discussed with each of the landfill operators. Both facilities have agreed that based on the radium-226 results being within background, they can accept the waste for disposal, and the Navy has agreed to do additional scanning of soil during loading activities similar to that done by the landfills, to ensure there are no anomalies that could be missed.

The Navy plans to commence additional excavation work in Excavations 7-4 and 7-5 on July 18, 2001. The material from these excavations will each be placed in their own

5090
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stockpiles. There will be no additional segregation of material from each of these excavations, except as discussed below.

To ensure that there are no anomalous radiological materials associated with the remaining buried sandblast grit material in these areas, the following procedures will be followed. The contractor will use a Ludlum 2221 Count Rate meter with 44-10 detector to scan the soil excavation areas where there is visible sandblast grit being removed. These scanning activities will occur at least hourly. If the sandblast grit material is observed at depths greater than is reasonable to scan during excavation activities (approximately four feet below ground surface), the material will be scanned with the same device discussed above, as it is placed in the stockpile. If there are field readings found at greater than three times background (i.e. two sigmas), the material will be segregated and the previously agreed stockpile characterization procedures will be followed.

Should you have any concerns with this matter, please contact the undersigned at (619) 532-0913.

Sincerely,



RICHARD G. MACH JR., P.E.
BRAC Environmental Coordinator
By direction of the Commander

Enclosure 1. Table with Ra-226 Results with Cross Comparison

Ra-226 Results with Cross Comparison				
28-Jun-01				
Sample ID	NWT Results		Eberline Services Results	
	Ra-226 pCi/g	Error +/- pCi/g	Ra-226 pCi/g	Error +/- pCi/g
Bldg. 126 IR 26 Bkgd	0.677	0.591	0.228	0.047
Bkgd. Parcel A 01	<0.125	MDA	0.168	0.027
Bkgd. Parcel D 01	1.16	0.882	0.3	0.015
Parcel B (7-4-03)	1.48	1.2	0.777	0.04
7-4-SP1-01	<0.961	MDA	0.277	0.051
7-4-SP1-02	<0.905	MDA	0.257	0.04
7-4-SP2-01	0.84	0.617	0.384	0.041
7-5-SP3-01	<0.928	MDA	0.272	0.071
7-5-SP3-02	0.705	0.51	0.236	0.03
7-5-SP3-03	0.727	5.78 E-01	0.219	0.044
7-5-SP3-04	<0.853	MDA	0.182	0.022
7-5-SP4-01	<1.14	MDA	0.327	0.04
7-5-SP4-02	<1.08	MDA	0.3	0.042
7-5-SP4-03	1.06	0.966	0.362	0.06
7-5-SP4-04	0.647	0.626	0.334	0.033
7-5-SP4-05	1.15	1.05	0.436	0.022
7-5-SP4-06	1.14	0.588	0.417	0.049