

RESPONSE TO COMMENTS ON
REVISED FINAL BASEWIDE RADIOLOGICAL REMOVAL ACTION
ACTION MEMORANDUM
DATED FEBRUARY 14, 2006
HUNTERS POINT SHIPYARD
SAN FRANCISCO, CALIFORNIA

Comments dated: March 17, 2006

Comments by: James Ricks, Project Manager, Superfund Division (SFD 8-1)
U.S. Environmental Protection Agency (EPA), Region IX

SPECIFIC COMMENTS

Comment 1: *Section II.A.2, Physical Location, Page 2: Since the conveyance of Parcel A to the City of San Francisco, Hunters Point Shipyard (HPS) is no longer 936 acres. Please update the text to reflect the current size of HPS.*

Response 1: The sentence has been revised to read "HPS consists of 848 acres, 416 acres of which are on land,"

Comment 2: *Section II.A.4, Release or Threatened Release into the Environment of a Hazardous Substance or Pollutant or Contaminant, Page 3: It is unclear why daughter products are no longer listed; the 2001 Action Memorandum included "cesium-137 (and daughter products)" and "uranium-235 (and daughter products)." In addition, it appears that text is missing from the first paragraph since there are two "and" statements. Please include daughter products or explain why they have been dropped from the 2006 Action Memorandum. Also, please revise the first paragraph for clarity.*

Response 2: The text has been revised to include the daughter products for uranium and cesium. Also, the first paragraph has been revised for clarity. In addition, the text and Table 1 have both been updated to reflect the appropriate isotopes listed in both places.

Comment 3: *Section II.A.5, National Priorities List Status, Page 3: The text does not reflect the most current CERCLA status of Parcel B, specifically that the Feasibility Study is being redone so that the Record of Decision can be amended. Please update the status of Parcel B.*

Response 3: The text has been changed to “RI/FSs have been completed for Parcels A and B, and an Addendum to the Technical Memorandum in Support of Record of Decision Amendment (TMSRA) is being prepared for Parcel B. RI/FSs are currently being conducted for Parcels C, D, E, and E-2.”

Comment 4: *Section V.A, Proposed Action, Page 10: The last paragraph states, “Table 3 does not include those sites that were in the former Parcel A,” but it is unclear if this statement refers to the former Building 322, which was demolished, or if it refers to radiologically impacted sites for which parcel boundaries were readjusted to move them out of Parcel A. It is also possible that the community and others could read this paragraph and conclude that there are still radiologically impacted sites in Parcel A. Please revise this paragraph to clarify whether there are still radiologically impacted sites in Parcel A and to discuss the fact that the Parcel A boundary was adjusted to move radiologically impacted sites into other parcels.*

Response 4: The last paragraph, second sentence has been changed to: “Table 3 does not include those sites in the former Parcel A that have received regulatory release or the Formerly Used Defense Site (FUDS). The remaining impacted sites (Buildings 813 and 819) in the former Parcel A have been reassigned to Parcel D after the Parcel A boundary was adjusted.”

Comment 5: *Section V.B., Estimated Costs, Page 15: The costs are the same as those in the 2001 plan, but there has been inflation and the cost of construction materials has increased. Please update the cost estimate to reflect 2006 costs.*

Response 5: The costs that have been presented on Page 15 reflect changes due to inflation (a volume/cost increase) and a reduction in the volume of material remediated from 20 cubic yards to 13 cubic yards (a cost decrease). The combined effects of these changes result in the overall cost to remain about the same.

Comment 6: *Table 1, Release Criteria: During the recent Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting, the Navy agreed to update the release criteria for Cesium-137 to reflect the current preliminary remediation goal (PRG) of 0.113 picoCuries per gram (pCi/g). Please update this table with the PRG for Cesium-137.*

Response 6: Release Criteria for Cesium-137 for Soil for Outdoor Worker and Residential have been changed to 0.113 picoCuries per gram.

Comment 7:

Figure 2, Base-Wide Impacted Buildings, Sites, Sanitary and Storm Drain Sewer Systems: It is unclear why the figure does not include IR-02 Northwest and Central (the Radium Dial Disposal Area) and the Metal Slag Area in the IR-01 panhandle, since radiological removal actions are still being done at these sites. Please include IR-02 Northwest and Central and the Metal Slag Area on Figure 2.

Response 7:

The intent of this figure is to show the impacted buildings and sites at Hunters Point Shipyard. The specific areas within the impacted sites that are currently undergoing radiological removal action, such as IR-02 Northwest and Central, Metal Slag area, PCB Hot Spot, and Metal Debris Reef, are covered by referencing Parcels E and E-2 impacted buildings and sites.

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DATED FEBRUARY 14, 2006
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SAN FRANCISCO, CALIFORNIA**

Comments dated: March 24, 2006

Comments by: Department of Health Services, State of California (DHS)
Environmental Management Branch

GENERAL COMMENTS

Comment 1: *Similar comments have been submitted previously in other reviews of the Navy's documents.*

Response 1: The Navy is aware of the State of California Department of Health Services previous comments on similar documents. The Navy intends to continue responding to DHS comments in an accurate and timely manner to sustain a shared vision for completing the radiological work with appropriate regulatory guidance.

SPECIFIC COMMENTS

Comment 1: *Section II.B.1.4, Phase V, Page 5: Using criteria for a "free release, for industrial use," will not guarantee a release for unrestricted use from the State of California. (See Specific Comment 2).*

Response 1: The Navy understands that using criteria for industrial re-use will not guarantee a free release. Appropriate release criteria for industrial and residential re-use has been established in Table 1. The Navy intends to use the release criteria as clean-up goals for the radiologically impacted sites at Hunters Point that are consistent with the planned reuse presented in the San Francisco Redevelopment Agency's (SFRA) Reuse Plan.

Comment 2: *Section II.B.1.5.3, NWT Interim Investigation and Removal Action, Page 6: If the Navy is requesting an unrestricted release from the State of California, the "site release criteria" will need to show that removal actions cleaned the site to as low as reasonably achievable (ALARA). Any averaged residual contamination concentrations when modeled should not exceed a dose of 25 millirem per year (mrem/year). The "Table 1, Release Criteria" will need to reflect these values.*

Response 2:

The Navy understands that using criteria for industrial re-use will not guarantee a free release. Appropriate release criteria for industrial and residential re-use has been established in Table 1. The Navy intends to use the release criteria as clean-up goals for the radiologically impacted sites at Hunters Point, which is ALARA.

In addition, the Navy intends to model the resulting residual radioactivity at the site to demonstrate the resulting dose is below 25 millirem per year. Table 1 will be revised to incorporate the resulting dose received at the release criteria identified. These release criteria are also consistent with the SFRA Reuse Plan.

Comment 3:

Section II.C.0, STATE AND LOCAL AUTHORITIES ROLE, Page 8: As stated numerous times, the CDHS does not defer to the U.S. EPA with regard to unrestricted release requirements. Our dose assessment will be based on ALARA and residual contamination. The averaged residual contamination data used for your dose model should reflect representative sampling of the site.

Response 3:

The Navy understands that the State of California Department of Health Services does not defer to the U.S. EPA for unrestricted release requirements. As stated in the previous response, the Navy intends to model the resulting residual contamination data, which will reflect representative sampling at the site, to demonstrate the resulting dose is below 25 millirem per year.

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REVISED FINAL BASEWIDE RADIOLOGICAL REMOVAL ACTION
ACTION MEMORANDUM
DATED FEBRUARY 14, 2006
HUNTERS POINT SHIPYARD
SAN FRANCISCO, CALIFORNA**

Comments dated: Sent via e-mail on March 24, 2006

Comments by: Thomas P. Lanphar, Senior Hazardous Substance Scientist
Office of Military Facilities
Department of Toxic Substances Control (DTSC)

SPECIFIC COMMENTS

Comment 1: *Section I. Purpose, page 1 and Section III, Threats to Public Health, Welfare, or the Environment and Statutory and Regulatory Authorities, page 9: While DTSC agrees that interim actions are often appropriate for the removal of radiological contamination at Hunters Point, DTSC continues to disagree with the Navy on the application of Time Critical Removal Actions. Please explain how the planned removal actions meet the requirements of Code of Federal Regulations Section 300.415(b)(4).*

Response 1: Title 40 Code of Federal Regulations (CFR) 300.415(b)(4) states the following:

“Whenever a planning period of at least six months exists before on-site activities must be initiated, and the lead agency determines, based on a site evaluation, that a removal action is appropriate:

- (i) The lead agency shall conduct an engineering evaluation/cost analysis (EE/CA) or its equivalent. The EE/CA is an analysis of removal alternatives for a site.
- (ii) If environmental samples are to be collected, the lead agency shall develop sampling and analysis plans that shall provide a process for obtaining data of sufficient quality and quantity to satisfy data needs. Sampling and analysis plans shall be reviewed and approved by EPA. The sampling and analysis plans shall consist of two parts:
 - (A) The field sampling plan, which describes the number, type, and location of samples and the type of analyses; and

- (B) The quality assurance project plan, which describes policy, organization, and functional activities and the data quality objectives and measures necessary to achieve adequate data for use in planning and documenting the removal action.”

First, the Department of the Navy (DON) has determined that the only acceptable alternative to address potential radioactive contamination in sewer and storm drain lines is excavation, survey, and appropriate disposal. In situ survey is not possible due to the limitations of field screening devices. The DON must also address the California Department of Health Services requirements for free release, based on the intended property reuse. These requirements include scanning all overburden soil above the drain lines in addition to the lines themselves. Since the DON concluded that only one alternative is applicable to the drain lines, an equivalent cost estimate was provided in the Action Memorandum. In this sense, an EE/CA would be a redundant document.

Second, the DON has provided a Sampling and Analysis Plan to the Base Realignment and Closure (BRAC) Cleanup Team (BCT) for review. This meets the Title 40 CFR 300.415(b)(4)(ii) requirement.

Comment 2:

Section II, C, 2. Potential for Continued State or Local Response, page 9: DTSC does not defer to US EPA for the development of cleanup goals for radiological removal actions. The remediation of radiological contaminated sites at Hunters Point must meet the requirement of CERCLA and Chapter 6.8 of California Health and Safety Code. This includes the evaluation of risks from sites in a report such as a Remedial Investigation Report, the evaluation of remedial alternatives in a Feasibility Study and a final selection of a remedial action, or no further action in a Record of Decision. The DTSC must concur with the Record of Decision, which will include the selection of a final remedy for radiological sites. Please elaborate on DTSC extended role in remedial decisions involving radiological sites being remediated under CERCLA at Hunters Point.

Response 2:

The DON concurs with DTSC's role in approving remedial decisions involving radiological sites being remediated under CERCLA at Hunters Point Shipyard. The DON fully acknowledges the role of DTSC as a full-fledged BCT partner, as outlined in the Federal Facilities Agreement.

Comment 3:

Section V.A.3, Contribution to Remedial Performance, page 12: This section states that the Navy intention is that the removal actions are the final radiological remedy for each site. Please add that the each radiological site cleanup will be later evaluated to determine if the level of cleanup achieved is appropriate for a final remedy or if additional remediation is necessary.

Response 3:

The Final Action Memorandum – Revision 2006 will be edited to clarify that the removal action is an interim action and that the final action for radiological site cleanup will be selected in the Record of Decision.



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San Diego, CA 92132-5190

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LOCATION: Hunters Point Shipyard

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Neil Hart, Program Manager

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RESPONSES TO COMMENTS ON THE REVISED FINAL BASE-WIDE RADIOLOGICAL REMOVAL ACTION,
ACTION MEMORANDUM DATED FEBRUARY 14, 2006.

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