



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

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HUNTERS POINT
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May 30, 1995

RECEIVED

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Michael McClelland
BRAC Environmental Coordinator
Hunters Point Annex
Engineering Field Activity, West
900 Commodore Drive, Code 62.3
San Bruno, CA 94066

Richard Powell
Engineering Field Activity, West
900 Commodore Drive
San Bruno, CA 94066

RE: EPA Review and Comment on Results of Subsurface Radiation Investigation in Parcels B and E, Volumes I and II

Dear Messrs. McClelland and Powell:

EPA has completed its review of the above-referenced documents regarding radiation investigations of Parcels B and E, Hunters Point Annex ("Hunters Point"). In general, the documents are well-drafted and we I have very few comments.

First, there are some minor typographical/grammatical errors in Volume II, page B-2, Section 1.2, paragraph 1 which need correcting. Second, where the reports discuss "shell(s)" EPA assumes that in all cases this terminology refers to marine organism shells and not ordnance. It would probably be a good idea to reword the document where necessary to ensure that this terminology does not confuse the public and result in unnecessary concern over an ordnance problem that does not exist.

Third, EPA strongly agrees with the interpretations in Volume 1, page 34 under Section 4.5, Bioturbation. There is ample evidence of burrowing activities by animals such as ground squirrels, feral cats and dogs, snakes, rats and other rodents at the Parcel E landfill. Radium devices buried below six inches could well be brought to the surface by animals' activities. EPA believes that the effects of bioturbation on radium sources in the landfill should not be underestimated and should be considered by the Navy when a final cleanup action for the Parcel E landfill is discussed.

Thank you for the opportunity to review these documents. Please keep us informed regarding the scope and schedule of additional radiation surveys planned for Hunters Point. EPA Region 9's in-house radiation expert, Mr. Steve Dean, will continue to be involved in the review of the radiation studies at Hunters Point so please be sure to copy him directly on any future deliverables. Mr. Dean's mailcode is A-1-1. In addition, EPA Region 9 may have the opportunity to involve EPA's NAREL lab in future work at Hunters Point so please keep this in mind when planning any future work.

If you should have any questions, please call me at (415) 744-2409 or Steve Dean at (415) 744-1045.

Sincerely,



Claire Trombadore
Remedial Project Manager

cc: Sheryl Lauth, EPA
Cyrus Shabahari, DTSC
Dave Song, EFAWEST
Jim Sickles, PRC