



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

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HUNTERS POINT
SSIC NO.5090.3

Mr. Raymond Ramos (T4HP)
BRAC Environmental Coordinator, Hunters Point Annex
Naval Facilities Engineering Command
Western Division
900 Commodore Drive
San Bruno, CA 94066-2402

Radiation Issues at Naval Station Treasure Island, Hunters Point Annex

Dear Mr. Ramos:

This letter attempts to clarify two issues which appeared to cause some confusion in our meeting on March 29, 1994 regarding radiation issues at Hunters Point Annex. Those issues are:

1. Removal of Point Source Devices in Parcel E
2. Study of the Treatability of Radioactive Waste by Separation and Removal

Regarding the Navy's proposed removal, as we understand it, the Navy proposes to remove by hand all the radium dials which have been surveyed and mapped in the surface soil layers within IR-1 and IR-2 in Parcel E. Further, we understand that the Navy proposes to remove any contaminated soil associated with the radium dials in the surface soil which emit detectable gamma activity, an estimated 1 cubic foot of soil around each point source. Each area of excavation will be monitored for radioactivity to ensure a complete removal and the excavated dials and soil removed from the site for disposal to a licensed facility off-site.

Remaining on site, however, will be point source devices such as radium dials buried at depth within IR-1 and IR-2, as well as other various sources of radiation and hazardous substances. We understand that it is the Navy's intention to evaluate as part of the Parcel E Remedial Investigation and Feasibility Study, the sources of radiation and hazardous substances which will be left in place following the removal action. We further understand that appropriate treatability studies will be designed and implemented to study the viability of removing the remaining sources of radiation. If this is not the Navy's intention, please be sure to inform us of that fact, immediately.

If our understandings are correct, however, we fully support the Navy in its effort in removing point sources of radiation in

the surface soil of IR-1 and IR-2 for the purpose of reducing any potential immediate health risk. We would like assurances that our office will have adequate opportunity to review the workplan for the removal effort before it is implemented. In particular, we would like to be assured that the activity will be conducted in such a manner that radioactive soil will not be dispersed into the air or otherwise disturbed so as to worsen the potential immediate health risks and/or complicate future treatability studies or remediation. Please keep us apprised of the Navy's schedule regarding this upcoming action so that arrangements can be made for a timely review of the workplan upon its submittal.

Regarding the study of the treatability of radioactive waste by separation and removal, it appears that the Navy no longer requires assistance from U.S. EPA's National Air and Radiation Environmental Laboratory. As such, our effort to implement an Interagency Agreement such that the Navy could utilize this source of expertise has been quelled. It is our understanding that the Navy will instead be soliciting bids from the private sector to conduct a treatability study of the Wet Screening Process and perhaps other applicable screening processes by which buried sources of radiation and the associated contaminated soil are separated from other landfill debris and hazardous substances and removed for disposal in a licensed facility. Again, if it is not the Navy's intention to pursue in the private sector the implementation of a treatability study similar in scope to that proposed by NAREL, please inform us of that fact, as soon as possible.

I hope this letter provides the necessary clarity regarding these issues. If you have any further questions, you can reach me at (415) 744-2409.

Sincerely,



Alydda Mangelsdorf
Remedial Project Manager

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