

USEPA Comments on the Draft Final Record of Decision for Parcel D-2  
Comments dated 2/13/09

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Page 2, First Full Paragraph: It would be better for the Declaration section to simply say that any contaminated storm and sanitary sewers around Building 813 were removed in 2006/2007. The current level of detail is actually somewhat confusing and is not needed in the Declaration section.

Page 2, Second Full Paragraph: Please remove the sentence "EPA also issued a release letter". Our letter wasn't a "release" letter, it was just part of the CERCLA process, culminating in this ROD.

Page 7, Section 2.3, First Paragraph: Why use the phrase "interim ambient levels"? Were the levels below the accepted background levels or not?

Page 7, Section 2.3: In the paragraph beginning "In 2004, the Navy ..." I don't understand the process described by "Piping laterals were removed to within the first 10 feet of their union with a main trunk line" means. ... or to the face of Building 813, whichever came first". Did you mean to say "Piping laterals were removed beginning within the first 10 feet ..."?

Page 7, Section 2.3: The discussion above describes the process but not the results. Please add a paragraph providing the results. Also, since a little cesium and I believe radium were found, you should explain where it came from since you state that no source existed in the building. Backflow from the main trunk line for the cesium? Possible natural variation in the fill material?

Page 11, Section 2.5.1: The first full paragraph (beginning "The Navy evaluated") needs clarifying. The phrase " the additional modeling showed that the increased excess cancer risk resulting from the remedial actions on the trenches was  $1.098 \times 10^{-4}$ " implies that the remedial actions caused an excess cancer risk. First, for correctness, change the word remedial to removal in any reference to a removal action. Secondly, find a better way to describe this result. Is this the modeling on the post removal conditions? If so, wouldn't that make it indicative of background and not excess risk? Alternatively, since no radiological contamination remains above background in and around the building, you could delete Section 2.5.1, and just add a sentence to Section 2.5 saying no source is present, thus there is no potential incremental risk.

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Page 1, Second Paragraph: Change the remedy selection language to match the signature page, i.e., the Navy and EPA co-select the remedy and DTSC and RWQCB concur.

Pages 1 and 4: The description of the leaking source is not clear, partially because no one here knows what the Disaster Control Center Inventory is, it could be a physical thing not a list. One could interpret the current language as meaning that a leaking source was there at the time of the HRA. Please change the description to something like: During research to support the HRA, documentation was found indicating that a single leaking 300 uCi strontium-90 check source may have been stored in the building in the past. The source was removed previously as part of the operational closeout of the building. Because of the potential for discharge from this previous source, the Navy recommended further evaluation of potential radiological contamination at Building 813.

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Page 6, Section 2.2: The second paragraph states that groundwater in the bedrock water-bearing zone is not suitable as a potential source of drinking water, but provides no justification. Since the groundwater sampling results were all acceptable, please consider removing this statement.

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Page 10, Section 2.5.1, First Paragraph: The second to the last sentence states: "The RESRAD results for the sewers were less than 1 millirem per year." This contradicts language two paragraphs down that the risk is  $10^{-4}$  (see our next comment). Please resolve the discrepancy and find a more simple way to describe the risk. If 1 millirem per year is correct, then what's the point of the following discussion.

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