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Subject: FW: TI Site 12 SWDA Bigelow Court SWDA NTCRA Work Plan - DTSC & CDPH Comments
Date: Thursday, February 20, 2014 9:01:45
Attachments: [Site 12 Bigelow Court NTRCA WP CDPH comments 02-14-2014.pdf](#)

Hi Ulrika - Here are DTSC and CDPH comments on the NTCRA Work Plan for Bigelow Court, Contract N62473-10-D-0807, CTO 0010.

Regards,

Tony K.

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-----Original Message-----

From: Sunga, Remedios@DTSC [<mailto:Remedios.Sunga@dtsc.ca.gov>]
Sent: Friday, February 14, 2014 4:20 PM
To: Konzen, Anthony CTR NAVFACHQ, BRAC PMO
Cc: Forman, Keith S CIV NAVFACHQ, BRAC PMO; Clark, David J CIV NAVFAC SW; Wright, Matthew (CDPH-DDWEM-EMB); Jue, Tracy (CDPH-DDWEM); Singh, Sheetal (CDPH-DDWEM); Zech, Myriam@Waterboards; Stensby.David@epa.gov; Chris Glenn; william.carson@terrphase.com; Tsuji, Denise@DTSC; Miya, Ryan@DTSC
Subject: TI Site 12 SWDA Bigelow Court SWDA NTCRA Work Plan - DTSC & CDPH Comments

Hi Tony,

The following are DTSC comments on the Draft Work Plan, Non-Time Critical Removal Action for Bigelow Court Solid Waste Disposal Area, Installation Restoration Site 12 dated January 2014. CDPH's comments on this document are provided in the attached memorandum from CDPH.

- 1) Section 1.0-Introductions, Page 1-1. Second Paragraph: Please delete the last sentence and the following bullet items listing the cleanup goals for each COC since the cleanup goals are more accurately presented in Section 1-4-Remedial Action Objectives.

- 2) Section 1.2-Work Plan Addendum Organization, Page 1-3. Please clarify if this Work Plan is an Addendum to the Site 12 SWDA NTCRA or a standalone Work Plan.

- 3) Section 1.4-Remedial Action Objectives, Page 1-5. Last Paragraph: Please clarify that the listed remedial action objective applies to Site 12 SWDA Bigelow Court only and not for the entire Site 12.

- 4) Section 2.2-Previous Investigations and Removal Actions, Page 2-3. Please discuss the radiological surveys of Buildings 1101 and 1103 at Bigelow Court that was presented at the November 2013 BCT meeting. These buildings are planned to be demolished for implementation of this Work Plan. Elevated readings were recorded in the slab foundation of Building 1101 indicating the presence of radiological materials beneath the slab.

- 5) Section 3.8-Site Safety and Security, Pages 3-5 and 3-6. The fifth sentence on page 3-6 states "Although the presence of radiological materials is not anticipated during excavation work, radiological screening will be conducted as described in Section 4.2. " Please revise this statement since elevated readings were recorded during the building surveys indicating the presence of radiological materials beneath the slab. In addition, Section 4.2.7 on page 4-8 states that there is a possibility of finding 226Ra commodities in soil in the Bigelow Court SWDA area based on information from field activities.

- 6) Section 3.8-Exclusion Zone, Page 3-6. Please revise the second sentence as the scope of work does not include encapsulation.

- 7) Section 4.1.1-Demolition. This section states that features within the proposed debris area boundaries will radiologically surveyed. Please explain the "proposed debris area boundaries." Are these areas the same as the three excavation areas in Figure 6?

- 8) Section 4.2-Radiological Characterization and Remediation, Page 4-2. The scope of work should include radiological surveys of buildings, vegetation, concrete, and asphalt prior to soil excavation as discussed in Section 4.1.1-Demolition.

- 9) Section 4.2.4-Radiological Work Permits, Page 4-4. Please discuss the entity or agency who issues these permits.

- 10) Section 4.3-Excavation, Pages 4-8 to 4-10. Page 4-9, Last Complete Paragraph: This paragraph states that a 6-inch layer of excavated soil will be placed in the plastic sheeting, compacted and covered with another plastic sheeting before initial placement of excavated soil. Please clarify the source of the "6-inch layer of excavated soil." This should be clean soil that can be used as backfill and not excavated soil from Treasure Island. Please discuss the disposition of this soil after its use.

- 11) Section 4.3-Excavation Procedures, Pages 4-8 to 4-10. Page 4-10, First Incomplete Paragraph: This paragraph states that the excavated soil will be stacked in layers in the radiological screening yard (RSY) for radiological surveys. Please discuss the anticipated number of layers in each RSY and the procedures in containing the soil in each layer.

12) Section 4.3.1-Saturated Soil, Page 4-10. Please discuss the control of any water runoff from the RSY drying pads.

13) Section 4.3.3-Air Monitoring, Page 4-11. Fourth paragraph: Please explain why day care occupants are mentioned here, and clarify that there are no residents or occupied buildings onsite. Although the Site is surrounded by residents, the closest day care center is about 900 feet from the Site.

14) Section 4.6.1-Bottom Sampling, Page 4-13. This section states that one discrete soil sample will be collected from each subgrid (20-foot by 20-foot grid) and analyzed for lead; however, Figure 6 (Confirmation Sample Locations) indicates that a four-point composite will be taken per 40-foot by 40-foot grid. Please clarify whether discrete or composite samples will be analyzed for confirmation of removal action.

15) Section 4.6.3-Step-Out Excavations, Page 4-14. This section does not discuss any compositing of samples as shown in Figure 8 (Step-Out Bottom Excavation). Please delete or revise Figure 8 if the samples will not be composited.

16) Section 5.3-Liquid Wastes, Handling, Transportation, and Disposal, Page 5-2. Please discuss the procedures in containing and collecting the liquid wastes from the stockpiles into drums or tanks.

17) Section 8.0-Removal Action Completion Report, Page 8-1. Please discuss whether the Final Status Survey Work Plan will be included in the RACR or prepared separately.

18) Figures. Please clearly delineate the boundaries of the SWDA Bigelow Court and the area that is considered radiologically impacted requiring a Final Status Survey. The Site 12 RI Report shows a different boundary from the figures in the Work Plan. Please clarify if radiological surveys will be conducted beyond the excavation areas or in other areas within the SWDA Bigelow Court boundaries. The area(s) where a free release will be sought from CDPH should be clearly delineated if they include areas outside of the excavation areas shown in Figure 6.

Thank you - Medi

Remedios V. Sunga

Project Manager

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