



## Department of Toxic Substances Control



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June 3, 2008

Mr. James B. Sullivan  
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DRAFT SCOPING SURVEY REPORT FOR BUILDING 233, NAVAL STATION  
TREASURE ISLAND (NSTI), SAN FRANCISCO, CALIFORNIA.

Dear Mr. Sullivan:

The Department of Toxic Substances Control (DTSC) staff completed its review of the *Draft Scoping Survey Report for Building 233 Drain Lines and Wall Vents, Treasure Island, San Francisco, California*, dated May 6, 2008 (Report). Building 233 is a two-story, raised floor, wood structure built in 1944 located at NSTI on the eastern portion of Treasure Island in the block bordered by Avenues M and North and 3<sup>rd</sup> and 4<sup>th</sup> Streets. Building 233 is currently not in use, but the building was used by the Navy as the Radiation Safety School beginning in 1947. A documented radium spill took place in the first floor laboratory in January 1950 and decontamination was accomplished using chemical and dry methods. After decontamination was completed nine months later, the building was released for use again. However, the potential for residual radioactivity in the drainage system exists. The purpose of the Report is to document the procedures and results of the scoping survey performed for Building 233 in September 2007.

Based on our review, DTSC has the following comments:

- Section 1.0 – Site Description and Background. While the text states that decontamination was completed nine months after the 1950 spill, are there any subsequent data available (radon monitoring, airborne alpha readings, etc.) to verify that the rooms in Building 233 were not subject to radiological spills after 1950? This type of information, if available, should be included in the Report. However, if no such data exists, the scoping survey must be expanded to include

verification that no additional spill(s) have occurred.

- Section 3.1 – Mobilization. The text states that piping diagrams were used to identify the downstream manhole closest to where the drainage piping from the building connected to the main drainage system. The building drainage piping system should either be added to one of the figures or the piping diagrams referenced should be copied and included as an Appendix to the Report.
- Section 3.5 – Parking Lot. The text states that thirteen locations within the exterior asphalt parking lot were discovered to have elevated gamma ( $\gamma$ ) radiation levels. However, a figure presenting the locations of the elevated exterior asphalt gamma measurements has not been presented in the body of the Report. A figure with the thirteen locations in the parking lot should be included in the Report body, and not just in Appendix C. As a result of the scoping survey, the Navy should consider installing temporary fencing around the impacted asphalt parking lot area(s) in order to restrict general public access. The comments section of the Radiation / Contamination Survey Form in Appendix C also states that “Elevated readings were found in all of the lined out areas, including area outside fence.” Additional radiological source(s) may be present that require further identification and delineation.
- Section 6.1 – Reference (Background) Measurements. Please add text specifying [1] the location(s) at which the ambient background measurements for alpha ( $\alpha$ ), beta ( $\beta$ ), and gamma ( $\gamma$ ) were obtained, [2] the total number of measurements that were used to calculate the average background level, and [3] the actual reference (background) levels obtained.
- Section 8.0 – Conclusion. The Report states that the extent of the common waste drain piping system that is radiologically impacted has not been fully surveyed and recommends complete identification of impacted piping prior to building demolition. An additional scoping survey work plan for Building 233 to delineate the extent of radiologically impacted waste drain piping should therefore be submitted for regulatory review and approval.
- Table 3-1 - Exterior Asphalt Gamma Measurements. The table presents elevated gamma measurements presented as counts per minute. However, without the ambient background gamma measurement for comparison, it is difficult to determine how elevated these results are. Please include the ambient background gamma measurement in the table for comparison.

In summary, the Report must be revised to incorporate the above comments. Furthermore, additional radiological survey work must also be implemented in order to [1] verify that no additional radiological spills took place in Building 233 after 1950, [2] delineate the extent of radiologically impacted waste drain piping associated with Building 233, and [3] characterize the extent of radiological impact present in the

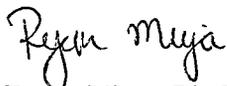
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exterior asphalt areas. Therefore, an additional scoping survey work plan for Building 233 must be drafted for regulatory agency review.

As a part of our review, DTSC requested that the California Department of Public Health (CDPH) also review the document and provide comments on the technical aspects of the report. As a result, please find the enclosed comment memorandum from Ms. Tracy Jue and Mr. Kurt Jackson of CDPH's Environmental Management Branch dated June 3, 2008.

Please revise the Report to incorporate the above comments. If you have any questions, please contact me at (510) 540-3775.

Sincerely,



Ryan Miya, Ph.D.  
Senior Hazardous Substances Scientist  
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Enclosure

Copies with sent via email transmission followed by hard copy.

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California Department of Public Health  
**MEMORANDUM**

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DATE: June 3, 2008.  
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SUBJECT: **Review of the Draft Scoping Survey Report For Building 233 Drain Lines and Wall Vents Dated May 6, 2008 for Naval Station Treasure Island, San Francisco, CA**

This review was performed by Tracy Jue and Kurt Jackson Associate Health Physicists, in support of the Interagency Agreement between DTSC and CDPH. Attached are our comments. If you have questions concerning this report, or if you need additional information, please contact Tracy Jue at (916) 324-4804.

Attachment

## California Department of Public Health Review

Activity: Review of Draft Scoping Survey Report For Building 233 Drain Lines, Naval Station Treasure Island San Francisco, California.

May 12, 2008

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### General Comments

1. Based on the history of the building described in the executive summary it is noted and the parking lot remains impacted. Additionally, the soil surrounding impacted pipes needs to be evaluated.
2. Section 8.0, Page 8-1, Paragraph 3 states "It is recommended the portion of the piping which is radiologically impacted be fully surveyed prior to demolition of the building". Is the Navy going to completely remove the entire piping and perform a complete survey in order to release the building?
3. Section 6.1, Reference Background, Please briefly include descriptions on how the ambient backgrounds were taken for piping surveys, including instruments used and how the data was obtained. Also no background measurements for the parking lot and building surveys were mentioned. Please provide descriptions or references that discuss how the background was determined.
4. Section 6.1 states "No Background Data were collected for sediment samples in the piping, as naturally occurring radioactive material would not be expected." The Navy should obtain a sediment background sample from another non-impacted location.
5. CDPH has noted that the Navy has identified some of the building piping as impacted and plans to remove piping and fully survey for release during building survey. Is the Navy going to completely remove impacted piping?
6. Page 6 and 7 of Appendix H shows pictures with expansive foam filling material filled inside the drainage pipe openings. CDPH noted there was no general description of the expansive foam indicating whether it is water proof or degradable. Please provide specifications for the foam filling material.
7. The manhole data indicates contamination, based on the current radium background used at Hunter Point, so it could be assumed that the manhole is elevated. Therefore, further steps out should be done beyond this manhole. Additionally remediation maybe necessary for drains/ sewers between 021-233-SL-002S and Manhole.
8. Please provide drain configuration for 021-233-SL-006 0.371 and 021-233-SL-005 0.351 sink drains and how they link to the manhole.