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EDMUND G. BROWN JR.
Governor

DATE: May 27, 2016

N60028_002723
TREASURE ISLAND
SSIC NO. 5090.3.A

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SUB: CDPH-EMB document review comments for the red line strike out *Final Report Scoping Survey of Wastewater Lines Downstream From Former Building 233 and Response to Comments (RTC) table*, Former Naval Station Treasure Island, San Francisco, California Issued April 14, 2016.

The California Department of Public Health (CDPH) - EMB has reviewed the subject document and has comments to submit. Please see the attached review comments. This review was performed by Matthew Wright in support of the Interagency Agreement between DTSC and CDPH-EMB.

If you have any questions concerning this review, or if you need additional information, please contact Matthew Wright at (916) 449-5687.



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The Environmental Management Branch (EMB) of the California Department of Public Health (CDPH) appreciates the opportunity to review the submitted redline document, *Final Report Scoping Survey Of Wastewater Lines Downstream From Former Building 233 and the Response to Comments (RTC) table*, Former Naval Station Treasure Island, San Francisco, California. Issued April 14, 2016.

The Department of Navy (DON) addressed most of the comments for *Final Report Scoping Survey Of Wastewater Lines Downstream From Former Building 233 Former Naval Station Treasure Island San Francisco, California*. Issued April 14, 2016 submitted by CDPH-EMB on February 12, 2016. A comment that was inadequately addressed is listed below. There are also 4 new comments that need to be addressed. The CDPH-EMB cannot concur with the *Final Report Scoping Survey Of Wastewater Lines Downstream From Former Building 233* until all the comments are addressed.

Please ensure the complete, "Response to Comments", tables are included in the *Final Report Scoping Survey Of Wastewater Lines Downstream From Former Building 233*.

Previous Specific Comments:

1. Please readdress Section 2.3.1 Number of Measurements, page ten, paragraph one, sentence one, "A minimum of 20 static measurements were collected per survey unit. This number of static measurements were developed using the MARSSIM process and is based on the design goals and constraints of the RMP (Attachment 1; ITSI Gilbane, 2013a)." CDPH-EMB notes RMP (Attachment 1; ITSI Gilbane, 2013a) is a generalized format on how to apply number of measurements equations. Please note this issue was brought up as Specific Comment number 13 of CDPH-EMB's comments submitted on February 12, 2016. Please supply the specific worked out equation which determined the value used in this document.

New Comments:

2. Please note that CDPH-EMB utilizes Section 30256 in Title 17 of the California Code of Regulations (17 CCR 30256) to render a decision to concur with an Radiological Unrestricted Release Recommendation or to issue a finding of no

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further action. CDPH-EMB notes that the Wastewater Lines Downstream from Former Building 233 covered in this document are immediately downstream from catch basins 505, 441, 439, 440, 438 and 437 and their associated piping. These structures are impacted in the Final Historical Radiological Assessment-Supplemental Technical Memorandum, Naval Station Treasure Island, San Francisco, California (2014a) and their radiological survey results are detailed in a separate documents not yet reviewed by CDPH-EMB. CDPH-EMB reserves to itself the right to re-assess any recommendation stemming from this document upon the review of the radiological survey results of the catch basins mentioned above.

3. Section 3.1.2 Instrument Response, page 14, paragraph one, sentence two, "Instrument response was checked before each day data were collected." Please include in the Final Status Survey Report (FSSR) logs of the Quality Assurance (QA) and Quality Control (QC) records, Certificates of Calibrations for the radiological instruments and sources, along with the chi-squared calculations when appropriate; for the radiological instruments used in this document.
4. Figure 5-3 Building 233 Sewer Drain Access Points with Gamma Scan Results, page 21, a manhole appears to be located between potholes numbers one and number two; this manhole is not numbered on the map and there seems to be no results listed in Table 5-2, "Building 233 Drain Gross Gamma Data Summary", or in Table 5-3, "Building 233 Sewer Drain Sample Data Summary". Please explain.
5. Section 6.2 DATA COLLECTION, page 28, paragraph two, sentence four, "The video inspection revealed points of root intrusion into the pipe at pipe joints. No soil samples adjacent to and/or beneath the drain piping were collected as overall, the video inspection had indicated that and scan survey revealed a pipe in good condition with no suspect integrity or contamination issues." How can a line with root intrusion be considered in overall good condition, with no suspected integrity issues? Please explain.