



Matthew Rodriguez
Secretary for
Environmental Protection

California Regional Water Quality Control Board San Francisco Bay Region

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Edmund G. Brown Jr.
Governor

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TREASURE ISLAND
SSIC NO. 5090.3.A

October 12, 2012 (MLZ)
GeoTracker Parent Facility ID: DOD100333400

U.S. Department of the Navy
Attn: Mr. Dave Clark
BRAC Program Management Office – West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310
Via email only: danielle.janda@navy.mil

Subject: DRAFT Historical Radiological Assessment -- Supplemental Technical Memorandum (HRASTM), Naval Station Treasure Island, San Francisco, dated August 6, 2012

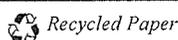
Dear Dave:

The Historical Radiological Assessment -- Supplemental Technical Memorandum (HRASTM) is an update to the 2006 Historical Radiological Assessment (2006 HRA) that incorporates new information and radiological work conducted at TI since 2006. The HRASTM was drafted after the Navy discovered that significant ship repair activities had occurred at NAVSTA TI during World War II. Repair activities were primarily done alongside Piers 11-16, and shop work was done in Building 3, making these areas radiologically impacted sites.

I read the HRASTM and concur with DTSC's comments dated October 5, 2012. My suggestions and comments are as follow.

- 1) Please add a glossary to the beginning of the document. Words like "impacted" or "contaminated" are defined in the 2006 HRA, but not in the HRASTM. Interested parties reviewing the HRASTM may not necessarily consult the 2006 HRA.
- 2) The Executive Summary could benefit from a small section explaining the difference between alpha and beta particles, and why we're interested in Radium-226, Thorium-232 and Cesium-137.
- 3) Please add a final paragraph to the Executive Summary, describing what work remains to be done to ensure that all sites are radiologically safe.

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- 4) Please include a Table indicating:
 - a) radiation levels found in the soil, in pCi/g;
 - b) release criteria;
 - c) background concentrations.

- 5) Please include a Table or a chart indicating dates by which investigations or reports are to be completed, including:
 - a) the scoping surveys that remain to be done;
 - b) the report explaining the elevated readings at the 9th Street recreational area;
 - c) the work currently being done on Building 233.

- 6) Please indicate how elevated count rates (in cpm) relate to pCi/g (p. 26, second paragraph).

- 7) The 2006 HRA says that "The Cs-137 sealed sources were leak tested and were demonstrated to be intact." However, on p. 26, the HRASTM designates the USS *Pandemonium* Site I (NW) area as a "radiologically impacted area based on a more conservative interpretation of existing information [about Cs-137] in the HRA." Can you please explain what the more conservative interpretation is, and explain which sites are affected?

- 8) Since materials stored at the former storage yard before the construction of housing are not known (p.22), please include Halyburton Court and Bigelow Court on the "impacted" list on p. 44.

- 9) On p. 61, please explain more clearly that the purpose of a FOST is to document that the property is environmentally suitable for transfer. Please add a note to say that Buildings 343 and 344 were released for closure because, although impacted, 2007 surveys have shown that they are not contaminated.

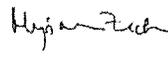
Miscellaneous typo:

p. 37, second paragraph: "impacted areas based on the detection of Ra-226."



Please contact me at (510) 622-5684 or mzech@waterboards.ca.gov should you have any questions.

Best,

 Myriam Zech
2012.10.12
15:58:42 -07'00'

Myriam Zech
Water Resource Control Engineer
Groundwater Protection Division

Cc (via email only):

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