Message

From: Stensby, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7F3EA928A8DB486B95B1F758507A38DE-DSTENSBY]
Sent: 3/14/2014 8:50:46 PM
To: Terry, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c02f0bbaadac4b5ab42c2d5bbcf20465-RTERRY03]
Subject: RE: TI Site 12 Sampling and Analysis Plan for Bigelow Court NTCRA Work Plan - DTSC Comments

Thanks Rob, Yes I noted that as well.

-----Original Message-----
From: Terry, Robert
Sent: Friday, March 14, 2014 1:36 PM
To: Stensby, David
Cc: Kennedy, John
Subject: RE: TI Site 12 Sampling and Analysis Plan for Bigelow Court NTCRA Work Plan - DTSC Comments

As always, DTSC did a great job of reviewing the document. I notice that their concerns, like mine, were directed primarily at Worksheets 10, 14 and 17.

-----Original Message-----
From: Stensby, David
Sent: Friday, March 14, 2014 12:48 PM
To: Terry, Robert
Subject: FW: TI Site 12 Sampling and Analysis Plan for Bigelow Court NTCRA Work Plan - DTSC Comments

Rob,
FYI, I thought you might be interested in these. Seems like a very thorough review to me. No need to respond, but if you have the time to read through the comments, I'd appreciate any observations you may have.

Thanks

-----Original Message-----
From: Sunga, Remedios@DTSC [mailto:Remedios.Sunga@dtsc.ca.gov]
Sent: Thursday, March 13, 2014 5:56 PM
To: Konzen, Anthony CTR NAVFACHQ, BRAC PMO
Cc: Forman, Keith S CIV NAVFACHQ, BRAC PMO; Clark, David J CIV NAVFAC SW; Singh, Sheetal (CDPH-DDWEM); Jue, Tracy (CDPH-DDWEM); Wright, Matthew (CDPH-DDWEM-EMB); Stensby, David; Zech, Myriam@Waterboards; 'william.carson@terraphase.com'; Chris Glenn; Miya, Ryan@DTSC
Subject: RE: TI Site 12 Sampling and Analysis Plan for Bigelow Court NTCRA Work Plan - DTSC Comments

Hi Tony,

Attached is a CDPH memo providing comments on the Site 12 Bigelow Court NTCRA SAP.

Thanks -- Medi

-----Original Message-----
From: Konzen, Anthony CTR NAVFACHQ, BRAC PMO [mailto:anthony.konzen.ctr@navy.mil]
Sent: Wednesday, March 12, 2014 11:17 AM
To: Sunga, Remedios@DTSC
Cc: Forman, Keith S CIV NAVFACHQ, BRAC PMO; Clark, David J CIV NAVFAC SW
Subject: RE: TI Site 12 Sampling and Analysis Plan for Bigelow Court NTCRA Work Plan - DTSC Comments

Hi Medi - Are there going to be additional comments from CDPH on the SAP? Those responses were due on Monday.

Thx,

Tony K.

Anthony D. Konzen, PG. CHG.
PM, BRAC PMO
Contracted Support to NAVY BRAC PMO
1455 Frazee Road, Suite 900
San Diego, CA 92108
Ph: 619-532-0924
Fax: 619-532-0983

-----Original Message-----
From: Sunga, Remedios@DTSC [mailto:Remedios.Sunga@dtsc.ca.gov]
Sent: Monday, March 10, 2014 4:06 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); Singh, Sheetal (CDPH-DDWEM); Wright, Matthew (CDPH-DDWEM-EMB); Jue, Tracy (CDPH-DDWEM); Zech, Myriam@Waterboards; 'Stensby.David@epa.gov'; Chris Glenn; 'william.carson@terraphase.com'; Tsuji, Denise@DTSC; Miya, Ryan@DTSC
Subject: TI Site 12 Sampling and Analysis Plan for Bigelow Court NTCRA Work Plan - DTSC Comments

Hi Tony,

The following are DTSC comments on the Draft Sampling and Analysis Plan (SAP), Non-Time Critical Removal Action for Bigelow Court SWDA that DTSC received on February 21, 2014. CDPH's comments on the SAP will be provided to the Navy in a follow up email.

1) Executive Summary, Page 2. The last paragraph states that radiological contamination has not been detected at Bigelow Court. Please revise this statement since radiological surveys of the building slab indicate radiological contamination beneath the slab. This potential radiological contamination should be discussed in the second paragraph to explain the inclusion of Radium-226 as COC and its cleanup goal.

2) SAP Worksheet #3, Distribution List, Page 12. Please replace my name with Denise Tsuji based on the SAP transmittal letter and Distribution list page. For future radiological documents for Treasure Island, please replace Ron Pilorin with Sheetal Singh of CDPH in the distribution list and CDPH EMB contact.

3) SAP Worksheet #5, Project Organization Chart, Page 15. Please include me in the line of communications for the regulators box and replace Ron Pilorin with Sheetal Singh for CDPH.

4) SAP Worksheet #10, Problem Definition, Pages 25. Remedial Action Objectives, First Paragraph: This paragraph states that radiological contamination has not been detected at Bigelow Court Please revise this statement and 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 contamination beneath the slab.

5) SAP Worksheet #10, Problem Definition, Pages 26. Remedial Action Objectives, First Bullet items: Cleanup goal for dioxins should be included in the list of COC cleanup goals since sampling for dioxin will be conducted if burn debris and ashes are found in the excavation. The dioxin cleanup goal should also be identified in the NTCRA Work Plan.

6) SAP Worksheet #10, Problem Definition, Pages 29. Remedial Investigation, Second Paragraph: This paragraph states that the alternative selected in the EECA includes soil excavation to 4 feet below ground surface. Please clarify that the soil removal will not be limited to 4 feet depth. As discussed in SAP Worksheet #17, soil removal will continue until the soil cleanup goals are achieved.

7) SAP Worksheet #10, Problem Definition, Pages 30. Remedial Investigation, Last Two Paragraphs: Please revise the first sentence since the radiological contamination at Bigelow Court has been confirmed during surveys of the building slab as presented at the BCT meeting. Please clarify that a Final Status Survey (FSS) Report will also be prepared and regulatory concurrence on the FSS report is required before backfilling the excavations.

8) SAP Worksheet #11, Project Quality Objectives, Page 31. Define the Problem that Necessitates the Study. Please revise the last sentence since radiological contamination was detected at Bigelow Court during surveys of the building slab as discussed at the BCT meeting.

9) SAP Worksheet #11, Project Quality Objectives, Page 31. Identify Information Inputs: This section states that dioxin samples may be collected if burn debris or ash is discovered during the excavation. Please include the potential sampling for dioxin in Section 1.4-Remedial Action Objectives and Section 4.0-Construction Activities of the Bigelow Court NTCRA Work Plan. Cleanup goal for dioxin should also be presented in the Work Plan and SAP in case elevated dioxin concentrations are detected.

10) SAP Worksheet #11, Project Quality Objectives, Page 32. Define the Boundaries of the Study: Please clarify that soil removal may be extended deeper than 4 feet below ground surface depending on the confirmation sample results as discussed in SAP Worksheet #17, Confirmation Soil Sampling.

Thank you - Medi

Remedios V. Sunga

Project Manager

Department of Toxic Substances Control

700 Heinz Avenue

Berkeley, CA 94710

510-540-3840

From: Sunga, Remedios@DTSC
Sent: Friday, February 14, 2014 4:20 PM
To: Tony Konzen (anthony.konzen.ctr@navy.mil <mailto:anthony.konzen.ctr@navy.mil>)
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 <mailto:Stensby.David@epa.gov> ; Chris Glenn; william.carson@terraphase.com <mailto:william.carson@terraphase.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 antici1pated 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 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 boundaries 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

Department of Toxic Substances Control

700 Heinz Avenue

Berkeley, CA 94710

510-540-3840