SFUND RECORDS CTR
2227348

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 16, 2004

Keith Forman
BRAC Environmental Coordinator for
Hunters Point Shipyard
1230 Columbia Street, Suite 1100
San Diego CA 92101-8571

RE: Final Historical Radiological Assessment, History of the Use of General Radioactive Materials, 1939 - 2003, and the Responses to EPA Comments on the Draft Final Historical Radiological Assessment, Hunters Point Shipyard, San Francisco, California, August 2004

Dear Keith:

Thank you for the opportunity to review the Final *"Historical Radiological Assessment, History of the Use of General Radioactive Materials, 1939 - 2003, and the Responses to EPA Comments on the Draft Final Historical Radiological Assessment, Hunters Point Shipyard, San Francisco, California,"* dated August 2004.

Our comments are in two attachments. First, attached are our comments on the revised document and the Navy's response to comments. Second, a memorandum from Steve Dean, EPA Region 9, Superfund Technical Support. Please note that is our recollection that EPA would not concur on the leasing of Building 707 when such a lease was being considered by the Navy (see attached history in the S. Dean memorandum).

Please feel free to contact me at 415-972-3024 if you have any questions.

Sincerely,

Michael Work
Remedial Project Manager
Superfund Division (SFD-8-3)

Attachment

cc: (see Distribution List)

Distribution List HPS

Pat Brooks
Lead RPM (Hunters Point Shipyard)
US Navy, Naval Facilities Engineering Command
SW Division
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8571

Tom Lanphar
Office of Military Facilities
Department of Toxics Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2721

James Ponton
California Regional Water Quality Control Board
SF Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Maurice Campbell
HPS RAB Co-Chair
1100 Brussels Street
San Francisco, CA 94134

Amy Brownell
City and County of San Francisco
Department of Public Health
1390 Market Street, Suite 210
San Francisco, Ca 94102

Karla Brasaemle
TechLaw
Suite 1010
90 New Montgomery Street
San Francisco, CA 94105

Lea Loizos
Arc Ecology
833 Market Street, Suite 1104
San Francisco, CA 94103

EPA Comments on the
Final Historical Radiological Assessment, History of the Use of General Radioactive Materials, 1939 - 2003, and the Responses to EPA Comments on the Draft Final Historical Radiological Assessment, Hunters Point Shipyard, San Francisco, California, August 2004

SPECIFIC COMMENTS

1. **Table 6-2, Operation Crossroads Ships Decontamination and Disposition, Page 17 of 23:** It is unclear why the date for the "Final Clear" of the PGM-25, 28 May 1947, is later than the date of disposition, 1946. The comments on final disposition state that this vessel was transferred "to Republic of China 1946." It seems unlikely that the final clearance of this vessel occurred after it was in the possession of the Republic of China. Please resolve this discrepancy and, if necessary, submit a replacement page.

2. **Figure 8.3.5.27, Experimental Shielding Range Site Plan, Figure 8.3.5.28, IR-01/21 Site Plan, Figure 8.3.5.29, IR-02 & IR-03 Site Plan and Figure 8.3.5.33, Parcel E Shoreline Site Plan:** The Metal Reef is not identified correctly on these figures; the area labeled "Metal Reef" is actually the Metal Debris Area. The Metal Reef is located at the opposite end of the Parcel E shoreline, at the extreme Southeast corner of Parcel E; this should have been identified on Figures 8.3.5.29 and 8.3.5.33 in the shoreline area just northwest of Berth 37. Both areas are believed to be impacted by devices containing radioactive materials. Please revise these figures to label the Metal Debris Area and the Metal Reef correctly and reissue the figures as replacement pages.

3. **Figures 8.3.6.1 through 8.3.6.1E, Storm Drain System Figures and Figures 8.3.6.2 through 8.3.6.2E, Sanitary Sewer System Figures:** We appreciate the fact that new Parcel-Specific figures were provided, the legibility of the original figures was improved, and note that some of the buildings do not appear to be connected to the storm drain system and/or sanitary system. It is possible that there are unmapped laterals in these systems, so it is unclear if the Scoping and Characterization Surveys will be conducted in a manner such that unmapped laterals will be identified and surveyed. It is recommended that all lines, manholes, and sumps in the vicinity of impacted sites be carefully examined to determine whether additional, unmapped laterals are present. Please clarify how these surveys will be conducted and discuss whether the need to identify unmapped laterals has been considered.

REVIEW OF THE RESPONSES TO COMMENTS

1. **Response to Comment 2:** The response states that Table 3-3 was modified to list both the Salvage Yard and Disposal Trench Area, but the entry in the table in the former uses

ED_004747_00001835-00003

column only lists, "Disposal Trench Area" and there is still a separate entry for the Salvage Yard on page 21 of 22. The response also states that Section 8.3.5.32 will be modified to include both the Salvage Yard and the Disposal Trench Area, but Section 8.3.5.32 references Figure 8.3.5.20, which does not show IR-12. The only area identified on Figure 8.3.5.20 is the Salvage Yard, and this is not associated with IR-12. The Disposal Trench Area does not appear to have been identified on any figure. Further, IR-12 encompasses the entire block between Spear Avenue and Sixth Avenue, northeast of the IR-02 boundary. Please revise the IR-12 entry in Table 3-3 to include the Salvage Yard, combine the Salvage Yard information into the IR-12 entry and issue the necessary replacement pages. Also, please revise Figure 8.3.5.20 and any other figures that include the Salvage Yard (e.g., Figures 8.3.5.14, 8.3.5.28, 8.3.5.29, 8.3.5.33) to include the boundaries of IR-12 and the Disposal Trench Area and issue replacement pages.

2. **Response to Comment 8:** The response states that the technical memorandum, "Interpretation of Fill Conditions at Installation Restoration Sites 07 and 18, Parcel B," was reviewed and that "any pertinent information was included in the Final HRA," but Section 8.3.2.13 has not been changed. Please clarify whether this document was reviewed, whether any pertinent information was identified and, if necessary, revise Section 8.3.2.13 and issue replacement pages.

3. **Response to Comment 12:** The response states that the "Contamination Potential for Building 224 is listed as 'likely,'" but the entry on Page 8-61 of the Final HRA indicates that the contamination potential is "unlikely." Please resolve this discrepancy.

4. **Response to Comment 15:** The response states that "the Contamination Potential for Building 707 and Kennels as well as the Building 707 Triangle Area is 'Known - Continued Access," but the entries in Sections 8.3.5.17 (Page 8-178) and 8.3.5.20 (Page 8-184) is "Known - Restricted Access." Please resolve these discrepancies and issue replacement pages, if necessary.

5. **Response to Comment 16:** The response does not address the issue of radon gas and whether landfill gas has been tested for radon. Please discuss whether landfill gas has been tested for radon, clarify whether this will be considered during future work, and discuss how this data gap will be addressed.

6. **Response to Comment 21:** The response states that sediment is "contained in equipment within a structure, drainage systems, or in underwater areas," but sediment can be discharged from drainage systems or tunnels, and underwater areas cannot be considered to be contained because of the potential that sediment can be eroded and redeposited. Please explain why sediment is considered to be "contained," when it can be discharged from drainage systems or tunnels during storms or eroded and redeposited in underwater areas.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 15, 2004

MEMORANDUM

SUBJECT: HPNS HRA Responses to Navy's Responses to EPA Comments

FROM: Steve M. Dean (SFD-8-B)
Superfund Technical Support

TO: Michael Work (SFD-8-3)
DOD and Pacific Islands Section

I offer the following response to the Navy's Response regarding EPA's Comments 4, 5 and 10 for the **Hunters Point Shipyard Historical Radiological Assessment for General Radiological Materials** document.

Comments 4 and 5, Section 6.4.12.5, Page 6-58 and Page 6-59: The Navy states that the incomplete list of Radium 226 daughters used for the risk assessment cited in this report comes from a historical document and cannot be changed. While it may be too late to correct the historical document, this document should add language that cites a proper cancer risk assessment using the complete compliment of Ra-226 daughters. Using incorrect information for this HRA is not appropriate solely on the basis that the erroneous information has been used previously. Please add a paragraph in the appropriate sections of the document clarifying the inconsistencies arising from incomplete risk assessment cited.

Comment 10, Section 8.3.5.17, Page 8-177: My recollection that Building 707 and its kennels were never leased to Pet Express is correct. The Navy records of building leases at HPS are either incomplete or in error. Below is a response from Claire Trombadore, former EPA RPM for Hunters Point at the time this lease was considered.

She writes: *The lease of the former dog kennel building 707 back in the 1994/1995 time frame did not go through because EPA did not concur with the Navy's conclusion that the building was "suitable to lease". This was one of the first things that I worked on when I came on the HPS site in the Fall of 1994. EPA determined that there was radiological contamination present on the concrete pad outside the building. In addition, we determined that additional investigation*

and remediation to address radiological contamination needed to be done in and around building 707. Therefore, EPA could not concur that Building 707 it was suitable to lease, at that time. EPA did not concur with the Navy's Draft Finding of Suitability to Lease (FOSL) and the lease did not go forward. It is my recollection that the name of the company/potential lessee was Pet Express. Pet Express had apparently leased the building for several years prior to base closure. However, in 1994/1995 when the Navy was exploring leasing building 707 to Pet Express, EPA could not concur that all of the radiological hazards and potential risks were sufficiently known and therefore we could not concur with the FOSL. Further, the building was located on the fenced off portion of Parcel E which further contributed to EPA's conclusions at the time that the lease of 707 was not suitable. - Claire Trombadore

Please amend this document to reflect these facts regarding the Navy's alleged lease of the HPNS dog kennels to Pet Express.

If you care to discuss this issue further contact me at 415 972 3071. Thank you.