Message

From: Praskins, Wayne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F47BC0A2C2E42A98347D59CD1A98B19-WPRASKIN]
Sent: 11/11/2020 1:05:10 AM
To: Brasaemle, Karla [Karla.Brasaemle@TechLawInc.com]
Subject: RE: TechLaw comments on the Draft Rad Scoping Survey Rpt for the Finger Piers

Thanks. On question #2, is the difference between the two appendices because the alpha/beta measurements were statics, not scans? See Section 3.4.4

Wayne Praskins | Superfund Project Manager
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415-972-3181

From: Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>
Sent: Tuesday, November 10, 2020 4:42 PM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>
Subject: RE: TechLaw comments on the Draft Rad Scoping Survey Rpt for the Finger Piers

Hi Wayne,

Please see below.

Karla Brasaemle, P.G.,
TechLaw
415-762-0566

From: Praskins, Wayne <Praskins.Wayne@epa.gov>
Sent: Tuesday, November 10, 2020 2:44 PM
To: Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>
Subject: RE: TechLaw comments on the Draft Rad Scoping Survey Rpt for the Finger Piers

Karla –

1. Did you take a look at the Navy's RTC #5 on the sub pen report? The comment is similar to our comment #4 on the finger pier report. Any need to modify our comment?

   KB: Yes, but I did not find any additional comments to add. The results in the two areas (Sub Pens and Finger Piers) were different and the reports are different.

2. One of the Techlaw comments is:

   "Appendix G, Alpha Beta Survey Data: The alpha/beta scan and static data in the appendix is provided in tables without the raw data from the Ludlum 2360 instrument. Please revise the Report to include the raw data files."

   I'm not sure I understand the comment. I see plenty of entries in the appendix that include 2360 in the "**Instrument/Serial Numbers**" column. What is missing?

KB: Compare the data at the beginning of Appendix F, which is raw instrument data. Appendix G appears to present "processed" data rather than raw data.

3. Another comment is:

"**Section 5.3.1, Reference Background Areas, Page 5-4, and Section 6.7, Solid Sample Laboratory Analysis Results Data Quality Review:** The last paragraph of Section 5.3.1 states that concrete samples were collected from SU 6, but it is unclear why SU 6 was selected. The text should explain how collecting a concrete sample from SU 6 was considered representative of all of the Finger Piers SUs. If these samples were collected to assess whether this area was suitable for use as an RBA, the text should discuss the results and whether this area was used as an RBA. Text in Section 6.7 states that the concrete samples "were collected at biased locations with the highest alpha static measurement results," which would not include sampling SU 6 for potential use as an RBA. Please revise the text to address these issues."

The results from the two concrete samples described in Section 5.3.1 are presented in Table 12 (F-B01-S001 and F-B01-S002) and discussed in Section 5.3.4. The three biased concrete samples mentioned in Section 6.7 are different samples (F-SU4-B04-S001, F-SU5-B05-S001, F-SU5-B10-S001). They are also presented in Table 12 and discussed in Section 5.3.4. I'm inclined to delete the comment.

KB: Because there were no significant detections, it may not matter. The underlying reason for this comment is whether the concrete in all three survey units is of similar age (and therefore likely of similar composition). The text (Section 6.4) does say that there were higher than expected counts in the RBA. It appears that the SU 6 composite samples were not used as background, although this appears to have been the intent of FCR 4.

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From: Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>
Sent: Monday, November 9, 2020 11:38 AM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>
Subject: RE: TechLaw comments on the Draft Rad Scoping Survey Rpt for the Finger Piers

Hi Wayne,

I made a few edits and responded to your questions/margin notes. I provided a draft new comment on Section 7.2 – but focused it on the inconsistency between Sections 7.2 and 7.3.

Karla Brasaemle, P.G.,
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From: Praskins, Wayne <Praskins.Wayne@epa.gov>
Sent: Wednesday, November 4, 2020 3:56 PM
To: Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>
Subject: RE: TechLaw comments on the Draft Rad Scoping Survey Rpt for the Finger Piers

How about Friday or Monday?

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From: Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>
Sent: Wednesday, November 4, 2020 3:51 PM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>
Subject: RE: TechLaw comments on the Draft Rad Scoping Survey Rpt for the Finger Piers

Thanks Wayne,

When do you need this? I'm in meetings most of tomorrow too.

Karla Brasaemle, P.G.,
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From: Praskins, Wayne <Praskins.Wayne@epa.gov>
Sent: Wednesday, November 4, 2020 3:47 PM
To: Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>
Subject: RE: TechLaw comments on the Draft Rad Scoping Survey Rpt for the Finger Piers

Karla –

I added my changes in track changes. Please accept the changes you agree with and let me know if there any we should discuss. Also, can you browse the RTCs for the submarine pen report to see if there are any other changes we should make to the comments? Thanks.

Wayne Praskins | Superfund Project Manager
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From: Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>
Sent: Wednesday, September 23, 2020 12:27 PM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>
Subject: TechLaw comments on the Draft Rad Scoping Survey Rpt for the Finger Piers

Hi Wayne,

TechLaw's comments on the Draft Radiological Scoping Survey Report Parcel F Structures - Finger Piers, Former Hunters Point Naval Shipyard, San Francisco, California are attached.

Please let me know if you have any questions.

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