

Memorandum

April 24, 1995

To : Mr. Cyrus Shabahari
Office of Military Facilities
Department of Toxic Substances Control
Region 2
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

From : Environmental Management Branch
601 North 7th Street (MS) 396
(916) 322-2040

Subject : Comments on **Hunters Point Annex**, Technical Findings on Naturally Occuring
Radioactive Material in Soils at IR07 and IR18 Parcel B (March 20, 1995) (DTSC/DHS
Work Form #82)

Attached are the Department of Health Services' (DHS) comments on the above document. These comments are in support of the Interagency Agreement between the Department of Toxic Substances Control (DTSC) and DHS. The document was received on March 23, 1995, and was prepared by PRC Environmental Management, Inc.

The attached comments were prepared by Mr. Claude Goode, Associate Health Physicist. If you have any questions concerning these comments, or if you need additional information, please contact me at (916) 324-2206 or Mr. Goode at (916) 445-4408.



Terry Macaulay
DoD Program Coordinator
Environmental Radiation Section

Attachments

cc: See next page

Mr. Cyrus Shabahari

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cc: Mr. Donn Diebert
Office of Military Facilities
Department of Toxic Substances Control
Region 1 10151 Croydon Way, Suite 3
Sacramento, CA 95827

Mr. John Adams
Division of Clean Water Programs
State Water Resources Control Board
2014 T Street, Suite 130
P.O. Box 944212
Sacramento, California 94244-2120

Mr. Claude Goode
Department of Health Services
Environmental Management Branch
601 North 7th Street (MS 396)
P.O. Box 942732
Sacramento California 94234-7320

Mr. Richard Heitt
Regional Water Quality Control Board
Region 2
2101 Webster Street, Suite 500
Oakland, CA 94612

Department of Health Services Comments on
Naturally Occurring Radioactive Material in Soils
at IR-07 and IR-18 Parcel B, Technical Memorandum
Hunters Point Annex

Background:

Previously, we reviewed the abstract of the soil sample study (prepared by the National Air and Radiation Environmental Laboratory). Our comments were relayed to you in a February 21, 1995, memo.

The abstract was submitted as a part of an Environmental Baseline Survey (EBS) and final report (relative to issuance of a Finding of Suitability to Transfer) to determine if the radionuclide activity in parcel B is from natural radiation sources and/or if it is sufficiently low to permit the parcel to be released for unrestricted use.

The abstract, as submitted, identified the methods of sample preparation and results of the studies done to identify the type and nature of radionuclides in the soil samples from Parcel B. However, it lacked information relative to the specific sampling sites.

We have not yet received an official request to release Parcel B for unrestricted use. Also, we have not received a final remediation investigative report.

Comments:

1. The current document adequately identifies the specific sampling sites within Parcel B.
2. Sampling techniques are assumed to have been completed within acceptable standards established in the earlier document's references.
3. After reviewing the data received, we concur with the conclusion that the soil samples contain only background quantities of naturally occurring radionuclides, with no indication of enriched radionuclides. Also, in accordance with US EPA Health Effects Assessment Summary (January 1992), the quantities are within the range of 10^{-6} to 10^{-5} lifetime cancer risk levels, as determined in picocuries/gram of soil, and may be considered as a minimal cancer risk.
4. Following our acceptance of the technical findings, an official request for release of Parcel B for unrestricted use classification would be appropriate. We assume that a Final Remedial Investigative report, with the request for Parcel B to be released for unrestricted use, will be forthcoming.

Comments prepared by:

Mr. Claude Goode
Associate Health Physicist
Environmental Radiation Program
Environmental Management Branch
Department of Health Services
(916) 445-4408

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

EINZ AVE., SUITE 200
SUNNYVALE, CA 94710-2737

April 27, 1995

*Rec'd
5/2/95
DS*

Mr. David Song
Engineering Field Activity, West
Mail Code 09RDS
900 Commodore Way
San Bruno, California 94066-0720

RESPONSE TO TECHNICAL MEMORANDUM, NATURALLY OCCURRING RADIOACTIVE
MATERIAL IN SOILS AT IR-7 AND IR-18 HUNTERS POINT ANNEX

Dear Mr. Song:

The enclosed memorandum from the Department of Health Services (DHS) is forwarded for your consideration. To release the property for unrestricted use, a separate letter needs to be submitted to the DHS for that purpose.

Should you have any questions regarding this letter, please call me at (510) 540-3821.

Sincerely,

Cyrus Shabahari
Project Manager
Office of Military Facilities

Enclosure

cc: US EPA
Region IX
Attn: Claire Trombadore
Mail Code H-9-2
75 Hawthorne Street
San Francisco, California 94105

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