

# Arc Ecology

*Environment, Economy, Society, & Peace*

March 16, 2004

Keith Forman  
Naval Facilities Engineering Command  
Southwest Division  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101-8517

**Re: Draft Final Historical Radiological Assessment, Volume II, History of the Use of General Radioactive Materials, 1939-2003, Hunters Point Shipyard, February 25<sup>th</sup>, 2004**

Dear Mr. Forman:

Arc Ecology would like to thank you for the opportunity to review and comment on the Draft Final Historical Radiological Assessment (HRA) for Hunters Point Shipyard. We have begun our review of the document and have an initial comment that we believe needs to be addressed at this time in order for us to successfully complete our review of the document.

In Section 8, the Findings and Recommendations, the sites that have recently undergone some type of survey or remediation reference the New World Technologies' 2002 Phase V investigations. The results of these investigations are summarized for each site by a phrase such as "Survey results meet the release criteria", or "Survey completed." However the Phase V investigations are not included in the reference section nor are they provided in the appendices. Section 2-2, page 2-2 mentions that "documentation of further investigation and/or remediation of impacted sites will be documented in separate reports." How we are to examine the conclusions of the HRA (including: "To date, no evidence has been identified that would indicate that shipyard tenants, the surrounding community, and the environment are at risk from previous radiological activities at HPS") if we are not provided with the most recent evidence for the majority of sites?

Our contractor, Radioactive Waste Management Associates, who is helping in the review of the HRA, has further verified our concerns about the lack of documentation and the difficulty it poses in reviewing the HRA. Attached is their letter reiterating these concerns.

I look forward to a prompt response from the Navy on this initial question regarding the HRA. If you would like to discuss this further, please contact me at 415-495-1786.

---

833 Market Street, Suite 1107  
San Francisco, California 94103, United States of America  
PHONE: 415.495.1786 | FAX: 415.495.1787 | EMAIL: [arc@igc.org](mailto:arc@igc.org)

Sincerely,

Lea Loizos

Cc (electronic): Michael Work, U.S. Environmental Protection Agency, Region IX  
Tom Lanphar, California Department of Toxic Substances Control  
Julie Menack, California Regional Water Quality Control Board – San Francisco Bay Region  
Amy Brownell, City of San Francisco, Department of Public Health  
Lynne Brown, RAB Community Co-Chair

Amanda Schneider  
Radioactive Waste Management Associates  
526 W 26<sup>th</sup> St. #517  
New York, NY 10001  
Ph: (212) 620-0526 Fax: (212) 620-0518  
mandyschneider@rwma.com

Lea Loizos, Staff Scientist  
Arc Ecology  
833 Market Street, Suite 1104, San Francisco, CA 94103  
Ph: (415) 495-1786 Fax: (415) 495-1787  
<http://www.arcecolony.org/>  
Email: lealoizos@mindspring.com

Dear Ms. Loizos,

We have conducted an initial review of the Hunters Point Draft Final Historical Radiological Assessment and its supporting documents. We are concerned that we will not be able to complete an adequate evaluation because the most recent documentation cited in the HRA has not been provided in Appendix D. This documentation consists of Phase V Radiological Surveys conducted by New World Technologies in 2002. According to Table 6-7 of the HRA, these surveys were conducted for 57 of the 90 impacted sites at Hunters Point. In the text of the HRA, in Chapter 8 "Findings and Recommendations", it is noted that the Phase V surveys are complete for most sites. The information from these surveys is the most recent piece of information cited to make the HRA's assessment of contamination and contaminant migration potential for each of these 57 sites. Therefore, it is essential that we review the Phase V surveys in their entirety before evaluating the conclusions of the HRA.

In the Draft HRA, which is still available online at [http://www.efds.w.navy.mil/Environmental/pdf/HP/Draft\\_HRA.pdf](http://www.efds.w.navy.mil/Environmental/pdf/HP/Draft_HRA.pdf), the 2002 NWT surveys are presented for 5 sites in Parcel B as an Appendix. We have reviewed these assuming that there have been no changes in them before the Draft Final HRA was prepared, although we would appreciate confirmation of this. For all other parcels, we will not be able to complete our evaluation until the Phase V surveys are provided. Since the HRA states that these have been completed for many sites, there should be no problem in obtaining them from the Navy and providing them to us so that we can complete our review.

Attached please find a list of the sites for which the NWT 2002 Phase V Surveys are necessary for review of the HRA.

We hope that this documentation can be provided to us as soon as possible so that we can complete our review according to the schedule that we have agreed on.

Sincerely,  
Amanda Schneider

**NWT 2002 Phase V Surveys Are Needed for the Following Buildings/Areas:**

**Parcel A**

821

**Parcel B**

103

113

113A

130 "

140

Drydock 6

**Parcel C**

211

214

224

241

253

271

272

Dry Dock 2

Dry Dock 3

Dry Dock 4

**Parcel D**

274

313

313A

317

322

351

351A

364

365

366

383

411

Gun Mole Pier

Mahan Street-NRDL

**Parcel E**

406

414

506

507

508

509

510

510A

517

520

529

701

707

707B

707 Triangle Area

708

810

Shack 79

Shack 80

Experimental Shielding Range

Industrial Landfill (IR-01/21)

IR-04

Shoreline

**Parcel F**

Ships' Berths

**Base Wide**

Storm Drain Lines

Sanitary Sewers

Septic Systems

Drain Fields