

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
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BERKELEY, CA 94710-2737



July 6, 1992

Ms. Louise T. Lew
Code 1811
Naval Facilities Engineering Command
Western Division
900 Commodore Drive
San Bruno, California 94066-2402

Dear Ms. Lew:

**ALAMEDA NAS, REVISED FINAL WORK PLAN FOR AN ECOLOGICAL ASSESSMENT
PLAN, MAY 1992**

The Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB) have reviewed the Revised Final Work Plan. Both state agencies, although with comments below, find the workplan acceptable and therefore should be implemented as soon as practicable.

The comments below are minor and the Navy may address these comments by sending a letter responding to and/or concurring, as appropriate, without resubmitting a revised work plan by no later than July 30, 1992.

This response should not delay any fieldwork scheduled for the ESAP workplan.

The following are comments from RWQCB (1-4) and DTSC (5-7):

1. Deviations from prescribed protocols must be reported as part of the QA/QC information package to be submitted to the regulatory agencies.
2. Bioassay data from test sediments should be compared to both control and reference sediments. The toxicity of the reference sediments should also be compared to that of the control. The question of what constitutes "unreasonable" (p.56) differences in the toxicity of test sediments, as compared to that of the reference sediments, will be determined upon review of the data.
3. Table 3-1: The total number of water samples multiplied by the volume per sample does not appear to equal the total volume of sample to be taken.

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4. Table 4, p.A-18: Typo: check the alignment of "Interstitial Salinity" requirements for "Sediment Chemistry" (need not be responded to).
5. The description of the procedure for laboratory replicates in the amphipod bioassay is accepted (Section 3.6.4, page 53) as long as the meaning is that 5 individual bioassays, each of which contains 5 replicates, will first be performed on one sample to evaluate laboratory variability. If the reproducibility among the 5 individual bioassays is less than 10 percent, then a single amphipod bioassay, with the required 5 replicates, may be performed on each field sample. The response of 20 amphipods in a single beaker is insufficient to characterize the toxicity of a sediment sample.
6. The descriptor "increases" in the sentence "Statistically significant increases are considered unreasonable when they are greater than or equal to two times the level measured in samples from the reference area" is somewhat confusing. Typical aquatic bioassay data is expressed in some form of mortality over a time period (with, perhaps, a concentration term). The meaning of this sentence seems to be that increases in mortality over a time period (with, perhaps, concentration term). The meaning of this sentence seems to be that increases in mortality are "unreasonable" if they exceed the mortality measured in the reference area sediments by a factor of two. I would not agree with that interpretation, but believe any differences in interpretation of the bioassay data may be discussed by the Navy and regulatory agencies once the data are available.
7. The error in spelling "excpet" in Figure 3-7 has not been corrected (need not be responded to).
8. Submit to DTSC and other concerned agencies the schedule of field work once available. Also, advise DTSC and other concerned agencies five days prior to implementation of field work.

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If you have any further questions, please call Virginia L. Lasky at (510) 540-3817.

Sincerely,



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