



ASIAN PACIFIC ENVIRONMENTAL NETWORK
 1221 PRESERVATION PARK WAY, 2ND FLOOR
 OAKLAND, CALIFORNIA 94612
 TEL 510 834.8920
 FAX 510 834.8926

N00236.001187
 ALAMEDA POINT
 SSIC NO. 5090.3

PLEASE DELIVER TO GARY MUNEKAWA

PAGE 1 OF 4

FAX# 415/244-2561

May 17, 1995

Gary J. Munekawa
 Code O9ER3GM
 Remedial Project Manager
 Department of the Navy
 Engineering Field Activity, West
 Naval Facilities Engineering Command
 900 Commodore Drive
 San Bruno, CA 94066-5006

RE: Draft Baseline Human Health Risk Assessment
 dated 10 April 1995

Dear Mr. Munekawa,

Regarding the above mentioned document, it does not address the human health risk of the ingestion of fish and seafood. Contaminated fish have been identified at the Oakland Middle Harbor Pier and Oakland Inner Harbor (see attached articles). Although the contaminants of the fish in/adjacent to the seaplane lagoon are not in the studies (of the articles), this area is publicly accessed via the Encinal boat ramp and studies here would be of a great service to the community.

I hope you will consider the human health risk of contaminated fish and seafood in the bay and the role of the Navy to inform the community that such health risks exist.

Sincerely,

Sharon Bayle
 Sharon Bayle
 RAB Member, Alameda NAS

Attachment: 3 pages

STEERING COMMITTEE
 FRANCIS CALPOTURA
 CENTER FOR THIRD
 WORLD ORGANIZING
 PAMELA CHIANG
 GREENPEACE
 SOUTHWEST NETWORK
 FOR ECONOMIC &
 ENVIRONMENTAL JUSTICE
 JACK CHIN
 ENVIRONMENTAL CAREERS
 ORGANIZATION
 PAM TAU LEE
 LABOR OCCUPATIONAL
 HEALTH & SAFETY, UC
 BERKELEY
 MARTHA MATSUOKA
 URBAN HABITAT
 ERIC SAIJO
 OKAMOTO SAIJO
 ARCHITECTS
 PEGGY SAIKA
 EXECUTIVE DIRECTOR

1187

Eating too much Bay fish risky

Bass, shark, perch too contaminated with PCBs, mercury, dioxin and pesticides that health officials are issuing an advisory against eating them more than twice a month, state tells anglers

By Jane Kay
STAFF WRITER

Sports fish in San Francisco Bay are so contaminated with PCBs, mercury, dioxin and pesticides that health officials are issuing an advisory against eating them more than twice a month.

The warning, based on the most comprehensive study yet of fish around a dozen piers and fishing holes in the Bay, was issued Friday by the California Environmental Protection Agency. It will be in effect until scientists can perform in-depth health assessments on every chemical. It is unclear when the work will be completed.

Salmon, anchovies and smelt are exempt from the advisory, but striped bass longer than 35 inches should be avoided, state officials said.

Past dumping from industry, farms and sewage plants has pol-

[See FISH, A-14]

◆ FISH from A-1

Bay fish found unsafe to eat

luted the waters so much that Bay residents can't live on fish from its waters, said Steve Ritchie, administrator of the San Francisco Bay Water Quality Control Board.

Paying for sins of the past

"We are seeing the consequences of the bad old days of Bay pollution, rather than what's being discharged today," Ritchie said. "Our study shows there are still problems, and we will use this information to better target our pollution-control efforts in the future."

Particularly at risk are people who fish for food, who often are recent immigrants who have grown up where fishing is a way of life, Ritchie said. The state says it does not know how many people subsist on fish from the Bay.

"While this ... warning has no impact on the vast majority of Bay Area residents who eat fish caught commercially outside the Bay," the state will work with environmental groups "to spread the word in those communities where fish caught in the Bay provides a significant portion of families' diets," Ritchie said.

Baywide study

In May and June, state Fish and Game Department officials pulled up catches of striped bass, shark, surf perch and white croaker (or kingfish) from Bayside fishing spots in Berkeley, San Francisco, Oakland, Richmond, Rodeo, Fremont and beneath the San Mateo and Dumbarton bridges.

These are the major findings:

► Fish from piers near Oakland's and San Francisco's industrial areas had the Bay's highest levels of PCBs, a now-banned industrial chemical still persistent worldwide and thought to damage the human immune system and cause cancer.

► Leopard and smoothhound shark, predatory fish that feed on other fish plus shrimp and crabs, carry the highest levels of mercury, a neurotoxin that poses a particular risk to children. The fish also contain arsenic, a compound in

SAN FRANCISCO EXAMINER

Friday, December 23, 1994 ★

SAFE TO EAT?

► **FISHING:** Fish in a variety of locations instead of one contaminated area.

► **EATING:** Eat smaller amounts of several species of fish instead of large amounts of one species that could be more contaminated. Do not eat fish or shellfish raw.

► **CLEANING:** Clean, skin and fillet all fish.

► **PORTIONS:** Do not eat whole fish, liver or intestines.

► **COOKING:** Bake, broil, grill or steam fish so fatty juice drains away. Throw away juices from cooked fish. Remove the skin and trim any visible fat.

pesticides.

Piers at Rodeo and Vallejo at Mare Island had fish with the highest amounts of mercury, especially the larger white croakers.

► Pesticides — DDT, dieldrin and the termite killer chlordane — were found at highest levels in white croakers, a fatty fish that tends to accumulate the poisons. Striped bass and shiner surf perch also contained the pesticides. DDT levels on average were twice as high as those in Monterey Bay.

► Dioxins, found in conjunction with PCBs, were well within the U.S. Environmental Protection Agency's reported normal, or "background," range. But the EPA, which is re-evaluating the health risk of dioxins, warns that even these levels may be too high. The chemicals are so toxic that in small amounts they can harm immune systems and trigger cancer and other diseases.

More work needed

Much testing still remains to be done at varying times of the year on jackmelt, bat ray, crabs and other species of shark, all popular with people who fish the Bay, said Karen Taberaki, a scientist with the Bay water quality board who coordinated the study.

For years, environmentalists and anglers have tried to persuade the state to conduct monitoring studies and post health advisories in many languages at the Bay's piers.

Multiracial groups such as SAFER — San Francisco Bay Advo-

cates for Environmental Rights, spawned by Citizens for a Better Environment — began organizing fishers at Bay piers. The local campaign, led by Wendell Chin, inspired 2,000 postcards to the California Environmental Protection Agency.

Meantime, the state Bay Protection and Toxic Cleanup Act of 1989 required that agencies identify "hot spots" around the state.

The study released Friday resulted from the act and from the groups' efforts.

The state issued health warnings against striped bass in the 1970s, then strengthened them in 1993.

The warnings said no one should eat more than four meals a month of striped bass. Pregnant and nursing women and children under 6 were told not to eat anything out of the Bay. People were advised against eating raw seafood.

In April, officials warned anglers at the Richmond Inner Harbor against eating white croaker, surf perch, bullhead, goby and shellfish. They said DDT, dieldrin and PCBs tainted the fish.

Risk of cancer, immune problems

Health investigators found that eating 7 ounces of fish a month at a site at South Eighth Street in Richmond would cause one cancer case in every 10,000 people over a lifetime. Health officials say environmental factors should cause a risk no higher than one case in 1 million people. Poisons in the fish also would increase risk of immune and developmental problems, the state said.

Surveys by the California Department of Health Services, Citizens for a Better Environment and Save San Francisco Bay Association have found that most people don't even know there are health warnings.

Some know, but discount the risk.

Michael Jenkins, 46, is aware that years of chemical wastes were washed into the waters at Hunters Point, which was first a steel mill, then a shipyard operated by both the Navy and a private company called Triple A.

"Once I was digging worms, and they were all dead," Jenkins said. "The chemicals used to wash out (of the shipyard) and the water

CHEMICALS FOUND IN FISH

► **PCBs:** Mixtures of chlorinated organic chemicals sold under the trade name, Aroclor, as transformer fluids, lubricants and hydraulic fluids. Banned since 1979, they persist in the environment and accumulate in animal tissues. They can be stored in body fat and secreted in milk. Continued exposure produces toxic effects even at low exposures, damaging kidneys and immune, nervous and cardiovascular systems. In tests, they cause cancer in animals.

► **DIOXINS:** Also mixtures of chlorinated organic chemicals, created as byproducts of chlorination reactions in industrial processes and incineration. They persist in the environment and accumulate in the food chain, particularly in fatty tissues. Extremely toxic to humans and animals, they damage multiple organ systems. Animal studies produce cancer and birth defects at low levels.

► **CHLORDANE:** A popular termite pesticide until most uses banned in 1988, but still found in significant levels in fish and in animal and human fatty tissue. High levels are found in soil around homes. Chronic exposures can damage the liver and nervous system. Animal studies produced

tumors. Some brain tumors and leukemia have been reported in humans.

► **DDT:** A pesticide banned in 1972 but still persists in eggshells, animal tissue and human milk as well as in farm soils, rivers and lakes. DDT and breakdown products can cause liver, neurological, reproductive and immune system damage.

► **DIELDRIN:** A pesticide phased out between 1974 to 1987 but still found in soils, river bottoms and animal tissues. It damages the liver and neurological system and can cause cancer.

► **MERCURY:** A metal dumped in the Bay during mining and leached out of natural ore. It accumulates in fish and other animals. In humans it concentrates in kidneys and can harm the central nervous system.

► **CADMIUM:** A metal in industrial and farm waste, which can cause kidney disease and hypertension. Inhaling it in the workplace may cause cancer in humans.

► **ARSENIC:** A metal in mineral deposits that can contaminate water; also used in pesticides. Lifetime exposures can cause cancer, nerve damage, vascular disease and birth defects.

would turn brown."

But now he believes polluters have been stopped.

"My friends said they heard the bass got mercury and lead. I said I've been eating the fish all my life, and I'm still alive."

He hates to quit fishing. He started going to the inlet behind the PG&E plant at Jennings Street with his mother when he was 7 to catch food and socialize. Now, not very many people come.

Ron Garrison, ranger at the Candlestick Point State Recreation Area west of the baseball park and south of Hunters Point shipyard, said he sees people fishing for food.

Not everyone agrees that Bay pollution is a problem from the past.

The District 7 Democratic Club, based in the Bayview area, is a plaintiff with the environmental groups BayKeeper, United Anglers

and Arms Control Research Center in a lawsuit against the Navy alleging 60,000 violations of the Clean Water Act over the last five years.

The suit, filed in U.S. District Court in October, alleges that the Navy's dilapidated storm water and sewer systems continue to discharge hazardous wastes, including PCBs, benzene and mercury.

It also charges that the Navy's cleanup, required by the federal Superfund law, fails to address water pollution from the shipyard.

"The toxic cocktail discharged from the storm water system poses an immediate threat to residents fishing anywhere in the Hunters Point area," said lawyer Daniel Cooper, who is working with the environmental clinic at Golden Gate Law School on the case.

The Navy denies the allegations, saying it is complying with the storm water permit and addressing cleanup.

Putting out the word on tainted fish

By Jane Kay
EXAMINER ENVIRONMENTAL WRITER

New findings of high levels of pollution in Bay fish will prompt environmentalists and officials to redouble their efforts to warn local anglers.

Most of those who fish the Bay are people of color and immigrants, health officials say. Many are poor and don't speak English, making them that much harder to reach.

"A strong effort needs to be made to communicate these new health advisories to these new populations," said environmental specialist Karen Taberski.

Taberski oversaw a study released Friday by the San Francisco Bay Regional Water Quality Control Board that found high levels of toxic substances in Bay sports fish. Findings led the state Environmental Protection Agency to issue a temporary health advisory that people eat no more than two meals of Bay fish per month.

"Levels of PCBs and mercury found in this study make us particularly concerned about ethnic communities with high consumption rates of fish caught in the Bay," Taberski said.

She said her agency used a survey conducted by Save San Francisco Bay Association, a private environmental group, to find out about the demographics and consumption habits of fishers.

In the group's Seafood Consumption Information Project, scheduled for formal release next year, researchers asked fishers questions in English, Cantonese, Mandarin, Vietnamese and Spanish.

The researchers wanted to know what kind of seafood the fishers ate from the Bay, how often they ate it and how often they

cooked it. From the 93 anglers who fished over five days at Municipal Pier in San Francisco and the Berkeley Marina Pier, the researchers learned one startling fact: English-speaking or not, none knew of the existing state health warning against eating too much striped bass from the Bay.

Still, many expressed concerns about seafood. Others said they saw dumping in the Bay and wondered how it could affect the fish.

Most of the people who answered the survey identified themselves as Asian, including Chinese, Filipino and Vietnamese. In descending order, others identified themselves as African American, Caucasian and Latino.

Twenty-eight people said they had eaten Bay fish in the previous 30 days. The most popular were topsmelt, jackmelt, white croaker and surf perch.

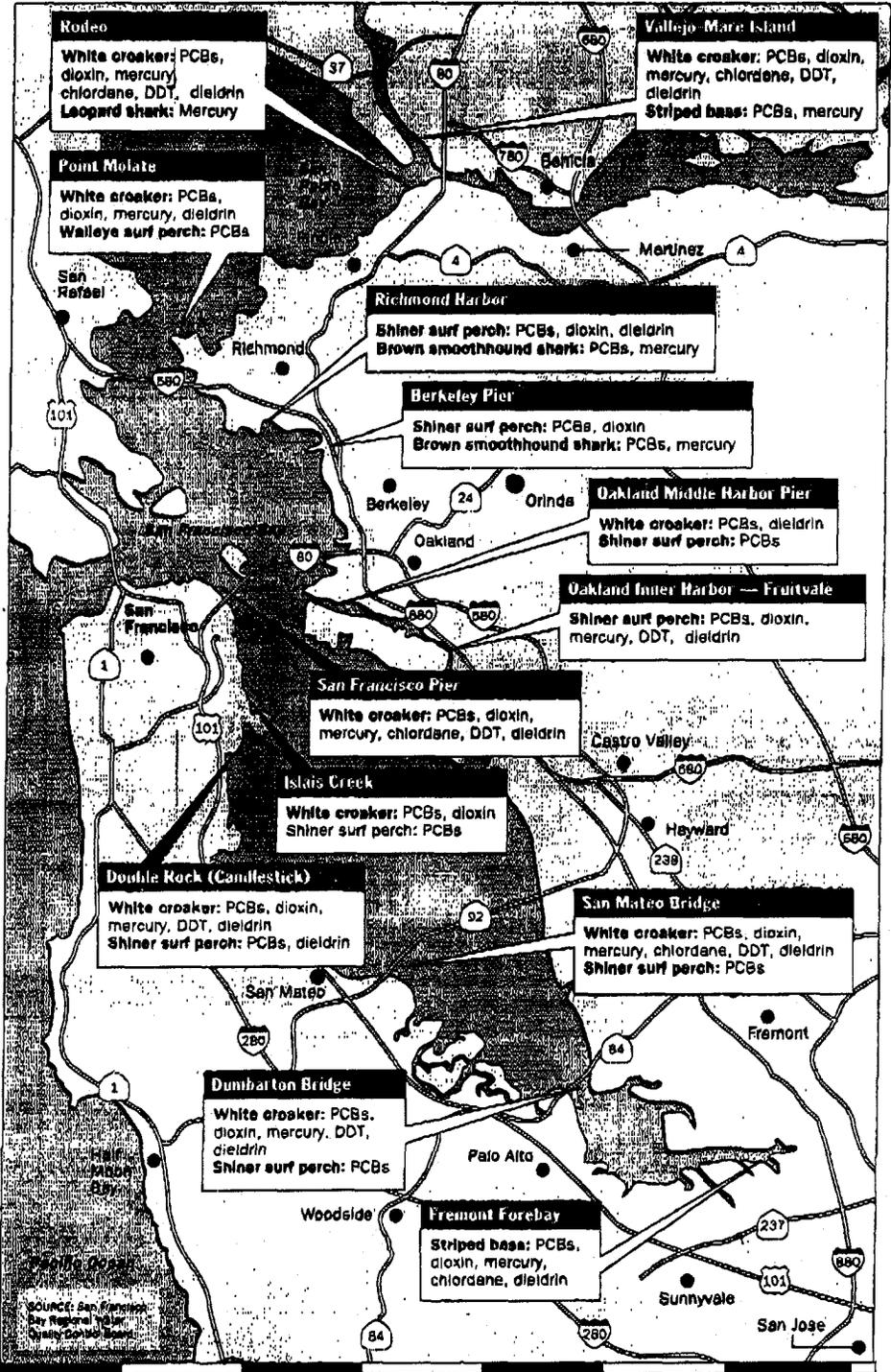
White croaker, according to the new study, carries the highest levels of pesticides in the Bay.

"With this information, we can develop an outreach program to help people minimize their own personal risk," said Ruth Gravano, who directed the demographics survey.

One of the things researchers hope to do is spread warnings about particularly dangerous parts of fish, such as livers and intestines, that accumulate poisons at a greater concentration. Some ethnic groups eat those parts.

"Our goal is to give people the information they need to make their own decisions," Gravano said. "Our goal isn't to tell people what to do or to denigrate cultural traditions. If the Bay were as clean as it should be, we'd acknowledge the liver as a nutrition-rich delicacy."

CONTAMINANTS IN SAN FRANCISCO BAY FISH



3 miles

EXAMINER GRAPHICS