

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**REGION 2  
700 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737  
(510) 540-3724

May 23, 1995

Commander  
Western Division  
Naval Facilities Engineering Command  
Attn.: Mr. Gary Munekawa, Engineer in Charge  
Code 09ER3GM  
900 Commodore Drive  
San Bruno, California 94066-2402

Dear Mr. Munekawa:

**ECOLOGICAL RISK ASSESSMENT: TERRESTRIAL SCOPING ASSESSMENT AND  
ENDANGERED SPECIES SURVEY, DRAFT, APRIL 3, 1995, NAVAL AIR  
STATION, ALAMEDA**

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) have reviewed the draft Ecological Risk Assessment: Terrestrial Scoping Assessment and Endangered Species Survey. Enclosed are the comments of the DTSC and RWQCB. Please respond to our comments before May 31, 1995. This request is made so that the DTSC and RWQCB may be prepared for the June 2, 1995 meeting to discuss this document.

If you have any questions regarding this letter, please call me at (510) 540-3809.

Sincerely,

A handwritten signature in black ink that reads "Thomas P. Lanphar".

Thomas P. Lanphar  
Project Manager  
Base Closure Branch

Enclosure

cc: See next page

1194



Mr. Gary Munekawa, P. E.  
May 23, 1995  
Page Two

cc. Mr. James Nusrala  
Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, California 94612

Lt. Mike Petouhoff  
Base Environmental Coordinator  
Alameda Naval Air Station  
Building 1, Code 52  
Alameda, California 94501

Mr. James Ricks  
U.S. Environmental Protection Agency  
H-92  
75 Hawthorne St.  
San Francisco, CA 94105

**Comments on  
Ecological Risk Assessment: Terrestrial  
Scoping Assessment and Endangered Species  
Draft, April 3, 1995**

Submitted to:  
Gary Munekawa  
Naval Engineering Field Activity, West  
900 Commodore Drive  
San Bruno, CA 94066-2402

Prepared by:  
Thomas P. Lanphar  
Project Manager  
Office of Military Facilities  
Department of Toxic Substances Control  
700 Heinze Ave, Suite 200

1. General Comment

The Ecological Risk Assessment: Terrestrial Scoping Assessment and Threatened and Endangered Species Survey clearly identifies the steps to be taken in conducting the assessment and survey. However, the workplan is lacking on details. More detailed methodologies should be included.

2. Page 1, Introduction.

Please identify and reference the U.S. EPA and State of California Guidance documents which were used developing the Terrestrial Scoping Assessment and Threatened and Endangered Species Survey.

3. Page 4, Biological Characterization

Please identify the qualifications of the PRC scientist and field biologist.

4. Page 5, second paragraph

Are grasslands also expected to be found in Operable Unit 3?

5. Page 6, Identification of Potential Receptors

The California Department of Toxic Substances Control's *Guidance for Ecological Risk Assessment at Hazardous Waste Sites and Permitted Facilities, Part B: Scoping Assessment* includes other literature sources. If practical, the references included in the Guidance should be consulted.

Was the California Department of Fish and Game, Natural Heritage Division contacted for current special animal and special plant lists?

6. Page 7, Identification of Potentially Complete Exposure Pathways

A pathway should be considered complete unless there is scientific justification to demonstrate the chemical will not enter the medium or the receptor will not contact the medium of exposure. The media are: air, soil, water, and biota. Please do not limit the exposure pathways for any Operable Units until a conceptual model can be completed.

7. Page 11, Vegetation Survey

Please identify and reference the US Fish and Wildlife Service concurrence with the approach for the vegetation survey.

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 500  
OAKLAND 94612

Phone: (510) 286-1255

Fax: (510) 286-1380

BBS (510) 286-0404



Mr. Tom Lanphar  
Department of Toxics Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

May 18, 1995  
File No. 2199.9285 (JN)

**Subject: Draft Workplan Ecological Risk Assessment: Terrestrial Scoping Assessment and Threatened and Endangered Species Survey, Naval Air Station (NAS) Alameda, dated April 3, 1995**

Dear Mr. Lanphar:

Regional Water Quality Control Board staff completed our review of the above mentioned document. Comments are being provided by Susan Gladstone, who is acting as technical support for the Ecological Risk Assessment at NAS Alameda. If you have any questions on the comments submitted by this office please contact me at (510) 286-0301.

Thank you,

James Nusrala  
Project Manager

**Internal Memorandum  
Regional Water Quality Control Board  
San Francisco Bay Region**

Date: May 18, 1995

To: James Nusrala

From: Susan Gladstone *Susan Gladstone*

Subject: Draft Workplan Ecological Risk Assessment: Terrestrial Scoping Assessment and Threatened and Endangered Species Survey, dated April 3, 1995

I have reviewed the subject document and have comments, some of which will need to be addressed prior to the Navy contractors performing the field work. These issues can likely be resolved in a meeting or conference call and described in the subsequent scoping assessment report of results. I would encourage the Navy to seek comments on this scoping assessment from the Department of Fish and Game and US Fish and Wildlife Service, as well.

**General Comments:**

In general, the workplan does not describe specifically how the habitat identification/vegetation survey, and the potential receptor identification will be carried out. For example, will surveys be conducted in a grid or transect pattern, or in a perimeter type survey? The surveys may vary in each OU, depending upon habitat type and percentage of vegetative cover. In addition, the Navy has not described how seasonal variations will be taken into account nor how transition zones between aquatic and terrestrial habitats will be assessed. Lastly, The Navy has not described how the terrestrial assessment will be related to the aquatic assessment, particularly where potential receptors of concern are utilizing both habitats.

**Specific Comments:**

1. **page 5, Section 2.1.1, Identification of Habitats, paragraph 1, sentence 1:** Typo? "during the field surveys at OUs 1, 2, 3, and at the *wetland* areas in OU 4, the survey team will delineate terrestrial habitats ..."
2. **page 6, Section Identification of Potential Receptors, paragraph 3, sentence 1:** Preferably, the receptor survey should be carried out during mid-day, as well as sunrise (as opposed to "morning") and dusk.

3. **page 7, Section 2.2, Identification of Contaminants of Potential Concern:** The project team should begin discussing how the criteria used to describe COPCs will be used to eliminate or include chemicals in the list of COCs.
4. **page 8, Section 2.3, Identification of Potentially Complete Exposure Pathways:** Potential exposure pathways should also include potential vegetation chemical uptake via groundwater.
5. **page 11, Section 3.2, Vegetation Survey (T & E), paragraph 1, sentence 1:** The Navy should describe what is meant by a general field survey.
6. **page A-19, Appendix A, Birds at NAS Alameda:** Typo? Should Least Tern Status be CE (California Endangered) instead of SE?
7. **page B-1, Appendix B, Table of Threatened and Endangered Species Expected to Occur at NAS Alameda:** This table should include the Least Tern.