



United States Department of the Interior

FISH AND WILDLIFE SERVICE
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IN REPLY REFER TO:
FWS/EC-98-052

June 15, 1998

Mr. Ronald Yee
Remedial Project Manager
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066

Subject: Draft Ecological Risk Assessment Work Plan and Field Sampling and Analysis Plan for West Beach Landfill, West Beach Landfill Wetland, and Runway Wetland, Alameda Point

Dear Mr. Yee:

Thank you for providing the U.S. Fish and Wildlife Service (Service) with the opportunity to comment on the subject document. Specific comments are as follows:

Page 12, West Beach Landfill, third paragraph, and Figure 4. Selection of Contaminants of Potential Ecological Concern (COPECs) should also consider spatial distribution so that hot spots are not overlooked because the overall frequency of detection for a particular COPEC is less than 5 percent.

Page 13, West Beach Landfill, last paragraph. The term "background" is used several times to describe concentrations of metals in Alameda Point soils from outside the study areas. It needs to be made clear that these values are actually ambient values from the fill material used to develop the air station, and do not represent natural background values.

Page 14, West Beach Landfill, third paragraph, and Figure 5. Ambient Water Quality Criteria (AWQC) are not adequate as a stand-alone screening tool for assessing risk to aquatic organisms when there is potential for exposure to COPECs by ingestion of contaminated prey as well as by water column exposure. In such cases AWQC should be considered in conjunction with prey and sediment concentrations before eliminating COPECs from further evaluation.

Page 15, West Beach Landfill Wetland and Runway Wetland, and Figures 7 and 8. The comments for pages 12 and 14 above also apply to the screening of sediments and surface water in the West Beach Landfill and Runway Wetlands.

Page 16, Problem Formulation and Study Design, first full paragraph. The Navy proposes the additional step in the baseline risk assessment for the West Beach Landfill (IR Site 2) of recalculating the hazard quotient (HQs) from the screening risk assessment using site-specific data, and eliminating the landfill surface soil from the baseline risk assessment if there is no significant incremental risk. The only circumstance under which the Service will support this approach is if IR site 2 then moves directly to a feasibility study for remediation. The Service will not support using this approach as the basis for a decision of no further action, or to delete IR 2 surface soils from further consideration in the baseline risk assessment, for a number of reasons: (1) The proposed reference area is fill material, and not necessarily representative of concentrations in naturally occurring background material; (2) the proposal does not address the rhizosphere and the potential of exposure of subsurface soil due to erosion or other hydrogeologic activity; (3) the hazard quotient approach described in the document, while conservative in some respects, does not evaluate additive or synergistic effects of multiple contaminants, and is applied to only two potential ecological receptors; and (4) the reuse plan designates IR 2 as part of the proposed Alameda National Wildlife Refuge, so the Service is extremely interested in ensuring that ecological risk is adequately characterized.

Page 18, Conceptual Site Model, second paragraph, and Table 8. The document proposes, in the list of ecological receptors, to use the red-tailed hawk and dowitcher species as surrogates for raptors and probing shorebirds, respectively. Consideration should be given to using the northern harrier and the black-necked stilt to represent those guilds. The Northern harrier has a smaller foraging territory and is documented to breed on-site. The black-necked stilt also breeds locally, as opposed to the dowitcher species, which breed in the north. If the red-tail hawk and dowitchers are used, then the site use factors should reflect the requirements of the most restrictive members of the guilds, not just of the species used to calculate the HQs.

Page 23, Benthic Invertebrate Community Evaluation, last paragraph. The document discusses comparing sediment bulk chemistry results to effects range-low (ER-L) and effects range-medium (ER-M) values. It should be made clear that these values will be used for comparison purposes only, and not to screen sites for no further action, without consideration of factors such as bioaccumulation and biomagnification.

Page 25, Data Needs, top paragraph, and Table 15. The priority of chemical analyses in the event that insufficient tissue mass is collected is mentioned as being established in section 4.5.2.2. However, the referenced section does not contain the analytical priority. The only place the information occurs is in a footnote at the end of Table 15. It is specified that, for fish and invertebrates, the priority is polycyclic aromatic hydrocarbons (PAHs), followed by metals, organochlorines, and organotins, in that order. The rationale for giving PAHs first priority should be fully explained in the document, since several factors would argue against it. First, risk to red-tailed hawks in the screening assessment was evaluated as being due primarily to metals and organochlorines. Although wading birds and probing shorebirds are

in different guilds than the hawk, a case has not been developed that the risk from PAHs to those guilds outweighs the risk from metals and organochlorines. Second, fish rapidly metabolize PAHs, so PAH analyses might not be as revealing as metal and organochlorine analyses.

Page 27, Sampling Stations, first full paragraph. This section discusses the "opportunistic" collection of invertebrates and fish. Consideration should be given to changing methods from dip nets and cast nets for fish to beach seines, and from hand-collection to coring and sieving for invertebrates. More systematic collection techniques might preclude the collection of insufficient mass for chemical analyses.

Page 29, West Beach Landfill Wetland, top paragraph. Pickleweed and brass-buttons are mistakenly referred to as "grasses." They are actually in the families Chenopodiaceae and Asteraceae, respectively.

Page 38, Aquatic Invertebrates, top paragraph, and Fishes, first paragraph. The comments made for Page 27 apply.

Thank you again for the opportunity to review this document. If you have any questions, please contact Mr. Jim Haas at (916) 979-2110.

Sincerely,



David L. Harlow
Acting Field Supervisor

cc: Dr. Ned Black, U.S. EPA Region IX, San Francisco, CA
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