



# Department of Toxic Substances Control



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AR\_N00217\_001475  
HUNTERS POINT  
SSIC NO. 5090.3.A

Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Gray Davis  
Governor

October 18, 2001

Commanding Officer  
Department of the Navy  
Naval Facilities Engineering Command  
Southwest Division  
1220 Pacific Highway  
San Diego, CA 92132-5190  
Attention: Richard Mach

PARCEL F VALIDATION STUDY AND HUMAN HEALTH EVALUATION  
FIELD SUMMARY REPORT, HUNTERS POINT SHIPYARD, SAN  
FRANCISCO, CALIFORNIA

Dear Mr. Mach:

California Department of Toxic Substances Control has completed review  
of above mentioned document, Our comments are attached to this letter.

If you have any questions, Please contact me at (510) 540-3822.

Sincerely,

Chein Ping Kao, P.E.  
Senior Hazardous Substance Engineer  
Office of Military Facilities

CC: Mr. Michael Work  
US EPA Region IX  
75 Hawthorne Street  
San Francisco, California 94105-3901

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Mr. Michael Bessette Rochette, R.G.  
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Oakland, California 94612

Ms. Amy Brownell  
City and County of San Francisco  
Department of Public Health  
1390 Market Street, Suite 910  
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# Department of Toxic Substances Control

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Protection

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## MEMORANDUM

**TO:** Chein Kao, Project Manager  
Site Mitigation Branch, Berkeley Office  
700 Heinz, Second Floor, Building F  
Berkeley, CA 94704

**FROM:** James M. Polisini, Ph.D.  
Human and Ecological Risk Division (HERD) 

**DATE:** September 23, 2001

**SUBJECT:** HUNTERS POINT SHIPYARD PARCEL F VALIDATION  
STUDY AND HUMAN HEALTH EVALUATION FIELD  
SUMMARY REPORT  
[PCA 14740, SITE 200050-47 H:16]

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### Background

We have reviewed the document titled *Hunters Point Shipyard Parcel F Validation Study and Human Health Evaluation Field Summary Report, San Francisco Bay, California*, dated July 26, 2001. This Field Report was prepared by Batelle, of Duxbury, Massachusetts. This review is part of the continuing HERD interaction with Navy contractors working on the Parcel F sediments at Hunters Point Shipyard.

Hunters Point Shipyard (HPS) is situated on a promontory in the southwestern portion of San Francisco Bay. HPS is bounded on the north and east by San Francisco Bay and on the south and west by the Bayview Hunters Point district of San Francisco. The area within the property boundaries is approximately 955 acres of which approximately 400 acres are offshore sediments.



### **General Comments**

The detail provided in this sampling report exceeds any provided previously by the Navy. The opportunity to review this report will facilitate review of the results of the field collection. No response is required for this comment.

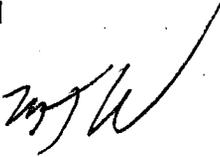
### **Specific Comments**

1. There is no indication that the Navy intended or intends to collect molluscs during the investigation of Parcel F sediments (Section 1.2, page 2) for the Human Health Risk Assessment (HHRA). This omission appears to contradict the statements made regarding collection of clam tissue (Section 4.1, page 32). HERD has indicated in previous memoranda that it is not necessary that there be 'shellfish beds of sufficient size' for this to be a significant exposure pathway for sensitive subpopulations (*Draft Final Hunters Point Shipyard (Parcel F) Human Health Evaluation Work Plan, San Francisco Bay, California Appendix B, page B-13*).
2. The Navy should respond regarding the areas outlined in previous HERD memoranda wherein HERD recommended that some areas in Parcel F would best be evaluated separately. Standard sediment investigation techniques are not applicable in these areas due to access or sampling problems. For example, the large area of concrete and riprap in Area III and the location in Area VIII, where the metal debris has fused, apparently due to corrosion, has many sample locations which were relocated (Table 3-2, page 12).
3. The toxicity test results from Area IX locations OR-24, OR26 and OR29 should be carefully evaluated. Few worms were found in the sediment samples (Table 3-3, page 17) and many species of polychaete worms are known to be tolerant of high chemical sediment concentrations. Sample location OR24 and OR26 are the closest to the shore in Area IX (Figure 3-5, page 24). No response is required for this comment.
4. Some comparison of the physical, chemical and biological data must be provided for the reference station results as the sediment samples for the Sediment Water Interface (SWI) samples at two 'reference' stations (Red Rock and Alcatraz Environs) were collected differently from the other three 'reference' stations (Section 3.2, page 29).
5. To our knowledge there was no mention of treatability testing (Section 3.3, page 30) in the work plan. Please confirm that this was included in the work plan provided for HERD review. In any event, the treatability test results should be reviewed by a DTSC geologist and/or DTSC engineer familiar with remedial actions for subtidal sediments.

6. Please explain in the text why fish species for the Human Health Evaluation (HHE) were only collected at four San Francisco Bay reference sites (Section 5.0, page 46), when five reference sites were sampled for sediment.

**Conclusions**

HERD requests a response to several of the Specific Comments. As the sampling has been performed, the response to these comments could be appended to the Validation Study Report and the Field Summary Report need not be amended.

Reviewed by: Michael Wade, Ph.D., DABT, Senior Toxicologist, HERD 

cc: Daniel Stralka, Ph.D.  
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