

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL PROGRAM

700 HEINZ AVE., BLDG. F, SUITE 200
BERKELEY, CA 94710-2737

February 22, 1991



Commanding Officer
Attn: Mr. Eddie Sarmiento
Naval Station Treasure Island
Building I (Code 84)
San Francisco, CA 94130-5000

Dear Mr. Sarmiento:

**DHS AND RWQCB COMMENTS ON THE PRELIMINARY PATHWAYS FOR GROUP 2
SITES - HUNTERS POINT ANNEX**

The Department of Health Services (Department) has reviewed the Preliminary Pathways for the Group 2 sites handed out at the Hunters Point Technical Review Committee (TRC) meeting January 10, 1991. Enclosed are the Departments and San Francisco Regional Water Quality Control Board comments. As discussed at the TRC meeting, the Department looks forward to further discussing the pathways and other risk assessment assumptions for the Group 2 sites at the next TRC meeting.

If you have any questions regarding this letter, please contact me at (415) 540-3816.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark Malinowski".

Mark Malinowski
Associate Hazardous Materials
Specialist
Site Mitigation Branch
Region 2
Toxic Substances Control Program

Enclosure

cc: (See Next Page)

February 22, 1991

cc: ✓ Ms. Louise Lew (Code 1811)
Naval Facilities Engineering
900 Commodore Drive
San Bruno, CA 94066-0720

Mr. Chuck Flippo (H-7-5)
Remediation Project Manager
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Mr. Tom Gandesbery
Regional Water Quality Control Board
1800 Harrison Street, Suite 700
Oakland, CA 94612

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FEB 15 AM 10:58

Mark Malinowski
Site Mitigation
Region 2
700 Heinz Street, Building F,
Second Floor
Berkeley, CA 94710

TSCP/REGION 2

Review of Proposed
Exposure Pathways
For Hunters Point
Annex Group 2 Sites

Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

DRAFT: NOT FOR CITATION OF ATTRIBUTION**BACKGROUND**

Per your written request of January 17, 1991 we have reviewed the initial summary pathways for the Group 2 operable units at Hunters Point Annex prepared by Harding Lawson and Associates.

ANALYSIS**GENERAL COMMENTS**

The pathways concentrate on human exposure to the exclusion of non-human biological receptors at Hunters Point Annex and in San Francisco Bay.

The Public Health and Environmental Evaluation (PHEE) was not supplied with the request for comments. We cannot, therefore, comment on the PHEE as requested on your written request form dated January 17, 1991.

The Environmental Sampling Plan was not supplied with the request for comments. We cannot, therefore, comment on the sampling plan as requested on your written request form dated January 17, 1991.

SPECIFIC COMMENTS

Into which potentially exposed population would a buyer visiting the mushroom farm once per week be placed? Repeat visitors would not appear to fall into the Onsite occasional Users category. Do any of the civilian lease holders actually live on the facility? If so, into which potentially exposed population would they be

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placed? The addition of a Current Land Use - Onsite Resident population would appear necessary to cover this group of lessees.

Both the Reconnaissance Activities Report dated August 9, 1990 and the Scoping Document dated March 3, 1988 mention considerable quantities of product and waste spilled on building floors and outdoor pads. Direct contact and inhalation exposures to contaminants in this matrix should be included for Current Land Use by Onsite Workers and Onsite Occasional Users.

Why the question mark in the "Considered for Evaluation" column for the Current Land Use Offsite Resident exposure via ingestion of fish and shellfish? Both the Reconnaissance Activities Report dated August 9, 1990 and the Scoping Document dated March 3, 1988 mention considerable quantities of contaminated discharge to San Francisco Bay in the past. Are the shellfish or fish in San Francisco Bay near Hunters Point Annex contaminated with the chemicals found onsite?

What are the current patterns in this part of San Francisco Bay? Are contaminants from Hunters Point Annex distributed up the west side of San Francisco Bay by the prevailing currents? Swimming in San Francisco Bay does occur at least as close as Fisherman's Wharf (Dolphin Club). Do similar activities occur nearer Hunters Point Annex? Perhaps the "dermal contact with bay water during swimming" exposure pathway should be evaluated or at least some determination made regarding the proximity of activities of this type.

How difficult is the access to the private property located just outside the perimeter fence nearest the industrial landfill site (IR-1)? The Reconnaissance Activities Report dated August 9, 1990 indicates "... portions of the landfill boundary appear to extend beyond the property boundary." along the northern boundary of the landfill. The extension of the site IR-1 boundary beyond the facility perimeter seem to offer an exposure pathway for Offsite Residents or visitors without the necessary "offsite migration of airborne chemicals" quoted in the comment section of the exposure pathway table for Offsite Residents direct contact exposure.

The explanation of the Current Land Use inhalation exposure pathway for Offsite Residents is confusing. By definition of the receptor as "Offsite" this pathway must refer to exposure occurring beyond the site boundaries due to movement (dispersion) of vaporized contaminants. What does the phrase "subsequent to dispersion offsite" intend to convey? Will Offsite Residents be considered exposed to the maximum onsite concentration which is one interpretation of the "subsequent to dispersion" phrase?

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Why will Future Land Use, Onsite Recreational Users inhalation of indoor air containing volatile chemicals not be considered? Indoor dust frequently contains concentrations of chemicals similar to outdoor dust. What is "limited indoor use" intended to communicate in the comment column? Another military facility in the San Francisco Bay area, Ft. Mason, now has a hostel on the facility. Will such future land use be banned at Hunters Point Annex? What is to preclude the city of San Francisco from constructing indoor recreation facilities at the site after it is deeded to the city? The reasoning for not addressing this route of exposure needs stronger justification.

The Scoping Document dated March 3, 1988 mentions that "Potentially exposed receptor populations will be identified. These receptor populations may include humans and both pelagic and benthic species found in San Francisco Bay." (page 4-1) as part of the PHEE. Why are these receptors not included in the initial summary pathways for the Group 2 operable units?

CONCLUSION

The pathways concentrate on human exposure to the exclusion of non-human biological receptors at Hunters Point Annex and in San Francisco Bay.

Nearly every conceivable human exposure scenario is covered by these very general exposure pathways. Contingent on the points raised above, the degree of investigation directed toward these exposure pathways will determine the adequacy of the PHEE.

James M. Polisini, Ph.D.
Associate Toxicologist
Toxicology and
Risk Assessment Section
Technical Services Branch

Reviewed by: James C. Carlisle, D.V.M., M.Sc.
Staff Toxicologist
Toxicology and Risk
Assessment Section

2-13-91
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TSCP/REGION 2

REGIONAL WATER QUALITY CONTROL BOARD

MEMO

TO: Mark Malinoski

DATE: 2/13/91

FROM: TRG

SUBJECT: Comments on HPA, PHEE Pathways

The following are my comments regarding the "Potential Exposure Pathways" draft document which was past out at the January meeting of the HPA TRC and the subsequent Summary for that meeting.

Meeting Summary:

1. Page 4 paragraph 6: Assumption that "there is no current recreational use of the Bay". This not the policy of the RWQCB as stated in its 1986 Basin Plan. Beneficial uses of the Bay include a) Contact and non-contact recreation and b) commercial and sport fishing.

Pathways Draft Document:

1. Page 2: Ingestion of fish and shellfish should be included in the PHEE. ESAP and further study of offshore sediments may alter the conclusions of the PHEE, but such data should be a part of the Navy's evaluation of Public Health exposure to pollutants at HPA.
2. Page 4, Assumption #1: The current use and potential use of Bay waters at, and adjacent to, HPA for contact recreation should be evaluated in the PHEE. This route of exposure is of special importance as the State of California, Department of Parks and Recreation, plans to create a park and possibly restore wetlands at Candlestick Park ("Candlestick Point Project"). The creation of such a park would likely increase the likelihood of recreational use of the Bay near and at HPA.

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