

DEPARTMENT OF FISH AND GAME

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CERCLA/NRDA Unit

March 4, 1994

*rec'd 2/2/94 mem**T4A1WM*Commander, Western Division
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-24025090
Ser T4A1WM/L4116
27 Jan 1994Attention: Michael McClelland
Code T4A1MM

Dear Mr. McClelland:

**Responses to EPA Comments by Navy, Hunters Point Annex (HPA),
Parcel C Site Inspection, Volume III Data Presentation**

In connection with the ongoing Remedial Investigation/ Feasibility Study (RI/FS) activities at Hunters Point Annex (HPA), Parcel C Site, the Department of Fish and Game (DFG) is concerned about the Navy's position to not consider ecological criteria and evaluations of fish and wildlife species receptors. As we have identified in previous correspondence on this facility, DFG, as State trustee for fish, wildlife species and their habitats, has a two-fold interest at this site: (1) assisting Navy in the technical and scientific evaluations of the Ecological Risk Assessment portions of the RI/FS with the inclusion of State Applicable or Relevant and Appropriate Requirements (ARARs) for the total HPA site, including each of the site's parcels, and; (2) determining if releases of hazardous materials at the site have resulted in injuries to State fish and wildlife resources, pursuant to CERCLA § 104 and 120.

DFG disagrees with the Navy's position that it does not need to ". . . consider ecological criteria at this stage of the investigation because ambient water and sediment quality criteria apply to media in the Bay, and no SI samples were collected in the Bay" (Response 10, Parcel C comments by EPA). The major reason that we disagree with the Navy's position, which is to consider only human health ARARs in the site assessment, is that human health endpoints are not relevant for the protection of ecological receptors, specifically fish and wildlife species and their habitat. It is commonly understood that certain responses of humans to toxic chemicals are not sufficiently sensitive to assess risks to fish, wildlife species, and their habitats. Therefore, we remain concerned that a strategy for remediation of individual parcels, based solely upon human risk assessment, will be adequate to characterize risks to, and to select remediation

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alternatives to protect, ecological receptors, including State natural resources at or adjoining the site.

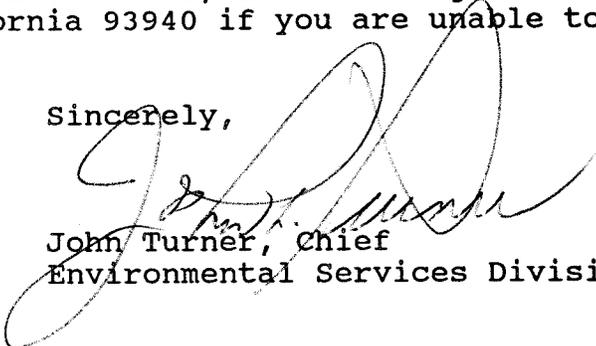
In view of the fact that various contaminants were used in significant quantities throughout many sites at Hunters Point, and further, that after ten years of continuous use, Triple A Machine Shop was finally forced to vacate the facility, sufficient question exists to support an ecological risk assessment for the RI/FS process for Parcel C. In 1986, the San Francisco District Attorney's Office charged Triple A with illegally disposing of hazardous materials throughout the Hunters Point Annex. It is highly likely that continuing ground-water releases from HPA enter the Bay; we believe the Navy should conduct ground-water screening evaluations as part of the RI/FS to estimate risk to ecological receptors, and that such remediation study should utilize ecological receptor endpoints, such as water quality or sediment quality criteria, to evaluate these risks.

I am surprised to learn that the previous DFG's comments on ARARs and request to participate in the RI/FS process has not been received by your agency. My staff submitted comments on the facility to the California Department of Toxic Substances Control on September 23, 1993.

In a concluding response to EPA review on Comment 10, Navy proposes the opportunity to work with the agencies to develop a scenario to address the issue of an ecological assessment. In our technical view, this can only be accomplished by use of ecological criteria, including fish and wildlife species receptor responses, as the basis for estimating risk to natural resources, and as a basis to determine cleanup alternatives at Hunters Point Annex.

Please contact Dr. Michael Martin, CERCLA/NRDA Unit, California Department of Fish and Game, 20 Lower Ragsdale Drive, Suite #100, Monterey, California 93940 if you are unable to obtain our letter.

Sincerely,



John Turner, Chief
Environmental Services Division

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