STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
[redacted] HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

November 6, 1995

Engineering Facilities Activity, West
Attn: Mr. David Song [1832.3]
900 Commodore Drive
San Bruno, California 94066-5006

Dear Mr. Song:

NAVY RESPONSES TO DEPARTMENT OF FISH AND GAME COMMENTS FOR DRAFT QUALITY ASSURANCE PROJECT PLAN FOR PHASE IB ECOLOGICAL RISK ASSESSMENT WORK PLAN, HUNTERS POINT ANNEX

The Department of Toxic Substances Control is forwarding enclosed comments from the Department of Fish and game or your consideration.

Should you have any questions regarding this letter and would like to seek clarification, please call me at (510) 540-3821.

Sincerely,

Cyrus Shabahari
Project Manager
Office of Military Facilities

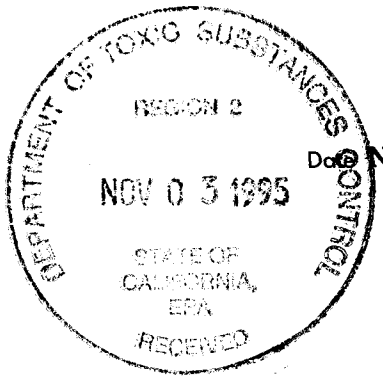
Enclosure

cc: US EPA, Region IX
Attn: Sheryl Lauth [H-9-2]
75 Hawthorne Street
San Francisco, California 94105

Regional Water Quality Control Board
Attn: Richard Hiett
200 Webster Street, Suite 500
Oakland, California 94612

State of California

Memorandum



To : Mr. Cyrus Shabahari
Office of Military Facilities
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, California 94710

Date November 1, 1995

From : **Department of Fish and Game**

Subject : Review of U.S. Navy Response to Department of Fish and Game Comments For Draft Quality Assurance Project Plan (QAPP) For Phase IB Ecological Risk Assessment Work Plan, Hunters Point Annex (5920/60120/NTX 403 00: 2)

The California Department of Fish and Game (DFG) has reviewed the response to our comments on the QAPP for the above-referenced project; we strongly believe that hydrogen sulfide should be included in the suite of chemicals monitored in all toxicity tests.

The measurement of hydrogen sulfide in the toxicity testing containers is not a required element of the written protocol for the toxicity tests being conducted. It is our experience with toxicity tests that hydrogen sulfide may cause toxicity. We request that you consider performing the analysis for hydrogen sulfide in the sea urchin test (pore water) and in the amphipod test (overlying water). The urchin larvae are particularly sensitive to hydrogen sulfide and it would make sense to conduct the analysis for this compound which can cause interferences in the toxicity test results. Most toxicity laboratories are now conducting hydrogen sulfide analyses, as well as the usual ammonia and other water quality analyses, as part of their routine suite of water quality parameters analyzed within the toxicity test containers during the conducting of the tests.

We do not wish to delay any of the upcoming field work, or to alter any planned activities related to this effort by the Navy. We believe that measuring hydrogen sulfide might be important in the interpretation of data at the conclusion of the testing. Samples can only be taken during the time when the testing occurs. We also want to thank you for your responses to our comments and for making several changes to your QAPP as a result. With the inclusion of our previous recommendations we concur with the QAPP for this field sampling effort.

If you have any questions regarding this matter, please contact Dr. Michael Martin, Department of Fish and Game, 20 Lower Ragsdale Drive, Monterey, California 93940, telephone (408) 649-2870.

John L. Turner, Chief
Environmental Services Division

cc: Department of Fish and Game

Dr. Michael Martin
Monterey

Mr. Joe Milton, Esq.
Sacramento