



Department of
Toxic Substances
Control

700 Heinz Avenue
Suite 200
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January 26, 1997

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HUNTERS POINT
SSIC NO. 5090.3


Commanding Officer
Engineering Field Activity, West
Attention: Code 18, Mr. Richard Powell (1832)
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-5006

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

**RE: Parcel E Draft Final Remedial Investigation Report, Hunters Point
Shipyard, San Francisco, California**

Dear Mr. Powell:

Attached please find additional comments from our Staff Toxicologist on
the above document.

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

Enclosures

CC: Ms. Sheryl Lauth
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Mr. David Leland
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MEMORANDUM

Pete Wilson
Governor

Department of
Toxic Substances
Control

James M. Strock
Secretary for
Environmental
Protection

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P.O. Box 806
Sacramento, CA
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TO: Chein Kao, Project Manager
Office of Military Facilities, Berkeley
700 Heinz, Building F, Second Floor
Berkeley, CA 94710

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

DATE: January 23, 1998

SUBJECT: HUNTERS POINT ANNEX DRAFT FINAL PARCEL E REMEDIAL
INVESTIGATION REPORT - RESPONSE TO COMMENTS
[PCA 14740 SITE 200050-47 H:24]

Background

We have reviewed response to HERD comments on the document titled *Parcel E Remedial Investigation Draft Report, Hunters Point Shipyard, San Francisco, California* dated May 29, 1997 prepared by PRC Environmental Management, Inc. of San Francisco, California, Uribe & Associates of Oakland, California and Levine-Fricke-Recon of Emeryville, California. The HERD comments on the Parcel E ecological risk assessment were contained in the HERD memorandum to Chein Kao dated August 4, 1997. The response to HERD comments on the Draft RI Report is contained in Appendix S of the Draft Final RI Report. This review is in response to your written work request dated December 9, 1997.

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 on-base property at HPS is approximately 497 acres on land of which 135 acres are contained in Parcel E.

General Comments

We have several concerns regarding some of the Navy's responses to HERD comments on the Draft Final RI Report.

Specific Comments

1. We accept the Navy's response to HERD general comment number one that the incremental cancer risk and non-cancer hazard associated with ingestion of fish and/or shellfish will be addressed in the *Parcel F Remedial Investigation (RI) report*.



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2. The intent of the human health risk assessment (HHRA) specific comment number one was that the California-specific ambient concentrations (Bradford, et al., 1996) should be used in place of, not in addition to, the ambient concentrations for the entire United States. We will not insist that this change be made at this late date.
3. Despite the Navy's response we still believe that a more appropriate hexavalent chromium concentration would be 2.2 percent rather than the 0.99 percent used in the HHRA. The response to the HERD HHRA specific comment number 3 refers to a lengthy discussion of statistics contained in the response to a similar U.S. EPA comment. Regardless of the statistical basis for one value or the other, the use of differing hexavalent chromium ratios in different parcels at HPA will make the base-wide HHRA extremely difficult to perform. We continue to recommend a more uniform hexavalent chromium value more similar to that used in other HPA parcels but will not insist that the hexavalent chromium value be changed at this late date. The Navy should be aware of difficulty this will cause in performing the base-wide HHRA.
4. The DTSC risk manager should bear in mind that the Navy admits the low dose hazard calculated in the ecological risk assessment was performed incorrectly by using trophic transfer factors but declines to change the calculation. This position is contained in the response to ecological risk assessment (ERA) general comment number 1. Removing the trophic transfer factors would increase the low dose hazard quotient (HQ₁) by a factor of ten for some representative species.
5. The response to ERA general comment 2 addresses the method for estimating deer mouse tissue concentrations as part of the kestrel intake calculation. The method used to estimate the maximum deer mouse tissue concentration is unacceptable to HERD. It has not been used in any DTSC ERA in California of which we are aware. **DO NOT USE THIS METHOD OF ESTIMATING MAXIMUM PREY TISSUE CONCENTRATIONS IN ANY FUTURE ECOLOGICAL RISK ASSESSMENTS.**
6. We continue to recommend sites IR-02 Northwest and IR-04 for validation studies to decrease the uncertainty in the Parcel E Predictive Assessment for terrestrial receptors as stated in HERD Conclusion comment number 2. These two sites are the most heavily contaminated of those evaluated in Parcel E. If validation studies at these two sites do not indicate a potential problem the other sites in Parcel E are unlikely to pose a threat.

Conclusions

The ecological risk assessment contains several calculations and methodological steps that we find objectionable and unreasonable.

The Navy's response to the HERD recommendation for validation studies at sites IR-02 Northwest and IR-04 is only that the work plan for any Parcel E validation studies will be developed in consultation with all appropriate regulatory agencies. We recommend that the DTSC project manager obtain Navy agreement to perform the validation studies prior to approval of the Parcel E Draft Final Remedial Investigation Report.

HERD Internal Reviewer: John P. Christopher, Ph.D., DABT
Staff Toxicologist
HERD

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cc: Michael J. Wade, Ph.D., DABT, Senior Toxicologist, OMF Liaison, HERD

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