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N00217.003888
HUNTERS POINT
SSIC NO. 5090.3

IN REPLY REFER TO:

5090
Ser 702P35/L9204
27 August 1999

Ms. Sheryl Lauth
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco CA 94105

SUBJECT: DRAFT REGIONAL ECOLOGICAL AND HUMAN HEALTH RISK
ASSESSMENT WORK PLAN, HUNTERS POINT SHIPYARD FACILITY-
SPECIFIC HUMAN HEALTH RISK ASSESSMENT, AND HUNTERS
POINT SHIPYARD FACILITY-SPECIFIC ECOLOGICAL RISK
ASSESSMENT WORK PLAN

Dear Ms. Lauth,

Enclosed please find copies of the *Draft Regional Ecological and Human Health Risk Assessment Work Plan, Draft Hunters Point Shipyard Facility-Specific Human Health Risk Assessment, and Draft Hunters Point Shipyard Facility-Specific Ecological Risk Assessment Work* for your review and comment. To facilitate your review, we have scheduled a meeting for Thursday, September 2, 1999 from 1pm to 5pm to provide you with a general overview of the work plan and to discuss specific issues requiring resolution before our planned field sampling effort in late October. The meeting will be held at TetraTech EMI office at 135 Main Street, San Francisco. Because of the shortened review period, we request that you focus your attention on the HPS specific sections and provide us with your comments by September 27, 1999. The regional work plan review period is not as time-critical and we will accept comments through October 27, 1999.

We plan to schedule a follow-up meeting at the end of September or early in October, to discuss agency comments in more detail. There are still some issues that need to be resolved and further developed in the work plan, including the following:

- Human Health Risk Assessment for offshore sediment sites. We expect the risk driver for these sediment sites to be ecological receptors, but we have identified several exposure pathways for human receptors, and have run a preliminary screen for human health. We need to decide whether it is necessary to put a lot of effort and time into performing quantitative analyses for any of these pathways, or whether a qualitative evaluation will suffice, given the low exposure expected for pathways such as dermal absorption. We will discuss this issue at our September 2nd meeting.

- Methodology to address fish tissue consumption in the Human Health Risk Assessment. We will discuss this issue further at the September 2nd meeting.
- Methodology for conducting the dose assessment for the willet, and peregrine falcon. There is existing benthic invertebrate tissue collected from South Basin that was used to model dose to the willet. There was a large amount of uncertainty associated with those dose calculations because the exposure parameters had not been refined (i.e., they assumed that the peregrine falcon's diet was composed of 100% willets from HPS Parcel F), and because the benthic invertebrate tissue samples could not be correlated with specific sediment concentrations. We are currently working on refining the exposure parameters for both the willet and the falcon, and will be sending a memo in the next several weeks for agency review. Once we run the dose calculations using refined exposure concentrations and existing the benthic invertebrate tissue data, we will need to decide whether it is necessary to collect additional tissue data, to reduce uncertainty and enable us to correlate bioaccumulation risk with specific sediment concentrations.
- Sampling design for HPS. We would like agency input on the sampling design, including the number and locations of samples, and the specific chemistry and biological tests proposed. We realize the agencies will not have had a chance to review this in detail prior to the September 2nd meeting, so we plan to discuss it at the following meeting.
- Weight of Evidence (WOE) approach. The process proposed in the regional workplan is essentially the same as the process that was used at Pt Molate. It is likely that this process will need further development and modification for application at HPS and other facilities. We have received comments from several agency members on this approach, both last winter when we held meetings to discuss the WOE application, and more recently with the review of the Point Molate Offshore Ecological Risk Assessment Report. We plan to address these comments and have further discussions with the agencies during the period while we are waiting for data to come back from the lab. Ideally we would like to have the process in place before going to the field, but in the case of HPS, time does not allow for that. However, we do feel that it is essential to have these discussions and establish the criteria, ranks, etc, before the data is available, so that we are not biased by what the results for specific measurement endpoints show.

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Thank you for your review of these documents. If you have any questions please contact me at (650) 244-2516, or e-mail me at lhunt@efawest.navy.mil. You may also contact Stacey Curtis at (650) 244-2596, or by email at stacey@spawar.navy.mil.

Sincerely,



LISA HUNT
Remedial Project Manager
By direction

Enclosures: (1) Draft Regional Ecological and Human Health Risk Assessment Work Plan, Hunters Point Shipyard Facility-Specific Human Health Risk Assessment, and Hunters Point Shipyard Facility-Specific Ecological Risk Assessment Work Plan, dated August 27, 1999

Copy to:

U.S. Environmental Protection Agency, Region IX (Attn: Dr. Ned Black)
U.S. Environmental Protection Agency, Region IX (Attn: Dr. Clarence Callahan)
U.S. Environmental Protection Agency, Region IX (Attn: Ms. Lynn Suer)
U.S. Environmental Protection Agency, Region IX (Attn: Ms. Claire Trombodore)
U.S. Environmental Protection Agency, Region IV (Attn: Mr. Tom Huetteman)
CAL EPA, Regional Water Quality Control Board, S.F. Bay Region (Attn: Ms. Susan Gladstone)
CAL EPA, Regional Water Quality Control Board, S.F. Bay Region (Attn: Mr. Brad Job)
CAL EPA, Regional Water Quality Control Board, S.F. Bay Region (Attn: Mr. David Leland)
CAL EPA, Regional Water Quality Control Board, S.F. Bay region (Attn: Mr. Richard McMurtry)
CAL Department of Fish & Game (Attn: Ms. Susan Ellis)
CAL Department of Fish & Game (Attn: Mr. Buzz Chernoff)
CAL Department of Fish & Game (Attn: Mr. Charlie Huang)
CAL Department of Fish & Game (Attn: Ms. Becky Ota)
CAL EPA Department of Toxic Substances Control (Attn: Dr. Jim Polisini)
CAL EPA Department of Toxic Substances Control (Attn: Ms. Eileen Hughes)
CAL EPA Department of Toxic Substances Control (Attn: Mr. Chein Kao)
CAL EPA Department of Toxic Substances Control (Attn: Mr. Dan Murphy)
US Fish and Wildlife Service (Attn: Ms. Sonce DeVries)
US Fish and Wildlife Service (Attn: Mr. Jim Haas)
U.S. Environmental Protection Agency, NOAA (Attn: Ms. Laurie Sullivan)

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Blind copy to:
622.1 (RP), 622.9 (BR), 181.21 (JB)
622 (MM), 182.3 (TG), 183.14 (KS)
181.2 (GR), 182 (RF)
Stacey Curtis
Chron
Admin. Files (3 Copies)
Activity file: Hunters Point

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ENCLOSURE

DRAFT REGIONAL ECOLOGICAL AND HUMAN HEALTH RISK ASSESSMENT WORK PLAN

DATED 27 AUGUST 1999

IS ENTERED IN THE DATABASE AND FILED AT
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