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MARE ISLAND  
SSIC NO. 5090.3.A



Cal/EPA

**MEMORANDUM**

Department of  
Toxic Substances  
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**TO:** Chip Gribble, Project Manager  
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**FROM:** James M. Polisini, Ph.D.  
Human and Ecological Risk Division (HERD)

**DATE:** June 11, 1997

**SUBJECT:** MARE ISLAND REVISIONS TO DRAFT FINAL ONSHORE FIELD  
SAMPLING AND ANALYSIS PLAN  
[PCA 14740 SITE 200063-47 H:8]

Background

We have reviewed the document titled *Mare Island Vallejo, California, Revisions to Draft Final Phase 1 Ecological Risk Assessment Field Sampling and Analysis Plan Onshore Areas*, dated June 2, 1997 and prepared by PRC Environmental Management, Inc. of San Francisco, California. This review is in response to your written work request dated June 10, 1997.

General Comments

The HERD comment numbers referenced in the Specific Comments are contained in a HERD memorandum from James Polisini to Chip Gribble, dated May 12, 1997, reviewing the Draft Final FSAP.

Specific Comments

1. The text has been changed to contain the agreed-upon use of the ambient soil and sediment concentrations available (Section 2.2, page 14) in response to HERD comment number 4 in the May 29, 1997 HERD memorandum. Reference to soil ambient concentrations has been correctly removed by ~~strikeout~~ from the set of screening criteria in the associated table. Reference to the soil ambient concentrations should, however, be included in the set of comparison values in the table. This can be made in the final FSAP without delaying field sampling.

Post-it® Fax Note	7671	Date	6/11/97	# of pages	5
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2. The text has been changed to include the basis for the assumption that the material in the dredge ponds is homogeneous in response to HERD comment number 5 (Section 3.3.3, page 21). The second portion of HERD comment number 5 was not addressed. This comment was that the FSAP be amended to indicate that the chemical and physical data from the dredge ponds will be tested to evaluate the assumption that the material is homogenous and provide an alternative plan if this crucial assumption proves false. We agree to consider an alternate course of action and potential additional sampling should the dredge pond material prove not to be homogeneous.
3. The table referenced in the text to contain the wetland cover, ER-L and ER-M values (Table 10, Section 6.1, page 47) still does not contain the ER-L and ER-M values. This was noted in HERD comment number 33. In addition, the copy furnished for our review does not contain Table 9 or Table 8. These errors should be corrected in the Final FSAP and need not delay sampling.
4. We continue to disagree with the proposed selection process for selection of contaminants of potential ecological concern (COPECs) (Section 6.1, pages 47 and 48). In addition to the number of contaminants which exceed the wetland cover or ER-L values, the selection of COPECs is dependent on 1) the specific contaminant which exceeds the wetland cover or ER-L values and 2) the margin by which a contaminant exceeds the wetland cover or ER-L value. This same comment was made in HERD comment number 34 with no apparent change in the text. We agree to await results of the sampling for selection of COPECs. This does not require delay of field sampling.
5. California Water Quality Objectives (WQOs) (Section 6.1, page 48) were added to Ambient Water Quality Criteria (AWQC) as screening criteria in response to HERD comment number 37. The HERD proposal that toxicity data from the scientific literature or site-specific toxicity tests should be used to assess the potential threat for contaminants for which there is no AWQC or WQO was not added to the text. HERD will implement this process when the onshore ecological risk assessment is submitted. These additional criteria should be added to the Final FSAP. This does not require delay of field sampling.
6. The text has not been amended in response to HERD comment number 38 that Application of the freshwater AWQC for the west side RMZ must be supported by measurements of salinity at sites in the west side RMZ. Salinity measurements will be required to justify selection of freshwater or marine AWQC or WQO and it is our understanding from discussions at the May 27, 1997 meeting that salinity will be measured. This does not require delay of field sampling.
7. Table 2 was changed in response to part of HERD comment number 48. However, no change was made in response to the statement that all California bats are California species of special concern and that there should be an 'X' rather than an '' in that column. Change the entry in Table 2 in the Final FSAP. This does not require delay of field sampling.
8. There does not appear to have been any change in the text and Appendix A-4 in response to HERD comment number 49 regarding the decontamination procedure. The decontamination procedure listed in the main text (Section 4.4, page 27) does not appear to agree with the decontamination procedure listed in the appendices (Appendix A-4). Extensive discussions between Navy contractors and regulatory agencies regarding decontamination of offshore sampling equipment between sampling cells ended with HERD acceptance of the contractors proposal that steam cleaning between sampling events be used rather than a detergent, dilute mineral acid and solvent wash. The description of onshore decontamination procedures

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(Section 4.4, pages 27 through 29) now does not include steam cleaning. Steam cleaning is included as an alternate to hand washing for soil sampling equipment in the separate decontamination section (Appendix A-4, Section 2.3, page 4 of 5). Decontamination of general sampling equipment specifies solvent, and dilute acid rinse (Appendix A-4, Section 2.5, page 5 of 5). Please amend Section 4.4 and Appendix A-4 so that they are correct and agree in the Final FSAP. This does not require delay of field sampling.

Conclusions

Several sections should be amended in the Final FSAP for onshore areas. The specific information regarding the predictive assessment for terrestrial receptors is not included, but this can be addressed prior to development of the onshore ecological risk assessment. We would normally recommend that field sampling be performed until all HERD concerns regarding the evaluation of the data are addressed in the FSAP. However, due to time constraints on the onshore and offshore sampling at Mare Island, and the assurances we have received from the Navy and PRC Management that the specific ecological risk assessment issues will be resolved in a cooperative manner, we agree that these ecological risk assessment issues can be resolved after sampling is completed.

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