

5090  
Ser1832.5EG/L7088  
4 Feb 1997

California Environmental Protection Agency  
Department of Toxic Substances Control, Region 2  
Attn: Mr. Chein Kao  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

Subj: SCHEDULE AND FIELD SAMPLING PLAN CHANGES FOR PHASE II ECOLOGICAL  
RISK ASSESSMENT SAMPLING AT NAVAL STATION TREASURE ISLAND

Dear Mr. Kao:

The Navy has been reviewing the final phase II ecological risk assessment (ERA) work plan/field sampling plan (WP/FSP) for Naval Station Treasure Island (NAVSTA TI). In order to maintain consistency with the risk assessment guidance for sediments (currently being prepared) and with regulatory agency comments received by the Navy on field sampling and work plans for Naval Air Station (NAS) Alameda and NAVSTA TI, the Navy has identified minor revisions to be incorporated into the WP/FSP for sampling activities to be performed offshore at NAVSTA TI.

The following changes have been made to the WP/FSP:

- Bioassay samples will be collected at 50 percent of the sample locations and analyzed immediately. This change was made because the U.S. Environmental Protection Agency (EPA) disputes the freezing of pore water samples before conducting bioassays, and because of the difficulty and additional cost of obtaining the analytical results from chemistry analyses within the holding time for unfrozen bioassay samples. Analyzing bioassay samples at 50 percent of the locations will generate data from areas with low levels of contamination and from more highly contaminated areas, allowing for correlation analysis to be used to predict toxicity at locations where no bioassay samples are collected.
- All bulk chemistry samples will be analyzed for organotins and acid volatile sulfides/simultaneously extractable metals (AVS/SEM) in addition to the original list of analyses. California waste extraction tests (WET) for metals will not be run on the bulk sediment samples, as the AVS/SEM analysis will provide a better measure of the metals' bioavailability.
- All pore water samples will be analyzed for organotins, total sulfides, and dissolved organic carbon in addition to the original list of analytes. Pore water samples will not be analyzed for volatile organic compounds (VOC) and total purgeable petroleum hydrocarbons (TPH-p), as volatile chemicals will be lost from the samples during centrifugation.

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- Core samples will be collected directly in the aluminum core tubes and extruded into a tray prior to compositing. This method is more efficient than using polycarbonate liners. The core tubes and trays will be decontaminated between sample locations.
- The cores will be split into 2-foot sections for chemical analysis.
- The sample type codes to be used in the sample identifications have been simplified: sediment chemistry samples will be designated with "SC," and pore water samples will be designated with "PW."
- The sample numbers have been preassigned; sample labels will be preprinted with the sample numbers and analyses to be performed.

The Navy has enclosed a revised schedule for the offshore sampling and report preparation. As reflected in the schedule, the submittal date for the draft offshore ecological risk assessment report to the regulatory agencies will be December 15, 1997, which conflicts with the August 1997 deadline currently in the federal facility site remediation agreement. The schedule extension is due to the additional sampling to be conducted offshore of Installation Restoration Site 12; laboratory limitations on the number of pore water samples that can be processed each day; the additional time needed for receiving and validating the increased amount of analytical data; and the overall increase in time needed for data analysis and presentation of the larger data set.

Should you require additional information, please contact me at (415) 244 2560.

Sincerely,

**Original signed by:**

ERNESTO M. GALANG  
Remedial Project Manager  
By direction of  
the Commanding Officer

Attachment: Revised schedule for phase II ERA

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Copies to:

California Regional Water Quality Control Board (Attn: Ms. Gina Kathuria)  
California Department of Fish and Game (Attn: Dr. Michael Martin)  
U.S. Environmental Protection Agency, Region IX (Attn: Ms. Rachel Simons)  
U.S. Fish & Wildlife Services (Attn: Mr. Steve Schwarzbach)  
Bay Area Air Quality Management District (Attn: Mr. Julian Elliot)  
Bay Conservation and Development Commission (Attn: Mr. Steve McAdam)  
National Oceanic & Atmospheric Administration (Attn: Ms. Laurie Sullivan)  
California Department of Toxic Substances Control (Attn: Mr. Jim Polisini)  
California Regional Water Quality Control Board (Attn: Ms. Susan Gladstone)  
U.S. Environmental Protection Agency, Region IX (Attn: Mr. Clarence Callahan)  
NAVSTA Treasure Island (Attn: Mr. Jim Sullivan)  
NAVSTA Treasure Island (Attn: LT Nannette Roberts)  
San Francisco Department of Public Health (Attn: Ms. Martha Walters)  
PRC Environmental Management, Inc. (Attn: Ms. Sharon Tobias)

Community RAB Members:

Mr. Joseph Alcedo	Ms. Karen Mendelow
Mr. James Aldrich	Mr. Rick Nedell
Mr. John Allman	Ms. Patricia Nelson (Co-Chair)
ARC Ecology (Mr. Saul Bloom)	Mr. Henry Ongerth
<del>Mr. William Foster</del>	Ms. Dale Smith
Mr. Richard Hansen	Mr. Timothy Such
Mr. Paul Hehn (Alt Co-Chair)	Mr. Thomas Thompson
Mr. Gary Jensen	TI Museum (Ms. Laurie Glass)
Ms. Alice LaPierre	TI Yacht Club (Mr. Harlan Van Wye)
Mr. Clinton Loftman	Ms. Usha Vedagiri
Mr. Daniel McDonald	Mr. Brad Wong

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**REVISED SCHEDULE FOR  
PHASE II ECOLOGICAL RISK ASSESSMENT**

ATTACHMENT

ENCLOSURE

REVISED SCHEDULE  
FOR PHASE II ECOLOGICAL RISK ASSESSMENT

THIS ENCLOSURE WAS NOT RECEIVED IN THE  
RESTORATION RECORDS FILE.

FOR ADDITIONAL INFORMATION, CONTACT:

DIANE C. SILVA, COMMAND RECORDS MANAGER, CODE EV33  
NAVAL FACILITIES ENGINEERING COMMAND, SOUTHWEST  
1220 PACIFIC HIGHWAY (NBSD BLDG. 3519)  
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