

**MEMO**

**From:** Usha Vedagiri, TI RAB Community MMember  
**To:** Pat Nelson, Community Co-chair  
**Subject:** Comments on RI Report Addendum 3, Ecotoxicological Testing  
**Date:** May 22, 1997

Attached please find my comments.

**General Comments**

- 1) The very high percentage of qualified data in both the chemical analyses (holding times) and toxicity testing procedures (holding times, salinity, ammonia) seems to throw into question the accuracy and reliability of this entire task.
- 2) The lack of relationship between chemical water quality and the toxicity tests (which is quite common) and the huge disparities in the results of the toxicity tests and the way they are eliminated or selected to estimate threshold values makes the screening levels of questionable value.
- 3) If the objective is to come up with an ecologically protective clean-up goal, I don't think it has been established that these groundwater values and soil values really will be protective. Also, since these TPH products that are being dealt with, is there a strategy for addressing additives and impurities that may be ecologically toxic?

**Specific Comments**

Page 6: Table 4 as referenced was missing from my copy of the document.

Page 7-10: Providing the chromatogram the Relative Carbon Number Index (RCNI) or whatever criteria were used to characterize the TPH fractions in the soil and eluate samples would help in determining if the reported fraction concentrations are reliable. What does "discrete peaks not indicative of fuel patterns" mean? Are these TICs that couldn't be nailed down?

Page 16: Are the blank action levels the same as the highest concentration seen in any blank or is the action level something else? Also, many of the chemicals that are reported as non-detects due to blank contamination or that affected quantitation limits are also quite

PAGE 2

THIS PAGE IS NOT AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY NAVFAC  
SOUTHWEST RECORDS OFFICE TO LOCATE THE MISSING  
PAGE. THIS PAGE HAS BEEN INSERTED AS A  
PLACEHOLDER AND WILL BE REPLACED SHOULD THE  
MISSING ITEM BE LOCATED.

FOR ADDITIONAL INFORMATION, CONTACT:

DIANE C. SILVA, COMMAND RECORDS MANAGER, CODE EV33  
NAVAL FACILITIES ENGINEERING COMMAND, SOUTHWEST  
1220 PACIFIC HIGHWAY (NBSD BLDG. 3519)  
SAN DIEGO, CA 92132

TELEPHONE: (619) 556-1280

E-MAIL: [diane.silva@navy.mil](mailto:diane.silva@navy.mil)

Page 3 - Comments Continued.

What is the rationale for test species selection? They are both approved west coast testing species, among others, but why were those species selected for this task & these chemicals?

Copy to:

Admin Record (3 copies)

Tetra Tech EM Inc. (Richard Knapp)