



State of California - The Resources Agency

DEPARTMENT OF FISH AND GAME<http://www.dfg.ca.gov>

Office of Spill Prevention and Response
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GRAY DAVIS, Governor

M. Bloom

August 16, 2001

Mr. Michael McClelland
SW Division, NAVFACENGCOM
1220 Pacific Highway
San Diego, California 92132

Dear Mr. McClelland:

**Draft Skeet Range (IR Site 29) Evaluation Work Plan, Alameda Point, California,
dated July 10, 2001**

As trustee for the State's Natural Resources, the California Department of Fish and Game (DFG) Office of Spill Prevention and Response (OSPR) has completed its review of the "Draft Skeet Range (IR Site 29) Evaluation Work Plan (WP), Alameda Point, California," dated July 10, 2001. The draft WP was prepared for the Navy by Battelle, Entrix Inc., and Neptune & Company.

Per the Navy/DFG agreement, we offer the following comments for consideration in the final WP. The comments must be incorporated before the WP is finalized.

Background

Alameda Point is a former U.S. Navy installation located at the western end of Alameda Island on the east side of San Francisco Bay. The installation, formerly known as Naval Air Station (NAS) Alameda, served as an aircraft maintenance, repair, and refit center and as a base of operations for Naval surface craft from before World War II until its closure in April 1997 under the Defense Base Realignment and Closure Act of 1990. NAS was renamed Alameda Point in a reorientation of the facility toward civilian use.

The Skeet Range is located at the northwestern edge of Alameda Point. The facility consisted of two shooting ranges (northern and southern) located roughly 1,400 ft south of the mouth of the Oakland Inner Harbor. The Skeet Range activities ceased in 1993 after 30 to 40 years of operation at Alameda Point. During shooting activities, lead shot was discharged in a westward direction toward San Francisco Bay. Clay targets were also released over the Skeet Range and may potentially be a source of polycyclic aromatic hydrocarbons (PAHs) due to the

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petroleum pitch used as a binding agent in targets. A draft Ecological Risk Assessment (ERA) technical memorandum was prepared to evaluate the extent of lead and PAHs at the Alameda Point Skeet Range and to determine the degree to which lead and PAHs were biologically available. The Regional Water Quality Control Board, San Francisco Bay Area (RWQCB) disagreed with the conclusions of this technical memorandum. To address the disagreement, this WP proposes the following tasks to collect supplementary data at the Skeet Range:

- Further characterize the spatial extent of lead shot distribution;
- Determine the source of the PAH contamination; and
- Develop sediment depositional rates.

This WP was prepared to define the extent of sediments that may pose an unacceptable risk to ecological receptors resulting from former Skeet Range activities.

General Comments:

1. The Navy intends to develop and implement a consistent, risk-based approach for sediment assessment and remediation at Navy facilities in San Francisco Bay. NAS is one of those Navy facilities. The Navy has proposed a Weight-of-Evidence (WOE) approach for use in Hunters Point Shipyard. Why is this approach not used at NAS? If the Navy wants to develop and evaluate potential regional remedies for sediments that pose unacceptable environmental risks, this proposed WOE approach should be implemented at NAS.
2. The DFG suggests that a phased sampling design (screening survey followed by comprehensive field and laboratory studies) and three lines of evidence (sediment chemistry, toxicity tests, and bioaccumulation studies) be used. Data for the three lines of evidence will be evaluated using a WOE approach. Additionally, we strongly recommend that appropriate bioassays be conducted on the samples collected for bulk chemical analysis. This will reduce the need for sampling at a later date and provide chemical and biological data from collocated samples.
3. The DFG was not a party to the original review of the draft ERA results that were used to make the determinations presented in the WP. We would like a copy of the Technical Memorandum Draft: *Ecological Assessment of the Alameda Point Skeet Range Area* to become more familiar with the site evaluation. The DFG needs to review the results of the ERA before we can concur with its conclusions.

Specific Comments:

1. Pg. 11, Section 3.2.1.1: This section does not include marine mammals. The marine mammals in this area should be considered selected receptors. This section should also

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include a description of the receptor food web, and a figure/table illustrating this concept would be helpful.

2. Pg. 14, Section 3.2.1.2: The DFG does not agree with the Navy in its identification of lead and PAHs as the only chemicals of potential ecological concern (COPECs). The DFG believes that identification of COPECs should be based on two criteria: 1) inorganic chemicals exceeding ambient conditions and 2) chemicals potentially causing toxicity. The WP should include analytical data for all inorganic and organic constituents that have been used historically in NAS.
2. Pg. 14, Section 3.2.1.3: This section and the conceptual site model (CSM) do not mention the possibility of marine mammals being exposed to lead and PAHs through contact with near shore sediments (e.g., at haulouts via the dermal pathway). Please clarify why it was determined that marine mammals were not exposed to lead and PAHs through contact with sediments.
3. Pg. C-31 and Table C-7: We suggest adding an Acid (HCl) Reaction test to the sediment analyses. It is a very simple test to help identify sediment mineralogical constituents.

Conclusions:

The DFG generally accepts the proposed plan to define the extent of sediments that may pose an unacceptable risk to ecological receptors resulting from former Skeet Range activities via the collection of sediment samples. The above comments are provided to assist in improving the clarity of the WP and the quality of the proposed investigation. The DFG recommends that the Navy provide both a revised document that clearly addresses all expressed concerns and a response to the comments detailed in this letter. The DFG has learned from past experience that the best way to expedite the process is to establish good working communications (such as technical issue meetings or conference calls) and promote early involvement of all technical staff who will be developing or reviewing the WP. In this way, resolution of technical issues and problems can take place more rapidly, reducing the time needed to resolve the DFG's concerns.

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The DFG appreciates the opportunity to review this document. If you have any questions regarding this review or require further details, please contact me at (916) 324-9805 or by e-mail at chuang@ospr.dfg.ca.gov.

Sincerely,



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