

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

400 P STREET, 4<sup>TH</sup> FLOOR  
SACRAMENTO, CA 95814

July 21, 1995

N00217.003111  
HUNTERS POINT  
SSIC NO. 5090.3

Engineering Facilities Activity, West  
Attn: Mr. David Song [1832.3]  
900 Commodore Way, Building 101  
San Bruno, California 94066-0720

Dear Mr. Song:

**PHASE 1B ECOLOGICAL INVESTIGATION WORKPLAN, HUNTERS POINT ANNEX**

The Department of Toxic Substances Control, (Department) recommends that due to the dredging project by Department of Park and Recreation on Parcel F, the ecological field work commences according to plans. Any deviation to the schedule should be brought to our attention for further evaluation. Further, despite assurances from the Navy, the State has yet to receive responses to our previous comment letter. We are forwarding the following and enclosed comments from the Regional Water Board for your consideration.

Section 1.1, the Department disagrees with the decision that the ecological investigation will be done in "three phases". The investigation to assess any risk to the environment or human health can be done in many phases and can take on many distinct scope of work. It is thus premature to decide and concur with the three-phase scope. In our previous comment letter to the Navy, the Department expressed that additional sampling may be required, as appropriate, for further characterization as well as developing and evaluating remedial options.

Section 6.1, please explain why contaminants in the groundwater will not flow with groundwater into the bay. This implies that groundwater contamination flows in a different direction, hence no discharges into the bay. However, the author did not expound on the likelihood of water soluble chemicals that will flow into the bay, as paragraph one indicates. We disagree with the implications of the statement. The Navy needs to explain further.

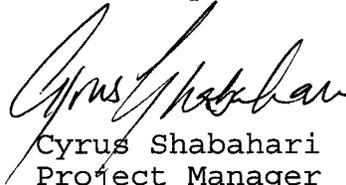
Section 6.3, please explain how preliminary assessment of off shore areas will dovetail into the present sampling event scheduled for fall of 1995. It is understood that results of such studies will be submitted to agencies for evaluation. Further, please explain the significance of a reference point recommended by the Regional Board. It is not clear how that information will assist the Navy in conducting the ecological investigation.

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As we indicated in our previous comment letter, the Navy agreed that "bathymetric studies", which was requested by the Regional Water Board in their comment letter, will be done and results incorporated in the Sampling Plan. However, the Department could not find the results of such studies in the Sampling Plan. It is not clear when such studies will take place. The Navy has acknowledged that the result of "bathymetric studies" could change the transect locations. The State would like to receive the results of such a study before changing the transect locations.

Should you have any questions regarding this letter and would like to seek clarification, please call me at (510) 540-3821.

Sincerely,



Cyrus Shabahari  
Project Manager  
Office of Military Facilities

Enclosure

cc: US EPA, Region IX  
Attn: Sheryl Lauth  
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75 Hawthorne Street  
San Francisco, California 94105

Regional Water Quality Control Board  
Attn: Richard Hiett  
2101 Webster Street, Suite 500  
Oakland, California 94612

California Department of Fish and Game  
Mr. Attn: Mr. Michael Martin  
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Monterey California, 93940

STATE OF CALIFORNIA

PETE WILSON, Governor

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**  
SAN FRANCISCO BAY REGION  
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**VIA FACSIMILE: 510.540.3819**

Mr. Cyrus Shabahari  
Department of Toxic Substances Control  
Office of Military Affairs  
700 Heinz Avenue  
Berkeley, CA 94710

July 13, 1995

File: 2169.6032(RH)

**RE: HUNTER'S POINT ANNEX, PHASE 1B ECOLOGICAL RISK ASSESSMENT, DRAFT FINAL WORKPLAN**

Dear Mr. Shabahari:

Regional Board staff have reviewed the aforementioned document and find it acceptable except for the following minor modifications:

1. The RWQCB requests that the Navy use NOAA's ER-Ls / ER-Ms ( Long and MacDonald 1995) instead of wetland creation values ( RWQCB, Wolfenden and Carlin , 1992) as screening values for sediments at Hunter's Point. It is inappropriate to use the wetlands screening criteria document because it was not developed for screening subtidal sediments and it used the earlier NOAA ER-Ls, which have since been revised, to derive the wetland creation values. The earlier NOAA ER-Ls were derived from both marine and freshwater data, and therefore are not relevant to San Francisco Bay. Comparison of Hunter's Point site data to the means from the SF Bay Regional Monitoring program is acceptable.
2. Two additional sampling points were chosen to evaluate potential impacts from areas where high levels of metals were found. These sampling points are designated S1 and S2 in *Figure 6-4 Sediment Sample Locations Offshore of Parcel E*. The legend indicates that surficial samples will be taken at these two locations. A depth profile of chemistry should accompany toxicity testing at these locations. Board staff recommend that three foot cores be taken and evaluated for bulk chemistry on one foot sampling intervals.
3. As per our November 14, 1995 comments on the draft Phase 1B workplan (specific comment # 3) the sediment value for copper should be 851 ppm instead of 20.8 ppm. Figure 3-2, Appendix A - ESAP, chemical data tables and subsequent hazard quotients should be modified to reflect this change.

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For questions regarding the contents of this letter please contact the undersigned at (510) 286- 4359.

Sincerely

A handwritten signature in black ink, appearing to read "Richard Hiatt", written in a cursive style.

Richard Hiatt