



United States Department of the Interior

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NAVSTA LONG BEACH
SSIC #5090.3

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Field Office
2730 Loker Avenue West
Carlsbad, California 92008

August 12, 1994

Commanding Officer
United States Navy
Naval Station Long Beach
Long Beach, California 90822-5000

Subject: Draft Technical Memorandum #5 Fish Sampling and Analysis
Plan for Naval Station Long Beach (Refer to 5090 Ser N4/1759)

Dear Commanding Officer:

Upon review of the Draft Technical Memorandum #5 describing proposed fish sampling and analysis plan for Naval Station Long Beach, the U.S. Fish and Wildlife Service (Service) has the following concerns regarding the proposed plan.

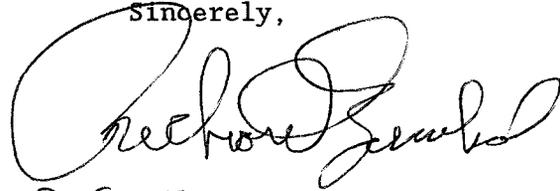
1. The fish species chosen for sampling are not ones that will address direct contaminant exposure for Service trust resources of concern in this action, primarily the California brown pelican and the California Least Tern. The resulting ecological risk assessment will be of limited usefulness in assessing the hazard in pathways affecting those bird species.
2. Expressing the unquantified polychlorinated hydrocarbon (PAHs) homologs as "equivalents" to the quantified B(a)P, phenanthrene, and naphthalene compounds may be a problem for accurate hazard assessment if the compounds do not have equivalent toxicities. Efforts should be made to determine the toxicity equivalencies of those compounds and make appropriate compensations in the risk assessment.
3. In the case of several proposed target analytes (listed in Table 3), the currently achievable laboratory Method Detection Limits (MDLs) are substantially higher than the desired MDL. If the desirable levels are not achieved, how will that affect the risk assessment?
4. Specific risk assessment procedures relating to human health are proposed in the plan, but ecological risk assessment procedures are vague. It is desirable to provide more information about what parameters will be used to determine and evaluate ecological risks, and how the values will be used once they are determined. Finally, what emphasis will be placed on ecological risks in the decision-making process, particularly if those risk thresholds are determined to be lower than those for human health.

Commanding Officer, Long Beach Naval Station

2

If you have questions regarding these comments, please contact Carl Roberts of the Division of Environmental Contaminants in this office at (619) 431-9440.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gail C. Kobetich". The signature is written in black ink and is positioned above the typed name.

for Gail C. Kobetich
Field Supervisor