



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

September 15, 1994

MEMORANDUM

To: Mike Radecki, Southwest Division

From: Sheryl Lauth, EPA *sl*

Subject: August 16, 1994 Monthly Status Meeting Minutes

CC: Dr. Clarence Callahan, EPA
Mr. Alvaro Gutierrez, DTSC
Mr. Omer Kadaster, Bechtel

I have reviewed the draft meeting minutes provided to me via facsimile on September 9, 1994. In general, the draft minutes were complete and accurate. I am, however, providing these comments for further clarification of my understanding of the issues raised and the agreements reached during the meeting. I was pleased at the level of detail presented in the minutes and would encourage the Navy to continue to provide this level of effort for future meeting minutes.

As we mentioned several times in the August meeting, EPA feels that this sampling effort will be of limited value unless the fish tissue data can be tied to the sediment sampling results. Further, we are still unclear what "support role" these data will provide.

As fish tissue collection has been added to the ecological assessment for the site, we still believe development of a conceptual site model, including the fish data, is a necessary step. Both Clarence and I requested the fish data collection task be incorporated into the decision tree diagram that was presented in Tech Memo #4. We understood from the meeting that this will be included in Tech Memo #6.

The statement attributed to me on Page 3 regarding the suggestion that the existing plan be discarded is not accurate. I suggested that the plan present the sampling and analysis information only and that the methods for data interpretation be included in Tech Memo #6. I suggested this because most of the comments provided by EPA on the Draft Fish SAP were related to data interpretation and consistency among documents.

To clarify our position in relation to your summary observations (provided on Page 4), 1) we question the usefulness of collecting fish data at this time if these data can not be tied back to the sediment data and 2) it was our understanding that our outstanding comments would be resolved as part of Tech Memo #6.

Although there are still some aspects of the ecological screening assessment that we do not agree with, we do understand that the Navy has decided to proceed with the fish collection as a screening assessment with the intention of determining if further action is warranted. Therefore, we agreed at the meeting that: 1) the Navy would develop a more comprehensive list of fish species, 2) the Fish SAP would be revised to present only the fish sample collection and analysis methodology (rather than the strategy for data interpretation), and 3) Tech Memo #6 will present the rationale and strategy for interpretation of the fish tissue data in relation to the sediment and bioassay data collected within the Harbor.

Finally, as the Navy has already implemented the Final Fish SAP and our comments regarding the Draft Fish SAP will be incorporated into Tech Memo #6, we will not be submitting formal comments on the Final Fish SAP. We do, however, look forward to receiving and providing comments on the Draft Tech Memo #6.

I look forward to seeing you at the next status meeting. If you have any questions regarding this memo, please call me at (415) 744-2410.

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