



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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

1994 DEC -7 AM 10:47

November 28, 1994

Mr. Duane Rollefson
Naval Station Long Beach
Code N46, Building 1, Room 268
Long Beach, California 90822-5000

Dear Mr. Rollefson:

The U. S. Fish and Wildlife Service (Service) has reviewed the draft Addendum to the RI/FS Work Plan and Risk Assessment Work Plan for Naval Station Long Beach. The Service offers the following comments for your consideration on the screening-level ecological risk assessment. The Service will not be providing comments on the baseline human health risk assessment.

Section 3.3.3. Screen and Evaluate Sediment Chemistry and Physical Data, p.3-9 - In the discussion of chemical residues in clam tissues, it is stated that chemical analyses on clam tissues were conducted without replication. While replication of all samples may not be required, some laboratory replication should be carried out for Quality Assurance/Quality Control purposes.

Section 3.4.4. Environmental Fate and Transport Evaluation, p.3-16 - The Service strongly supports the evaluation of toxicity of current land-based discharges. Remediation of existing sediment contamination problems is of limited value if sources of new contamination remain in the system.

Section 3.6.1. Hazard Quotient Method, p. 3-25 - As discussed in the Service's previous letters on the draft and final Fish Sampling Plans, this risk assessment approach is not designed to address Service trust resources. The Service is concerned that the potential impacts to the endangered California least tern and California brown pelican may not be adequately evaluated in this risk assessment process. Also, interspecific extrapolation of benchmark values is frequently problematic, and the Service urges the use of conservative safety factors in these calculations.

Section 3.7. Derivation of Sitewide Sediment Quality Objectives, p.3-29 - The document states that if biological responses produced by the chemicals of potential concern (COPC's) cannot be defined due to the interaction of numerous environmental variables, existing numerical sediment quality guidelines developed by various regulatory agencies may be used as guidance. The Service recommends greater specificity in terms of what criteria will be considered. The Environmental Protection Agency has not yet implemented standards for most COPC's.

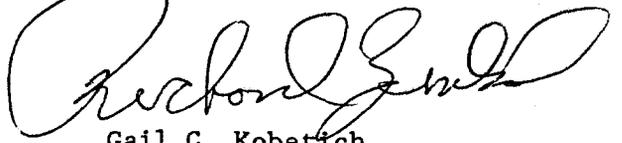
Mr. Duane Rollefson

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Section 3.10. Summary and Conclusions of the Screening-Level Ecological Risk Assessment, p.3-30 - The Service strongly supports the evaluation of residual risks for all remedial actions being considered. This type of evaluation is frequently overlooked thus skewing the cost/benefit analysis of the alternatives under consideration.

The Service appreciates the opportunity to comment on this document. If you have any questions regarding these comments, please contact Carol Roberts of my staff at (619) 431-9440.

Sincerely,



Gail C. Kobetich
Field Supervisor