

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

April 12, 1996



Commanding Officer
Engineering Field Activity West
Attn: Code 18, Mr. Ernesto Galang
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-5006

**COMMENTS TO PHASE II ECOLOGICAL RISK ASSESSMENT RESPONSE TO
AGENCY COMMENTS ON THE DRAFT FINAL WORK PLAN AND FIELD SAMPLING
PLAN, NAVAL STATION TREASURE ISLAND (February 26, 1996)**

Dear Mr. Galang:

The Department of Toxic Substances Control and San Francisco Bay Regional Water Quality Control Board have reviewed the Navy's Phase II Ecological Risk Assessment Response to Agency Comments on the Draft Final Work Plan and Field Sampling Plan for Naval Station Treasure Island, dated February 26, 1996. The responses to most comments are adequate with the exception of Comment 4 and comment 5. We are willing to discuss with the Navy on these issues at your convenience.

Specific comments are enclosed. If you have any questions regarding this letter, please contact me at (510) 540-3822.

Sincerely,

A handwritten signature in black ink, appearing to read "Chein Ping Kao".

Chein Ping Kao, P.E.
Senior Hazardous Substances
Engineer
Office of Military Facilities

Enclosure
c.c: Please See Next Page

cc: Ms. Gina Kathuria
California Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, California 94612

Ms. Rachel Simons [H-9-2]
U. S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105-3901

Jim Sullivan
PRC Env. Mgmt. Inc.

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**MEMORANDUM**

TO: Mary Rose Cassa, Project Manager
Office of Military Facilities, Region 2
700 Heinz, Building F, Second Floor
Berkeley, CA 94704

FROM: James M. Polisini, Ph.D.
Office of Scientific Affairs (OSA)
Human and Ecological Risk Section (HERS)

DATE: April 2, 1996

SUBJECT: TREASURE ISLAND PHASE II ECOLOGICAL ASSESSMENT WORK PLAN
[PCA 14740 SITE 200231-45 6]

A handwritten signature in black ink, appearing to read "James M. Polisini".

Background

We have reviewed the document titled *Phase II Ecological Risk Assessment Response to Agency Comments on the Draft Final Work Plan and Field Sampling Plan Naval Station Treasure Island*, dated February 26, 1996 and prepared by PRC Environmental Management, Inc. of San Francisco, California. The cover page, page I Table of Contents and pages 11 through 16 of this document were delivered to our offices via facsimile copy on March 1, 1996. This review is in response to your written work request dated March 1, 1996.

We have commented on previous drafts of the Phase II Ecological Risk Assessment Work Plan in OSA memoranda dated February 8, 1995 and September 1, 1995 in addition to attending a meeting at PRC offices in San Francisco to discuss the Phase II ecological assessment risk work plan on August 15, 1995.

Naval Station Treasure Island occupies both Treasure Island and Yerba Buena Island in San Francisco Bay midway between San Francisco and Oakland. Treasure Island (TI) is manmade and approximately 450 acres in size. Yerba Buena Island (YBI) is a natural island in San Francisco Bay approximately 130 acres in size. The U.S. Army first occupied YBI in 1866. The Navy began operations on YBI in 1896. TI was constructed in 1936 and 1937 as a site for the Golden Gate International Exposition in 1939. TI was leased to the Navy in 1941 for use as a training and personnel processing facility. Naval Station Treasure Island (NAVSTA TI) is used today for processing personnel, and training such as fire fighting. YBI is mainly a residential facility.

General Comments

With the exception of two proposed responses, the responses address OSA comments on the ecological risk assessment work plan.



Specific Comments

The proposed response to comments is adequate with the exception of two responses (Response to Comment 4 and Response to Comment 5) which reserve consideration of certain toxic endpoints to rare, threatened or endangered species. This was not the intent of the author, in fact no mention was made of rare, threatened or endangered species in the original OSA comments.

We are willing to discuss with the Navy whether avian embryo toxicity of polycyclic aromatic hydrocarbons (PAHs) applied to eggshells is or is not, a significant ecological risk measurement endpoint for populations of birds which are not rare, threatened or endangered. Birds which are not rare, threatened or endangered are generally free to choose among nesting sites throughout San Francisco Bay. The same freedom of movement, is not the case for the burrowing mammal populations extant on Yerba Buena Island (YBI) and therefore, the proposed limitation of dermal and inhalation pathways to rare, threatened and endangered burrowing mammals is not appropriate. Given the apparent 'patchiness' of the terrestrial habitat at YBI and therefore the potentially disjunct populations of small mammals we recommend that the dermal and inhalation pathways be quantitatively evaluated for burrowing mammals which are representative species. This recommendation is in accord with OSA draft ecological risk assessment guidance which has been distributed to environmental consulting groups including PRC Environmental Management, Inc.

Conclusions

The proposed response to most comments is adequate. The importance of avian embryo toxicity from eggshell contact with PAHs can be evaluated once the list of potential ecological COCs is developed and can be considered with the selected representative species. Dermal and inhalation pathways should be included in the quantitative risk assessment for all burrowing mammals.

Reviewed by: Michael J. Wade, Ph.D., DABT, 
Senior Toxicologist
OMF Liaison
Human and Ecological Risk Section

cc: Steven DiZio, Ph.D., DABT, Staff Toxicologist, Northern California Liaison, HERS

Clarence Callahan, Ph.D.
U.S. EPA Region IX
Superfund Technical Support (H-8-4)
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Mary Rose Cassa
April 2, 1996
Page 3

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