



Department of
Toxic Substances
Control

700 Heinz Avenue
Suite 200
Berkeley, CA
94710-2737

February 24, 1997

N60028_000632
TREASURE ISLAND
SSIC NO. 5090.3.A



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

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Dear Mr. Galang:

Re: Response to comments on the Treasure Island Phase II Ecological Assessment Draft Final Quality Assurance Project Plan (QAPP) and Proposed changes in the Work Plan and Field Sampling Plan for the Phase II Ecological Risk Assessment at NAVSTA TI.

The Department of Toxic Substances Control and the Regional Water Quality Control Board (the State) have completed review of the above documents. Attached please find our comments for your considerations.

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

Sincerely,

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

Enclosure (2)

Page 2, Mr. Galang, February 24, 1997

cc: Ms. Rachel Simons
US EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105-3901

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

Jim Sullivan, EPA WEST
Pat Holson, RAB
Paul Hehn, RAB
ARC Ecology, RAB
Sharon Tobias, PRC
Admin Record (3 Copies)



Cal/EPA

Department of
Toxic Substances
Control

400 P Street,
4th Floor
P.O. Box 806
Sacramento, CA
95812-0806

MEMORANDUM

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

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

FROM: James M. Polisini, Ph.D.
Human and Ecological Risk Division (HERD) 

DATE: February 21, 1997

SUBJECT: RESPONSE TO DTSC COMMENTS ON THE TREASURE ISLAND
PHASE II ECOLOGICAL ASSESSMENT DRAFT FINAL QUALITY
ASSURANCE PROJECT PLAN
[PCA 14740 SITE 200231-47 H:6]

Background

We have reviewed the document titled *Naval Station Treasure Island, San Francisco, California, Navy Responses to Agency Comments on the Phase II Ecological Risk Assessment Draft Final Quality Assurance Project Plan* dated January 13, 1997 and prepared by PRC Environmental Management, Inc. of San Francisco, California. This review is in response to your written work request dated January 15, 1997.

We have reviewed previous drafts of the Phase II Ecological Risk Assessment Work Plan in 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.

Specific Comments

1. The responses to comments are sufficient to address HERDs earlier concerns.



Chien Kao
February 21, 1997
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- 2. There appears to be a typographic error in the response to Comment 11 (D). The lowest concentration is listed as 6.35 percent, where 6.25 percent would be the lowest concentration of a dilution series which decreases by a factor of two with each step.

Conclusions

The response to comments on the QAPP are sufficient.

Reviewed by: Gerald Chernoff, Ph.D.
Staff Toxicologist
Human and Ecological Risk Division

cc: Michael J. Wade, Ph.D., Senior Toxicologist, OMF Liaison, HERD

Clarence Callahan, Ph.D., BTAG Member
U.S. EPA Region IX
Superfund Technical Support (H-8-4)
75 Hawthorne Street
San Francisco, CA 94105

Laurie Sullivan, BTAG Member
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Susan Ellis, BTAG Member
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Cal/EPA

MEMORANDUM

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400 P Street,
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TO: Chein Kao, Project Manager
Office of Military Facilities, Region 2
700 Heinz, Building F, Second Floor
Berkeley, CA 94704

FROM: James M. Polisini, Ph.D.
Human and Ecological Risk Division (HERD)

DATE: February 21, 1997

SUBJECT: RESPONSE TO DTSC COMMENTS ON THE TREASURE ISLAND
PHASE II ECOLOGICAL ASSESSMENT DRAFT FINAL QUALITY
ASSURANCE PROJECT PLAN
[PCA 14740 SITE 200231-47 H:8]

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Background

We have reviewed a letter to Chien Kao, DTSC Project Manager for Naval Station (NAVSTA) Treasure Island (TI), which outlines some proposed changes in the Work Plan (WP) and Field Sampling Plan (FSP) for the Phase II Ecological Risk Assessment at NAVSTA TI. The letter is signed by Ernesto M. Galang and dated 4 February 1997. This review is in response to your verbal request on February 18, 1997. Time was allocated to the written work request dated January 15, 1997, for the response to comments on the Quality Assurance Project Plan (QAPP) for the Phase II Ecological Risk Sampling at NAVSTA TI.

We have reviewed previous drafts of the Phase II Ecological Risk Assessment Work Plan in 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.

Chien Kao
February 27, 1997
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General Comments

We object to changes in the approved work plan and field sampling plan without thorough review by the regulatory agency technical experts who spent considerable time in the cooperative development of the sampling plan with the Navy and Navy contractors. As of 1:00 pm on February 19, 1997, Clarence Callahan, of the U.S. EPA Region IX had yet to receive this letter, even though his name appears on the list for delivery of copies. We are not certain which of the other regulatory technical experts received this letter and suggest that the sampling not begin until thorough review has been completed.

Specific Comments

1. A proposal is made to collect bioassay samples at 50 percent of the sample locations for immediate analysis. This change is proposed due to the results of a recent analysis by the U.S. EPA Region IX (described below) and to reduce the cost associated with rapid turn around of laboratory chemical analyses which would be required based on the study. The U.S. EPA Region IX investigation indicates that pore water samples which have been frozen do not yield bioassay results equivalent to bioassays performed on unfrozen pore water samples. After consultation with the U.S. EPA Region IX, we propose that bioassays be performed on a set of sample locations to be selected by the Navy contractors and regulatory agencies and that sediment samples be frozen until the results of the bioassays are available. Chemical analyses would then be performed on those sediment samples, to be selected cooperatively with concerned agencies, which demonstrate a range of adverse effect in the bioassays. The U.S. EPA laboratory in Narragansett, Rhode Island has reportedly demonstrated that sediment samples frozen at -20 degrees can be stored for extended periods without seriously altering the results of the sediment chemical analyses. Reducing the number of sediment chemical analyses should reduce the cost significantly and focus resources on those sediment samples which are of the greatest interest, the samples which produce and adverse effect in the bioassays.
2. We agree with the proposal to perform simultaneously extracted metals/acid volatile sulfide (SEM/AVS) analyses on sediments as a measure of metal bioavailability. SEM/AVS should be evaluated by sequentially subtracting the millimoles of the least soluble divalent cation from the total millimoles of AVS until the AVS is exhausted. Any remaining millimoles of divalent cations should then be compared to the bioassay results to determine whether the remaining SEM is predictive of the bioassay result.
3. We agree that pore water samples need not be sampled for volatile organic compounds (VOCs) or total purgeable petroleum hydrocarbons (TPH-p).
4. Core samples should be collected using polycarbonate liners, as originally agreed upon. The Navy cannot argue for consistency across Navy sites on page 1 and then propose to change the coring procedure used at other sites in San Francisco Bay.
5. We agree that the cores may be split into two foot sections for chemical analysis.
6. Changes in sample coding and labeling are at the discretion of the Navy.

Conclusions

We propose that a conference call be scheduled to address the Navy proposals and the proposals contained in this memorandum prior to sampling.

Reviewed by: Gerald Chernoff, Ph.D.
Staff Toxicologist
Human and Ecological Risk Division

Chien Kao
February 27, 1997
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cc: Michael J. Wade, Ph.D., Senior Toxicologist. OMF Liaison. HERD

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