



Cal/EPA

Department of
Toxic Substances
Control

January 23, 1998

Pete Wilson
Governor

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Commanding Officer
Engineering Field Activity West
Attn: Mr. Ernie Galang
Naval Facilities Engineering Command
900 Commodore Drive
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Peter M. Rooney
Secretary for
Environmental
Protection

**VALIDATION STUDY FOR SITES 11, 28, AND 29 DRAFT WORK
PLAN/FIELD SAMPLING PLAN (WP/FSP), NAVAL STATION TREASURE
ISLAND (NAVSTA TI)**

Dear Mr. Galang:

Thank you for the opportunity to review the Validation Study and Draft Work Plan for sites 11,28, and 29 for NAVSTA TI, submitted to the Department of Toxic Substances Control (DTSC) on December 8, 1997.

Please find enclosed with this letter comments from Dr. James Polisini of the Department of Toxic Substances Control Human and Ecological Risk Division.

If you have any questions regarding this letter, please contact me at (510) 540-3763.

Sincerely,

David Rist
Hazardous Substances Scientist
Office of Military Facilities

cc: See next page.

Mr. Ernie Galang
January 23, 1998
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DEPARTMENT OF TOXIC SUBSTANCES CONTROL
COMMENTS ON VALIDATION STUDY FOR SITES 11,28, AND 29
DRAFT WORK PLAN/FIELD SAMPLING PLAN

Specific Comments

1. Page 1, Section 1.1, Background

The sixth paragraph of this section indicates that Site 8 has been proposed for no further action because the proposed future development will eliminate the pathway for transfer of contaminants into the food chain.

Is the Navy certain that development will occur and if so, when? Please provide a discussion about Site 8 that clearly defines the timeframe and type of development that will eliminate Site 8 as a concern.

2. Page 6 and 7, Sections 2.2.2 and 2.2.3, Site 28 - West Side On- and Off-Ramps, Site 29 - East Side On- and Off-Ramps

These sections indicate that analyses of organic chemicals were not conducted on samples from Sites 28 and 29 because no sources of organic chemicals related to Navy activities were identified.

The language in these sections leads the reader to believe that organic chemicals may be present but that analysis were not conducted because they could not be associated with Navy activities. If the rational for not sampling is that no sources were identified that could have led to the release of organic chemicals, then the text needs to be rewritten to make this point clear.



Cal/EPA

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MEMORANDUM

Pete Wilson
Governor

James M. Srock
Secretary for
Environmental
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TO: David Rist, Project Manager
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700 Heinz Street, Building F, Second Floor
Berkeley, CA 94704

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

DATE: January 23, 1998

SUBJECT: TREASURE ISLAND VALIDATION STUDY WORK PLAN
[PCA 14740, SITE 200231-47 H:12]

Background

We have reviewed the document titled *Validation Study for Sites 11, 28 and 29, Draft Work Plan/Field Sampling Plan, Naval Station Treasure Island, San Francisco, California* dated December 3, 1997. This document was produced by Tetra Tech EM Inc., of San Francisco, California. We have also reviewed the conference call minutes for the November 4, 1997 conference call regarding the proposed validation study. The minutes of the conference call include a general overview of the proposed validation study complete with the Navy's response to the regulatory agency comments made on the initial validation study proposal. HERD comments on the initial proposal are contained in the HERD memorandum to Mary Rose Cassa dated November 4, 1997. This review is in response to your written request dated January 16, 1998.

General Comments

1. HERD and the Navy previously disagreed on whether a small mammal validation study, to decrease the uncertainty in the small mammal predictive assessment, was necessary for Sites 11, 28 and 29. Based on the size, state of disturbance, continuing disturbance of Sites 28 and 29 and the most likely remedial action for Site 11, HERD is withdrawing the recommendation that small mammal validation studies be performed for these sites.



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Specific Comments

2. The Treasure Island predictive assessment indicated a potential threat to small mammals at Sites 11, 28 and 29. HERD recommended in a November 4, 1997 memorandum to Mary Rose Cassa and in the November 4, 1997 conference call, that the validation studies include validation of the food and other media concentrations to which the representative small mammal is exposed at Sites 11, 28 and 29. HERD agreed that future commercial or residential use of Site 8 would make small mammal studies at Site 8 unnecessary. The Navy concluded that small mammal populations at Sites 11, 28 and 29 would be supported by recruitment from surrounding populations even if there were site-related impacts. This conclusion was unsupported by any population studies. The Navy has responded in the minutes of the conference call that neither validation studies nor small mammal population studies will be done for Sites 11, 28 and 29. After further evaluation of the characteristics of Sites 11, 28 and 29 HERD is willing to withdraw the recommendation for small mammal validation studies at these sites. This decision is based on the disturbed nature of these sites, the continued disturbance of Sites 28 and 29 due to bridge maintenance, the likelihood of a cap being placed on Site 11 and the small size of all three sites, not on the Navy's contention that potential recruitment obviates the need for small mammal validation studies. HERD will recommend small mammal validation studies for other Yerba Buena Island (YBI) sites with similar results in the predictive assessment if those sites are larger and have less disturbed habitat.
3. This work plan references a method for selecting chemicals of concern based on exceedance of ambient concentrations in more than 10 percent of the samples (Section 2.2.1, page 5, Section 2.2.2, page 6 and Section 2.2.3, page 8). It is our understanding that this was agreed to by the risk assessors performing the human health risk assessment at Treasure Island. It was not agreed to for the ecological risk assessment. Do not use this criterion in future ecological risk assessments for Treasure Island sites.
4. The figure presenting the plant communities on YBI (Figure 6) is most helpful. However, why does the dashed line indicating the study boundary appear to exclude a portion of the Navy property which is not indicated as Coast Guard property?
5. We recommend that bird tissue samples which are analyzed for metals be analyzed by inductively coupled plasma (ICP) spectroscopy and the results of all metals be reported rather than limiting the metals data to those specified (Section 7.2, page

- 27). Mercury should, of course, be analyzed by the cold vapor atomic absorption method.
6. The numerically low dose used for hazard quotient one (HQ₁) and the numerically high dose used for hazard quotient two (HQ₂) are presented as they have been used at other Navy sites in northern California (Section 8.1.1, page 29). However, the text makes numerous references to body weights and ingestion rates 'representative' of male and female peregrine falcons. The problem that arises methodologically is that the male body weight is paired with the female ingestion rate and vice versa. While this may be correct methodologically for the low dose and high dose calculation, it is obviously not correct biologically. The text should be modified to indicate that the exposure parameters for males and females were used because they are indicative of potential low and high doses not representative of male and female peregrine falcons.

Conclusions

HERD withdraws the recommendation for small mammal validation studies for Sites 11, 28 and 29 based on site-specific conditions and future use, not the Navy contention that recruitment makes a validation study unnecessary.

Once the other specific comments are addressed this study should provide a framework in which to interpret the results of the predictive assessment for the peregrine falcon.

Reviewed by: Brian K. Davis, Ph.D.
Staff Toxicologist, HERD

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

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January 23, 1998
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