Arc Ecology *Environment, Economy, Society, & Peace*

September 12, 2003

Mr. Keith Forman
Department of the Navy
Naval Facilities Engineering Command, Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5190

RE: Parcel F Feasibility Study Data Gaps Investigation Work Plan

Dear Mr. Forman:

Arc Ecology has reviewed the above-mentioned document. As you know, the PCB and metals contamination in the South Basin greatly concerns us for several reasons. In summary we do not believe that the Navy is adequately considering and responding to the needs of current and proposed uses for the area consistent with the requirements of the base closure process.

First and foremost, the South Basin Yosemite Slough area is used as a recreational area for community youth and fishing spot for local fisher folk. Currently, there are no signs posted along the South Basin shoreline warning the public of the contaminated sediments and the potential hazards associated with eating fish from the area. Furthermore, California State Parks is planning on substantial improvements to the Candlestick Point recreation area, including the restoration of wetlands along South Basin, Yosemite Slough and Double Rock. This promises to bring an even larger number of birds and fisher folk to the area increasing the potential hazard from exposure. Secondly, the contamination in the South Basin directly affects our current CALFED-funded project to assess the possible restoration of the Yosemite Slough watershed. Finally, the Navy's approach is inconsistent with the reuse plan adopted by the community for the shoreline of Parcel E.

We are pleased to see that the Navy is making efforts to better characterize the extent and nature of the contamination in the South Basin. It is our hope that this will lead to better coordination and consistency between cleanup, use and reuse. Please find below our comments and suggestions on the work plan.

Conclusions Drawn from Past Studies

1. Section 2.1, page 5: Results from the sediment dynamics study conducted as part of the Parcel F Validation Study showed that the South Basin can generally be characterized as a net depositional environment. It should be noted that while this may currently be the case, it is quite possible that sedimentation patterns will change over time, resulting in a net erosional environment.

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Sampling Plan

2. Tank S-505, a 630,000-gallon aboveground fuel-oil tank was formerly located in IR-02 Southeast, on Mahan Street between J and K Streets. According to the Draft Final Parcel E Remedial Investigation, "Sometime between 1976 and 1986, Triple A allegedly used Tank S-505, it's 28,000-square-foot berm area, and adjacent ponds and trenches to store waste oil. […] The waste liquids were moved to tank S-505 by truck or by steam lines diverted to run from Dry Dock 4 in Parcel D. Once the contents of Tank S-505 had separated into oil and water layers, Triple A personnel allegedly drained the tank of the water portion and dumped the water on the ground along the Parcel E shoreline. Oil and other wastes mixed with the water were also dumped onto the ground." No sampling for PCBs has occurred along the shoreline in this area. Samples taken in this area (Area VIII) during the Validation Study were taken east of the area of concern and no samples were taken in this area during the EBS. Why is there no sampling planned for the area directly south of the Tank S-505 area? Please consider taking samples in this area.

3. Please explain how you chose the mercury "hot spot" sampling locations between areas VIII and IX. According to the Phase 1B EBS, the high hits of mercury occurred at stations TWSM01, TWSS02, and TVSS02. The proposed new samples are all to the south of this area. Why are there are no samples planned directly in the vicinity (to the east and west) of the historical sampling locations?

Data Quality Objectives (Table 3.1)

4. The primary decision rule (Step 5) talks about using area-weighted average concentrations of PCBs within South Basin to determine the volume and location of sediment that would require evaluation in the FS. This appears to be the only place in the work plan that mentions how the Navy plans to analyze the data. Over what area is the Navy considering averaging the concentrations? More information is required before deciding whether or not to average concentrations and over what area averaging would be appropriate. I strongly suggest involving the community in decisions about how to analyze the data.

5. The first bullet under the secondary decision rules (Step 5) states that if the correlation between total PCBs as determined by laboratory and RSC results is strong ($r>0.70$), then RSC results will be corrected using the correlation relationship prior to data analysis. How the RSC results be handled if $r<0.70$?

6. The secondary decision rule written in response to the question of whether or not all major sources of PCBs from the Parcel E shoreline have been identified plans to compare the chemical similarity of PCBs collected in the offshore area with existing PCB data from Parcel E. It seems that this would help to indicate whether or not PCBs in the offshore are from **known** onshore sources, rather than assuring that all major onshore sources have been identified.

7. The fourth bullet under the secondary decision rules (Step 5) ends with the sentence "If PCBs are determined to be relatively immobile, then passive remediation (*i.e.,* monitored natural recovery) may be considered appropriate […]." It does not seem appropriate within the data

quality objectives to be making statements about remediation techniques that may be chosen. I suggest removing this last sentence.

Minor Comments

8. Figure 2-1 is very difficult to read with the different sized overlapping circles used to indicate PCB concentrations on the shoreline. Different colored or shaped dots would be preferred.

Arc Ecology appreciates the opportunity to review and comment on this document. If you have any questions, please call me at 415-495-1786 or email: lealoizos@mindspring.com

Regards,

Lea Loizos
Staff Scientist

Cc: Michael Work, US EPA
Chein Kao, Department of Toxic Substances Control
Julie Menack, Region Water Quality Control Board
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