



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.
National Ocean Service
Office of Ocean Resource Conservation and Assessment
Hazardous Materials Response and Assessment Division
c/o EPA Office of Site Remediation and Restoration (HIO)
1 Congress Street
Boston, MA 02114
21 May 2001

Ms. Kymberlee Keckler
U.S. EPA Waste Management Division
1 Congress Street
Boston, MA 02114

Mr. James Shafer
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Dear Kymberlee/Jim:

Thank you for the Feasibility Study for Soil and Marine Sediment at the Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island, prepared by Tetra Tech, NUS, Inc., April 2001.

This FS may be summarized as a decision document to remove contaminated sediment or not. Sediment Alternatives 1 and 2 are grouped together under no or very limited action and Sediment Alternatives 3 and 4 are nearly identical in scope and cost, differing only with regard to removing or not removing sediment underlying the eelgrass. This latter issue is best discussed with the technical review team whereby pros and cons of each may be orally discussed

The short discussion/comments below concern the sediment and highlight ecological risk.

1. Of particular interest to NOAA are stations OFF-2, 3, 5, and 6, all of which show elevated total PAH concentrations. The text proposes remedial action based on PRG exceedences at, and adjacent to, Stations 3, 6, and 6. This is clearly shown on Figure 2-4. The area designated for clean-up is acceptable to NOAA although only Station #5 showed unacceptable ecological risk. But one question concerns the selection of specific semivolatile PAHs (Table 2-13) as contaminants of concern. First, it is unclear why flouranthene is not a contaminant of concern given the very high concentrations is the stations listed above. Section 2.2.3.1 (page 2-13) Identification of Chemicals of Potential Concern (COPC) in Sediment makes note that sediment COPCs were selected based on the Ecological Risk Assessment (SAIC, 2000). I am unclear how flouranthene could not be a COPC. Are sediment concentrations greater at the reference locations?

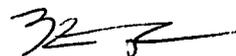
Secondly, I am unclear why a PRG based on ecological risk was not calculated for benzo(a)anthracene or for benzo(b)fluoranthene. It is noted that the PRGs based on human health shellfish ingestion for these two chemicals are 34,270 ug/kg and 51,296 ug/kg, respectively well above sediment screening levels or Apparent Effect Thresholds. Hence, despite high site-specific concentrations of these chemicals in nearshore sample locations, they do not drive the remediation because the PRG is so high. NOAA is aware that this might be a moot point given that the exceedence of other COCs will drive remedial action where these chemical concentrations are highest. In fact, when reviewing Appendix B, Step #7 (page 3-6) the text states just that; "limit the contaminants for which PRGs are developed to the contaminants that are causing the highest risk at each station." But Figure 2-4 shows several exceedence of PRGs per station; granted these are limiting PRGs as calculated in Table B-3.9. Although the text explains the limiting PRG approach, Figure 2-4 shows only a few PRG exceedences when there are actually more as shown in Table B-3.9. The reader who quickly reviews the document, focusing on Figures and Tables would believe that few PRGs are exceeded when in fact many might be exceeded. NOAA would like to see Tables 2-13 to 2-15 adjusted to include PRGs based on ecological risk for these two chemicals as the calculation of Table B-3.9 begins to do.

Lastly, back to Fluoranthene. It appears when reviewing Step 1 in Part 3 of Appendix B along with Table B-3.1 that Fluoranthene is eliminated as a potential PRG candidate because we have an actual AWQC value of 16 ug/l. Only the chemicals that do not have such an actual value, but force the authors to calculate one using a sediment benchmark and EQP process, move forward through the PRG process. Is this because this method results in a WQSV low enough to allow calculation of a limiting PRG? There may be a problem in the method that would eliminate fluoranthene but keep other lesser understood chemicals.

2. Reference atop of Page 2-17 referencing EPA Draft Sediment Guidelines (EPA, 2001) is not provided in the text References. It is provided at the end of Appendix B but dated 2000.

Please let me know if you have any questions. Much of my discussion relates more to the methods than to any change in remedial action areas.

Sincerely,



Kenneth Finkelstein, Ph.D.