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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
24 September 2002

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 final 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., September 2002 and the draft Proposed Plan. As before, NOAA's interest relates to the development of sediment remedial actions. Previously, NOAA reviewed drafts of this document in May of 2001 and in March of 2002 plus the related Draft Sediment Predesign Investigation in March of 2002. The comments/discussion provided below concern ecological risk in the offshore and intertidal environments and do not apply to any potential human health risk.

NOAA has reviewed and supported the Ecological Risk Assessment and Preliminary Remedial Goal (PRG) processes. Both methods are scientifically defensible and result in generally conservative measures. Furthermore, the Navy worked with the regulatory and trustee agencies to develop these methods and should stand by them. This history is important given that the Navy is proposing Alternative 2 (monitoring after soil removal). But NOAA agrees that one (2-Methylnaphthalene), but certainly not all, of the PRGs is quite conservative and possibly do not reflect much ecological risk. Hence, it may be best to monitor areas showing intermediate ecological risk before a removal option is selected thereby potentially protecting valuable habitat.

NOAA supports:

1. The prompt removal of all sediment that shows high ecological risk whereby at least one PRG is compromised (i.e., area around Station 5).
2. No sediment removal should be considered for those areas showing low to no ecological risk with or without PRG exceedence(s) (e.g., area around Station 3).
3. As discussed during our meeting of 5/30/02, the eelgrass surrounding Station 410 where ecological PRGs were exceeded will not be removed due to its habitat value.

4. And, as proposed by the Navy, they will monitor those areas showing intermediate risk with concentrations above the PRG threshold. Although only one PRG is marginally exceeded at Station 6, its intermediate risk results in further monitoring.

NOAA recommends that the Navy consider the natural resource injury resulting from the delay of contaminated sediment removal if, after five years, the concentrations have not lessened. In that way, the public is compensated for the lost use of the resource during the five years of additional potential natural resource injury. The Navy should draft a compensation plan/outline that protects the public interest in natural resources and their habitat throughout the monitoring phase.

The magnitude of ecological risk in the intertidal (i.e., beach) area is more difficult to determine because such an assessment was not undertaken here. In addition, PRGs were developed for the offshore but not the intertidal environment. With caution, one can use the offshore ecological PRGs for sediment collected along the beach. When doing so, one notes that Station 414 sediment exceeds the acenaphthylene PRG (1500 vs. 697 ppb) and Station 442 sediment exceeds the acenaphthylene PRG (870 vs. 697 ppb). Given that only one chemical modestly exceeded the PRG at both beach sites and risk is not known, NOAA suggests that the Navy monitor these two areas as their proposal suggests. But again, NOAA requests that the Navy prepare a natural resource compensation plan/outline if such concentrations remain elevated throughout the 5-year monitoring event. A second option is to complete an additional ecological risk assessment for the intertidal area to learn if these sediments actually are causing risk.

NOAA remains committed to assist the Navy and EPA in reaching consensus to select a remedial alternative in the intertidal and offshore of the OFFTA. Please let me know if you have any questions or comments.

Sincerely,



Kenneth Finkelstein, Ph.D.

CC: Bart Hoskins (EPA)