



State of Rhode Island and Providence Plantations
Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908

May 2, 1997

James Shaffer, Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Response to RIDEM Comments on the Draft Final, Offshore Derecktor Shipyard
Ecological Risk Assessment, Naval Education and Training Center, Newport, Rhode
Island

The Office has reviewed the Navy's response to comments on the Draft Final Ecological Risk Assessment for Derecktor Shipyard. As requested in the letter dated 18 April 1997 this Office contacted the Navy's consultant immediately via telephone concerning issues raised in this response package. It is this Office's understanding that these concerns would be brought to the Navy's attention. Attached are a written record of these concerns.

If the Navy has any questions concerning the above, please contact this Office at (401) 277-2797.

Sincerely,

Paul Kulpa, Project Manager
Division of Site Remediation

cc: Warren S. Angell, DEM DSR
Richard Gottlieb, DEM DSR
Christopher Deacutis, DEM DWS
Robert Richardson, DEM DWR
Kymberlee Keckler, USEPA
Brad Wheeler, NETC

dirdFecns.com

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**Annotate Response to Comments on the
Draft Derecktor Shipyard
Marine Ecological Risk Assessment Report**

2. General Comment

The Office requested that the Navy expand the discussion of the various test parameters. That is, the report should discuss the function of the test parameters, their limitations, factors which produce false positive/negatives, etc.

Evaluation of Navy's Response

The Navy did expand this discussion for some of the test parameters, others, however, were not addressed. Since information concerning false positive and negatives is available for these test parameters the State reiterated it's request that this discussion be included for these parameters. It is this Office understanding that this information will be provided.

3. General Comment

The Office, in previous correspondence and during EAB meetings, requested that information from historic investigations be included in this document. As an illustration, based upon information provided in the appendixes of the Preliminary Assessment Report, it is known that, the area in the vicinity of the dry docks was subject to periodic releases of contaminated sand blast grit. Samples taken revealed that high levels of copper/zinc (> 400 ppm) and lead (> 200 ppm) were found in thirteen of the twenty sample taken at the site. In addition, elevated levels of TPH, PAHs and PCBs (6,000 ppb) were also discovered. A number of these sample stations were located in areas not sampled or addressed by the current study and therefore it is important that they are included in the report as it may have a bearing on any remedial activity in the area. Please include the requested information in report.

Evaluation of Navy's Response

As requested the Navy did include information from a 1987 study. However, information from a 1988 study was not included in the report. The Office indicated where this information was available. It is this Office's understanding that the historic findings from the 1988 study will be included in the report.

4. General Comment

The report has compared the results of a number of the indexes, diversity index, and other test to the background sampling locations. Discussion indicating whether the results of these indexes or other test would indicated that the background sampling locations are impacted. Please indicate which pages of the report include this discussion as it is pertinent to any comparisons to onsite sampling locations.

Evaluation of Navy's Response

The Navy initial response was limited to COC and tissue analysis. It is this Office understanding that the information concerning the diversity indexes will be included in the report.

**5. Section 1.6, Impact on Benthic Communities;
Page 1-26, Paragraph 2.**

Shallow depths of sediment oxygenation (redox depth) were found in surface sediments at Stations DSY-25, DSY-29, DSY-40 and DSY-41 suggesting that near-bottom hypoxia or sewage-associated organic enrichment may contribute somewhat to the altered benthic community structure at these stations.

The report indicates that Station DSY-40 and 41 are subject to hypoxia. Information presented in an earlier section of the report described these stations as having sandy bottoms and no oxygen deficiency problems. Please explain.

Evaluation of Navy's Response

During the recent EAB meeting the paradoxes at these stations were discussed. It was the opinion of the board that additional work was warranted at these stations. Potential approaches include measurements of dissolved oxygen, deployment of artificial substrates, etc. This Office suggests that the report note that additional work is warranted for this area.

**8. Table 6.6-3, Summary of Effects based Weights.....
Table 6.6-3, Overall Summary of Exposure.....**

Table 6.6-2 summarizes the results of the individual test to produce an overall risk ranking for each group of tests. Based upon the information presented in this table, lobster and cunner test were prominent factors in determining the overall effects ranking for tissue residue effects (the results from the other test in this grouping were approximately equal). Cunner and lobster samples were not

collected in Stations DSY-40, DSY-41. This lack of analysis skewed the overall evaluation. In addition, since these stations are known to be devoid of life it is likely that the aforementioned skewed analysis resulted in these stations receiving an overall lower ranking. Furthermore, Stations DSY-40 and DSY-41 were differentiated from each other by the results of fecal analysis in the blue mussel. This analysis was not conducted at Station DSY-41, which once again skewed the analysis. The report should discuss this lack of analysis. In addition, the Office recommends that the overall ranking for these stations in Table 6.6-3 be changed to intermediate or high.

Evaluation of Navy's Response

This Office has a number of concerns with respect to the Summary of Effects Based Weights for the tissue analysis. The Office requested the following additional information concerning these issues; the affects on the scoring for the different lobster tissue sampling schemes employed at McAllister Point and Derecktor Shipyard, ie. McAllister point analyzed the HP and the whole meat, Derecktor Shipyard analyzed the whole meat and no HP, whether the scoring criteria for the various test were the same for McAllister Point and Derecktor Shipyard, the criteria used for cunner for the two sites and the overall scoring for lobster at Jamestown Cranston Cove, (ie whether it was 3+ 2+). As of this writing the Navy has not verbally responded to this issue. Please be advised that this information will be used in the evaluation of this criteria.