

11/8/04 -01317

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

November 8, 2004

NAVFAC MIDLANT
Attn: Ms. Winoma Johnson
Code EV3, Bldg N-26, Rm 3208
9742 Maryland Avenue
Norfolk, VA 23511-3095

Subject: Naval Station Norfolk
*Step 4 Work Plan, Ecological Risk Assessment
Bousch Creek*

Dear Ms. Johnson,

EPA has completed review of the subject document and offers the following comments for your consideration.

1. The work plan proposes using *Leptocheirus plumulosus* for the sediment toxicity tests. Experience has shown that using a single test organism can lead to difficulty in interpreting results, particularly if conditions are not optimal. Furthermore, as sensitivity to contaminants can be significantly different across species, the results obtained for a single test species can be misleading. It is recommended that additional tests be run utilizing a second test organism. Other test species that could be considered include *Neanthes* sp., *Rhepoxynius* sp., *Eohaustorius* sp. or a bivalve

2. Section 4.3.2.6 should indicate that, to the degree practicable, the same species will be submitted for tissue analysis across all sampling locations.

In order to ensure that the appropriate data is collected, it would be beneficial if the plan specified the relationship between the data that will result from the proposed sampling activities and the assessment endpoints. For example, the plan should indicate how the data from the whole body fish samples will be used to assess the survival, growth, and reproduction of fish communities.

If you have any questions please contact me at (215) 814-5264.

Sincerely,

Todd Richardson,
Remedial Project Manager
Federal Facilities Section
richardson.todd@epa.gov

Capito, Bonnie P CIV NAVFAC Lant

From: Johnson, Winoma A CIV NAVFAC MidLant
Sent: Monday, November 08, 2004 1:58 PM
To: Capito, Bonnie P CIV NAVFAC Lant
Subject: FW: Bousch Creek ERA comments



bousch creek ERA
S4.doc

For Admin Record.

-----Original Message-----

From: Richardson.Todd@epamail.epa.gov
[mailto:Richardson.Todd@epamail.epa.gov]
Sent: Monday, November 08, 2004 13:13
To: Johnson, Winoma A CIV NAVFAC MidLant
Cc: Ben.Francisco@CH2M.com; BlackwellWC@PWCNORVA.NAVY.MIL;
djoiner@mbakercorp.com; peherman@deq.virginia.gov; Johnson, Winoma A CIV
NAVFAC MidLant; Holly.Rosnick@CH2M.com
Subject: Bousch Creek ERA comments

(See attached file: bousch creek ERA S4.doc)