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LETTER AND COMMENTS FROM STATE OF NEW HAMPSHIRE FISH AND GAME
DEPARTMENT REGION III REGARDING MEDIA PROTECTION STANDARDS FOR
OFFSHORE MEDIA BASED ON HUMAN HEALTH RISKS NSY PORTSMOUTH ME

8/7/1995

STATE OF NEW HAMPSHIRE FISH AND GAME DEPARTMENT REGION III

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State of New Hampshire
Fish and Game Department
Region 3

Headquarters
2 Hazen Drive
Concord, NH 03301

225 Main Street, Durham, NH 03824-4732
(603) 868-1095

TDD Access: Relay NH 1-800-735-2964
Fish and Game Headquarters: (603) 271-3421

August 7, 1995

James J. DiStefano
Executive Director

James M. Conroy, PE
Lt. CEC USN
NORTHNAVFACENGCOM
101 Industrial Hwy MSC 82
Lester, PA 19113-2090

Dear Jim,

The following are our comments on Chapter 2: Media Protection Standards for Off-Shore Media Based on Human Health Risks.

It is of concern that the general methods used to develop surface water MPS (p.2-6) are fresh water references. Does this mean there are no differences in the "...processes that determine the movement of chemicals between different environmental compartments (eg. surface water and biota)..." for fresh versus salt water? Since water transfer across living membrane is in part dependent upon the molality of solutes within the aqueous phases should we not expect different osmotic rates in general between fresh and marine waters? Are the octanol-water partition coefficients corrected for marine waters?

On p. 2-7 there is a statement from the USEPA - Great Lakes reference that speaks on the determination of bioaccumulation factors. It says: "...few BAFs have been measured accurately and their application to sites other than the specific ecosystem where they were developed is problematic and subject to uncertainty." Clearly no site-specific BAFs are available for PSNY. All this argues for the development of site-specific measured accumulation factors and/or concentration factors.

Throughout the report PCBs are unspecified as to their particular arochlor. Whereas arochlors vary as to their toxicity and carcinogenicity shouldn't the PCBs be further identified as to their degree of chlorination (ie. specified as to discrete archlors?) Once done shouldn't the entire exercise of developing contaminant specific MPS' be directed at individual arochlors, not lumped as PCBs?

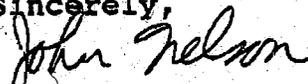
The section 2.3.2.4 Uncertainties seems to add further doubt as to the application of referenced fresh water methods to marine waters. On p.2-25 it mentions unknown methods by which octanol-water partition coefficients were generated. We share the authors uncertainty.

Wild
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Would it be possible to get either the drafters of this report or someone from EPA revise the conclusions to fully present their findings?

If you have any questions, please give me a call.

Sincerely,



John I. Nelson
Chief of Marine Division

JIN/kmn