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LETTER AND COMMENTS FROM STATE OF NEW HAMPSHIRE FISH AND GAME  
DEPARTMENT REGION III REGARDING DRAFT ESTUARINE ECOLOGICAL RISK  
ASSESSMENT REPORT NSY PORTSMOUTH ME

8/17/1995

STATE OF NEW HAMPSHIRE FISH AND GAME DEPARTMENT REGION III



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James J. DiStefano  
Executive Director

August 17, 1995

Fran Endyke  
Portsmouth Naval Shipyard  
Code 121, 10 Bldg 44  
Portsmouth, NH 03804

Dear Fran,

We have reviewed the draft PNSY Estuarine Ecological Risk Assessment report.

There are numerous typos, grammatic and syntactic errors which we have outlined in our copy of the report. We probably did not catch all of them so we suggest a thorough reading of the text. Also page numbers are incorrect for various sections figures and tables. We will give you the copy at our next meeting or when we are in the area.

Specific comments are as follows:

P. 4-12 Re: Boiler blowdown waste water. The text states that heat is the only potential contaminant expected in boiler blowdown. In fact, many NPDES boiler related permits acknowledge the presence of high pH for boiler blowdown and place pH limits on such effluents. Also, boiler water may have additives such as hydrazine or trisodium phosphate that may be in measurable quantities. As for the addition of heated water, the statement would be better supported if the volume of boiler blowdown was mentioned and the point of release into the water column explained.

Same page as above. Re: dioxin. Any use of herbicides on PNSY might have been a source of dioxins if the phenoxy herbicide 2,4,5,T was used. Disposal of unused herbicides (in addition to their application) should also be reviewed.

P. 4-13. Re: radionuclides. The significance of Co-60 as a "yardstick" isotope that serves as a general index of PNSY radionuclide presence should be explained.

P. 4-15 and elsewhere. Re: The term benthic community, infaunal benthic community and epibenthic community. In some discussions the term benthic community denotes only the infauna whereas epibenthic covers animals that are on the

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infauna whereas epibenthic covers animals that are on the bottom. Unfortunately this becomes somewhat jumbled in other sections where benthic community is used to cover both infauna and epifauna. We would prefer the latter approach throughout the report i.e. the benthic community is inclusive of both infauna and epifauna.

P. 5-19-20. Throughout the discussion of lobsters the terms juvenile, sublegal adults and adults are used. This implies some discrimination as to individual lobster sexual maturity or, some arbitrary size classification for sexually mature lobsters. Which was used? If size, what then was the size at which lobsters were judged sexually mature? Was the size the same for both sexes?

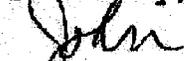
P. 6-5 and beyond. Re: Arbacia punctulata as "representative of local biota". Certainly Arbacia bioassay is a valuable assessment tool for determination of effluent toxicity. Because the Arbacia test is so standardized and popular it is understandable that it would be one performed to support the overall assessment of PNSY CoCs. However, it should not be characterized as being representative of local biota in the same sense Mytilus, Ampelisca and Ruppia are. Arbacia is not indigenous to our waters. While the tests on Arbacia may be useful there is little value in taking these results and trying to apply them to population modeling.

In general, the report needs to ferret out inconsistencies, eliminate ambiguities and generally bring concordance as to the key findings of the various studies.

Finally, Table 8-1 attempts to set out results and includes a further study 'wish list'. It probably would be appropriate to rank those in regard to their relative value to PNSYs overall objectives.

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

Sincerely,



John I. Nelson  
Chief of Marine Division

JIN/kmn