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NSY PORTSMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING REVISED APPENDIX IX
PAPER FOR BENTHIC ASSESSMENT ENDPOINT AND CHAPTER 7 RISK
CHARACTERIZATION NSY PORTSMOUTH ME
11/2/1998
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

November 2, 1998

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Hwy., Mail Stop #82

Dear Mr. Evans:

The United States Environmental Protection Agency (EPA) has reviewed the following information submitted to our office by the Navy in relation to the Portsmouth Naval Shipyard in Kittery, Maine.

- 1) Revised Appendix IX paper for the Benthic Assessment Endpoint
- 2) Chapter 7. Risk Characterization
- 3) Executive Summary and Glossary
- 4) Meeting minutes from the August 20th Offshore Technical Team Meeting

EPA's comments on items 1 and 2 are provided below. EPA has no comments on the discussion or information presented in items 3 and 4.

1) Revised Appendix IX paper for the Benthic Assessment Endpoint

There still remains lack of agreement between the text discussion for 3. Measure of Exposure: Comparison of Sediment Chemistry Data to Crustal Ratio and the information and weights presented in the corresponding tables. Based on the discussion in the text, *"Storage Yard, Drydocks, Sullivan Point and Jamaica Island are areas of concern that were not evaluated with respect to this measure."* However, this measure has been included in the tables for these areas of concern. For Back Channel and Clark Cove, the interpretation of exposure should be identified as low exposure not elevated exposure. In addition, the measure of exposure: EqP Pore Water Toxic Unit for the Back Channel table should be listed as Medium under Study Design as outlined in the text.

2) Chapter 7. Risk Characterization

7.1.5.3 Clark Cove Benthic

Page 7-19, first paragraph

The last sentence of this paragraph should be revised to read, "*This was supported by adverse exposure, indicated by bulk-sediment concentrations of PCBs, Hg and pesticides (DDT and DDD) above the ER-M levels, ...*"

7.1.6.3 Sullivan Point Benthic

Page 7-21, first paragraph

The last sentence of this page should be revised since it is uncertain as to whether crustal ratio measures were obtained for this area of concern.

7.1.9.3 Back Channel Benthic

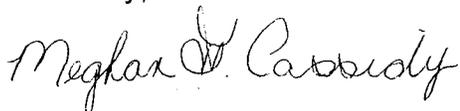
Page 7-29, first paragraph

The first sentence of this paragraph should be revised to read, "*.....and bulk sediment concentrations that were higher than the ER-M for PHEN, flourene, ANTH, pyrene, BAA, BAP, HPAHs and DDD.*"

Once the Navy has responded to the above comments, EPA is satisfied that all of EPA's outstanding issues regarding the Offshore Ecological Risk Assessment have been resolved.

If you have any questions regarding this matter, please contact me at (617)573-5785.

Sincerely,



Meghan F. Cassidy
Remedial Project Manager

- cc: Marty Raymond/PNS
Iver McLeod/ME DEP
Carolyn Lepage/Lepage Environmental
Ken Finklestein/NOAA
Ken Munney/U.S. Fish & Wildlife
Patti Tyler/EPA
RAB Members