

5/29/03-02611

May 29, 2003

Mr. Roger Jackson
LANTNAVFACENGCOM
1510 Gilbert Street
Norfolk, VA 23511-2699

RE: Draft Step 3A Addendum to the Ecological Risk Assessment, Operable Unit 1

Dear Mr. Jackson:

In an attempt to ensure that Lynn Wellman's comments have been adequately addressed, I have reviewed the meeting minutes of the March 31, 2003, Step 3A Addendum to the Ecological Risk Assessment, Operable Unit 1 discussion, the Response to Comments and the OU1 Step 3A Addendum text file with changes. These three documents are considered adequate for their intent and address EPA's overall concerns. However, as you may remember, one issue that Lynn Wellman (Region 4 Ecological Risk Assessor) identified regarded the potential exposure of terrestrial receptors at Site 17. He suggested that the Navy look at spatial distribution of contamination and determine whether there were hot spots that could be removed to mitigate the potential for impact to upper tropic level receptors. He indicated, that based on work in Region IV, 1 mg/kg total PCBs on average is considered acceptable. If the total PCBs are in the 10 to 15 mg/kg range, the Navy should consider some type of covering. If total PCBs were over 25 mg/kg, Lynn suggested removal actions at the site. With these concerns in mind the Feasibility Study for OU1 should consider a range of alternatives (from covering to removal of PCBs) in order to protect the upper tropic level terrestrial receptors.

If you have any questions, please feel free to contact me at (404)562-8526 or via e-mail at thornton.michelle@epa.gov

Sincerely,

Michelle P. Thornton
Remedial Project Manager
U.S. EPA, Region 4