



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Admin.**  
National Ocean Service  
Office of Ocean Resource Conservation and Assessment  
Hazardous Materials Response and Assessment Division  
c/o EPA Waste Management Division (HEE-6)  
J.F. Kennedy Federal Building  
Boston, MA 02203  
4 November 1994

Ms. Christine Williams  
U.S. EPA Waste Management Division  
J.F. Kennedy Federal Building  
Boston, MA 02203

Dear Christine:

The following is a brief review of Appendix C, Ecological Risk Assessment for Allen Harbor, prepared by SAIC and EA Engineering for the NCBC superfund site. I found the workplan to fulfill the data needs requested by EPA and others during the 1 September 1994 meeting with the Navy and their contractor. As you are aware, this study will supplement the data collected and interpreted in the NCBC Phase I, II, and III pilot study reports. During these three phases of ecological investigation, numerous studies were conducted, many of which indicated potential risk to the aquatic environment from exposure to contaminated environmental media, particularly adjacent to the landfill. Presently, landfill wastes are in contact with saturated soils, and contaminated seeps are emanating from the landfill, particularly in the southern end. It appears that the landfill is a contributor to Allen Harbor (sediment and shellfish) contamination.

Two comments/recommendations are as follows:

1. The problem formulation component of the study should be explicitly defined and discussed. Referencing a generic URI/SAIC workplan for Navy sites is not acceptable. A site specific overview of the problem should be included.
2. Menzie-Cura Assoc. presented some Allen Harbor ecological data at the TRC meeting on 15 December 1993. Here, data indicated that the landfill acts as a source of contamination because stations in Allen Harbor that abut the landfill show elevated chemical concentrations in sediment and biological toxicity. However, Allen Harbor stations away from the landfill do not. In addition, SEM/AVS ratios were greater than 1. This information should be included in the final ERA.

Let me know if you have any questions.

Sincerely,

Kenneth Finkelstein, Ph.D.

cc: Tim Prior (USF&WS)  
Susan Svirsky (EPA)

*Attachment 4*