



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.
National Ocean Service
Office of Response and Restoration
c/o EPA Office of Site Remediation and Restoration (HIO)
1 Congress Street
Boston, MA 02114
2 July 2003

Mr. Fred Evans
U.S. Department of the Navy
Northern Division - NAVFAC
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Dear Fred:

Thank-you for the Phase II Remedial Investigation Report, Site 16, NCBC Davisville, dated June 2003. NOAA reviewed the workplan and the draft Screening Level Ecological Risk Assessment (SLERA) for this site (latter enclosed). It was during this SLERA that both NOAA and the Navy recognized the high organic (and some inorganic) concentrations in the adjacent Allen Harbor sediments. Although the source of this contamination remains unclear. Soon after, NOAA discussed these findings with Jason Speicher of the (Navy ecological risk assessor) and we discussed UV and X-Ray Fluorescence as a tool to better get a handle on the intertidal and subtidal contamination. We also discussed a source evaluation of the PAHs in the sediment but did not reach a decision on how to complete that task.

Given the above, it is with much surprise that both phases of the RI did not consider the sediment as a location of potential risk that deserved assessment. Thus, NOAA asks the following questions:

- Why are the sediments not considered in the RI?
- What is the source of the contamination in the harbor adjacent to the site and what evidence is used to reach a conclusion?
- Are there any future intertidal and subtidal sampling plans?
- The SLERA indicates potential risk; is the Navy planning any follow-up studies (e.g. BERA)?

Please contact me if you have any questions or comments.

Sincerely,

Kenneth Finkelstein, Ph.D.

CC: Christine Williams (EPA)