



**U.S. DEPARTMENT OF COMMERCE**  
**Nati nal Oc anic and Atmospheri c 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  
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Ms. Kimberlee Keckler  
U.S. EPA Waste Management Division  
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Boston, MA 02203

Mr. James Shafer  
U.S. Department of the Navy  
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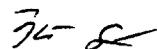
Dear Kimberlee/Jim:

Thank-you for organizing the ecorisk advisory board meeting, held 18 July 1996. I believe our agreement to collect and analyze sediment samples from the nearshore and offshore sediments adjacent to McAllister Point Landfill for toxicity and chemical analysis will assist in the ecological risk assessment given the erosion of the "contaminated" intertidal sediments during the past winter. NOAA would like to repeat two issues of concern that was discussed at the meeting.

1. The erosion of the sediments in front of the landfill has resulted in an intertidal landscape of marginal habitat for estuarine biota. Much debris remain and little fine sediment is in place. Although the material may not be directly toxic to estuarine resources, the area is both a safety hazard to humans and a poor example of a natural estuarine intertidal environment. Hence, a remedial action for this area is likely appropriate and Feasibility Study "work" should begin before the results of the new ecological studies, discussed above, is completed. Extending the stone revetment from the cap over the exposed landfill debris field is one recommendation that should be considered. A gently sloping revetment will likely withstand the winter storms. Although the intertidal environment will vastly change from its natural state, the revetment may act as a habitat for mussels and other wave energy-resistant invertebrates. The results of the upcoming sampling will tell us if the remaining intertidal sediment is contaminated and what type of liner will be needed below the revetment.
2. Because of the potentially widespread dispersal of contaminated sediments from the front of the landfill into Narragansett Bay and the likely change in the intertidal (and shallow subtidal?) environment in front of the landfill, NOAA recommends a restoration aspect to the selected remedy. NOAA considers this a negotiated settlement rather than a natural resource damage claim; a project to compensate the public for the lost use of the intertidal environment and the unfortunate dispersal of the sediment into Narragansett Bay is deserving of the Navy's consideration. It is premature to discuss specific projects; NOAA would prefer to hold a meeting with the Navy, the Department of Interior, the State of Rhode Island natural resource trustee, a RAB representative, and EPA where a "laundry list" of projects could be catalogued and discussed. NOAA has a Restoration Center that has much expertise in this field. Classes of restoration projects include: public access, habitat creation/replacement and fishery enhancement.

Please let me know if you have any questions. I await the data from the upcoming sediment sampling.

Sincerely,



Kenneth Finkelstein, Ph.D.

cc: Simeon Hahn (NAVFAC)  
Paul Kulpa (RIDEM)  
Mary Philcox (RAB)  
Tim Prior (USF&WS)  
Susan Svirsky (EPA)