



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

August 15, 1996

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Minutes from the July 18, 1996 Ecological Advisory Board

Dear Mr. Shafer

Thank you for the opportunity to review the minutes from the Ecological Advisory Board ("EAB") held on July 18, 1996. Overall, the minutes accurately represent the discussions held at that meeting. The following comments are to clarify two issues where needed.

First, as discussed during the meeting and in my letter to you dated July 25, 1996, the sediments offshore of the McAllister Pont Landfill will be resampled. As you know, this is because the sediments in that area have significantly eroded and may have therefore invalidated the baseline risk assessment contained within the Ecological Risk Assessment ("ERA") dated June 3, 1996. The new sampling will enable us to determine whether adverse risks to the environment still exist and establish baseline risk.

I am therefore concerned that the minutes in the middle of page 3 could be misinterpreted as the issuance of two separate reports. It is EPA's understanding that the Navy will submit the resampling test results when they are available. At that time we would host another EAB meeting to discuss such results and how they will be compared with the data that was collected before the erosion occurred and incorporated into the ERA. It is critical that the new data and the data already contained in the ERA are evaluated concomitantly so that we can accurately characterize the conditions at this site and evaluate appropriate remedial options. The consensus that was reached at the meeting was to postpone the Draft Final Report until the EAB agreed how to proceed. For example, if significant differences are identified (risks are substantially changed), then the Draft Final Report will require substantial revision to all relevant sections, including the recalculation of risk - not simply the addition of a section. If the risks are deemed unchanged or if the numbers are lower, then revisions to the Draft Final Report will include the newly collected data and they will be summarized as an addendum. It is critical to note that *in both cases* EPA expects the conclusions of the ERA to be revised in the main body of the report. The ERA must explain that site conditions have changed between the data collection efforts and that the baseline risk presented in the report is accurate.

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Secondly, the minutes in the middle of page 5 need to be further clarified. Susan Svirsky indicated that the sampling sediment should be collected from significant beds of fine-grained sediment in each of the resampling locations. If fine-grained sediments cannot be found in a particular location after repeated attempts, simply indicate such and do not collect or analyze sediment from that location.

I look forward to working with you on the revised ERA for the sediments offshore of the McAllister Point Landfill. Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

cc. Paul Kulpa, RIDEM, Providence, RI
Brad Wheeler, NETC, Newport, RI
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