

N62661.AR.002514
NS NEWPORT
5090.3a

EMAIL AND COMMENTS FROM U S FISH AND WILDLIFE SERVICE REGARDING DRAFT
PHASE 2 REMEDIAL INVESTIGATION/BASELINE ECOLOGICAL RISK ASSESSMENT SITE
17 BUILDING 32 GOULD ISLAND NS NEWPORT RI
2/14/2011
U S FISH AND WILDLIFE SERVICE

1: Wagner
Bemhardt
600944-3.1

Parker, Stephen

From: Kenneth_Munney@fws.gov
Sent: Monday, February 14, 2011 1:48 PM
To: maritza.montegross@navy.mil
Cc: keckler.kymberlee@epa.gov; hoskins.bart@epamail.epa.gov; Ken.Finkelstein@noaa.gov; Parker, Stephen
Subject: Newport - Gould Island

Ms. Montegross -

Thank you for the opportunity to review the Draft Phase 2 Remedial Investigation and Baseline Ecological Risk Assessment for Site 17, Building 32, Gould Island, Naval Station Newport. The following are brief, informal comments on BERA issues:

We are in agreement with and support the comments provided by EPA and NOAA with regards to contaminant and toxicity issues in the offshore areas of the site. The major agency issues were discussed during our 1-31-11 conference call, with all vested parties. We are particularly interested in follow-up statistical analysis of the toxicity tests, which EPA will be conducting. Toxicity tests that show <70% survival, even though not showing significant difference from reference areas, are problematic and need to be further reviewed/discussed. As mentioned by EPA, sample locations showing potentially toxic response in any of the toxicity test endpoints (survival, growth, or reproduction) should be considered impacted for corresponding NOEC/LOEC determinations. Several iterations of NOEC/LOEC determinations have been conducted but all endpoints combined per area, may be the most pertinent. This may significantly alter existing NOEC/LOEC determinations per area.

It would make more sense to present conservative and average terrestrial food chain scenario tables in succession, for review. We are interested review The Phase 1 RI screening level terrestrial risk assessment that did not trigger the identification of any COPCs. Please send us a CD when possible. if available.

NOAA has also made some suggestions about data presentation that would facilitate data review.

Some section-specific comments:

- Section 2.3, pg. 2-9: Clarify that both spider and green crabs were analyzed, as per Table 2-6.
- Section 3.1.3, pg 3-4: The indicator species great blue heron and raccoon, should be mentioned as present on island or their use explained if they are not present.
- Section 4.2: It may be helpful to differentiate 2005 samples from 2009/2010 samples on the figures. As NOAA noted, it would also be helpful to identify elevated locations by ID to aid in cross-checking data or provide a summary figure with pertinent elevated COCs per select location in highlighted boxes.
- Section 4.3: It would be beneficial to denote which species are represented per location on Figures 4-26-29. It is unfortunate that PAHs were not included in the tissue analysis.
- Section 6.2.4.3: Earlier in the document great blue heron was mentioned as an indicator species. It is unclear if this species was only used in the screening ERA and why it or black-crowned night heron were not carried through to this phase.
- Section 6.3.2: Table 6-9 should reflect sediment ingestion, in addition to food ingestion, for total exposure potential, as shown in Table 6-3.
- Section 6.3.4.2, pg 6-14: Table 6-7 footnote PALs: It is unclear how PALs for crabs and clams/mussels were determined. Please clarify. Crabs exceeded PALs for several metals according to text on 4-46 and therefore should be included in food chain modeling for specific COCs. Please clarify. Additionally, PALs for crabs and clams/mussels do not compare equally to upper food chain PALs and therefore should not be used as exclusionary measures in food chain modeling.

Section 6.3.4.3: It is unclear why crabs are not included in the food chain uptake modeling, especially if they have different uptake potential than clams/mussels, for specific COC (i.e. Cu, Fe, Hg, etc., pg-4-45), as noted above.

We will continue to examine the toxicity test data and food chain modeling and may have additional questions pertaining to those topics.

We look forward to continued discussions on site data and their implications.

Best regards,

Ken Munney

USFWS

Environmental Contaminants

70 Commercial St - Suite 300

Concord, NH 03301

603-223-2541, ext.19

FAX 603-223-0104

Kenneth_Munney@fws.gov