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LETTER AND COMMENTS FROM NATIONAL OCEANIC AND ATMOSPHERIC  
ADMINISTRATION ON SUMMARY INFORMATION FOR REMEDIAL ALTERNATIVES AT  
DEREKTOR SHIPYARD NS NEWPORT RI  
11/8/2012  
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Admin.**  
National Ocean Service  
Office of Response and Restoration  
Assessment and Restoration Division  
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8 November 2012

Mr. Dominic O'Connor  
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Dear Mr. O'Connor:

Thank-you for the Summary Information for the Remedial Alternatives at the Derecktor Shipyard, Naval Base Newport, dated 31 October 2012. As discussed in the numbered comments below, I would appreciate some discussion (i.e., conference call) with the authors to alleviate my apparent confusion.

1. Attachment 1 – Background of Alternatives SD4. I remain unclear how the removal and backfill of the sediment will absolutely result in no need for Institutional Controls. That is, there must be a scenario for sediment disruption that will expose sediments below one foot thereby exhibiting sediment chemical concentrations above a PRG. At the meeting, boat/ship traffic was offered. Unless, I am misunderstanding SD-4 that I believe only addresses the top 1 foot for removal. For this reason, among others concerning SD-5, I would welcome a conference call to discuss these Remedial Alternatives.
2. Attachment 1-Alternative 5. Again, some help from the authors is requested. From what I understand, concerning the weight averaging – either from the surface or from the volume – the result is an average calculation of the entire site using locations where a PRG is compromised (as shown in #3 at the top of Page 1-3). That is the entire marine areas from A1 to BJ31 as shown on Attachment 2. And that – in my opinion – is too large a single area for averaging. Rather, I would suggest an average (weighted or volume) chemical concentration – using the same sample locations where at least one chemical is above a PRG at some depth – at somewhat smaller discrete locations like each of the two large piers and the southern shoreline area.
3. Granted zinc becomes considerably less important when going through the average volume weighting method (VWAC). But it is also clear that zinc is high in three surface locations and not high elsewhere allowing the assumption of site-specific sources.

Hence, the three locations showing elevated zinc - concentrations of 823 mg/kg 799 mg/kg and 678 mg/kg at stations W-17, BB-26, and K-05 respectively – overwhelm the VWAC- value of 250 mg/kg (cf. #5 on Page 1-3). These three locations are apparent hotspots that should not be “averaged away”.

4. Otherwise I have no specific issues with either of the averaging methods used – spatial or volume. But I remain unclear of the general issue concerning the depth of the contamination addressed. That is, if 1 foot is removed because the surface is above a PRG and then the 0-4 feet average is recalculated following backfilling, it could easily result in a concentration at the 4 foot depth that is above the PRG; but no longer needs to be addressed because the weighted average drops below the PRG. And that brings me back to Item #1 above.
5. I appreciate the difficulty of dredging below the piers and understand the Navy point concerning the viability of doing so. With this understood, it would be appropriate for the Navy to offer some shoreline restoration to counteract the past and future benthic and possibly aquatic injury
6. As pointed out in my comment letter of 4 May 2012 concerning the SSI and during the meeting of August 16, I do not believe copper is of concern and should be eliminated from further study.
7. Table 2 of Attachment 3 (Evaluation of Zinc and Copper in Sediment): The ERM for copper is 270 mg/kg not 210 mg/kg
8. The TEL/PEL used in Attachment 3 Table 2 is from Ecotoxicology 5 (1996) and are considerably more conservative when compared to the ERL/ERM in addition to other SQGs (see next comment). More importantly is that this marine TEL/PEL was derived for sediments in Florida and not necessarily for Narragansett Bay. I would select the nationally-derived ERL/ERM when comparing site specific data.

9. I also question the Apparent Effect Threshold (AET) values used in Table 2 of Attachment 3. The lowest AETs are best compared against the ERM. The lowest AET from the original PTI document of 1988 (where they were originally derived) provides a lowest AET of 410 mg/kg for zinc exactly the same as the ERM. The values of Table 2 are considerably higher but it is true that AETs can only go up, never down. Nevertheless, I think it best to use 410 mg/kg ERM/AET and, if necessary, the 150 mg/kg ERL

Please contact me with questions or comments concerning the above

Sincerely,

Kenneth Finkelstein, Ph.D

CC: Ken Munney (USF&WS)  
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