



**U.S. DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Admin.**

National Ocean Service  
Office of Response & Restoration  
Assessment and Restoration Division  
c/o EPA Office of Site Remediation and Restoration (HIO)  
1 Congress Street  
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Mr. James Colter  
U.S. Department of the Navy  
Naval Facilities Engineering Command, Mid-Atlantic  
9742 Maryland Avenue  
Norfolk, VA 23513-3095

**3660**

Dear Jim:

Thank you for the Draft Final Feasibility Study – Revision 1 for the Former Derecktor Shipyard, Naval Station Newport, Rhode Island dated March 2007 and submitted by Tetra Tech NUS, Inc. The study makes note of four remedial options: 1. No Action, 2. Limited action that includes monitoring, 3. A combination of capping and dredging, and 4. Dredging only. The report makes good use of the 1997 Final Marine Ecological Risk Assessment and the 2004 additional sediment sampling. As previously reported by NOAA (letter dated 10 June 2005), more recent sediment concentrations of chemicals of concern are markedly reduced when compared to those same chemicals and locations sampled in the 1990's.

The three proposed remediation areas are shown on Figure 2-3 with sediment concentrations and their respective PRGs listed in Table 2-2. Three areas show sediment concentrations above at least one PRG. Each is addressed below:

1. Southern area with PRG exceeded at Stations at DSY-03 and DSY-29. Sediment concentrations are shown above three out of four PRGs when using the historical (1993 or 1995 data) and one (benzo(a)pyrene) out of four when reviewing the more recent sediment data. The Ecological Risk Assessment designated this area as a high ecological risk
2. Central area with PRGs exceeded at Station DSY-103. Here, only sediment data was collected in 2004 with two of four PRGs exceeded.
3. Northern area with one (total PCBs) PRG exceeded at Station 27. The Ecological Risk Assessment designated this area as a high ecological risk.

Although PRGs are exceeded, the magnitude of such needs to be compared against any removal/capping action. A general recommendation is for the Navy to look into the net environmental benefit analysis (NEBA) of the two aggressive remedies (#s 3 and 4) when compared to the ecological threat of the sediment contamination. EPA has documentation on NEBA

Two specific recommendations follow.

Specific Recommendation #1. Given only that benzo(a)pyrene exceeds its PRG in the southern zone at a factor of only two, NOAA does not believe there is sufficient harm to the benthic organisms to warrant an aggressive cleanup. Two specific reasons stand out: 1. PAH toxicity is assumed additive with a narcosis mode of action, yet at Station DSY-29 and DSY-03, the total PAH concentration is below its respective PRG; and 2. this individual PAH compound, despite its notoriety as a cancer agent, is very common in commercial ports and marinas, often at much higher concentrations. This elevated benzo(a)pyrene concentration is not unusual for a working port and the 2X to 4X reduction in concentration from the 1990's to 2004 speaks well of an area showing improvement. Given this trend, NOAA believes it is appropriate to consider a Monitored Natural Recovery remedy (MNR) much like is presented in Alternative #2.

Specific Recommendation #2. The central and northern areas are somewhat more problematic with two and one PRG(s) exceeded, respectively. As before, the PRGs are not greatly exceeded. Of these two areas reviewed, the central area is of most concern. Nevertheless, NOAA does not believe the current sediment concentrations found in these two areas are resulting in immediate excessive harm to the benthic community or the organisms feeding on them. Given the sediment concentration trend, certainly less harm than what was indicated 10 years ago. Rather than consider a cap or dredging remedy now, NOAA recommends a sediment analysis and toxicity testing study to take place after removal of the two aircraft carriers; then a new comparison against the PRGs. Photographs in the FS do not show their location and the extent of their coverage, but visits to Naval Station Newport indicate it is considerable and when moved NOAA expects much sediment disturbance. Hence, any removal or capping now may be jeopardized when the ships are removed resulting in the need for a second removal. One needs to balance the protection of the local estuarine organisms and their supporting habitat with the threat of elevated chemical concentrations. So as to fully address the former, only one removal action need be considered. NOAA recommends Alternative #2 until the collection of more sediment data following the removal of the ships when the regulatory and trustee agencies will again address the PRG (and toxicity) question.

NOAA stand by our point from our 2005 letter, adjusted slightly: NOAA suggests that the Navy make note of the past lost use of the estuarine habitat and put the funding that would be used to remove sediment from Stations 29 and 03 (and possibly Stations 103 and 27?) into a natural resource restoration project. NOAA could help with such planning. This because although much improvement has taken place, the past high ecological risk likely resulted in a natural resource injury; hence, the need for public compensation.

Please let me know if you have any questions or comments.

Sincerely,

Kenneth Finkelstein, Ph.D

CC: Kymberlee Keckler (EPA)  
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