



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

National Ocean Service
Office of Ocean Resource Conservation and Assessment
Hazardous Materials Response and Assessment Division
c/o EPA Office of Site Remediation and Restoration (HIO)
1 Congress Street
Boston, MA 02114
29 December 1998

Ms. Kimberlee Keckler
U.S. EPA Waste Management Division
1 Congress Street
Boston, MA 02114

Mr. James Shafer
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Dear Kimberlee/Jim:

Thank you for the Stillwater Basin Evaluation Report, Former Robert E. Derecktor Shipyard, Naval Education and Training Center, Newport, RI, dated December 1998. NOAA found the report well organized and agrees with the major conclusions of the study. Of particular interest is the SAIC-authored Appendix C, the Characterization of Benthic Colonization Potential. Here data were presented that indicate that the environmental quality of the water column in the Basin is sufficient to support a balanced infaunal and epifaunal community yet the sediment quality did not. However, the concentration of lead in the water was measured as high as 41.8 ug/l, well above the chronic marine AWQC of 8.5 ug/l. Granted this was measured near the outfall but the previously deployed mussels at station DSY-40 showed significant bioaccumulation of lead; nearby station DSY-29 was also considered lead-affected.

NOAA strongly supports the last paragraph of Appendix C whereby SAIC suggests addressing the onshore sources of ecological risk. NOAA's natural resource concerns include both CERCLA and outfall (NPDES?) contributions to the marine environment. The elimination of the elevated lead (and possibly other metals and PAHs) discharging from the outfall pipes into Narragansett Bay should be considered immediately.

One editorial comment concerns the missing Figure 2-3, which shows the outfall locations, referenced in Section 2-3.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "KF", written over a horizontal line.

Kenneth Finkelstein, Ph.D.

cc: Cornell Rosiu (EPA)
Tim Prior (USF&WS)