



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

National Ocean Service  
Office of Response & Restoration  
Coastal Protection and Restoration Division  
c/o EPA Office of Site Remediation and Restoration (HIO)  
1 Congress Street  
Boston, MA 02114  
10 June 2005

Mr. Curtis Frye  
U.S. Department of the Navy  
Naval Facilities Engineering Command  
Northern Division  
10 Industrial Highway  
Code 1823/PO - Mail Stop 82  
Lester, PA 19113-2090

Dear Curtis:

Thank you for the Marine Sediment Sampling and Analysis for the Former Dereecktor Shipyard, Naval Station Newport, Rhode Island dated April 2005 and Submitted by Tetra Tech NUS, Inc. Similar to those finding by EPA (dated 31 May 2005), NOAA also noted the generally lower 2004 sediment concentrations when compared to that collected for the 1996 Ecological Risk Assessment. And where concentrations remained above the RPRG such as DSY-SD-29 (Benzo(a)pyrene) and DSY-SD-27 (PCBs), both are at concentrations that are modest when compared to most industrial areas.

The 1996 Ecological Risk Assessment made note of five intermediate risk locations: Stations 27, 28, 29, 40, and 41. Only the fore-mentioned Station 27 and 29 would still remain defined as intermediate today. Most of the biological testing completed for the ERA showed little impacts to the organisms used. Exceptions were the benthic community at Station 29 and amphipod (*Ampelisca abdita*) toxicity at Station 27. The sea urchin (*Arbacia punctulata*) toxicity test using porewater showed mixed results but indicated potential toxicity at stations closest to the shore, for example Stations 27 and 29.

Because of the delay in completing a Proposed Plan for this site, conditions have improved and considerable natural attenuation has taken place. Although this occurrence is not a solution advocated by NOAA, there is obvious natural improvement. In 1996 there were 5 stations elevated above the RPRG, several considerably higher than this target level. Currently there are 4 stations above the RPRGs, three resampled stations, and one new station. All four are very close to the shoreline and none exceed the RPRG by a factor of 3.

The data indicates that further natural attenuation will likely occur. And the generally low exceedences of the RPRGs make a cleanup only marginally worthwhile. Rather,

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 27 and 29 (and Stations 03 and 103?) into a natural resource restoration project. NOAA could help with such planning.

NOAA believes that the long planning process resulting in an expensive removal activity are not in the best interests of the environment or the public's well being. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'KF', with a long horizontal stroke extending to the right.

Kenneth Finkelstein, Ph.D.

CC: Kymberlee Keckler (EPA)