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U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.
National Ocean Service
Office of Response and Restoration
Coastal Protection and Restoration Division
c/o EPA Office of Site Remediation and Restoration (HIO)
1 Congress Street
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Ms. Meghan Cassidy
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Mr. Fred Evans
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Northern Division
10 Industrial Highway, Mail Stop#82
Lester, PA 19113-2090

Dear Meghan and Fred:

Thank-you for the Proposal for the Evaluation of Seep/Sediment Data Collected Between December 1996 and November 1997, Portsmouth Naval Shipyard, Kittery, ME. This is a welcome proposal that should provide a means to address potential estuarine impacts from the shipyard seeps. Nevertheless, NOAA has several comments numbered below, most of them are minor.

1. Four rounds of sampling is identified in the text. Previously, NOAA reviewed seep data from Rounds 7 and 8. Are the four rounds of sampling inclusive of Round 7 and 8? Are the other two rounds numbers 9 and 10? Is there any value in including previous rounds (Rounds 1-6?)?

2. Section 2.0, second paragraph. Add the word "samples" to the sentence "52 seep and 48 sediment."

3. Section 2.0, fourth paragraph. Findings cannot be "denied"; please adjust the text. More importantly, the Navy should use any relevant data collected during the interim offshore monitoring rather than just considering it. Under the activities in Section 2.1, (1) Evaluation of the seep/sediment correlation, NOAA suggests that the Navy include the relevant offshore monitoring data.

This use or non-use of the interim offshore monitoring becomes more confusing in Section 2.2 (Seasonal Variations of Data) when compared with Section 3.0 (Objectives and Scope of Seep/Sediment Summary Report). Section 2.2 states that "the selection of a season for interim monitoring is outside the scope of this evaluation" while Section 3.0 (bottom of Page 11) states the Evaluation may include a "Preliminary recommendation of a selected season for Baseline Rounds of Interim Offshore Monitoring."

4. Section 2.1.2. PCA should be defined as Principal Component Analysis.

5. Section 2.1.5. Sub task No. 4: "Study of end-member tracer analytes to indicate sources" needs more explanation.

6. Section 3.0. NOAA is unclear how this Evaluation will result in the conclusion/recommendation (top of Page 12): "Potential for eliminating selected samples

for AVS and SEM analysis in rounds following the Baseline Rounds of Interim Offshore Monitoring." The two studies appear distinct when concerned with these chemical constituents.

Please let me know if you have any questions.

Sincerely,

Kenneth Finkelstein, Ph.D.

cc: Ken Munney (USF&WS)
Iver McLeod (MEDEP)