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LETTER REGARDING COMMENTS ON U S NAVY RESPONSE TO COMMENTS ON  
PROCESS FOR DEVELOPMENT OF OFFSHORE PRELIMINARY REMEDIATION GOALS  
NSY PORTSMOUTH ME  
8/7/1998  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-777-1370

August 7, 1998

Peter Vandermark  
Seacoast Anti-Pollution League  
P. O. Box 1136  
Portsmouth, New Hampshire 03802

Subject: Responses to Comments on the Process for Development of Offshore Preliminary Remediation Goals

Dear Mr. Vandermark:

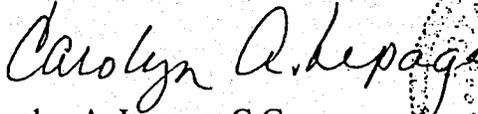
As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the Navy's July 20<sup>th</sup> responses to our June 18<sup>th</sup> comments on the Process for Development of Offshore Preliminary Remediation Goals (PRGs). The comments provided below incorporate Dr. David Brown's input.

1. The majority of the responses to our June 18<sup>th</sup> comments are satisfactory. We look forward to reviewing the report documenting the PRG approach and development of offshore PRGs that the Navy mentioned in its response to our first comment. We also look forward to discussing ways to improve the PRG process with the Navy and other interested parties, as the Navy suggests in the response to our second comment. As currently presented, the process is unnecessarily complicated.
2. With regard to the Navy's responses to our ninth comment, our understanding is that the Navy proposes using whichever is greater of the water quality screening value (WQSV) and the no observable effects concentration (NOEC). We are concerned that this approach is too non-conservative. We feel that there may be effects that may not be readily observable or that may occur too slowly to be detected within the testing system, but could indeed have an effect on the long-term population viability. We feel the WQSVs are the appropriate guidelines to use, unless a WQSV is less than background or method detection limit. Such an occurrence should be decided on a case-by-case basis.

Page 2 of 2, P. Vandermark  
August 7, 1998  
Responses to Comments on PRG Approach

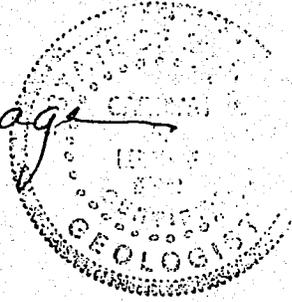
If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,



*Carolyn A. Lepage*

Carolyn A. Lepage, C.G.  
President



Enc.

cc: Iver McLeod, Department of Environmental Protection  
Meghan Cassidy, Environmental Protection Agency  
David Brown, Sc.D.  
✓ Marty Raymond, Portsmouth Naval Shipyard

## Response to Comments

SAPL Comments dated 8/7/98

*Comment: The Navy proposes using whichever is greater of the Water Quality Screening Value (WQSV) and the No Observed Effects Concentration (NOEC). We are concerned this approach is too non-conservative. We feel there may be effects that may not be readily observable or that may occur too slowly to be detected within the testing system, but could indeed have an effect on the long-term population viability. We feel the WQSV's are the appropriate guidelines to use, unless the WQSV is less than the background or the method detection limit. Such an occurrence should be decided on a case-by-case basis.*

Response: The Navy would concur that WQSV's are appropriate benchmarks to be used, among others, as part of a Weight of Evidence (WoE) approach for assessing the potential for adverse ecological risks to aquatic receptors (in fact, most of the WQSV values applied for PRG development were used in the ERA). However, the findings of the risk assessment, based on the WoE, provides the best available data to assess potential long-term population viability impacts, and cannot be simply reduced to either WQSV or NOEC comparisons. In this regard, the PRG process is intended to derive candidate numerical values (CPRGs) which address this risk: the implementation of candidate PRGs (based on NOEC estimates) is a critical step to confirm that PRGs will address risk. Hence, while the NOEC data are used to help derive PRGs, the real test is whether remedial actions are focused in the right areas on the most probable CoCs causing the risk. The Navy believes the PRG process, taken as a whole, is satisfactory to meet this objective.

SAPL Comments dated 8/14/98

*Comment 3, p. 2, What to sample. The Navy proposes one round of sediment porewater and juvenile lobster sampling as being sufficient for the Preliminary Remediation Goal (PRG) needs. How will potential seasonal effects be evaluated?*

Response: With regard to the chemical exposure of CoCs (independent of organism behavior), the Navy proposes to sample during late winter, early spring (March-April) in order to assess environmental conditions when metals are expected to be most available (due to minimum in AVS that normally binds metals into a non-toxic state). As far as organic CoC exposure, seasonality is less important as only the chemical concentration and TOC of sediment control the exposure concentration. Beyond exposure considerations, the propensity for bioaccumulation of organics does have a seasonal component as related to the lipid content of organisms (affected by spawning cycle). For this reason, measurement of lipid content and appropriate normalization is an established method for accounting of seasonality due to spawning cycle. Hence, the Navy's proposed sampling strategy should capture worst case exposure conditions and hence provide optimal data for development of PRGs.