



United States Department of the Interior



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Heather Kosnick
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Lester, PA 19113
Attn: CODE 1812

March 2, 2001

Dave Barney
Caretaker Site Office
NAS South Weymouth
P.O. Box 169
1134 Main St.
South Weymouth, MA 02190

Dear Ms. Kosnick and Mr. Barney:

Thank you for the opportunity to review and provide comments on the Draft Phase II Comprehensive Site Assessment Report, Nomans Land Island, Chilmark, MA, November 2000. These comments are provided as part of our intragency agreement for cross-programmatic support of contaminant-related issues. We have discussed our thoughts and findings concerning the Phase II Report with FWS Refuge personnel. The main components are as follows:

Sampling of surface soils, surface water and sediments to date has been limited in areal coverage.

- surface soil sampling has been limited to four known or suspected source areas and a few potential background areas within the eastern third of the island
- inland surface water and sediment sampling has been limited to a few water bodies that are most directly associated with the known source areas and background locations

We suggest that you conduct an expanded survey to determine the areal extent of contamination for the three media to include:

- additional surface soil locations in both the western complement of the island subjected to aerial gunnery and bombing and the eastern no-bomb zone
- additional shoreline sediment locations within water bodies previously sampled

- additional inland water bodies for surface water and sediments
- offshore/mid-pond sediment locations for inland ponds; at a minimum, this should include those ponds previously sampled for potential impacts
- additional surface and sub-surface soil locations in the four source areas, both vertically and horizontally.

Additionally, evaluation of site-specific effects needs to be conducted rather than solely relying on the standard literature-based benchmark comparisons. Current data suggest that the elevated contaminants detected in some locations may merit removal based on literature values. It would be beneficial to proceed with the following studies to determine how site-specific conditions compare to literature-based risk levels.

- surface soil toxicity testing with soil invertebrates and/or plants
- surface water and/or sediment toxicity testing with aquatic invertebrates

Future activities on the island may also warrant assessing upland and wetland plant tissue concentrations/uptake in areas of highest potential concern.

For further comments or questions please contact Kenneth Munney at 603-223-2541

Sincerely,



Kenneth Carr

Kenneth Carr
Assistant Supervisor
New England Field Office