



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEANIC SERVICE
OFFICE OF OCEAN RESOURCES CONSERVATION AND ASSESSMENT
HAZARDOUS MATERIALS RESPONSE AND ASSESSMENT DIVISION
COASTAL RESOURCES COORDINATION BRANCH
c/o U.S. Environmental Protection Agency (H-1-2)
75 Hawthorne Street
San Francisco, CA 94105-3901

October 7, 1997

Mr. Mike Radecki
Remedial Project Manager
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132

Dear Mr. Radecki:

Thank you for the opportunity to comment on the "Draft Final Remedial Investigation (RI) for Site 7" of the Long Beach Naval Shipyard. The draft final report is greatly improved over the 1996 draft and National Oceanic and Atmospheric Administration (NOAA) largely concurs with the findings of the report. The great majority of NOAA's comments and concerns regarding the draft RI report have been addressed satisfactorily. NOAA appreciates the Navy's efforts to address the concerns of their co-trustees at this site and looks forward to continuing to work with the Navy in the future at this site.

There are only a few remaining issues I would like addressed for the final report regarding the analyses presented in the draft and draft-final report.

Adequacy of reference station 40010 and SEZs

Section 3.7.1 provides an incomplete summary of the regulatory agencies' and trustees' concerns regarding the analyses used in the draft RI and only partially covers subsequent discussions. For example with respect to station 40010, Section 3.7.1, page 3-41 states that the agencies and trustees met on April 15, 1997 and "jointly decided that there was not a strong enough basis to eliminate this reference station." There were many factors involved in retaining reference station 40010. One factor was the relatively good performance of the bioassay tests. The agencies also evaluated this station based on exceedences of NOAA sediment guidelines. Lastly, the agencies considered the Navy's agreement to use more conservative comparisons for a station-by-station basis by using the reference maximum.

In order to simplify the text, NOAA recommends that the discussion in section 3.7 from pages 3-39 through 3-41 be moved to an appendix. The appendix should include the agencies' memoranda and the Navy's meeting notes. The actual text of the RI should be limited to describing the data analyses that were actually used. If SEZs were not used in the RI, they should not be discussed in the main body of the RI.



Use of the reference station data for the ecological risk assessment

At the April 28, 1997 meeting, NOAA agreed with the Navy's approach to categorize stations based in part on the ratio-to-reference (RTR) for sediment chemistry. However, for the purposes of the ecological risk assessment, the Navy should make clear that the Navy's analysis of the reference areas' performance leads them to conclude that reference stations represented areas of low ecological risk based on bioassay performance and sediment chemistry. From NOAA's perspective, Station 40010 had elevated chemistry compared to the other stations and had poor benthic community performance, but NOAA agrees that using the reference station maximum (rather than a 95% UPL) was appropriately conservative so as to represent a low level of risk when used for a station-by-station comparison in the ecological risk assessment. The best place for such a statement is in section 6.4.1.

Editorial comments

Page 4-29. For white croaker whole body tissue samples, text should clarify that TBT concentrations in the West Basin were statistically significant.

Table 4-55 and 4-56 are unclear. No data given for reference stations, or is way back in table 4-15. Table should be clear regarding any statistics (ANOVA) performed.

Page 4-38 (Section 4.6.1). If the results of this grouping was not really used, it is confusing to use this in report. Suggest that it be included only as an appendix, referenced through Section 3.

Page 6-16 and 17, "Effects Range Analysis". Appendix S does not include this analysis.

Page 6-22, 2nd sentence. Adverse effects to fish cannot be ruled out, because of external physical appearances.

6-23, under Clam bioaccumulation. Correlation between sediment and tissue chemistry probably not meaningful with so few stations, especially for chemicals like pyrene.

Page 6-30. Under the "Preponderance of Evidence" section, Table 4-66 is cited. That should be Table 4-68.

If you have any questions or concerns regarding these comments, please do not hesitate to call me at (415) 744-1893.

Sincerely,



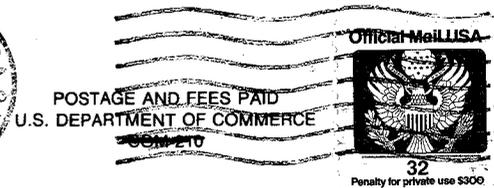
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