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Indian Head, Maryland 20640

Captain T. L. Honey  
Area Operations Officer  
Naval District Washington, West Area  
101 Strauss Avenue  
Indian Head, MD 20640-5035

April 6, 2004

RE: Final Mattawoman Creek Study of January 2004

Dear Captain Honey:

This is in reply to the request for comments in your letter to me of February 9, 2004 relative to the above referenced subject.

Since many of the comments in my letter of July 25, 2001 to Mr. Shawn Jorgensen relative to the Draft Work Plan for Mattawoman Creek, dated March 2001 are reinforced by the conclusions and recommendations in the January 2004 Mattawoman Creek Study I have enclosed a copy of my letter to Mr. Jorgensen and ask that it be a part of the background information and record relative to this Final Mattawoman Creek Study.

I would like to site several comments and recommendations noted in the report that deserve particular emphasis.

***I- Human Health Risk Assessment--As a member and community representative of RAB I am particularly concerned about the potential health risk to members of the community from the ingestion of fish from the Mattawoman. Pages 6-34 and 7-5 cite the following:***

1. The incremental cancer risk for ingestion of fish by adult recreational users exceeded EPA's target risk range of  $10^{-4}$  to  $10^{-6}$  for both the RME (Reasonable Maximum Exposure) and CTE (Central Tendency Exposure) scenarios. Arclor-1260 was the major contributor to the incremental cancer risk for ingestion of fish from Mattawoman Creek
2. The hazard indices for ingestion of fish by adolescent and adult recreational users exceeded the acceptable level of 1, 2-Amino-4, 6-dinitrotoluene and 4-methylphenol was the major contributor to the HI (Hazard Index) for ingestion of fish from Mattawoman Creek.
3. The hazard indices for ingestion of fish by adolescent and adult recreational users are subject to uncertainty because only three background fish fillet samples were collected so a statistical comparison to background could not be performed during the selection of COPC's (Chemical of Potential Concern). Consequently, no chemical was eliminated as a COPC on the basis of background.

***Comment: Many residents of the community who ingest fish from Mattawoman Creek would not consider themselves "recreational users." Many depend upon***

*fish caught from the Mattawoman as part of their regular diet and the Mattawoman as a primary food source.*

***Recommendation:*** *I strongly urge that the sampling of fish be expanded to more accurately measure the Human Health Risk Assessment by ingestion. The concern for protecting the health of our neighboring residents should be an item of high priority.*

**II- Conclusions and Recommendations--** *I strongly support the 7.4 Recommendations identified on page 7-8 of the report.*

“Based on the results of this Mattawoman Creek Study, it is recommended that consideration be given to the following:

- Sediment sampling to define Navy-related contaminant concentrations in additional depositional locations within the study area.
- Surface water and sediment sampling in locations of high recreational activity to better define potential human health risks resulting from Navy activity. (Note: members of RAB at a recent RAB meeting identified specific locations on maps. These areas include recreational areas off the south shore of Mattawoman Creek particularly near Gray’s Beach, the residential housing accessed by Willoby Lane and the area around Thoroughfare Island.)
- In areas where potential risks to benthic macroinvertebrates from chemicals in the sediment have been identified (areas 1,4 and 5), collect additional data necessary to reduce the uncertainties in the risk determinations.
- Human health and environmental risks should be reevaluated after accepted perchlorate reference doses become available.”

**III- I also strongly support the statement in the 8.4 Summary on page 8-20 of the report:**

“Chemicals within Mattawoman Creek may move by dissolving in the water column and moving with the current. Also, sediment containing chemicals can be transported to other parts of Mattawoman Creek and even the Potomac River by force of currents in the Creek.”

*In other words additional sediment sampling is necessary to address these concerns.*

Thank you for the opportunity of commenting.

Sincerely,



Elmer S. Biles  
Community Member RAB  
301 283 6298

cc: letter to Shawn Jorgensen of July 25, 2001