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U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.
National Ocean Service
Office of Response and Restoration
c/o EPA Office of Site Remediation and Restoration (HIO)
1 Congress Street
Boston, MA 02114
16 June 2004

Ms. Kymberlee Keckler
U.S. EPA Office of Site Remediation and Restoration
1 Congress Street
Boston, MA 02114

Dear Kymberlee:

Thank-you for the invitation to attend the CSTAG meeting of 15 July 2004 to discuss the Centredale Manor/Woonasquatucket River Superfund site. NOAA has had the opportunity to review most/all of the EPA-authored documents including the recent Ecological Risk Assessment. NOAA's concern at this site is either the downstream migration of contaminated sediment (e.g., dioxin) or the migration over the downstream dam of natural resources of trust to NOAA.

1. EPA used the former Dyerville Dam as the downstream edge of the site (downstream of Exposure Area 4). Because, as stated, a dam no longer exists here, it seems reasonable to assume that contamination may have moved further downstream. Therefore we question the location of the downstream boundary. NOAA does point out that a year 2000 sampling event noted only one of eleven sediment samples just upstream of the former Dyerville Dam showed an elevated concentration (1.01 ppb TEQ). But we would like some discussion on downstream migration given the removal of the dam and pond in Dyerville. Note also, the pond behind the former Dyerville Dam is shown on EPA drafted maps but no longer exists.

1A. Secondly, NOAA is unclear on how many impassable dams exist below the former Dyerville Dam. We are aware that one exists at the mouth of the Woonasquatucket River where it meets the Providence River estuary but we are unclear of others downstream of the EPA site boundary. Are there plans to remove the downstream dam(s)? If so, are anadromous fish threatened if EPA does not complete a comprehensive clean up?

2. The Ecological Risk Assessment chose appropriate assessment endpoints covering invertebrates (aquatic and terrestrial), demersal fish, pelagic fish, and a variety of wildlife. The associated measurement endpoints also include appropriate comparisons to water, sediment, and tissue quality criteria/TRVs, as well as site-specific population assessments and toxicity studies. However, one major concern is the reliance placed on the limited site-specific data; for example, the benthic community evaluation. In that section, the ERA establishes substantial and consistent exceedances of surface water and sediment quality criteria, as well as substantial and fairly consistent toxicity in laboratory



bioassays. The field studies, however, also noted basically unimpaired benthic communities at the site. The ERA gave most weight to the latter studies and concluded that the benthic community was not at substantial risk from the releases. However, the benthic community samples were not collected synoptically with the bioassay samples, but rather were collected by kick-net from "free-flowing" portions of the river, i.e., areas expected to have the sediments that are coarser and with lower TOC compared to depositional areas. The latter areas were sampled for the bioassays. The taxa observed appeared to be dominated by those associated with coarser substrates. The differences in locations and substrate sample make the "weight of evidence," biased toward the limited data that are arguably from areas of lower contamination than others.

NOAA is ambivalent concerning an oral presentation; although, we would like the CSTAG to take these comments seriously. If you think NOAA's points discussed herein would be received better if presented verbally, I would be happy to do so.

Sincerely,



Kenneth Finkelstein, Ph.D.