



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.
National Ocean Service
Office of Ocean Resource Conservation and Assessment
Hazardous Materials Response and Assessment Division
c/o EPA Office of Site Remediation and Restoration (HIO)
J.F. Kennedy Federal Building
Boston, MA 02203
30 January 1997

Ms. Susan Svirsky
U.S. EPA Office of Site Remediation and Restoration
J.F. Kennedy Federal Building
Boston, MA 02203

Dear Susan:

Thank you for the Baseline Ecological Risk Assessment (April 1996) and Remedial Investigation Reports (June 1993/April 1996) for the Stratford Army Engine Plant Stratford, CT. I spent relatively little time reviewing the documents, rather, my brief inspection assesses that NOAA is concerned that trust resources are likely at risk by past facility releases. Hence, NOAA would like to become actively involved in the planning and reviewing of future studies, along with subsequent negotiations and settlement activities with the Army.

The Ecological Risk Assessment clearly shows that the benthic community is at risk. Both the toxicity test results and the community analysis demonstrates risk. Elevated inorganic and organic sediment concentrations were found in the intertidal environment. Oysters showed more modest chemical concentrations but elevated PCBs were found in one sample (IFT-2) that is nearby the extreme PCB sediment concentration of 130 mg/kg from station TC1. The Ecological Risk Assessment provides much valuable information but does not include fish tissue concentrations. It is puzzling that the authors preferred modeling to estimate chemical concentrations in Atlantic silverside rather than direct tissue analysis. Future studies should include tissue analysis possibly using *Fundulus heteroclitus*.

I look forward to working with EPA on this site.

Sincerely,

Kenneth Finkelstein, Ph.D.

cc: Rick Leighton
Mary Sanderson
Meghan Cassidy