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DEPARTMENT OF THE NAVY
PUGET SOUND NAVAL SHIPYARD
AND INTERMEDIATE MAINTENANCE FACILITY
1400 FARRAGUT AVENUE
BREMERTON, WASHINGTON 98314-5001

IN REPLY REFER TO:

5090
Ser 106.32/0482

DEC 10 2004

Department of Ecology
Water Quality Program

DEC 14 2004

Mr. Ken Koch
Water Quality Program
Washington Department of Ecology
POB 47600
Olympia, WA 98504

Dear Mr. Koch:

We have reviewed Washington State's Water Quality Assessment and offer the following comment.

We would like to call your attention to Washington State's Water Quality Assessment listing ID #8713. Assessment listing #8713 places grid cell 47122F6F3 (Sinclair Inlet) in category 5 for total PCBs in tissue. We recommend that this listing should be placed in category 4b (polluted waters that do not require a TMDL based on an existing pollution control plan) rather than category 5 for the following reasoning.

According to the Water Quality Assessment, grid cell 47122F6F3 is listed in category 5 based on 1994 data collected by URS Corporation indicating that polychlorinated biphenyls (PCBs) exceeded the National Toxic Rule criterion for the PCBs in mussel tissue and English Sole. This data was part of the Remedial Investigation/Feasibility Study (RI/FS) conducted for the Navy's Operable Unit B (OUB) marine site listed on the National Priorities List (superfund list). The Record of Decision (ROD) for this site determined that the PCBs in fish tissue were from sediments contaminated by historical practices and Remedial Action (RA) was initiated in 2000 to clean up the site. Since the samples included in listing #8713 were taken, the Navy has conducted remedial dredging and is monitoring the effectiveness of the cleanup as specified in the ROD. Since an existing cleanup plan consisting of the RI/FS, ROD, and RA are already in place to address the listing, we recommend that the list be placed in category 4b.

If you have any questions about this comment, please contact Mr. Bruce Beckwith, who can be contacted at beckwithb@psns.navy.mil, (360) 476-0118. Thank you for your assistance in this matter.

Sincerely,

S. S. RUPP
Head, Environmental Division
Environment, Safety, and
Health Office