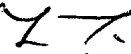


NOV 13 1992

Subj: Comments - Tutu Wells site - Draft Work Plan

From: Larry Tannenbaum 
Technical & Pre-remedial Support Section

To: Caroline Kwan, RPM
NYCSB2E

The Work Plan appears adequate. Because of its brevity, there may be room for it resulting in too minimal an effort as regards the ecological risk assessment. Specific comments follow:

1) page 2, 2nd paragraph: 'The Site was proposed for placement on the NPL in . . . '

2) page 2, Statement of Work, 4th bullet, and page 7, section 2.1.8: These two paragraphs do not provide the complete list of documents that need to be followed in order to result in an acceptable ecological assessment. They lack the supplementary guidance series to RAGS Volume II - "Eco Updates", of which there are five at the present time. Numbers 2 and 4, are quite critical to the eco assessment being properly performed and structured.

3) page 4, last paragraph: this paragraph is too brief for my liking. For the purposes of a properly conducted eco assessment, it's not clear that the level of effort is sufficient. Specifically, a singular site visit will probably not be adequate. Usually at least two does the trick. The season of the visit(s) is critical, as is the actual day/night time(s) spent walking the site. The credentials of the wildlife types doing the work needs to be presented. The paragraph should be open to animal collections if need be. The level to which organisms are described (i.e., keyed out) may be an issue. Wetlands, if present, will need to be delineated. It's not overtly clear that they too will be identified, etc. under this task.

4) page 5, Task 6, and page 7, section 2.1.6.6: it's not clear that eco will be given the same scrutiny as human health in the endangerment assessment. As I read through the work plan, I have every reason to believe that the chemicals of concern will be the same for both assessments (note that Contaminant Identification, for example is described only one. I assume this step will be carried out for both human and eco.) I suggest, at the least, a sentence to the effect that the eco assessment will be structured as per the Eco Update guidance i.e., broken out following the four steps that make up the process, beginning with "Problem Formulation".

5) page 9: related to the above comment, why is eco not broken out in similar fashion to human evaluation. For example, where is the 'eco' equivalent of the bullet point of item D. Can we be sure that appropriate toxicological data, in appropriate literature will be used, etc?

cc: V. Pitruzzello, PSB
M. Hauptman, NYCSB2E ✓
Files