MetroWest
Growth Management Committee

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Ken Soderholm, Co-Chairman, Natick Planning Board
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Jennifer Raitt, Interim Director
Andrew Flanagan, Assistant Planner

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September 30, 2009

Daniel Keefe
Massachusetts Superfund Section
U.S. EPA - 1 Congress Street
Boston, MA 02114

RE: Comments on the Sudbury River Supplemental Baseline Ecological Risk Assessment

Dear Mr. Keefe,

As you know, the MetroWest Growth Management Committee is conducting a project related to the impacts of the Nyanza Superfund site on the Sudbury River. The MetroWest Nyanza Advisory Committee has been established to oversee this project on behalf of the towns of Ashland, Framingham, Southborough, and Wayland. The project is funded by the MetroWest Community Health Foundation.

A major part of this project is the review of a series of technical documents published by EPA regarding the impacts of Nyanza on the Sudbury River. MetroWest has procured the services of Exponent to conduct these reviews. Exponent has previously commented on the Human Health Assessment, and we appreciate EPA's response to that review. I write today to comment on the Supplemental Baseline Ecological Risk Assessment. Our comments are summarized in the attached document from Exponent. As the review states, Exponent finds that the risk assessment is detailed and comprehensive and the conclusions are reasonable. The comments provided are largely related to suggestions to strengthen the rationale for several of the assessment's conclusions, and more clearly explain some of the data.

We appreciate the efforts that EPA is making to address the challenges posed by contamination of the Sudbury River by the Nyanza site, and we look forward to reviewing the cleanup plan when that is released. Thank you for the opportunity to comment on this important document.

Sincerely,

Martin Pillsbury
Chair, MetroWest Nyanza Advisory Committee

cc: Charles Gaffney, MetroWest Co-Chairman, Southborough Planning Board
Ken Soderholm, MetroWest Co-Chairman, Natick Planning Board
Susan Kane-Driscoll, Exponent

SDMS DocID 449088

Comments on the Supplemental Baseline Ecological Risk Assessment
By Exponent on behalf of the MetroWest Nyanza Advisory Committee

In general, we found the risk assessment to be detailed and comprehensive and the conclusions of the Ecological Risk Assessment to be reasonable. The site characterization data in the SBERA constitute one of the largest and most comprehensive data sets collected for a contaminated site.

Major comments:

- The conceptual model for the Supplemental Baseline Ecological Risk Assessment (SBERA) identifies the most important potential routes of exposure and ecological entities, but generally lacks a detailed discussion of the rationale for the selection of specific assessment endpoints and exclusion of others, such as herbivorous mammals, reptiles, and amphibians.
- We found that the rationale used to reach the risk conclusions presented in the Executive Summary and Risk Characterization (Section 4.4) was not clearly presented. Specifically, the relationship of the risk findings presented in Tables 4-61 to 4-71 in the SBERA to the risk conclusions is confusing. It appears that although certain lines of evidence indicate risk for certain receptors, sufficient confidence is not placed in these lines of evidence to support a conclusion of risk. The wording of the Executive Summary and Risk Characterization should be changed to acknowledge that although various lines of evidence indicate elevated risk, levels of confidence in only certain of the lines of evidence are sufficient to support a risk conclusion of a likelihood of adverse effects above baseline.
- The Executive Summary and the Risk Characterization discuss various issues related to the final risk conclusions, including uncertainties related to the lines of evidence, lack of concordance among lines of evidence, and issues related to regional levels of mercury. The SBERA concludes that that the "results of the SBERA do not indicate that mercury contamination resulting from Nyanza Site discharges are likely to result in population-

level risk to ecological receptors residing in or using the Sudbury River." In general, we agree with the conclusions of the risk assessment, but feel that this statement does not clearly convey the findings of the SBERA. It would be clearer to state that, based on the results of the SBERA, one cannot conclude with a high level of confidence that any populations are at risk from exposure to mercury.

Minor comments:

- It would be helpful if the SBERA provided one table that summarized the various "lines of evidence" and types of organisms considered for each reach of the river, because these vary from reach to reach, depending on the availability of data for the various reaches. Rationale for the lack of certain types of evidence for certain reaches should be presented more clearly.
- We note that the risk matrix does not present any scenarios for which risk is considered "probable." This presumably reflects the uncertainties underlying the lines of evidence that are included in the SBERA. Nonetheless, the risk matrix seems incomplete without inclusion of a scenario that could be used to identify circumstances that result in a probable risk, should such risks exist.