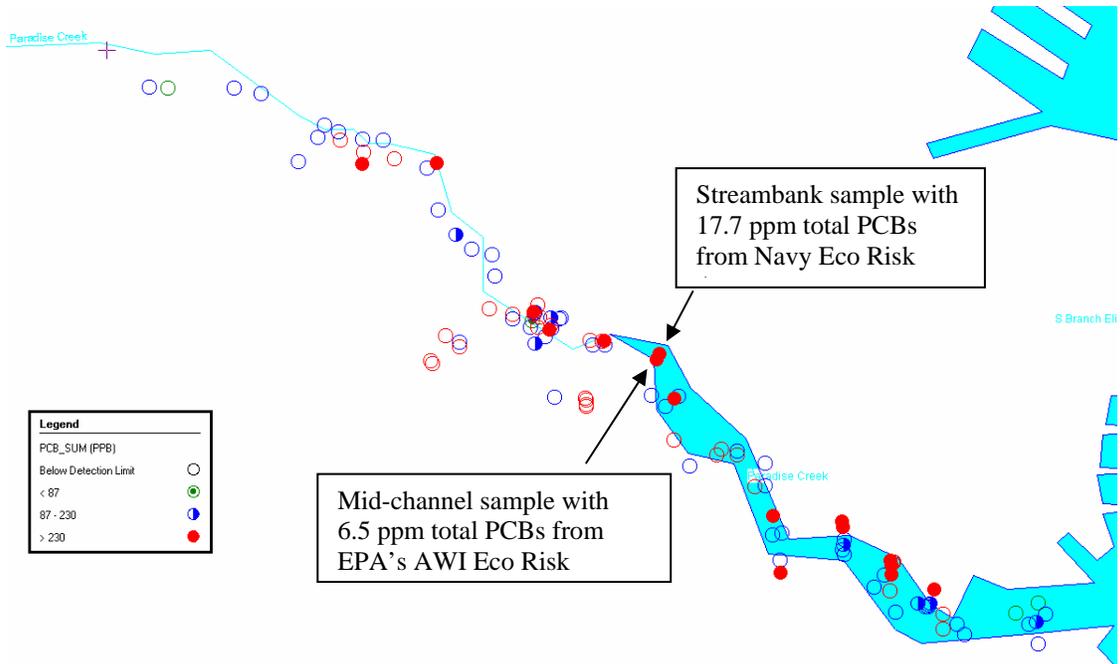


Attachment C

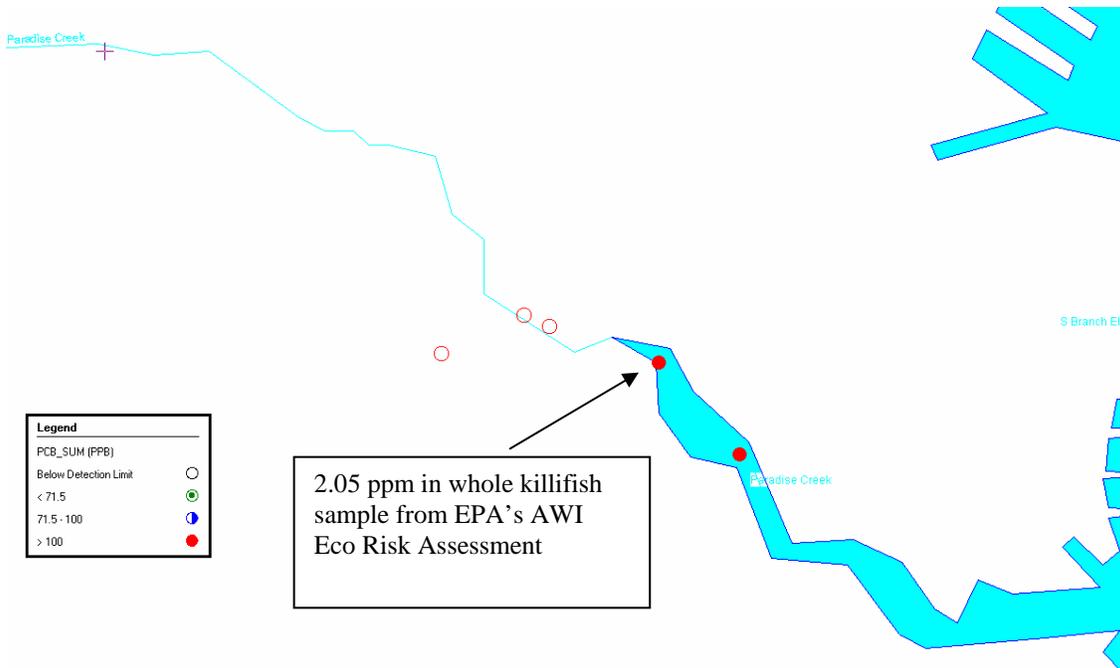
Communication from
National Oceanic and Atmospheric Administration,
A Trustee for Natural Resources including Paradise
Creek

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Surficial Sediment total PCBs (ppb)



Tissue analyses of total PCBs

The samples highlighted above are the highest total PCB values recorded for their respective media (sediment and tissue) among all samples collected throughout the entire Elizabeth River watershed, as reported among 31 various references compiled in the NOAA Elizabeth River Watershed Database and Mapping Project (NOAA, 2003). These occur immediately off the Peck property drainage channel. These particular samples were reported in EPA's Ecological Risk Assessment for the Atlantic Wood Industries (AWI) site (Lockheed Martin REAC, 2002) and the US Navy's Ecological Risk Assessment for Paradise Creek (CH2MHill, Baker Environmental, CDM, 2000). To put these values in perspective, the concentration of PCBs in the shoal sample is nearly two orders of magnitude greater (~100 times more) than those associated with adverse impacts to benthic biota (ER-M value = 0.18 ppm). And the tissue value exceeds the FDA action level.

The shoal sample also contains the highest concentrations of chromium and nickel among all 250 sediment samples from the entire watershed. Levels reported for other metals in this shoal sample, including copper, lead, mercury, silver, and zinc, are among the highest reported for the watershed. Cadmium and lead in the channel sample are also among the highest levels reported.

These data indicate a significant exposure to biota of Paradise Creek, plus evidence of transport into the food web of this riverine system. It should be noted that recreational fisheries do exist on this river. Thus, these data may reflect a significant vector for human health risk as well. These exposures constitute a high probability of ecological risk to the ecological receptors of Paradise Creek and the Elizabeth River, to the aquatic food chain, and to the habitat. NOAA, in its role as a trustee for natural resources, considers exposures of this magnitude reflective of significant ecological endangerment. This also potentially represents significant natural resource injury liability and the potential for referral to NOAA's Damage Assessment Center for Natural Resource Damage Assessments (NRDA).