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**SCREENING LEVEL ECOLOGICAL RISK  
ASSESSMENT**

**11/24/93**

**USEPA/DOE-FN  
15  
COMMENTS  
OU5**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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H-1060

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DEC 1 10 09 AM '93

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REPLY TO THE ATTENTION OF:

Mr. Jack R. Craig  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Screening Level Ecological Risk  
Assessment

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Fernald Environmental Management Project Screening Level Ecological Risk Assessment for the Sitewide Risk Assessment. Although, the document is thorough and concise, the discussions of the results present several issues that must be resolved.

Therefore, U.S. EPA hereby disapproves the Screening Level Ecological Risk Assessment pending incorporation of the attached comments.

Please contact me at (312) 886-0992 if you have any questions.

Sincerely,

James A. Saric  
Remedial Project Manager

Enclosures

cc: Graham Mitchell, OEPA-SWDO  
Pat Whitfield, U.S. DOE-HDQ  
Nick Kaufman, FERMCO  
Jim Thiesing, FERMCO  
Paul Clay, FERMCO

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: November 3, 1993

SUBJECT: Screening Level Ecological Risk Assessment  
Fernald Environmental Management Project, Ohio

FROM: Eileen Helmer, Ecologist *EHelmer*  
Technical Support Section

TO: Jim Saric, RPM  
ON/MN Technical Enforcement Section

I reviewed the above mentioned document and have the comments which follow. Overall the screening is thorough yet concise, and for that the authors are to be congratulated. However, its discussions of results have some major shortcomings, which constitute the majority of my comments. The risk assessment screening will in no way be acceptable unless its conclusions truly reflect not only the existing ecological risk in the ecosystems of concern, but the potential impacts of the site source areas on these ecosystems. Current risks may not merit physical disturbance of the ecosystems affected because risks do appear low (relative to disturbances which would be expected from remedial activities there). Yet, the screening combined with previous studies indicate that (1) source areas clearly merit remediation and (2) at least one exposure pathway merits field investigation.

Executive Summary - In fact, contrary to what is stated here, at least one study of Robins found a possible problem (though I realize that later studies contradicted those findings). In addition, the Facemire et al. (1987) study indicated aquatic community impacts in Paddy's Run below the site; the presence of the state threatened Cinninnati crayfish (also called Sloan's crawfish, *Orconectes sloanii*); the potential for presence of the Indiana bat (*Myotis sodalis*); riparian usage by the Northern Waterthrush (*Seiurus noveboracensis*); and wintering habitat for Dark-Eyed Junco (*Junco hyemalis*).

The Fernald property may best be left as a natural area, given that (1) the residual contamination found in the environmental media of Operable Unit 5 could pose too much risk for an agricultural or residential future scenario; and (2) fair ecological resources have been documented there.

The executive summary should reflect these ecological resources and the current and potential site impacts.

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Page 2-3, top of page - Although not included as a benchmark, surface water and sediment samples should be explicitly compared with background (upstream) levels for Paddy's Run (as well as the Miami River) throughout the evaluation.

Page 2-13, last para, final surface soil COCs - Mercury should be included with the final COCs since no samples have apparently been collected and from the aquatic data, and a site source exists (data from Site-Wide Characterization).

Page 2-28, last para, sect. 2.4.1 - This discussion, along with the discussions for several other contaminants, is misleading and therefore must be revised to be acceptable. While it correctly states that risk might be overestimated because surface water concentrations are for unfiltered samples, it misleads the reader by not stating that in fact sometimes 90% or more of total metals in surface water samples are filterable, or "dissolved." Also, interestingly for aluminum in particular, the toxicity of precipitating aluminohydroxides can cause the greatest biota (fish) problems. That aspect of Al ecotoxicology could be addressed here; however, for this site it is likely not relevant unless discharges containing aluminum are undergoing pH change.

Page 2-29, 2nd paragraph on Cd - This discussion fails to but must recognize that cadmium levels are increased in Paddy's Run downstream from the site, where benchmark levels are exceeded. The conclusion should be drawn that the site contributes to any ecological risk present from cadmium.

Page 2-31, last paragraph on Ag - As with the cadmium discussion, silver in surface water increased downstream from the site and any ecological risk present from silver in Paddy's Run is contributed to by the site. The document should clearly state the former, rather than only stating that contaminants in the Miami River are *not* associated with the site (on the top of page 2-32). The lack of such a discussion relevant to Paddy's Run indicates a bias in the document's discussions.

Page 2-33/34, discussion of cadmium in sediments - Another discussion bias is indicated here. While the upper 95% confidence level (a value which is often higher than the maximum value of a data set) of background aluminum samples is used to show that sediment aluminum levels are *not* that high; the upper 95% confidence level of cadmium in sediment samples is not considered in concluding that the quotient value of 1.10 is not a problem. To correct this problem, please discuss this quotient value in terms of the numbers and concentrations of other sediment cadmium data.

Page 2-33, uranium in sediment - State that toxicity testing would be necessary to evaluate uranium toxicity in sediment here, and that the site apparently contributes uranium to Paddy's Run. Also, please state the basis for the sediment contaminant of concern (COC) for uranium selected from the EPA 1993 document.

Page 2-34, last para, uranium in soils - If possible, an explanation should be provided regarding the very high soil uranium levels detected. Since concentrations ranged up to 4000 mg/kg, that should be stated instead of the stated range of up to 579.3 mg/kg.

Page 2-36, summary - Mercury should be included as a possible soil COC.

Page 3-17, insect ingestion pathway - Because of the potential importance of the insect ingestion pathway to mice and to insectivorous avian species, this pathway merits a site-specific field investigation. Recall that the Facemire et al. (1987) study noted an absence of insectivorous bird species, and such a study could also help to clarify the possible risk to vermivorous birds (Robins). The document should be re-worded to indicate the need for such an investigation.

Page 4-2, last para, summary and conclusions - Revise this discussion as per all of the above comments.

Page 4-3, last para - Revise to read: "The results of the SLERA indicate continued release of contaminants associated with activities occurring at the FEMP would continue to adversely impact on-site or off-site ecological receptors, resulting in continued degradation of the aquatic community and ecosystem of Paddy's Run. These results are consistent with results of past studies that have indicated a degraded benthic macroinvertebrate community and lowered fish diversity downstream from waste areas (Facemire et al. 1987)."

Because of the presence of a state-threatened crayfish in Paddy's Run, a monitoring program should be undertaken or continue throughout remedial activities. Feasibility studies should address prevention of sediment- or (and chemically-) contaminated run-off release to Paddy's Run. In addition, because the highest species diversity is present there, including avian diversity and the possible presence of Indiana bat habitat in the riparian zone, precautions to safeguard and potentially enhance the Paddy's Run riparian community should be part of feasibility studies.

If you have any questions or need any additional information, please contact me at 6-4828. Also, please take the time to complete the attached critique sheet and return it to Steve Ostrodka (HSRLT-5J). These sheets help us to evaluate how to be most helpful to RPMs and the Superfund process.

cc: Steve Ostrodka, TSS  
Barb Mazur, HRE-8J  
Wayne Gorski, WQ-16J  
Bill Kurrey, USFWS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

MEMORANDUM

DATE: November 2, 1993

SUBJECT: Comments on the Screening Level Ecological Risk Assessment for the Site-wide Ecological Risk Assessment of the Fernald Environmental Management Project

FROM: Barbara Mazur, <sup>Bzm</sup> Ecologist  
RCRA OH/MN Technical Enforcement Section

TO: Jim Saric, Project Manager  
RCRA OH/MN Technical Enforcement Section

I have reviewed the Screening Level Ecological Risk Assessment (SLERA) for the Site-wide Ecological Risk Assessment of the Fernald Environmental Management Project (FEMP), Fernald, Ohio. The report is generally acceptable as presented but I have a few concerns which are listed below.

General Comments:

1. In the Site-Wide Characterization Report (March 1993) for the FEMP, some of the field studies described in the Ecological Assessment Section (pages 6-101, 6-109, and 6-110) found differences in vegetation and wildlife on-property versus off-property. These differences have not been discussed in any subsequent documents and the SLERA makes no mention of any such observed differences. The conclusion of the SLERA is that the terrestrial and aquatic organisms are typical of populations of the area and have not been adversely impacted. Some mention of previously documented population differences and the reasons for discounting the differences as adverse impacts should be included in the SLERA.
2. The SLERA report does not indicate what steps will be taken to confirm that the Indiana bat (Myotis sodalis) does not occur at the FEMP site. Appendix A of the SLERA states that additional studies are necessary to determine whether or not the Indiana bat is present at the site, but the SLERA report does not acknowledge this point.

Previously, in the Site-Wide Characterization Report (March 1993), Appendix G, it was determined that areas classified as good habitat, which includes some areas along Paddys Run, "should be considered to have high potential for containing Indiana bats." During the field survey for the Indiana bat, echolocation equipment did detect bats of the genus Myotis at three sampling locations where no Myotis spp. were captured,

possibly because of acknowledged problems with positioning the mist nets. Therefore, additional information must be provided before the presence of the Indiana bat at the FEMP site can be discounted.

3. Throughout the document there are references to a drinking water maximum contaminant level (MCL) for lead. There is no longer a MCL for lead in the Federal drinking water regulations and none is proposed. Instead, an "action level" of 5 ug/l has been established for lead. Therefore, the references to a proposed MCL for lead should be corrected to refer to the action level.

Specific Comments:

1. Page 2-1, Paragraph 3 - The last sentence incorrectly defines bioavailable concentration of a chemical. Bioavailability refers to the extent to which a chemical can be ingested, absorbed or assimilated by an organism. Bioconcentration is the net uptake of a chemical by organism.
2. Page 2-29, Paragraph 2 - The last sentence states that cadmium in the Great Miami River samples is not associated with FEMP activities. Supporting documentation should be provided.
3. Page 2-29, Paragraph 4 - Lead does not have a proposed MCL. The drinking water action level has been set at 5 ug/l for lead.
4. Page 2-30, Paragraph 0 - The last word of the second full sentence should be changed from MCL to "action level".
5. Page 2-32, Paragraph 1 - In the third sentence, "proposed MCL value" should be changed to read "drinking water action level".
6. Page 4-2, Paragraph 4 - This paragraph, which continues on page 4-3, should be reworded to more clearly identify the contaminants of concern for the surface water and sediments of Paddy Run and the Great Miami River.
7. Table D-13 - Footnote b is incorrect. Lead and copper do not have maximum contaminant levels (MCLs), rather they have action levels.
8. Tables D1 - D11, Note 4 (immediately following Table D11) - The notation is incorrect, in that lead and copper do not have proposed MCL values. They have final action levels which are equal to the BTV numbers shown (i.e., the final action level for lead is 5 ppb).

9. Appendix H - The pages of Appendix H should be numbered for easier reference.

I have also attached a marked-up copy of the comments from PRC Environmental Management, Inc. There are a few corrections which need to be made to that set of comments.

cc: K. Pierard

HRE-8J:BMAZUR:11/2/93

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COMMENTS ON THE "SCREENING LEVEL ECOLOGICAL RISK ASSESSMENT  
FOR THE SITEWIDE ECOLOGICAL RISK ASSESSMENT"  
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA  
Section #: General  
Original General Comment #: 1

Page: NA

Commentor: Saric  
Paragraph: NA

Comment: The report appears to be adequately prepared, reasonably comprehensive, and consistent with current U.S. EPA guidance. However, the only U.S. EPA guidance cited is unpublished 1977 U.S. EPA Region 5 guidelines for conducting ecological assessments discussed with a U.S. EPA Region 5 Biological Technical Assistance Group (BTAG) representative in a February 1993 meeting. The reference list indicates that this U.S. EPA Region 5 guidance is dated 1977. U.S. EPA has developed several more recent guidance documents for ecological risk assessments, including "Risk Assessment Guidance for Superfund, Volume 2, Environmental Evaluation" (Office of Solid Waste and Emergency Response Directive 9355.3-01, EPA/540/6-89/004). The report should be revised to cite more current U.S. EPA guidance in addition to the 1977 guidance.

Commenting Organization: U.S. EPA  
Section #: General  
Original General Comment #: 2

Page: NA

Commentor: Saric  
Paragraph: NA

Comment: The report interchangeably uses the terms "ecological receptors" and "ecoreceptors." The report should be revised to use one term consistently.

Commenting Organization: U.S. EPA  
Section #: General  
Original General Comment #: 3

Page: NA

Commentor: Saric  
Paragraph: NA

Comment: Toxicity quotient values in the SLERA are presented with up to five significant figures (for example, 112.62). U.S. EPA's "Risk Assessment Guidance for Superfund" recommends that, because of their inherent uncertainties, risk estimates be reported with only one significant figure (for example, 1 E+02). Therefore, the SLERA should be revised to present toxicity quotient values with only one significant figure.

Also, the SLERA uses the toxicity quotient method only for surface water, stating that no similar method is available for other media. Because this is a screening level report, for the sake of being conservative the toxicity quotient method should also be used to

evaluate sediment and soil at the FEMP. The SLERA should be revised accordingly.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: General Page: NA Paragraph: NA  
Original General Comment #: 4  
Comment: The SLERA includes numerous citations of "(pers. comm.)." Each personal communication should be fully referenced, including the names, titles, and organizations of the persons involved in the communication and the date of the communication. The SLERA should be revised to properly reference all personal communications and to cite them clearly in text.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: General Page: NA Paragraph: NA  
Original General Comment #: 5  
Comment: Five references, including "EPA, 1985e"; "EPA, 1985f"; "EPA, 1986"; "Revis et al., 1981"; and "Schuurman and Klein, 1988" are apparently not cited in the text of the SLERA. The SLERA should be revised to include citations of these references or to eliminate them from the reference list.

**SPECIFIC COMMENTS**

Commenting Organization: U.S. EPA Commentor: Saric  
Section: Executive Summary Page: ES-2 Paragraph: 1  
Original Specific Comment #: 1  
Comment: The first sentence discusses "the area immediately east of the production area." The sentence should be revised to specify this area as Area C.

Commenting Organization: U.S. EPA Commentor: Saric  
Section: Executive Summary Page: ES-2 Paragraph: 0 and 3  
Original Specific Comment #: 2  
Comment: Based on Tables D-7 through D-11, lead, mercury, and silver were found in the Great Miami River and were retained as contaminants of concern. The first full sentence of paragraph 0 (the incomplete paragraph at the top of the page) on page ES-2, states that none of the contaminants identified in the Great Miami River appear to be related to activities at the FEMP. However, the first sentence in paragraph 3 suggests that lead, mercury, silver, and selenium may be associated with FEMP activities and may adversely impact on-site or off-site ecological receptors. Therefore, the first sentence in paragraph 3 appears to conflict with the first complete sentence of paragraph



Commenting Organization: U.S. EPA  
Section: 1.1.3.3  
Original Specific Comment #: 8

Commentor: Saric  
Page: 1-11  
Paragraph: 2

Comment: The second sentence states that the storm sewer outfall ditch (SSOD) originates east of the production area. However, Figures 1-3 and 1-4 show the SSOD originating south of the production area. The sentence or the figures should be revised as necessary to correct this inconsistency. Also, the fifth and sixth sentences of this paragraph refer to a retention basin. However, Figure 1-1 shows two retention basins. The sentences or the figure should be revised as necessary to correct this inconsistency.

Commenting Organization: U.S. EPA  
Section: 1.1.3.4  
Original Specific Comment #: 9

Commentor: Saric  
Page: 1-14  
Paragraph: NA

Comment: Figure 1-4 indicates that sampling locations W5 and W8 are off the figure to the north and south, respectively. However, there is no indication of how far off the figure these sampling locations are. The figure should be revised to indicate about how far off the figure sampling locations W5 and W8 are.

Commenting Organization: U.S. EPA  
Section: 1.1.3.6  
Original Specific Comment #: 10

Commentor: Saric  
Page: 1-15  
Paragraph: 3

Comment: The last sentence in this paragraph uses the term "SLERA.6", which is probably a typographical error. This sentence should be revised to use the term "SLERA."

Commenting Organization: U.S. EPA  
Section: 1.1.3.5  
Original Specific Comment #: 11

Commentor: Saric  
Page: 1-16  
Paragraph: NA

Comment: Figure 1-5 indicates that sampling locations W1 and W4 are off the figure to the northeast and southwest, respectively. However, there is no indication of how far off the figure these sampling locations are. The figure should be revised to indicate about how far off the figure sampling locations W1 and W4 are.

Commenting Organization: U.S. EPA  
Section: 1.2.1  
Original Specific Comment #: 12

Commentor: Saric  
Page: 1-19  
Paragraph: NA

Comment: Figure 1-6 presents the areas of greatest probable deposition of airborne particulates. The symbol in the legend is very difficult to read. The figure should be revised to provide a clear, legible legend.

Commenting Organization: U.S. EPA Commentor: Saric  
Section: 1.2.1 Page: 1-20 Paragraph: 2  
Original Specific Comment #: 13  
Comment: The third sentence includes the reference citation "(WMO 1990)." The reference list indicates that the reference citation should read "(WMO 1987)." The sentence or the reference list should be revised as necessary to correct this inconsistency.

Commenting Organization: U.S. EPA Commentor: Saric  
Section: 2.1.1 Page: 2-3 Paragraph: 1  
Original Specific Comment #: 14  
Comment: The second sentence of this paragraph indicates that contaminant values were compared to concentrations known to be potentially hazardous to aquatic and terrestrial biota. However, Section 2.2.1 (referred to in the second sentence) states that contaminant values were compared with protective levels. This sentence or Section 2.2.1 should be revised as necessary to correct this inconsistency.

Commenting Organization: U.S. EPA Commentor: Saric  
Section: 2.1.3 Page: 2-5 Paragraph: 3  
Original Specific Comment #: 15  
Comment: Unlike Sections 2.1.1 and 2.1.2, this section does not explain what benchmarks soil contaminant concentrations were compared to. This paragraph should be revised to briefly provide this information.

Commenting Organization: U.S. EPA Commentor: Saric  
Section: 2.2.1 Page: 2-9 Paragraph: 2  
Original Specific Comment #: 16  
Comment: This paragraph discusses calculation of surface water hardness. The paragraph refers to Appendix C for the formula used to calculate hardness; the formula requires calcium (Ca) and magnesium (Mg) concentrations as input parameters. The Ca and Mg concentrations used to calculate the hardness data presented at the end of the paragraph are not specified. This paragraph and Appendix C should be revised to clearly state what Ca and Mg concentrations were used and whether mean or maximum values were used.

Commenting Organization: U.S. EPA Commentor: Saric  
Section: 2.2.2 Page: 2-11 Paragraph: 1  
Original Specific Comment #: 17  
Comment: This paragraph states that Effects Range-Low (ER-L) and Effects Range-Median (ER-M) have been used by various agencies as appropriate screening criteria. However, no specific agencies are identified. This paragraph should be revised to identify the various agencies.



493  
Commenting Organization: U.S. EPA  
Section: 3.2.3 Page: 3-9  
Original Specific Comment #: 23  
Comment: This paragraph includes the reference citation "(Scott and Crossman 1978)." The reference list indicates that this reference should be cited as "(Scott and Crossman 1973)." This paragraph or the reference list should be revised as necessary to resolve this inconsistency.

Commenting Organization: U.S. EPA  
Section: 3.4 Page: 3-15  
Original Specific Comment #: 24  
Comment: The second sentence of this paragraph states that "intermediate calculations" are presented in Appendix K. The phrase "intermediate calculations" implies that additional calculations will be forthcoming; however, no additional calculations are included in this report. This paragraph should be revised to clearly explain why the calculations are referred to as "intermediate."

Commenting Organization: U.S. EPA  
Section: References Page: R-3  
Original Specific Comment #: 25  
Comment: The reference beginning "EPA, 1977" is inadequate as presented. Not enough information is presented to identify and locate the document referenced. This reference should be revised to include at a minimum the document title and the party or parties responsible for the document. Also, the reference should include the document control number, if available.

Commenting Organization: U.S. EPA  
Section: Appendix A, Section 1.0 Page: 3  
Original Specific Comment #: 26  
Comment: Item (3) states that several species were listed as "special interest" and thus were not included in this appendix. This item should be revised to define the term "special interest" and to provide additional justification for excluding the red-shouldered hawk and cobblestone tiger beetle.

Commenting Organization: U.S. EPA  
Section: Appendix A, Section 3.2 Page: 6  
Original Specific Comment #: 27  
Comment: This paragraph includes an improperly placed hard return. The paragraph should be revised to eliminate this hard return.

Commenting Organization: U.S. EPA  
 Section: Appendix A, Section 3.9 Page: 9  
 Original Specific Comment #: 28  
 Comment: The last sentence of this paragraph includes the reference citation "(McCance, 1984)." The reference list indicates that the citation should read "(McCance et al., 1984)." The sentence or the reference list should be revised as appropriate to resolve this inconsistency.

Commentor: Saric  
 Paragraph: 3

Commenting Organization: U.S. EPA  
 Section: Appendix D Page: NA  
 Original Specific Comment #: 29  
 Comment: Tables D-13 through D-22 include parenthetical statements referring to Tables 10 and 11. These statements should be revised to refer to Tables D-10 and D-11. Also, Tables D-13 through D-22 do not indicate which contaminants were retained as contaminants of concern (COC). Tables D-13 through D-22 should be revised to indicate which contaminants were retained as COCs in a manner similar to that used in Appendix E.

Commentor: Saric  
 Paragraph: NA

Commenting Organization: U.S. EPA  
 Section: Appendix G Page: G-2  
 Original Specific Comment #: 30  
 Comment: This paragraph under the discussion of mercury includes the reference citation "(Rogers et al. 1984)." The reference list indicates that this citation should be "(Rogers 1984)." The paragraph or reference list should be revised as appropriate to resolve this inconsistency.

Commentor: Saric  
 Paragraph: 2

Commenting Organization: U.S. EPA  
 Section: Appendix H Page: NA  
 Original Specific Comment #: 31  
 Comment: The first equation under Item 2 includes the term "R." According to the description of terms below the equation, this term should be "R<sub>v</sub>." The equation should be revised to use the term "R<sub>v</sub>." Also, below the second equation under Item 2 is a citation reading "(from NOREG/CR-4370, vol 1)." Earlier in the SLERA, the phrase "NOREG/CR-4370" is associated with the citation "(Oztunali and Roles, 1986)." The citation under Item 2 apparently should be revised to incorporate "(Oztunali and Roles, 1986)."

Commentor: Saric  
 Paragraph: Item 2



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Reynoldsburg Ohio Field Office  
6950-H Americana Parkway  
Reynoldsburg, Ohio 43068-4115

IN REPLY REFER TO:

RECEIVED  
OFFICE OF RCRA  
WASTE MANAGEMENT  
EPA REGION 4

November 19, 1993

Ms. Barbara H. Mazur  
U.S. EPA, RCRA Enforcement Branch  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Dear Ms. Mazur:

We have reviewed the "Screening Level Ecological Risk Assessment for the Sitewide Ecological Risk Assessment" for the Fernald Environmental Management Project in Fernald, Ohio and offer the following comments:

1. On page 2-30, couldn't the amount of dissolved lead and other metals be determined by filtering the water samples? Since this appears to be an issue, this should probably be a part of future studies.
2. In part 3.3, it does not appear that any empirical data has been collected to validate the dose assumptions for the species under consideration. We believe that the model assumptions should be validated by radiological analysis of tissue in these species. Where models are used to estimate the concentrations of other contaminants of concern in species of fish and wildlife, appropriate chemical analyses should be conducted to validate the models. Model validation information specific to the Fernald site should be included in the Sitewide Ecological Assessment.
3. In Appendix H, Shiner Exposure Pathways, the "uptake of contaminants" model apparently does not include a factor for uptake from ingested material.

We would also like to endorse the November 3, 1993 comments of Eileen Helmer regarding the subject document. If you have questions or we may be of further assistance in this matter please contact Mr. Bill Kurey of this office.

Sincerely,

Bill Kurey  
Acting Supervisor