



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C. 20460

OFFICE OF THE ADMINISTRATOR
SCIENCE ADVISORY BOARD

October 14, 2005

EPA-SAB-CON-06-001

The Honorable Stephen L. Johnson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: EPA Science Advisory Board (SAB) Consultation on the Polychlorinated Biphenyl-Artificial Reef Risk Assessment

Dear Administrator Johnson:

The U.S. Navy and the State of Florida are planning to deploy the ex-Oriskany, a World War II era aircraft carrier, as an artificial reef in the Gulf of Mexico. In accordance with the Toxic Substances Control Act (TSCA) and its Federal PCB regulations (40 CFR part 761), the U.S. Navy has applied for and must obtain approval from EPA prior to sinking the vessel with non-liquid PCBs onboard. EPA's Region 4 and Office of Prevention, Pesticides and Toxic Substances (OPPTS) requested that the EPA Science Advisory Board (SAB) conduct a Consultation on the human health and ecological risk assessments prepared and submitted by the U.S. Navy.

Accordingly, SAB members — collectively referred to as the Polychlorinated Biphenyl-Artificial Reef Risk Assessment Consultative Panel (“Panel”) — met in a public meeting held in Washington, DC on August 1-2, 2005, to conduct a consultation. The focus of the SAB consultation included leaching studies of on-board PCB cable materials, fate and transport models known as the Time Dynamic Model (TDM) and the Prospective Risk Assessment Model (PRAM), used to address the characterization of potential risks to human and ecological receptors using the artificial reef.

In general, the Panel was complimentary of the work undertaken by the Navy thus far. While the draft risk assessment does not appear to indicate a significant risk, the Panel identified several limitations and has made recommendations to strengthen the current TDM and PRAM models before they are applied in assessing the risk from the deployment of the ex-Oriskany as an artificial reef. With regard to the charge question about the transferability of the TDM and PRAM models to other naval reefing applications, the view of the Panel was

the current models are not adequate and they recommend the development of probabilistic models to better characterize the uncertainty inherent in the risk assessment.

There will be no formal report from the SAB since this was a consultation. Individual Panel member comments and the Summary of recommendations from the panel have been included in the minutes of the meeting. We hope these comments and recommendations are helpful to EPA as they consider the Navy's request.

Sincerely,

/signed/

Dr. Granger Morgan, Chair
Science Advisory Board

/signed/

Dr. Joan Rose, Chair
Polychlorinated Biphenyl-Artificial
Reef Risk Assessment Consultative
Panel
Science Advisory Board