

**MARINE MAMMAL COMMISSION**  
**4340 EAST-WEST HIGHWAY, ROOM 905**  
**BETHESDA, MD 20814**

4 September 2003

Admiral Thomas H. Collins  
Commandant  
2100 2nd Street, S.W., Room 2208  
Washington, D.C. 20593

Dear Admiral Collins:

The Coast Guard operated a facility on Tern Island, located at French Frigate Shoals in the Northwestern Hawaiian Islands, for many years. Tern Island is part of a small atoll that provides habitat for the largest remaining colony of endangered Hawaiian monk seals. During the Coast Guard's occupancy of Tern Island, the area around a landfill became contaminated with PCBs from electrical equipment.

In 2001, at considerable expense, the Coast Guard cleaned up much of the landfill and atoll. However, at the Commission's April 2002 review of the Hawaiian monk seal recovery program, representatives of the Coast Guard and the Fish and Wildlife Service reported that some contaminated soils remained on Tern Island. On 10 September 2002 the Marine Mammal Commission wrote to you recommending that the Coast Guard complete the clean-up of its dump site on Tern Island.

The U.S. Fish and Wildlife Service, which now manages Tern Island as part of the Hawaiian Islands National Wildlife Refuge, has been planning for more than 10 years to construct a new seawall at Tern Island to protect the facilities there. Our September 2002 letter noted that additional clean-up work was needed to prevent further dispersal of toxic PCBs into the marine food chain and to avoid impeding construction work, which could add to the project's cost.

On 11 October 2002 the Coast Guard Assistant Commandant for Systems responded to our letter, noting that past clean-up work had removed approximately 95 percent of the contaminants and that available funding was needed for more pressing clean-up work elsewhere. Recently we received a copy of the enclosed letter from Region XI of the Environmental Protection Agency to the Coast Guard's Civil Engineering Unit in Honolulu. The letter indicates that the 2001 restoration work did not meet required clean-up standards in a number of sampled grids and that several grids were not adequately sampled to determine what contaminant levels may remain. Although we appreciate the cost involved in completing the clean-up work, initial clean-up efforts apparently have failed to meet EPA's required regulatory standards. In addition, given that adequate assessments of some parts of the targeted clean-up area are not available, we question the basis for the Coast

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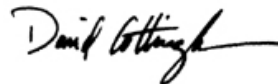
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Guard's conclusion that 95 percent of the contaminants were removed. Based on EPA's letter, we are concerned that some areas may have contaminant levels substantially higher than allowed levels.

The Fish and Wildlife Service has now signed a construction contract for the Tern Island seawall. Work is scheduled to begin early next year, making it essential that clean-up of the Coast Guard dump site be completed promptly. We remain concerned that failure to completely clean up the site to EPA standards will significantly impede the urgently needed seawall construction project. The Marine Mammal Commission, therefore, recommends that the Coast Guard promptly fund the needed clean-up work on Tern Island and take immediate steps to coordinate that work with the Service's seawall construction plans.

If you or your staff have questions regarding this recommendation, please call.

Sincerely,

A handwritten signature in black ink that reads "David Cottingham". The signature is written in a cursive, flowing style.

David Cottingham  
Executive Director

Enclosure

cc Ms. Paula Bisson  
CDR R. M. Diehl