

**Restoration Advisory Board (RAB) Meeting
Recreation Center
U.S. Army Soldier Systems Center
November 18, 2004
Meeting Minutes**

I. Attendance

RAB Members Present

Joel McCassie, Co-Chair	Environmental, Safety, and Health Office (ESHO), U.S. Army Soldier Systems Center (SSC)
Robert Campbell	Massachusetts Department of Environmental Protection (MADEP)
Marco Kaltofen, Co-Chair	Community Member
John McHugh	Restoration Officer, ESHO, SSC
A. Richard Miller	Community Member
Christine Williams	U.S. Environmental Protection Agency (EPA)
Elizabeth McCoy	Employee Member, Natick Soldier Center
Sidney Gantman	Community Member
Stephen Lubic	Representative of Natick Board of Selectmen

RAB Members Absent

Dr. Charles Czeisler	Community Member, Lakewood Association
Anthony Doheny	Community Member
James Straub	Massachusetts Department of Conservation and Recreation (DCR)
Dr. Kannan Vembu	Representative of Natick Board of Selectmen
James Fitzgerald	Community Member
Tony Doheny, Jr.	Community Representative
Dr. Harlee Strauss	Community Representative
Leo Pessin	Community Representative

Others in Attendance

Michelle Bonanca	ESHO, SSC
James Connolly	ESHO, SSC
Anne Marie Desmarais	Environmental Insight
Stacey Forman	Recorder, ICF Consulting
Michael Kipp	US Army Environmental Center (USAEC) - Versar
Kevin Palaia	Environmental Consultant, ICF Consulting
Jeffrey Pickett	Environmental Consultant, MACTEC
Harold Prebensen	ESHO, SSC
Amy Rosenstein	Environmental Consultant, ICF Consulting
Kathleen Thrun	Environmental Consultant, ICF Consulting

II. Handouts

- 1). Draft Fish Consumption Human Health Risk Management Technical Memorandum, ICF Consulting
- 2.) Sediment Sites, Plan of Action and Schedule for NRDEC-07, -10, and -17, U.S. Army SSC

III. Meeting Minutes

Mr. McCassie brought the meeting to order at 7:10 pm and asked if there were any comments, changes, or revisions to the October 14th 2004 meeting minutes. There were none. The minutes were accepted without amendments.

General Comments

Mr. McCassie asked for general comments.

Mr. Miller asked if before the meeting closes, if the thermal test facility could be mentioned into the minutes of this meeting.

Mr. McHugh stated that he could talk about the environmental assessment (EA) of the thermal test facility. He stated that SSC placed the Final EA and the response to comments on the SSC web-site, and members of the RAB should have received an email message informing them of that posting.

Mr. Kaltofen asked if the new thermal test facility would have a basement.

Mr. McHugh responded that it would not.

Mr. Miller commented on item 1 of the response to comments. He stated that his comment is on the process, and asked that future EA's be brought to the attention of the RAB. Mr. Miller stated that the answer in the EA did not address the question.

Mr. McHugh clarified that if Mr. Miller is commenting specifically on the technical aspects of the EA, he may do so on the record at this meeting, but referred Mr. Miller to Mr. Garrahan for making formal comments on the EA. He stated that the EA does not address process-related questions, which was discussed at the last RAB meeting and is stated in the minutes of the last meeting.

Mr. Miller just wanted to have stated for the record that the question and the answer are a mismatch and the answer did not address the question on Item 1.

Mr. Kaltofen stated that he had a comment on his request to be given perchlorate data at some point.

Mr. McHugh stated that SSC has not done testing for perchlorate.

Mr. Kaltofen stated that is it less of an issue now that I know that the town has results from the Springvale wells that show that perchlorate is not present in the town wells.

McHugh stated that one of the DOD's criteria for testing for perchlorate is if it is detected in local

public water supplies.

Mr. Kaltofen stated that it might be interesting to add that parameter to the new monitoring well located to the north of the site.

Ms. Williams stated that there needs to be a compelling reason why testing should be done.

Mr. Kaltofen stated that a portion of the SSC facility used to be a former gravel pit, and gravel pits are one potential source of perchlorate. This part of the facility is now owned by the Army, therefore the Army would be required to bear responsibility, as requirements demand.

Mr. McHugh stated that there is a rather rigorous procedure that is required not only by the base but by the DOD, part of which includes detection of perchlorate in the public water supply.

Mr. Kaltofen asked how would the RAB members go about getting results for perchlorate.

Mr. McHugh stated that he could look into that.

Mr. Kaltofen requested that this item be put on the agenda for the next RAB meeting and asked Mr. McHugh to think about what the participants might want to do.

Ms. Williams asked when the gravel pit was active, and when it was opened.

Mr. Kaltofen replied that it was active until 1953, but opened sometime in the late 1930s to early 1940's.

Ms. Williams stated that there were some folks on the west coast that had done some research on this and would look into retrieving their data.

Mr. Kaltofen replied that this information would be very useful to know, and thanked Ms. Williams.

Mr. McCassie asked if there were any additional general comments.

Mr. Mike Kipp stated based on the last RAB meeting, the Army Environmental Center (AEC) had indicated that they would finalize the performance-based contracting (PBC) after action report. AEC has finalized it, and they intend to make it available on the AEC web site. He also noted that no comments on the report were received by the RAB.

Draft Fish Consumption Human Health Risk Management Technical Memorandum

Mr. McCassie introduced Kevin Palaia and Amy Rosenstein of ICF Consulting to present the Draft Fish Consumption Human Health Risk Management Technical Memorandum presentation.

Mr. Palaia stated that at the last RAB meeting (October), the ecological risk assessment aspect of the technical memorandum was presented, and tonight the presentation would focus on the human health risk assessment (HHRA) of the recreational fish ingestion.

Mr. Palaia provided a summary of the aquatic HHRA's that have been conducted at SSC since the mid-1990's. Recreational swimming scenarios were evaluated, which included the ingestion of and dermal contact with surface water and sediment by adults and children. The areas at SSC that were evaluated included: T-25 Area Outfall, Boiler Plant, Building 22 and 36, Water Supply

Well Site/Building 2 and 45, Main Stormwater Outfall (MSO), Former Proposed Gymnasium Site (FPGS), and Little Roundy Pond (LRP). HHRA were conducted for each of these specific locations, which encompass a large portion of the shoreline of the facility. He stated that none of the SSC areas are accessible by the public.

Mr. Palaia stated that the results of these previous risk assessments indicated that the cancer and noncancer risk estimates from recreational swimming at the SSC areas were generally within ranges considered acceptable by the EPA. The Agency for Toxic Substances and Disease Registry (ATSDR) did an independent study in 1997 and found that risks during swimming at the T-25 outfall were unlikely.

Mr. Palaia stated that in 1996 the Massachusetts Department of Public Health (MADPH) issued a fish consumption advisory for Lake Cochituate, which was based on limited number of fish that the State collected in 1995. The State collected three largemouth bass samples from the South Pond, composited those three samples, and analyzed the one composite sample. The fish consumption advisory was issued because of elevated PCB concentrations, and restricts the consumption of American Eel by all populations and all fish by sensitive populations (pregnant women, children, and nursing mothers). In January 2004, after reviewing the fish data collected as part of the Tier III program, the EPA requested that the Army conduct a HHRA for the recreational consumption of largemouth bass for adults. In August 2004, a Letter Work Plan was provided to the regulators and RAB that described the approach to the fish ingestion HHRA.

Ms. Rosenstein described the process of the HHRA for Superfund sites, which consists of hazard identification, dose response assessment, exposure assessment, risk characterization, and uncertainty analysis.

Ms. Rosenstein presented a slide on Hazard Identification and stated that during the Tier III ERA fish sampling program, there was a subset of legal-sized (greater than 12 inches) largemouth bass collected, filleted, and analyzed for the PCBs, pesticides, SVOCs, and metals. Stocked species were not collected. Six site samples were collected from the T-25 Outfall, Main Stormwater Outfall, and the Boiler Plant Cove area, and three reference samples were collected from the Possum Hollow and Crescent Street areas.

Mr. Kaltoven asked if the fillet samples were skin on.

Ms. Rosenstein replied that they were not - they were skin off.

Ms. Rosenstein presented a slide about the selection of chemicals of potential concern (COPC). The maximum concentrations in the SSC fish fillets were compared to the Region 3 Risk-Based Concentrations (RBCs) for fish ingestion, which are conservative criteria. The COPCs that were selected include: mercury, chromium, copper, thallium, PCBs, DDD, DDE, DDT, chlordane, dieldrin, and heptachlor epoxide. These are the chemicals that were carried further through the risk assessment.

Ms. Rosenstein presented a slide on the Dose Response Assessment. She stated that to estimate the potential toxicity of these chemicals, oral toxicity values are developed by the EPA and these values are used in the HHRA. The oral toxicity values are based on studies that are reviewed to a great extent within the EPA. Carcinogens use an oral cancer slope factor (CSF), which is an upper bound estimate of the cancer risk. The non-cancer health effects are evaluated using an oral reference dose and that is a level at which adverse effects are unlikely to occur. Uncertainty factors are added to the oral toxicity values in order to be protective of sensitive members of the population. Chemicals without available oral toxicity values are discussed qualitatively.

Ms. Rosenstein presented a slide on Exposure Assessment. The exposure pathway evaluated was the adult recreational fish ingestion pathway, using largemouth bass data. EPA requires the calculation of a central tendency exposure (CTE) and a reasonable maximum exposure (RME). The CTE is considered a typical or average exposure scenario, while the RME is an upper bound or “worst case” exposure scenario. The fish ingestion rate was calculated based on a 1994 Lake Cochituate winter creel survey (fish catch/harvest rates), which was conducted by the Massachusetts Division of Fisheries and Wildlife (MADFW). In that survey MADFW interviewed 166 people in the winter season and asked them which species of fish they were targeting and how much of each were caught and harvested during the survey period. The calculated fish ingestion rate is likely to be conservative because the creel survey was conducted before the fish advisory went into effect. Published data show that when a fish advisory is in effect, people tend to eat less fish from that water body, even if it’s not that particular fish that’s being advised against. The ingestion rate is also conservative because according to a biologist from MADFW, people tend to keep more of their catch during the winter months, and it also assumes the catch is not shared - that one individual is eating all the fish.

Ms. Rosenstein presented a slide that showed the exposure parameters that were used during the HHRA. She stated that the only parameter that did not use the standard EPA approach is the “Fraction Ingested from Source” value. For this value, it is the EPA requirement to use 100% of the fish sampled from South Pond to represent the RME exposure, while for the CTE exposure, the HHRA assumed that 33% of the fish ingested are from South Pond. The ingestion rates used were 10 grams/day for the CTE and 16 grams/day for the RME, which are similar to the ingestion rate ranges recommended by EPA. She stated that the EPA recommends using site-specific data, if it is available, and that is why the Lake Cochituate creel survey was used to develop the ingestion rate.

Mr. Kaltofen asked if the people who performed the survey spoke Spanish, because that may affect the results of the survey.

Ms. Rosenstein replied that she wasn’t sure but she could find out.

Ms. Rosenstein presented a slide on Risk Characterization. In the risk characterization, you estimate potential adverse carcinogenic and non-carcinogenic effects to human health. For non-cancer risks, a hazard quotient is calculated for each chemical by dividing the estimated daily intake by the oral reference dose. The hazard index is the sum of all of the individual hazard quotients. If the hazard index is less than one, that is considered acceptable by EPA. For cancer risks, the lifetime incremental cancer risk is the estimated daily intake multiplied by the oral cancer slope factor. EPA generally considers incremental cancer risks in the 1×10^{-4} to 1×10^{-6} (an increased risk of one in ten thousand to one in one million for potentially exposed individuals) range as acceptable. Non-cancer and cancer risks were estimated for exposure to SSC and reference locations.

Mr. Miller asked if what Ms. Rosenstein was saying was that 1×10^{-4} to 1×10^{-6} is what the EPA would find an acceptable range, or is that what was estimated for the site.

Ms. Rosenstein stated that this is the range considered acceptable by EPA, and that she had not yet presented the results from the site.

Mr. Miller asked that if it were less than one part out of a million, would the EPA would consider acceptable.

Ms. Rosenstein replied that Mr. Miller was correct – anything less than 1×10^{-4} would be considered acceptable. She also stated that the State of Massachusetts considers anything less than 1×10^{-5} acceptable.

Mr. Kaltofen asked whether the foraging range was determined for the largemouth bass, and whether that range was smaller than the distance between the reference and the sample sites.

Mr. Palaia replied that it was discussed in the Tier III ERA Report. He stated that the forage range of the largemouth bass can be on the order of miles, however, the literature and wildlife biologist that performed the wildlife survey at the SSC site suggest that during feeding times, the foraging range is much smaller. A lake study conducted in Minnesota actually radio-tagged a number of fish and studied their migration patterns, and found that during feeding time of the year 95% of the radio tagged fish stayed within a 100 meter radius.

Mr. Kaltofen asked if feeding is a certain time of year.

Mr. Palaia replied that it is generally in the summer and towards the early fall. The Tier III ERA sampling program was conducted in the middle of October to coincide with the approximate end of their active feeding period. This represents a conservative approach, because the fish contaminant body burden could potentially be at its maximum at that point in the season.

Mr. Kaltofen asked if the survey asked how the fish were prepared. He stated that if you go to the picnic area you might find more people fishing who prepare their fish right there and eat them then.

Ms. Rosenstein replied that information was not in the survey information.

Mr. Miller asked if it was assumed that the harvest rate is the ingested amount or some fraction of the ingested amount.

Ms. Rosenstein replied that we are assuming that the harvest rate is 100% of the ingested amount.

Mr. Miller then stated that this is at the high end of the spectrum to be safe.

Ms. Rosenstein concurred.

Ms. Rosenstein presented a slide which showed the non-cancer risk estimate results. She stated that the non-cancer hazard index (HI) is dominated by estimated risk from total PCBs. The total CTE hazard index at the site is 2 versus a CTE hazard index of 1 at the reference location. The total RME hazard index at the site is 17, versus a RME hazard index of 9.8 at the reference location. (Note: a subsequent review of the RME hazard index calculations indicated that the site HI is 19 and the reference HI is 11). For PCBs, the oral reference dose for Aroclor 1254 was used, which is the most toxic of the Aroclors. The predominant Aroclor in the fish tissue is Aroclor 1260, so this is a conservative estimate. For the remaining COPCs, the hazard quotients are less than or equal to one, and the risk estimates are similar at the site and reference locations.

Ms. Rosenstein presented a slide which showed the cancer risk estimates. She stated that total PCBs are the predominant risk driver for cancer risks as well. PCBs are the only COPC that exceed EPA's acceptable cancer risk range, and that only occurs for the RME estimates for both the site and reference locations. Two chemicals that had no toxicity values were copper and thallium, however, the intakes for these two chemicals were way below the estimated daily allowance (for copper) or the estimated typical average daily intake (for thallium), therefore it is

unlikely that these chemicals would contribute to the risk.

Ms. Rosenstein presented a slide which showed the uncertainties that are associated with this HHRA. She stated that the uncertainty analysis is qualitative in nature. The first uncertainty is the data set, which is small. Another uncertainty is the fish ingestion rate, which is likely to be conservative primarily because it is based on the pre-fish advisory creel survey and winter season. Conversations with MAFWS personnel have indicated that many people in the area practice “catch and release” fishing and do not ingest the fish. For this HHRA, we assumed that all the recreational fish ingested are largemouth bass, and that all recreational fish caught and eaten from Lake Cochituate are from the SSC area (for the RME scenario). Both of these assumptions could over-estimate the ingestion rate, because people likely fish from other parts of Lake Cochituate and other water bodies, and people likely catch other species such as stocked species. We have also assumed no loss of PCBs during the cooking of caught fish – a certain percentage of PCBs will volatilize during the process.

Mr. Kaltofen asked for some clarification on the magnitude of the uncertainty from different sources, the ingestion rate and the preparation method. He stated that these two uncertainties would probably be associated with most of the variability and the ingestion rate would likely be the largest issue. He questioned if the creel studies were done only in English or other languages, because that could have an impact on the results of the survey. He stated that the lake is very heavily used by the Spanish speaking population.

Mr. Miller stated that Lake Cochituate is the largest recreational lake this close to Boston.

Mr. Kaltofen stated that some people are catching and cooking the fish immediately, and the difference in preparation method (e.g., skin on versus fillet) could impact the results of the assessment. He stated that other states require the assessment to use a cross section of different preparation methods, instead of just the fillet method.

Mr. Campbell replied that he couldn't verify that that was the approach the State of Massachusetts uses.

Mr. Kaltofen then described a special tool which has an auger on the end of it which is used to cut all the way through the fish to obtain samples. He stated that this was a fairly common method of collection. He stated that when adding up the preparation method uncertainties, there may be the potential for significantly larger ingestion rate for someone who is naturally harvesting fish for protein instead of recreation.

Ms. Rosenstein mentioned that there is a more recent creel survey from 1997 (after the fish consumption advisory went into affect), however there were fewer interviews and less data available from that study, so it was not used in the ingestion rate calculations. There are no more recent surveys for this area.

Mr. Kaltofen stated that he remembers a similar study outside of the Everett, Massachusetts area (along the Mystic River) where there were a large number of non-English speaking people, many recent immigrants, who were fishing and taking a larger amount of fish than average.

Ms. McCoy asked that if the state enforces fishing licenses, you might be able to use those data to determine which population's fish. The general reply in the room was that not everyone obtains fishing licenses to fish, so you may not be able to get an accurate number from that source.

Mr. Miller asked what the significance of the cancer risk estimates presented on Slide 14 was, and

whether the site RME of 3.1×10^{-4} and reference RME of 1.6×10^{-4} were reason for concern given EPA's acceptable risk range.

Ms. Rosenstein stated that the site and reference RME cancer risk estimates are above EPA's acceptable risk range.

Mr. Palaia clarified that the RME scenario the results are slightly above EPA's acceptable range, but the CTE results are within EPA's acceptable range.

Mr. Miller stated that Mr. Kaltofen's point is that people who eat more than the typical amount might be within some range of concern, but the typical fisherman with the amount of catch they keep would not be.

Mr. Palaia replied that the study is based on the recreational fishing exposure.

Mr. Kaltofen stated that Native Americans are likely to eat 10 times more than the average fisherman.

Mr. McHugh asked if there were any more questions related to the presentation.

Mr. Kaltofen stated that the Native American Pow Wow in town is the last weekend of September, and that they fish at the north end of the lake by the boat ramp.

Mr. Miller stated that he hasn't seen any data in recent years, but he has observed Asian populations fishing, and often from the shoreline in areas that might be more contaminated.

Mr. Kaltofen stated that an action item should be to look into how the creel survey was done last time – whether it was done in just English or in other languages. He also stated that he is sure this is not the first time we looked at cultural differences in terms of the surveys.

Ms. Williams asked if there is a large cultural diversity around the pond, and if the visitors to the area travel to the lake by car.

Mr. Kaltofen stated that the area is often visited by a culturally diverse population.

Ms. Williams asked if the visits occurred during weekends in the summer, particularly.

Mr. Kaltofen replied yes. He stated that if surveys of the visitors were to be done, that would be a good place to start.

Ms. Williams commented on the calculated SSC fish ingestion rate and said that it was comparable to the fish consumption rates used for the Housatonic River study. She stated that the EPA was happy with the ingestion rates that the Army had arrived at.

Mr. Kaltofen stated that there is an area on Route 135 at the south end of South Pond, where you will see the same trucks there all the time. This area is near the railroad tracks and a lot of people swim and fish in this area in the summertime.

Ms. Williams asked if it is near one of the reference locations.

Mr. Palaia pointed to a map indicating that the area was close to Fisk Pond.

Mr. McHugh stated that you used to be able to park along the railroad tracks in that area, and be able to go down to the water. However, he noted there is a curb and sidewalk now in that area. Mr. Kaltofen stated that there is construction in that area right now.

Mr. Miller stated that there are two locations on the south end of South Pond where families hang out especially during the summer. One is called the water ski beach. There is no boat launch, but boats come from elsewhere on the pond. Families drive up and park on the south side of the railroad track (which is the north side of Route 135), walk over the tracks with picnic baskets and lawn chairs, and stay for the day. You will find they take turns going on the lake in boats and kids will be fishing. The other area is across the culvert that leads to Fisk Pond. These two areas are popular with the Asian fishermen who like to catch American Eel. Mr. Miller asked how the largemouth bass numbers compare to the eel numbers, because that is the Asian fisherman's choice catch.

Mr. Palaia replied that the Army's assessment did not evaluate the ingestion of American Eel because the current MADPH fish consumption advisory for Lake Cochituate restricts the consumption of American Eel by all populations.

Mr. Miller stated that he has observed signs posted warning the public about the fish consumption advisory, but he stated that they still like the eels. He asked what we could do about it.

Mr. Kaltofen asked what language the fish consumption advisory sign was in.

Mr. Miller replied several more languages than he could read.

Mr. Palaia asked if there was a sign posted in the area that they were talking about – near Route 135.

Mr. Miller stated that he didn't know about this particular year, but noticed it did take two years after the fish advisory went into effect before there were any signs up warning the public.

Sediment Sites: Plan of Action and Schedule for NRDEC-07, -10, and -17

Mr. McCassie introduced Mr. Connolly.

Mr. Connolly stated that he was going to talk about what the Army anticipates is going to happen regarding the sediment sites. He stated that there have now been two RAB presentations about the Sediment Risk Management Technical Memorandum. The Draft Memorandum will be provided to the public in early December 2004, and the public will have a 60-day review and comment period. Mr. Connolly stated that following the 60-day comment period; the Army will look at comments, finalize the report, and likely go to a Proposed Plan that will incorporate comments. The anticipated Draft Proposed Plan is scheduled for April 2005, with a public hearing scheduled for May/June 2005.

Mr. Kaltofen asked if the RAB would see and review the Draft Proposed Plan before April 2005, or if the RAB wouldn't see it until April.

Mr. Connolly replied that the results from the Sediment Risk Management Technical Memorandum and comments on the memorandum will be used to develop the Draft Proposed Plan.

Mr. McHugh clarified that the reason for the 60-day review period is due to recognition of the

holidays, and the volume of information about both the ecological and human health risk assessments. The Army would like to address technical comments related to some questions asked tonight, and some of the questions asked at the last RAB meeting in October.

Mr. Connolly stated that as a reminder, one of the options the Army will look at before we propose a plan is the No Action alternative, depending on the comments. Right now we are showing a risk for one receptor and one pathway. Given that, it is possible that the Army will look at a limited remedial action or No Action alternative.

Public Comments

Mr. Kaltofen asks if there are any public comments. There were none

Mr. Kaltofen then asked about scheduling for the next RAB meeting.

Mr. McHugh suggested that on January 13th or 20th, 2005, the Army would be willing to have a meeting to talk further about the Draft Sediment Risk Management Technical Memorandum, if RAB members had any questions.

Mr. Miller commented that the RAB had in the past aimed for first Thursdays in the month and asked if that had changed, or if this particular Thursday didn't fit well.

Ms. Williams commented that January 6th is the first Thursday and thought that the holidays would postpone the meeting and that is why they had selected the January 13th and 20th dates.

Mr. Miller said that both dates work for him.

Mr. Kaltofen said that January 13th was probably the best for him.

Mr. Kaltofen commented that data regarding the contamination on the lake may be helpful to assess if there is contamination coming from sources other than the Army Labs.

Mr. Palaia stated that the data could be found in the Tier III ERA Report in the Appendices found at the back of the report.

Ms. Williams stated that she had taken all the data out and put it in a table to evaluate the data. She offered to give it to the members of the RAB who would like it, but noted it would take time to do that and to check it to make sure it was accurate.

Mr. McHugh stated that he has a conflict on January 13th and would request January 20th if possible. The January 20th meeting was accepted by all.

Mr. McHugh then proposed March 24th for the subsequent RAB meeting. It was accepted.

The meeting was adjourned at 8:09 pm.

Action Items

1. Mr. Kaltofen asked how would the RAB members would go about getting results for perchlorate.

Mr. McHugh stated that he could look into that.

Mr. Kaltofen requested that this item be put on the agenda for the next RAB meeting and asked Mr. McHugh to think about what the participants might want to do.

Ms. Williams asked when the gravel pit was active, and when it was opened.

Mr. Kaltofen replied that it was active until 1953, but opened sometime in the late 1930s to early 1940's.

Ms. Williams stated that there were some folks on the west coast that had done some research on this and would look into retrieving their data.

Mr. Kaltofen replied that this information would be very useful to know, and thanked Ms. Williams.

2. Mr. Kaltofen asked if the people who performed the survey spoke Spanish, because that may affect the results of the survey.

Ms. Rosenstein replied that she wasn't sure but she could find out.

3. Mr. Kaltofen commented that data regarding the contamination on the lake might be helpful to assess if there is contamination coming from sources other than the Army Labs.

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