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New Bed Ford
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Dave Dickerson

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cc: Jim Brown/R1/USEPA/US@EPA
Subject: comment on "Decision Rules for Evaluating Individual Confirmatory Sampling Results..." (3/03)

Greetings,

My one comment on this tech memo is to recommend that we use a 100 ppm "ceiling" for any individual sample location in the lower harbor subtidal or mudflat areas. In other words, any location with a confirmatory sample value greater than 100 ppm would automatically have to be redredged, even if the average for the DMU is less than the 50 ppm cleanup level.

The rationale for this goes back to the whole history of how the cleanup levels were developed. In a nutshell, EPA's risk assessments (both human health and ecological) pointed to a 1 ppm cleanup level throughout the harbor. However, given the adverse enviromental impacts to the harbor and huge costs that such a cleanup level would have caused, as well as the fact that the lower harbor is a state designated port area, the ROD selected a 50 ppm level for the lower harbor subtidal and mudflat areas. Allowing an individual location at 250 ppm as the draft memo proposes is considered too high an exceedance given this background. Use of a ceiling of 100 ppm instead stays within a factor of 2 of the cleanup level (with the entire DMU below 50 ppm), and is more consistent with the general levels found in the lower harbor.

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