Lower Willamette Group

Co-Chairperson: Bob Wyatt, NW Natural
Co-Chairperson: Jim McKenna, Port of Portland

July 13, 2006

Chip Humphrey and Eric Blischke
US Environmental Protection Agency, Region 10
811 SW 6th Avenue, 3rd Floor
Portland, OR 97204

RE: Response to Comments on the Technical Memorandum: Approach to Determining Background

Dear Chip and Eric:

EPA provided comments on the Technical Memorandum: Approach to Determining Background (Background Approach TM) in its letter dated June 5, 2006. The Lower Willamette Group (LWG) has reviewed the comments and responses to the comments are attached. However, prior to revising the Background Approach TM, the LWG believes that further discussions are needed regarding the use of and need for upstream tissue data. During the July 7, 2006 meeting between the EPA, LWG, and Oregon Department of Environmental Quality management representatives, the EPA agreed that preliminary remediation goals (PRGs) will not need to be developed for tissue. Further discussions on the need for upstream tissue data will consider this agreement that tissue PRGs will not be developed. In the meantime, the Round 3A Upstream/Downstream Field Sampling Plan will be submitted separately.

Please contact us if you have any questions.

Sincerely,

Bob Wyatt
Jim McKenna
Co-Chairs

cc: LWG Executive Committee

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