From: ANDERSON Jim M
To: Eric Blischke/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA
Cc: MCCLINCY Matt; POULSEN Mike; PETERSON Jenn L; GAINER Tom
Subject: UR & MC Sed Evaluation & FSP
Date: 07/27/2007 10:46 AM

Eric,
I sent you DEQ's preliminary comments of the LWG's 5/21/07 "*Upriver & Multnomah Channel Sediment Evaluation & FSP Tech Memo*" in my 6/7/07 e-mail below. The only other comments we (Mike P) have to offer are:

1) Statistical evaluation- The statistical evaluation used to come up with an estimated number of upriver samples to collect appears reasonable. The current reference would be to EPA's new ProUCL 4.0 guidance (not available in May when the LWG submitted the plan), which allows incorporation of non-detect values. The LWG apparently used regression on order statistics (ROS) to develop simulated concentrations for non-detect values, which were then used in ProUCL 3.0. Regardless, the break at about 20 samples looks to be about right.

Note that this is 20 additional samples. We will likely include the existing 20 or 30 samples (depending on the analyte) in our evaluation of upstream concentrations, so the ultimate number of samples will be greater.

2) Method to determine upstream (background) concentrations- As mentioned in my 6/7 e-mail, there is no discussion of the exact method used to determine the upstream concentrations (mean, upper confidence on mean, upper percentile, etc.). That is fine at the FSP stage. The LWG may want to state that this issue ultimately needs to be resolved in discussions with EPA. We urge EPA to assign an environmental statistician to the project to help determine an acceptable method for calculating upstream concentrations.

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-----Original Message-----
From: ANDERSON Jim M
Sent: Thursday, June 07, 2007 4:30 PM
To: 'Blischke.Eric@epamail.epa.gov'; Humphrey.Chip@epa.gov
Cc: MCCLINCY Matt; POULSEN Mike; PETERSON Jenn L; GAINER Tom
Subject: FSP Comments

Eric,
I understand tomorrow (6/8/07) you're going to submit to the LWG EPA/partners': 1) initial concerns with the 3 LWG RD 3B FSPs; 2) a rough scope of work for filling TZW data gaps; & 3) rough justification (biota DQOs) & scope of for biota sampling. I further understand EPA/partners will get more time to develop more detailed comments on the 5 groups of data gaps before you submit more complete comments/direction to the LWG on 7/1/07.

I reviewed 2 of the 3 LWG RD3B FSP Tech Memos, here are my comments. Hope they help.

Best of luck.

LWG's 5/21/07 "*Upriver & Multnomah Channel Sediment Evaluation & FSP Tech Memo*"
I don't have any substantive comments. I think the approach & scope of work the LWG proposed is reasonable & should likely be able to achieve the stated objectives. I know there are still some outstanding questions re: establishing background…, eg., should we use a mean, upper limit, or UCL on a mean. We'll want to resolve these concerns & review the scope of work in more detail, but I thinks the FSP looks good.

LWG's 5/07 "*Draft RD3B Surface & Core Sediment FSP Preliminary Tech Memo*"
The scope of work the LWG proposes in this prelim FSP only addresses N&E & FS (volume) data gaps associated with the iAOPCs they developed in the RD2 SCSR. The LWG did **not** suggest any work outside their iAOPCs in the Study Area in this FSP. The LWG used their SLRA & RD2 risk assessment to develop their iAOPCs, & EPA/partners have a lot of concerns about that risk assessment process. The result is that while the iAOPCs may cover a lot of the areas we are concerned with…, they don't cover all the areas & they don't include all the COIs that may drive risk.

EPA/partners developed a very comprehensive approach to identify benthic toxicity data gaps & a scope of work to fill those data gaps (surface sediment samples & bioassays). I think this approach will go a long way to evaluating the N&E outside the iAOPCs. The only obvious type of data gap that may be missing from EPA/partners' benthic toxicity approach are data gaps associated with endpoints other than benthic toxicity (e.g., bioaccumulation or HH). Another concern is buried sediment contamination outside the iAOPCs.

Matt sent you DEQ's comments on Sections 11.3 & 12 of the RD2 SCSR on 6/4/07 (see attached e-mail). These comments include what we consider data gaps inside the LWG's iAOPCs.

<< Message: Round 2 Report DEQ Comments Champter 11 >>

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