To: Brown, Anthony R (RM)[anthony.brown@bp.com]; Halsey, Ronald H[ronald.halsey@bp.com]
Cc: Greg Reller[gr@burlesonconsulting.com]; Serda, Sophia[Serda.Sophia@epa.gov]; Riley, Gary[riley.gary@epa.gov]
From: Barton, Dana
Sent: Wed 9/13/2017 12:16:43 AM
Subject: Task Sampling and Analysis Plan (TSAP) for Bioaccessibility Testing

Dear Mr. Brown and Mr. Halsey:

EPA has reviewed Atlantic Richfield's August 25, 2017 correspondence regarding planned sampling for bioaccessibility at Leviathan Mine, and we accept the sample collection and analysis approach presented. At this time, EPA is unable to fully concur with the statement that "the bioaccessiblity results will be directly applicable to the calculation of risk using the adjusted exposure point concentration for all five media regardless of whether a sample was sieved." This statement relates to statistical analysis of sampling results and subsequent application to human health risk assessment; therefore, it will be considered at a later stage in the remedial process.

As you are aware, EPA is currently in the process of identifying a new Remedial Project Manager for the Leviathan Mine Superfund Site. The incoming RPM will work with Atlantic Richfield and EPA's technical experts to determine the appropriate statistical methods to apply to sieved data and to determine applicability to other samples.

Thank you,

Dana Barton

Dana Barton

Section Chief

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