Message

From: Schwartz, Jerry [Jerry_Schwartz@afandpa.org]
Sent: 10/30/2017 5:35:27 PM
To: Fotouhi, David [fotouhi.david@epa.gov]
Subject: BAFs
Attachments: BAF Attachments E and F.PDF; BAF Excerpt HHWQC Derivation Comments.docx

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Hi David,

Attached is information on BAFs; I will send something on RSCs separately.

The bottom line issue is that while everyone agrees that BAFs are more scientifically advanced than BCFs because they account for additional exposure pathways, EPA's national default BAFs are flawed for a number of reasons. The primary reason is that the BAFs were developed based on food chain models for PCBs in the Great Lakes. EPA consistently has stated that the Great Lakes are unique, and as described in the attachments, there are numerous reasons why food chains and water quality in waters of others states (especially flowing waters) will have very different food chain and water quality characteristics. In light of this foundational problem, it is very reasonable for states to use the existing BCFs that have been properly developed and applied for years. Moreover, there is every reason to believe that the resulting HHWQC will be adequately protective, considering the inherently conservative nature of the HHWQC derivation process. I will send in a second a separate email on that; I previously sent it to Lee.

I would read the attached Word document first and then refer to the pdf. These are excerpts from detailed technical material we have put together and shared with a number of states as they have begun their triennial reviews to adopt EPA's national HHWQC.

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