Message

From: Sheldrake, Sean [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D16E2780A4094BBA82DAAA5283A71572-SHELDRAKE, SEAN]
Sent: 8/29/2020 4:12:06 PM
To: SCHWARZ Bob [Bob.SCHWARZ@state.or.us]
CC: dexb@yakamafish-nsn.gov; Laura Klasner Shira [shil@yakamafish-nsn.gov]; Jack Bell (jackb@nezperce.org) [jackb@nezperce.org]; Jeremy_Buck@fws.gov
Subject: Bradford Island lack of TAG funding sf
Attachments: 2020.07.31 Corps payment demand letter to DEQ.pdf; ODEQ Voluntary Cleanup Agreement-6Nov1997.pdf

Bob, Sorry, I'm referring to this nonsense which we were able to get from USACE directly—wondering if I can get letters from the Tribes too to document the lack of partner support.

Thank you.

S

Sean Sheldrake
U.S. Environmental Protection Agency
RPM, HSPC, Superfund and Emergency Management Division
Unit Diving Officer, Training Director, Laboratory Services and Applied Sciences Division
1200 Sixth Avenue, Suite 155, M/S DOC-01
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell
https://www.epa.gov/scientific-diving
https://www.facebook.com/EPADivers

From: SCHWARZ Bob <Bob.SCHWARZ@state.or.us>
Sent: Friday, August 28, 2020 5:05 PM
To: Sheldrake, Sean <sheldrake.sean@epa.gov>
Subject: RE: [EXTERNAL] Draft Bradford Island crayfish, SMB, clam comments (sf)22

Hi Sean,
What do you mean by anti-deficiency letter?
Bob

From: Sheldrake, Sean <sheldrake.sean@epa.gov>
Sent: Friday, August 21, 2020 2:31 PM
To: dexb@yakamafish-nsn.gov
Cc: Jeremy_Buck@fws.gov; Bob Schwarz <Bob.SCHWARZ@state.or.us>; PETERSON Jenn L <Jenn.L.PETERSON@state.or.us>; shil@yakamafish-nsn.gov; Marcy, Ken <Marcy.Ken@epa.gov>
Subject: RE: [EXTERNAL] Draft Bradford Island crayfish, SMB, clam comments (sf)22

Hi Bob,

You too!

I haven't reviewed the revised documents yet but I would be interested in any issues or deficiencies you find. I'd be happy to echo any comments you all feel are important on EPA letterhead if that's helpful given the ncp requirement for EPA to approve ri/fs sampling...

On another note, if anyone has one of the anti-deficiency letters that USACE has been sending around (BobS you may have gotten one?), I'd appreciate a copy of that. Even if USACE is going the right direction on technical/policy issues I would like to make sure we're making progress on funding for parties that don't have a court order for USACE to do so, such that we all can be meaningfully involved.

I'm off sampling with Danny /GSI /Hart Crowser this weekend/next week so I may not be on email much until 8/31.

Have a good weekend.

S

Sean Sheldrake
U.S. Environmental Protection Agency
RPM, HSPC, Superfund and Emergency Management Division
Unit Diving Officer, Training Director, Laboratory Services and Applied Sciences Division
1200 Sixth Avenue, Suite 155, M/S DOC-01
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell
https://www.epa.gov/scientific-diving
https://www.facebook.com/EPADivers

From: Robert Dexter <dexb@yakamafish-nsn.gov>
Sent: Friday, August 21, 2020 11:36 AM
To: Sheldrake, Sean <sheldrake.sean@epa.gov>
Cc: Jeremy_Buck@fws.gov; Bob Schwarz <Bob.SCHWARZ@state.or.us>; PETERSON Jenn L <Jenn.L.PETERSON@state.or.us>; shil@yakamafish-nsn.gov; Marcy, Ken <Marcy.Ken@epa.gov>
Subject: Re: [EXTERNAL] Draft Bradford Island crayfish, SMB, clam comments (sf)2

Hello all. I trust everyone has been staying safe and somewhat sane.

Before I send comments to the Corps, I thought I would see if anyone else is providing any additional comments. It seems they made substantial changes consistent with our comments. I only still have questions about details in sample handling that were not provided, such as whether crayfish meat would be removed and analized. The question of more interest is how the QA samples are obtained. Section 2.3.1.1. states that field duplicates will be collected at the rate of 1 per 10, but where and how those will be collected is not described. Also, I may have missed it but I didn't find duplicates listed in the sample tallies in the text or tables.

Bob

On Thu, Jul 30, 2020 at 6:23 PM Sheldrake, Sean <sheldrake.sean@epa.gov> wrote:

Thanks for sharing Jeremy; I support everything you've drafted. S

Sean Sheldrake

U.S. Environmental Protection Agency

RPM, HSPC, Superfund and Emergency Management Division

Unit Diving Officer, Training Director, Laboratory Services and Applied Sciences Division

1200 Sixth Avenue, Suite 155, M/S DOC-01

Seattle, WA 98101

206.553.1220 desk

206.225.6528 cell

https://www.epa.gov/scientific-diving

https://www.facebook.com/EPADivers

From: Buck, Jeremy <jeremy_buck@fws.gov>
Sent: Thursday, July 30, 2020 5:08 PM
To: Sheldrake, Sean <sheldrake.sean@epa.gov>; Bob Schwarz <Bob.SCHWARZ@state.or.us>; PETERSON Jenn L <Jenn.L.PETERSON@state.or.us>; shil@yakamafish-nsn.gov; dexb@yakamafish-nsn.gov
Cc: Marcy, Ken <Marcy.Ken@epa.gov>
Subject: RE: [EXTERNAL] Draft Bradford Island crayfish, SMB, clam comments (sf)

Ok- here's the draft version of my comments. Thanks-Jeremy

From: Sheldrake, Sean <sheldrake.sean@epa.gov>
Sent: Friday, July 24, 2020 2:00 PM
To: Bob Schwarz <Bob.SCHWARZ@state.or.us>; Buck, Jeremy <jeremy_buck@fws.gov>; PETERSON Jenn L <Jenn.L.PETERSON@state.or.us>; shil@yakamafish-nsn.gov; dexb@yakamafish-nsn.gov

Cc: Marcy, Ken <Marcy.Ken@epa.gov>
Subject: [EXTERNAL] Draft Bradford Island crayfish, SMB, clam comments (sf)

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

All, Please see my preliminary comments below—let me know if you'd suggest I add/modify/delete anything so we're as close to speaking with one voice as possible to move things forward in a prioritized fashion. From an NCP RI/FS perspective, there is an explicit requirement for EPA to approve of sampling approaches taken under CERCLA so I'd be happy to repeat any common themes that I may have missed to help bring attention to your concerns.

Thanks for your time this week!

S

1. Data quality objectives require further refinement. It seems that nature and extent is the primary objective with an updated view of current site risks as an additional objective. Understanding these objectives and framing the interpretation of this data before program execution is crucial to best eliminate bias in the sampling design, and better ensure consensus on later interpretation. DQOs should be further refined before FSP development to ensure consistent sampling design, e.g. size of the fish being collected, fish tracking timing relative to foraging behavior trying to be explained, etc.
2. DQOs should be developed in light of overall RAOs and lines of evidence associated with them, e.g. various species home ranges and COC distributions in those exposure units. For example, if SMB exhibit acceptable (ie. equivalent to background) levels, what other species will be scrutinized to express achievement of RAOs? Over what spatial area? This information is critical to establishment of appropriate strata and decision units to evaluate over time.
3. If possible, it would be useful to archive individual samples (ie. 30 clams) before compositing for nature and extent purposes to be run later, if possible, based on criteria developed beforehand that might be useful for source area definition.
4. It is unclear to me if sufficient lack of spatial bias exists to directly compare each data set, e.g. for clams between 2011 and 2020 are the study designs in terms of randomization similar enough to allow for an unqualified comparison? If additional steps are necessary to de-bias previous data, that would be helpful to spell out here and agree upon.
5. It is unclear what the data objective is for "reoccupation of historic sampling locations" and what conclusions USACE believes can be derived from doing so? Rather it seems the goal should be to represent each strata and sub areas with an appropriately random sample collection to compare areas between time steps while being as free as possible from spatial bias. This may be the intent of the study but hopefully the underlying approach can be clarified relative to removing as much spatial bias as possible before dataset comparison.

6. While DQOs may not involve collection of information on all COCs for each species at this time to prioritize limited resources perhaps to the nature and extent DQO, it should be stated that source information is not well understood for non PCB COCs that need to be carried forward, particularly if non PCB COCs begin to drive risk potentially in certain areas.
7. Given that nature and extent is still of [highest] interest, and clams do not uptake the full range of site COCs except at very high levels, foregoing Cascade Locks SMB reference area sampling in favor of another species that do uptake a broader range of COCs over a smaller home range collected in the forebay, such as sculpin and additional crayfish, is recommended. These species can both service updated risk evaluations as well as the primary nature and extent objective. In addition, additional sample numbers in the forebay area will be more useful in increasing the statistical power of these datasets. When reference area information is needed to evaluate whether SMB at the source area have reached achievable anthropogenic background levels, an equivalence approach should be developed with an appropriate dataset that has been scrubbed of outliers to evaluate achievement of RAOs for tissue and other media. For example, it seems that Cascade locks has several clear outliers. In the future, outliers should be discarded per the dataset per EPA guidance.
8. There seem to be very distinct populations amongst PCB SMB tissue results in the forebay. This could be utilized in the future as a nearby reference area for the purposes of reaching equivalence, but how this is interpreted should be agreed upon beforehand.
9. Acoustic tracking. As much as this would be very interesting information, reconfirming the home range and level of movement during foraging of small mouth bass without seeing the specific tissue COC levels for certain behaviors may not answer any of the fundamental study questions above, as SMB are a poor indicator of potentially small source area(s) as theorized in the CSM. Perhaps these resources would be better focused in collection of sculpin, added craysfish, and clams around Bradford Island where possible.
10. Crayfish traps. Some discussion of treatment of salmonid bycatch should be added here and reviewed by NMFS staff to ensure adequacy of proposed BMPs.

Sean Sheldrake

U.S. Environmental Protection Agency

RPM, HSPC, Superfund and Emergency Management Division

Unit Diving Officer, Training Director, Laboratory Services and Applied Sciences Division

1200 Sixth Avenue, Suite 155, M/S DOC-01

Seattle, WA 98101

206.553.1220 desk

206.225.6528 cell

https://www.epa.gov/scientific-diving

https://www.facebook.com/EPADivers