Message

From: Sanga, Ravi [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=94FC8A3DE5994339AF563FF14098A8F8-SANGA, RAVI]
Sent: 7/1/2021 5:56:48 PM
To: dberlin@anchorqea.com; Brick Spangler [Spangler.B@portseattle.org]
CC: Blocker, Shawn [Blocker.Shawn@epa.gov]; florer.j@portseattle.org; debra.williston@kingcounty.gov; jeff.stern@kingcounty.gov; pete.rude@seattle.gov; allison.crowley@seattle.gov; Merv Coover [merv.coover@erm.com]; Greg Brunkhorst [gbrunkhorst@anchorqea.com]; Allen, Elizabeth [allen.elizabeth@epa.gov]; Gardiner, William W CIV USARMY CENWS (USA) [William.W.Gardiner@usace.army.mil]; Hoffman, Erika [Hoffman.Erika@epa.gov]
Subject: Revised East Waterway AB Memo - Remaining EPA Comments/Issues

Dan and Brick -- EPA has reviewed the latest version of the Draft EW Anthropogenic Background Evaluation Memo and the following remaining comments/issues remain:

1) Page 4, last paragraph – EPA disagrees with adding the discussion regarding mixing of contamination left due to dredging limitations. If material left in place is problematic, or may be problematic to the performance and success of the remedy, then the remedy as envisioned by the EW FS is flawed and needs to be revised so that other arrangements are made to properly contain it. Given that EPA does not believe the remedy as presented in the EW FS, to be flawed, the last paragraph in the intro of Section 2 that begins with "in the long term…" needs to be deleted.
2) Page 11, third paragraph – Explain how turning basin data was considered when determining AB or reference the section where turning basin data is presented. It needs to be very clear in the AB Memo that data from the turning basin was not considered or used in calculating AB.
3) Page 19, third paragraph – The third paragraph in section 4.4 needs to be removed.

EPA expects a revised EW Anthropogenic Background Evaluation Memo, that addresses the above comments, to be submitted to EPA, by Monday July 19th, 2021. Should you have any questions or require a meeting to resolve these remaining issues, please contact me at Ex. 6 Personal Privacy (PP)

Thanks

Ravi

From: Dan Berlin <dberlin@anchorqea.com>
Sent: Wednesday, June 09, 2021 4:52 PM
To: Sanga, Ravi <Sanga.Ravi@epa.gov>
Cc: Brick Spangler <Spangler.B@portseattle.org>; florer.j@portseattle.org; debra.williston@kingcounty.gov; jeff.stern@kingcounty.gov; pete.rude@seattle.gov; allison.crowley@seattle.gov; Merv Coover <merv.coover@erm.com>; Greg Brunkhorst <gbrunkhorst@anchorqea.com>
Subject: Revised East Waterway AB Memo

Ravi,
Please find attached the revised EW Anthropogenic Background Evaluation Memo. We've included the following files:

- PDF of the main AB memo showing redlines
- Word doc of the main AB memo showing redlines
- PDF of the response-to-comments table

Per our discussion yesterday, we also cross-checked EPA's responses to Ecology and the Suquamish Tribe. The AB memo is consistent with the responses, except in 3 places:

- **Ecology Comment #26 regarding request to add range of fine grained percentages of EW bedded sediment.** This comment was not incorporated. As described in EWG's response to EPA's comments (EPA comment #34), percent fines varies depending on proximity to outfalls as well as propwash from ships, and the Phase 1 removal action contains a sand cover layer, so the range of percent fines (1% to 92%) would not provide useful information for AB determinations.
- **Suquamish Comment #7 regarding dioxin/furan uncertainty of establishing AB for only 4 congeners.** EPA's response to the tribe suggests this uncertainty discussion is not needed. However, EPA required EWG to incorporate this comment. Per EPA comment #44, EWG has added this discussion to Section 5.
- **Suquamish Comment #8 requesting deletion of last sentence in Section 5.7 (now Section 5.9 in the revised AB memo).** EPA did not require EWG to delete this sentence, but indicated in the response to the tribe that it would be deleted. EWG has deleted "and contaminant" from the sentence in an attempt to address the tribe's concerns with retaining this sentence.

Please let us know if all looks good, and if so, we can provide a final clean pdf of the AB Memo.
Thanks
Dan

Dan Berlin, PWS
Principal

ANCHOR QEA, LLC
1201 3rd Avenue, Suite 2600
Seattle, WA 98101
T 206.287.9130
D 206.903.3322
C Ex. 6 Personal Privacy (PP)