

John Stone

From: Ashton, William S (DEC) [william.ashton@alaska.gov]
Sent: Monday, January 12, 2009 11:05 AM
To: Andrew Schicht; Bret Walters; Chris Meade; Heffern, Richard K (DEC); Jackson, Richard G POA
Cc: John Stone; Gary Gillette; Jack Q. Word ; Meg Pinza; Dick Somerville
Subject: RE: Douglas Harbor soil testing - ADEC Comment

Hi,

We've had some discussion back and forth, with a response to comments about ADEC & COE earlier comments. Here is ADEC response to the response to our earlier comment about tissue concentrations for mercury.

In the Inland Testing Manual on page 6-7 the paragraph at the bottom of the page says the following: “(t)he above comparisons to FDA values address human health concerns, and follow from EPA/USACE (1991). Other approaches which should be considered in addition to the use of the FDA values include comparisons to *state fish advisories*, cancer and non-cancer risk models, existing ambient fish concentration data.” (emphasis added)

In 2007 the State of Alaska Division of Public Health published the Epidemiology Bulletin Volume 11, Number 4 entitled, “Fish Consumption Advice for Alaskans: A Risk Management Strategy to Optimize the Public’s Health.” This Bulletin includes information about mercury in fish in Alaska and gives recommended consumption allowances. The Bulletin describes an EPA screening value for unlimited consumption defined as over 16 meals per month (p.5). In Table 8 of the Bulletin it lists for 16 meals per month a monthly consumption allowance for fish of 0.32 ppm wet weight of total mercury (assumed that all mercury is methylmercury)(p.31). ADEC considers the 0.32 ppm as the tissue concentration number to use based on the Alaska fish advisory.

We look forward to reviewing the results of the testing.

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From: Andrew Schicht [mailto:ASchicht@pndengineers.com]
Sent: Monday, December 15, 2008 9:39 AM
To: Bret Walters; Chris Meade; Heffern, Richard K (DEC); Jackson, Richard G POA; Ashton, William S (DEC)
Cc: John Stone; Gary Gillette; Jack Q. Word ; Meg Pinza; Dick Somerville
Subject: Douglas Harbor soil testing - response to agency comments

All-

Attached are comments prepared by NewField’s in response to recent comments received from COE & ADEC regarding the Douglas Harbor soil testing program. COE has requested another teleconference to discuss selected topics. We would like to hold this teleconference Tuesday morning (12-16) at 9:00 AM AKDT w/COE,

9/23/2009

ADEC & EPA. We hope to reach final consensus about the testing procedures by the conclusion of this meeting. Please advise if this date & time is acceptable. If it is not, please propose one that is.

Andrew Schicht, P.E. | Senior Engineer

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