

Message

From: Kelly, Albert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08576E43795149E5A3F9669726DD044C-KELLY, ALBE]
Sent: 10/5/2017 7:30:12 PM
To: rich.gold@hklaw.com
Subject: Re: Grids and transects issue

Keep pushing

Sent from my iPhone

> On Oct 5, 2017, at 3:18 PM, "rich.gold@hklaw.com" <rich.gold@hklaw.com> wrote:
>
> Step forward fyi.
>
> Rich Gold | Holland & Knight
> Practice Group Leader
> Public Policy & Regulation Group
> 800 17th Street, N.W., Suite 1100<x-apple-data-detectors://0/1>
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>
> Begin forwarded message:
>
> From: Peter Saba <psaba@schn.com<mailto:psaba@schn.com>>
> Date: October 5, 2017 at 12:16:46 PM PDT
> To: "rich.gold@hklaw.com<mailto:rich.gold@hklaw.com>"
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<HSchweitzer@cozen.com<mailto:HSchweitzer@cozen.com>>
> Subject: FW: Grids and transects issue
>
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>
> EPA Region 10 has now confirmed that the issue is not grid versus transect, it is the movement step in the grid approach. That is of course different than what they said on Monday. They have now confirmed that they will agree to use of the grid approach if we eliminate the movement step. We are checking on what this means for the recovery trend analysis and whether this is acceptable to the group.
>
> More detail in the email from Mat below.
>
> From: Mat Cusma
> Sent: Thursday, October 05, 2017 11:29 AM
> To: Jason Conder <JConder@Geosyntec.com<mailto:JConder@Geosyntec.com>>; Peter Saba <psaba@schn.com<mailto:psaba@schn.com>>; Hans Feige <hfeige@feige.us<mailto:hfeige@feige.us>>; Anne Fitzpatrick <AFitzpatrick@Geosyntec.com<mailto:AFitzpatrick@Geosyntec.com>>; Betsy Ruffle <betsy.ruffle@aecom.com<mailto:betsy.ruffle@aecom.com>>; Fred WOLF (frederick.wolf@total.com<mailto:frederick.wolf@total.com>); <frederick.wolf@total.com<mailto:frederick.wolf@total.com>>; 'Karen E. Traeger' <karen.traeger@total.com<mailto:karen.traeger@total.com>>; Blomgren, Nathan F (nathan.blomgren@chevron.com<mailto:nathan.blomgren@chevron.com>); <nathan.blomgren@chevron.com<mailto:nathan.blomgren@chevron.com>>; Marquez, Christy (ChristyMarquez@chevron.com<mailto:ChristyMarquez@chevron.com>); <ChristyMarquez@chevron.com<mailto:ChristyMarquez@chevron.com>>; Nathanson, Kirsten L. <KNathanson@crowell.com<mailto:KNathanson@crowell.com>>; George, Gerald <GeraldGeorge@dw.com<mailto:GeraldGeorge@dw.com>>; Debbie Deetz Silva <Debbie.Deetz.Silva@evrazna.com<mailto:Debbie.Deetz.Silva@evrazna.com>>; Drew Gilpin (Drew.Gilpin@evrazna.com<mailto:Drew.Gilpin@evrazna.com>); <Drew.Gilpin@evrazna.com<mailto:Drew.Gilpin@evrazna.com>>; Eileen Tierney (Eileen.Tierney@evrazna.com<mailto:Eileen.Tierney@evrazna.com>); <Eileen.Tierney@evrazna.com<mailto:Eileen.Tierney@evrazna.com>>; Loren R. Dunn <LDunn@bdlaw.com<mailto:LDunn@bdlaw.com>>; 'David C. Weber' <DWeber@bdlaw.com<mailto:DWeber@bdlaw.com>>; Linda Baker <lbaker@integral-corp.com<mailto:lbaker@integral-corp.com>>; Christine L. Hein <CHein@ringbenderlaw.com<mailto:CHein@ringbenderlaw.com>>; J.W. Ring (JWRing@ringbenderlaw.com<mailto:JWRing@ringbenderlaw.com>); <JWRing@ringbenderlaw.com<mailto:JWRing@ringbenderlaw.com>>; Mark Strandberg (mstrandberg@ringbenderlaw.com<mailto:mstrandberg@ringbenderlaw.com>); <mstrandberg@ringbenderlaw.com<mailto:mstrandberg@ringbenderlaw.com>>; Howard Cumberland <hcumberland@Geosyntec.com<mailto:hcumberland@Geosyntec.com>>; Scott Rowlands <srowlands@Geosyntec.com<mailto:srowlands@Geosyntec.com>>; christopher.bozzini@pgn.com<mailto:christopher.bozzini@pgn.com>; richard.george (richard.george@pgn.com<mailto:richard.george@pgn.com>)

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> Subject: RE: Grids and transects issue
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> Based on Jason's conversation with Karl, the conference call with EPA Region 10 counsel this morning,
and a follow-up phone call between Peter (and me) and Dan Opalski, it has been made clear that EPA's
remaining technical threshold issue is not sediment sampling based on Transects vs. Grids, but the steps
in our sample placement methodology (Work Plan Appendix B) that call for shifting certain samples to
reoccupy 2004 sample locations (Section B1, Steps 2 and 4). At all levels, EPA has now indicated its
willingness to accept the unbiased grid approach, but they are uncomfortable reintroducing bias by moving
sample locations within randomly selected grid cells.
>
> As a group, we need to decide how critical it is for us to be allowed to "scooch" sample locations to
get the information we need. I would like Jason's (and other technical folks') input on the issue:
>
> . Recognizing we can't perfectly reoccupy sample locations anyway (as Linda and Howard recently
noted), how much resolution might we lose, or how much uncertainty might we introduce, by comparing
unbiased locations from 2018 with the nearest neighbors from 2004?
>
> . Expecting that some unbiased grid locations are likely to fall near 2004 sample points, do we
really expect to need to move 108 sample locations to achieve the needed certainty in our trend analysis?
>
> . Is there a possible trade-off to be considered between number of SMA delineation sample
locations and reoccupation samples, or has that optimization already been performed?
>
> We need to decide in pretty short order whether we can accommodate the middle ground without losing our
ability to draw meaningful recovery trend conclusions from the data.
>
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