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**From:** Peter Saba [psaba@schn.com]  
**Sent:** 10/7/2017 12:32:40 AM  
**To:** Kelly, Albert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=08576e43795149e5a3f9669726dd044c-Kelly, Albe]  
**CC:** rich.gold@hklaw.com; Schweitzer, Howard [HSchweitzer@cozen.com]; mcusma@schn.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f0893ea4892247d181eb8d07bba0b3f5-mcusma@schn.com]  
**Subject:** RE: portland

Kell,

The Pre-RD Group is prepared to move forward and to accept the most recent EPA proposal on surface sediment sampling locations (grid-based process to achieve unbiased, random generated samples for the 428 samples with no relocation or movement to the 2004 sample locations or otherwise). This acceptance is explicitly subject to the Work Plan stating that the Pre-RD Group has the option of adding additional samples (above the 428) in order to reoccupy stations to collect additional data points to assist in analyzing recovery trends since the 2004 dataset.

As previously noted, one of the Pre-RD Group's key objectives is to analyze the extent to which there has been natural recovery since the 2004 dataset to inform the scope and extent of remedial actions. We believe that this is an objective that EPA shares. EPA had previously suggested that the group could add additional samples, and therefore I hope that EPA would support including in the Work Plan the option of additional sampling to be conducted in the same timeframe as the rest of the Work.

The Pre-RD Group's acceptance of this proposal on sample locations is also subject to reaching an acceptable resolution of the language in Section 3.1 of the AOC with respect to the Statement of Purpose and to review of the other EPA comments on the SOW and draft Work Plan that we just received. One company reserved its position fully until it has had an opportunity to review those comments to determine if there are other major issues.

I am available to discuss if you have any questions or would like further clarification. Thanks again for your continued time and attention to reaching resolution on a mutually acceptable AOC and Work Plan for this important sampling effort.

Peter