

BIOACCUMULATION – ECOLOGICAL RISK NARRATIVE

Clay Patmont

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- I generally agree with the draft text.
- Definition of BCOCs – the RSET work should be referenced here, in part to promote consistency with related regional sediment management programs.
- I agree that it is appropriate to reserve at this time any further narrative on direct impacts from non-bioaccumulative contaminants, as the state of the science in this area (e.g., PAH risks to fish) is currently far too uncertain to warrant any regulatory foray into this area, given the wide range of outcomes from published studies. Also note that the bioaccumulative elements of the contemplated SMS rule revisions are likely to set off a firestorm of stakeholder comments that will more than preoccupy Ecology's staff resources (i.e., stay focused on what Ecology can reasonably achieve at this time).