



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 4, 2007

Stephanie Sterling
Regional Sediment Evaluation Team Coordinator
Dredged Material Management Office
U. S. Army Corps of Engineers
P. O. Box 3755
Seattle, Washington 98124-2255

RE: Continued Support of the Sediment Evaluation Framework prepared by
the Regional Sediment Evaluation Team (RSET)

Dear Ms. Sterling:

Earlier this year, you asked the Department of Ecology (Ecology) to provide comments on the January 2007 Interim Final Version of the Sediment Evaluation Framework (SEF). Over the last several months, Ecology has reviewed the document. This letter provides you with the results of our review and describes several needed changes to the SEF before we can support and approve the document.

Ecology's main concern is the relationship between the SEF document and the Sediment Management Standards (SMS) [Chapter 173-204 WAC]. The SMS rule is the primary regulatory tool for contaminated sediment sites in Washington. The SEF needs to have the SMS rule added and properly referenced throughout the document. In particular, the SEF document should clearly state that project proponents must comply with the SMS rule requirements. The Interagency Cooperation Agreement (ICP) describes the relationship between the SEF document and the SMS rule. The SEF document should have similar terms added.

Ecology also believes the final SEF document should address several specific issues. We have prepared a series of issue papers that describe our concerns and recommended solutions. Attached to this letter are the following issue papers:

- Issue Paper #33: Should "regional conditions" be included in the SEF?
- Issue Paper #34: Inclusion of cleanup in the SEF.
- Issue Paper #35: Method Detection Limit (MDL) vs. Screening Level (SL) problem.
- Issue paper #36: Changes in Table 7-1.
- Issue paper #37: Inconsistency with Level 1 and Level 2 usage.
- Issue paper #38: General editorial issues.
- Issue paper #39: Missing acronyms and abbreviations.
- Issue paper #40: Non-functional web-links.
- Issue Paper #41: Typological issues, reference citation errors.



Ms. Stephanie Sterling
May 14, 2007
Page 2

Ecology continues to support the efforts of the RSET team and the method developed over the past few years. The personnel and financial commitments Ecology has made to RSET and the Freshwater Sediment Quality Guidelines (SQG) Workgroup shows Ecology's interest in working with the other RSET agencies. We will continue to work with RSET to develop the SEF into a guidance document which clearly defines SMS rule requirements.

If we can provide any added support or clarification on these issues, please contact Dave Sternberg at (360) 407-7146 or dast461@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "James J. Pendowski". The signature is fluid and cursive, with a large initial "J" and "P".

James J. Pendowski, Manager
Toxics Cleanup Program

Enclosures

cc: Jim Reese, NWD/USACE
Dave Sternberg, Ecology