

Received by Tim Chibnall, HWP, by email on August 16 at 9:50 a.m.

Tim,

One of the main reasons for revising the tanks MRBCA guidance was a desire to update its risk-based levels with the most current toxicological data and scientific methodology utilized by the EPA and other federal and state agencies. The result would be consistent target levels for Missouri's tanks and B/VCP programs that are in line with the most current information used throughout the country.

The proposed updates to the tanks guidance include revisions to the target levels so that they are consistent with the departmental target levels currently in use. However, we understand that a forthcoming update to the departmental guidance will further update its target levels. If the updates to the tanks guidance occur as currently scheduled, Missouri's guidance documents will contain consistent target levels for only a very brief period (a matter of months at most). Thereafter, the guidance documents will conflict with each other once again.

Acknowledging that the tanks guidance process has been delayed several times already, it seems prudent to delay it one more time so that both it and the departmental guidance can benefit from the latest toxicological and scientific methodology.

Brian

Please note my new office telephone number.

Brian Porter, PE

Principal

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