

# CONTAMINATED SOILS FORUM

*A stakeholder body advising the Florida Department of Environmental Protection*

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07 March 2003

Roger B. Register, Rule Manager  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS4505  
Tallahassee, FL 32399-2400

*Re: 62-777, F.A.C. -- Bioavailability Factor for Direct-Contact Soil Arsenic CTLs*

Dear Mr. Register,

On behalf of the Florida Contaminated Soils Forum, I have submitted a letter and two technical reports to Mr. John Ruddell, Director – Division of Waste Management, regarding recommendations for incorporating a chemical-specific bioavailability factor in the calculation of the direct-contact CTLs for arsenic in soil. These materials are attached and are offered as comment upon the proposed revisions to 62-777, F.A.C.

Please consider the recommendation of the Contaminated Soils Forum to incorporate a chemical-specific bioavailability factor of 25% in calculating the direct-contact soil CTLs for arsenic to be provided as default values in 62-777, F.A.C. This value was recommended by the Forum as an upper-bound characterization of bioavailability based on the result reported in the publication of an FDEP-sponsored study for the “most bioavailable” of the Florida soil samples evaluated. The Forum considered the appropriateness of this study for deriving bioavailability factors and considered the associated uncertainties in selecting this upper-bound value as its recommendation.

I appreciate your inclusion of this topic on the rule workshop agenda so that additional input could be solicited from other interested parties. I am pleased to communicate the finalized recommendations of the Contaminated Soils Forum to you in conjunction with the rule updates. Thank you in advance for considering this input.

Sincerely yours,



Robert P. DeMott, Ph.D., DABT  
Chairperson

cc: Bill Burns (MS 4520) – Rule Manger, Dry Cleaning Solvent Cleanup Program;  
Tom Conrardy and Guillermo Wibmer (MS 4530) – Rule Managers, Petroleum Cleanup Program

Attachments: 1) Transmittal letter, 2) MFG recommendation report, 3) uncertainty white paper