

14. New Issue, Applicant Data Submittal. Tim Thompson of Parametrix reintroduced the issue of applicant data submittal. When additional concurrently run biological testing data that would not be required by the PSDDA tiering process has been collected by an applicant, must this data be submitted? He asked for documentation and also asked whether PSDDA interpretive criteria would be applied to this data. An additional comment was that he feels the dredger should have the option of running only the biological tests with chemistry performed only for confirmation. John Malek replied that this will be discussed between the PSDDA agencies. From the EPA standpoint the chemistry is used for inventorying, while biology has the primacy for decision-making. The controversy for PSDDA was that PSDDA developed threshold levels (SL and ML) for when we expect those biological responses to occur. These correspond to chemical numbers. These are not cause and effect numbers but efficient and reliable predictors. Discussion of this topic was tabled until further discussion can occur among the PSDDA agencies. (For resolution of this issue reference Appendix A post-ARM meeting summary).

#### Appendix A - Post-Arm Meeting Issue Resolution Summary

- Data Submission. All applicants considering concurrent chemistry and biological testing will be informed that *ALL chemistry and biological data must be submitted to the PSDDA agencies. This data is to be submitted whether or not tiered testing procedures would have required biological testing.* The decision whether or not to pursue concurrent or tiered testing remains with the applicants. This programmatic clarification will be included in all sampling and analysis plan response letters.