

BAE Systems San Diego Ship Repair Inc.



NASSCO

BAE Systems Current Leasehold

DTR § 31.2 - Comparison of Incremental Cost versus Incremental Benefit



“The highest net benefit per remedial dollar spent occurs for the first \$24 million (12 polygons), based on the fact that **initial exposure reduction is 16 to 13 percent per \$10 million spent**. Beyond \$24 million, however, exposure reduction drops consistently as the cost of Remediation increases. Exposure reduction drops to **7 percent or below per \$10 million spent after \$33 million** and below **3 percent after \$102 million**. Based on these incremental costs versus incremental benefit comparisons, **cleanup to background sediment quality levels is not economically feasible.**”

- See Cleanup Team’s 9/15/2011 Revised DTR Page 31-4

- Goals

- Water and Sediment

- Acknowledges variability of measurements
 - Compare chemical concentrations in remediated area with 120% of background levels

Post-Remedial Monitoring



- Goals – remaining chemical concentrations will not unreasonably affect Bay beneficial uses
- Evaluate Triad and bioaccumulation
- Trigger concentrations will be used to evaluate if cleanup levels achieved
- Trigger concentrations recognize sediment chemical concentrations cannot be measured with absolute accuracy and addresses natural and sampling variability
- Safety net – if trigger concentrations exceeded, investigation and report follows. Water Board, not dischargers, identifies future action