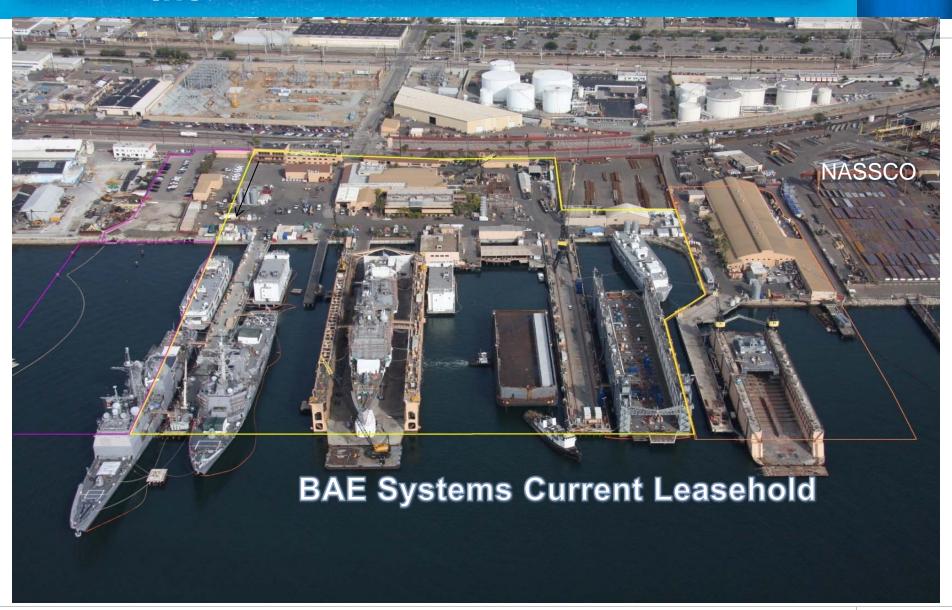
BAE Systems San Diego Ship Repair Inc.





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

Remedial Monitoring



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