

Summary of Dr. Allen's Opinions

March 11, 2011 Expert Report

The Order fails to incorporate bioavailability. . .

1. *Metals* in sediments at NASSCO do not cause potential risks to aquatic life.
2. *Polycyclic Aromatic Hydrocarbons (PAHs)* at NASSCO will not be toxic to aquatic organisms.
3. *Bioaccumulation. Macoma* tissue testing not indicative of bioaccumulation risk.
4. *Pore Water.* Inappropriate to compare *pore* water concentrations to criteria developed for *surface* water.