

Summary table applying interim step to fish consumption variables in SSRA.

The basis of calculation starts with EPA HQ of 2.55 derived from their 2012 draft risk assessment; based on 87.5 g/day consumption @100% contaminated fish, 4.05x10<sup>-6</sup> BAF and 15% methylation rate. Green shaded boxes denote results at or near protective HQ. Tan boxes denote duplicate entries from other combinations, thus blank.

		BAF 2003	Methylation Rate 2003	Typical Fisher Consumption			Hi-end Fisher Consumption		
				Consumption	% Contaminated Fish	Combined Consumption & Contaminated Fish Rate	Consumption	% Contaminated Fish	Combined Consumption & Contaminated Fish Rate
Typical Fisher	Fish Consumption Rate (7.15 g/day)			0.21		0.02			
	% of Contaminated Fish (10%)				0.26	0.02			
Hi-end Fisher	Fish Consumption Rate (32g/day)						0.93		0.23
	% of Contaminated Fish (25%)						0.23	0.64	0.23
BAF 2003 <sup>1</sup>	1.4 x 10 <sup>-6</sup>	1.06		0.09	0.11	0.01	0.39	0.27	0.10
Methylation Rate 2003	6% assumption <sup>2</sup>	0.43	1.02	0.08	0.10	0.01	0.37	0.26	0.09

<sup>1</sup> EPA had recommended a methylmercury BAF of 4.05E+06 L/kg, to represent a mixture of fish being taken from lakes at France Park. More specifically, this involved a mixture of BAFs for Trophic Level 4 Fish, which was 6.8E+06 L/kg, and BAFs from Trophic Level 3 fish, which was 1.6E+06, resulting in the average of BAF of 4.05E+06 L/kg mentioned above. *1997 Mercury Study Report to Congress*, Dec. 1997, EPA-452/R-97-003, referenced. However, U.S. EPA's most recent guidance document recommended a Trophic Level 4 BAF of 2.7E+06 L/kg and a Trophic Level 3 BAF of 6.8E+05 L/kg. *Guidance for Implementing the January 2001 Methylmercury Water Quality Criterion*, April 2010, EPA 823-R-10-001. Averaging these two figures results in a BAF of 1.69E+06 L/kg, which is considerably lower than the BAF of 4.05E+06 L/kg relied upon by EPA.

<sup>2</sup> EPA had additionally construed the nearby water bodies at France Park as essentially "deep water lakes" in its 2012 risk assessment. The Old Kenith Stone Quarry Lake and Elzbeck Lake are shallow, spring-fed lakes, more akin to rivers than deep water lakes. In the 2003 risk assessment, EPA had applied a methylation value for rivers to the hazard quotient calculations. The change for the Old Kenith Stone Quarry Lake and Elzbeck Lake represents a change that disregards the facts.