

March 24, 2025

Reply to DTSC Response to SCF000014

Dear Valerie,

Thank you for your prompt response.

I believe that you concur that DTSC made an error in choosing unattainable LUTVs (based on unrealistically low MRLs) for chemicals whose background datasets were predominantly non-detects. Would it not be a more logical path forward for DTSC to admit this to the public, then recalculate LUTVs using a similar protocol as used by EPA for radionuclides, namely using the 2-sigma UCL of MDLs in characterization data? That way, the public would not incorrectly think that DTSC is cheating, fudging the numbers, or moving the goalposts, using MLEs.

Just trying to help.

Phil