

**Submission of STREAM SCF000014**

**Category:** Cleanup

**Subject:** Soil Smarts Meeting No. 3

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**Message:**

Please see my comments and questions on the Soil Smarts Meeting #3.

[https://philrutherford.com/SSFL/DTSC/Soil\\_Smarts/2025-03-13\\_Comments\\_Questions\\_on\\_Soil\\_Smarts\\_No\\_3.pdf](https://philrutherford.com/SSFL/DTSC/Soil_Smarts/2025-03-13_Comments_Questions_on_Soil_Smarts_No_3.pdf)

In general, I agree with your attempts to utilize MLE, however I believe that if DTSC had followed EPA protocols in calculating chemical LUTVs, the use of MLEs would have been unnecessary. I remain opposed to the 2010 AOC.

Phil Rutherford

**Attached files** (optional):

[2025-03-13\\_Comments\\_Questions\\_on\\_Soil\\_Smarts\\_No\\_3.pdf](https://philrutherford.com/SSFL/DTSC/Soil_Smarts/2025-03-13_Comments_Questions_on_Soil_Smarts_No_3.pdf)