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Subject: [External] Bishop Tube Public Comment
Date: Tuesday, January 25, 2022 4:26:39 PM

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The proposed Analysis of Alternatives and Remedial Response (AOA) fails to address known presence of DAPL in the bedrock at the site and DAPL suspected off the property. This DAPL will be a continuing source to the groundwater and Little Valley Creek.

Given the TCE and other COCs detected in seeps and surface water samples from Little Valley Creek downstream of the property, and the lack of containment or treatment of these chemicals off the property; the AOA fails to meet anti-degradation protections required for Little Valley Creek and associated wetlands.