

Subject: Benicia Dispute Basis  
From: Chris Parent  
Date: Tue, 12 Sep 2006 15:42:00  
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Based on investigations so far, USACE is recommending that just about all sites investigated in the Expanded SI be designated PRP and therefore outside the scope of the FUDS program. The unresolved sites from the PA Phase fall into proposed PRP designation, beneficial reuse post Army, and access issues. In addition to the overwhelming use of designating sites as PRP, there is a pervasive issue of inadequate characterization of many sites because of lack of soil samples, lack of investigations because of USACE reliance on historical records (gaps), and again beneficial reuse exemption (basically any use post Army).