

## John Price

173-340-747(e) is popularly referred to as the 3-part test for verifying soil cleanup. Ecology recently (Dec 2017) allowed the use of incremental sampling methodology (ISM) for sediments in its SCUM II manual, Ecology Publication No. 12-09-057. I request that Ecology modify 173-340-747 to allow the use of ISM for MTCA soil cleanups. I request that Ecology allow ISM for soil cleanups on industrial properties via the 173-340-745 reference to -747. While you are modifying only 173-340, I would also like ISM to be allowed for the closure of dangerous waste management units under 173-303-610; note that 173-303-610(2)(b)i refers to 173-340-700 through -760. Therefore, I request that the Concise Explanatory Statement for the changes to 173-340 should explicitly acknowledge the applicability of the changes to 173-303-610(2)(b)i