

Public comment submitted via the online meeting viewing platform after meeting concluded

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I really enjoyed the PA presentations. I basically agree with everything said and it was very well said. Like many PA presentations, however, it did not state the key questions. Are the predicted doses less than some standard? Often a very simple vadose zone model is sufficient to answer the compliance question. And no matter how complex the vadose zone model, the answer will not change. Soon the questions that can derail a performance assessment are related to vadose zone model parameters and assumptions that do not change the results of the performance question. Missing the point of a compliance model! PA presentations (analysis and documentation) need to increase the focus on the performance question (as you started the presentation). In my experience, simple vadose zone models are often sufficient to provide reliable confidence in the performance of the site. If the questions at the end of the presentation or review of the analysis are related to the ability to demonstrate compliance, we did our job. If the questions are about detailed modelling of the vadose zone when a simple vadose zone model provides the same compliance demonstration, we have missed the point of compliance modelling and sometimes derailed the whole project by focusing on the wrong portions of the conceptual model. Thanks for emphasizing to start with a simple conceptual model and add complexity when the analysis and data demonstrate the need. I also enjoyed the improbable is more probably than you might expect, sentiment.