To: Tommy Mobley, Larry Champagne
From: Jessica White
Date: June 18, 2009
Re: Comments on the Draft Updated SLERA, Gulfco Marine Maintenance Site, Freeport, Texas

General Comments

1. A sediment ERM is not a suitable threshold for screening ecological risk. Since ERM marks the point above which effects become probable it is not a very protective metric for risk (particularly at the screening level). ERM is often used as a threshold for injury to natural resources in Natural Resource Damage Assessments. Further knowledge is gained by looking at ERM values in combination as a quotient in multiple contaminant sites such as this. An ERM quotient would be a more reliable indicator of the potential for risk or injury to exposed ecological receptors.

2. The use of soil sample data for background comparison to sediment samples is a concern in most cases. While it is understood that there was some justification for the comparison of sediment data to soil data in this particular case (given that many of the wetland sample locations were dry) – there is still a subset of sediment samples that were likely to be wet year-round and thus should not be comparable to soil samples. However, since it is not likely that the screening of sediment samples made a significant difference in the ultimate outcome of the SLERA, it is not necessary to revise this aspect of the report.

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