Issue Category	BERA Directive Comments	General Response
Use of COCs in the FS and beyond	7, 11, 179, 180, 181	Consistent with the flow diagram developed in the 8/20/10 and 9/9/10 EPA-LWG meetings (Attachment A), COCs will not be identified in the BERA. The Risk Management Recommendations Section of the BERA will recommend COCs to be evaluated in the FS. The process for recommending COCs is described under Risk Management Recommendations below. COCs will be identified in the FS. The list of BERA recommended COCs may or may not be the same as the list of focused PRGs developed by EPA and LWG. The FS will evaluate the COCs in detail and will loop back to ensure that the selected remedy adequately addresses all chemicals that present "potentially unacceptable risks", i.e., those with HQs≥1 in the final step of the analysis of hazard quotients (HQs) for each line of evidence (LOE).
Risk Management Recommendations	6a, 7, 8, 9, 10, 12, 26, 90, 145, 172, 178, 181, 184	For the record, the LWG's position is that no risk management decisions were made in the draft BERA. As discussed in the September 9th meeting, recommendations about which chemicals should be identified as COCs in the FS will be presented in a distinct Risk Management Recommendations section of the BERA, or a separate document if the LWG so desires. The BERA risk management recommendations will be either summarized or included in its entirety, in a separate document along with BHHRA risk management recommendations. The risk management recommendations would include information such as the following: Support for the selection of certain chemicals in the FS that constitute the majority of risks, (e.g., PCBs risk to mink) based on the:

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		• spatial extent, • magnitude, • ecological significance of risks • whether PRGs for a subset of chemicals are protective of the extent of risks from other chemical-receptor pairs (e.g., spatial extent of mink PCBs risk subsumes risk from other chemical-receptor pairs) Information on whether there is a sediment pathway associated with the risks (e.g., whether a tissue-sediment relationship exists and the strength of that relationship) also will be used. The above information would be used to identify those chemicals that will be recommended as chemicals of concern (COCs) in the FS.
Eco HQs≥1	7, 8, 10, 11, 12, 26, 145, 175, 178, 179, 180, 181, 184, 185	Consistent with the flow diagram developed in the 8/20/10 EPA-LWG meeting, those COPC -receptor pairs resulting in a hazard quotient (HQ) ≥ 1 for any given LOE based on the final step of the hazard quotient analysis will be identified as posing potentially unacceptable risk. No term will necessarily be used to describe those COPC-receptor pairs with HQs ≥ 1 for a given LOE, however, if the LWG determines that a term to describe such COPC-receptor pairs, (e.g., “potentially unacceptable risk (PUR)”) improves readability, such a term may be used. Individual LOEs for COPC-receptor pairs with HQs ≥ 1will be tabulated, then subject to uncertainty analyses and combined through weight of evidence analyses to provide interpretation of ecological significance. Per ERAGS (EPA 1997, Section 7.3.3), in addition to developing numerical estimates of existing impacts,

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		risks, and thresholds for effect, the LWG will put the estimates in context with a description of their extent, magnitude, and potential ecological significance. This information will be detailed in the Risk Characterization section and summarized in a revised Table 11.2.
Treatment of TZW	41, 61, 99, 164, 165, 167, 169, 170, 171	In the 8/20/10 and 9/9/10 LWG-EPA meetings to resolve EPA directed changes the following was resolved: 1) EPA directed the LWG to include TZW as a LOE for lamprey and sculpin populations and the benthic invertebrate community in the BERA. 2) Consistent with the Problem Formulation, information on the fraction of TZW ventilated relative to surface water **may** be included to modify the exposure point concentrations (EPCs) for fish if such a modification of the exposure rate is scientifically supported. 3) The initial analyses will be point by point; the results will then be evaluated based magnitude, spatial extent and ecological significance of any TRV exceedances. 4) Also consistent with the Problem Formulation for benthic invertebrates, information on the fraction of TZW ventilated relative to surface water **may not** be used to modify the EPCs. 5) The LWG will present a review of the scientific literature on benthic invertebrate exposure to TZW and EPA will provide any literature that they are aware of on this subject. 6) EPA would like an evaluation of the fraction of TZW ventilation for benthic invertebrate presented in the uncertainty analysis and for this uncertainty analysis to be considered in characterizing the extent, magnitude and ecological significance of TZW HQs. 7) For TZW COPC-receptor pairs resulting in HQs>1.0, EPA would like an evaluation of the strength of the TZW LOE relative to other LOEs to be considered in characterizing the extent, magnitude and

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		ecological significance of TZW HQs. 8) EPA will consider the LWG's risk management recommendations on whether potentially unacceptable risks associated with TZW should result in chemicals being identified as COCs.
Osprey risk from lead	182	In the 9/9/10 LWG-EPA meeting to resolve EPA directed changes EPA agreed that the information presented in this table was factual. The LWG agreed that they will provide a more thorough characterization of the magnitude, extent and ecological significance of the potentially unacceptable risk associated with this LOE.
2,3,7,8-TCDD Surface Water TRV	79, 193	In the 9/9/10 LWG-EPA meeting to resolve EPA directed changes, EPA indicated erroneously that there is an AWQC value for the protection of aquatic life, though based on protection of human health. Based on this assertion, the LWG agreed to present both an ecologically relevant screening value and the EPA-directed value based on protection of human health but to screen on the lower EPA-directed human health criterion. LWG agreed to this because changing the screening value to EPA's directed value does not change the results of the screen (2,3,7,8-TCDD doesn't screen in as a surface water COPC based on a screening value of 10 or 100 pg/L).
Uncertainties that contribute to underestimating risk	143	In the 9/9/10 LWG-EPA meeting to resolve EPA directed changes, the LWG agreed to identify additional instances where uncertainties may result in an underestimation of risks. Additionally, EPA and LWG agreed that because ecological risk assessment relies on conservative assumptions, as stated in

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		ERAGS (EPA 1997), most uncertainties discussed in the BERA will be described as resulting in overestimation of HQs and risks.

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