Response to Travis/Peterson Environmental Consulting (T/P) Comments (dated 11 July 2005) on the April 2005 Draft DMTS Fugitive Dust Risk Assessment

No.	Comment	Priority	Recommendation	Response	
T/P-1:	Sediment Transport In Chapter 3, Exponent describes the importance of sediment movement to transport heavy metal away from the DMTS facilities. The document sites several past studies that sampled marine and freshwater sediments. Figures 3-3 and 3-9 showed concentrations of metals in streams and around the port facilities. Table 3-20 displayed sample results. All these references displayed high concentrations of metal in the sediments. The risk assessment does not model sediment transport from the DMTS road or port site. Since the majority of metals move by sediment transport, the assessment must demonstrate how the streams carrybed loads and give a reasonable estimate of the rate of movement. The long term risk then can be estimated by knowing the spread of contamination throughout the watersheds.	Medium	Please provide the rationale for not conducting sediment transport modeling or please conduct the appropriate modeling.	It is likely that there is some transport of metals in sediment downstream from the road crossings of the streams, or downcurrent from the port facilities. However, the concentrations will naturally decrease with distance from the road or port shiploader sources. Samples collected for the risk assessment were typically collected closer to facility sources, to capture the higher exposure concentrations, so as to provide a more conservative assessment. The results of the risk assessment provide a snapshot of risk under current conditions. The risk assessment does not directly address the degree of change that might occur over the life of the operation, such as with ongoing sediment migration. However, monitoring data collected in the future can be evaluated in the context of the risk assessment results to maintain an ongoing understanding of conditions and possible risks associated with those conditions. Monitoring and source management and control is likely to provide more value for the dollar spent than modeling future conditions would. However, modeling of future conditions could be considered as a possible approach to addressing uncertainties in the risk assessment, and can be considered during development of the risk management plan.	Response is acceptable.

Notes: Please note that RA text quoted herein may differ from that in other comment response documents, and in comparison with the final RA document, as a result of successive revisions made during the comment resolution process.

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DMTS - DeLong Mountain Regional Transportation System
RA - risk assessment