

PPC 9523.1986(05)

ATSDR HEALTH ASSESSMENTS UNDER RCRA 3019

NOV 21 1986

Dr. Barry L. Johnson  
Associate Administrator  
Agency for Toxic Substances and Disease Registry  
Chamblee 28 South  
1600 Clifton Road, NE  
Atlanta, Georgia 30333

Dear Dr. Johnson:

Thank you for your recent letter of October 30. I agree that we should meet to discuss ATSDR health assessments under RCRA §3019. I would also like to follow-up on several issues that you raised.

The "Procedural Guidance for Reviewing Exposure Information under RCRA Section 3019" alluded to in your letter was issued in final form and distributed to the Regions on September 26, 1986. This document alerts the Regions to the possibility of the public submitting release and/or exposure information to ATSDR, as well as to EPA or the State. The guidance (page 9) goes on to state that ATSDR should forward copies of these submissions to the EPA Region, and encourages the Regions to coordinate any response with ATSDR's activities. I believe that we still need to work out the details of this process in future meetings.

While §3019 allows public submissions, the statute does not explicitly provide for public petitions to ATSDR for health assessments. However, we recognize that public petitions for assessments at RCRA sites may be forthcoming under the new Superfund provisions. For this reason, we agree that published procedures for responding to petitions should cover RCRA facilities, as well as Superfund sites. I look forward to working with OERR and ATSDR to develop these procedures.

In your letter you also sought clarification of the role of Mr. Ralph Touch as part of the Permit Assistance Team (PAT). Let me assure you that Mr. Touch will be involved in all phases of the PAT decision-making process, including workload planning and preliminary technical assistance, as well as formal referrals to ATSDR for a health assessment. To date, no formal PAT meetings have been convened to recommend referrals, and Regional requests for site-specific assistance have been fairly limited.

RO 12786

-2-

On October 28, we forwarded the attached letter to Mr. Touch which summarizes the results of our survey of the Regions for sites likely to need ATSDR assistance in the near future. Since then, we also sent to Mr. Touch the data for one site in Region IV (B.F. Goodrich, Kentucky) for ATSDR review. In this case we are seeking technical assistance in performing a preliminary evaluation of the potential impact of apparent exposure to the public, caused by releases into the Tennessee River, in order to determine the need and extent of further evaluation. We will continue to keep Mr. Touch informed by phone of the status of other §3019 sites and will send him the necessary data as our Regions generate it.

I look forward to meeting with you soon to discuss these and other issues. Ralph Touch will be meeting with my staff to discuss the status of funds for ATSDR activities, the list of candidate facilities for ATSDR assistance, and procedural issues. I suggest that we meet shortly after this so that we can take advantage of our staff's discussions. Please have your secretary contact my office to arrange our meeting.

Sincerely Yours,

Original Document signed

Marcia Williams  
Director  
Office of Solid Waste

Attachment

cc: Ralph Touch

RO 12786