

PPC 9523.1986(02)

EXPOSURE INFORMATION REPORT REVIEW  
IN CONJUNCTION WITH ATSDR

July 31, 1986

Dr. Barry L. Johnson  
Associate Administrator  
ATSDR  
Chamblee 28-South  
1600 Clifton Road, NE  
Atlanta, Georgia 30333

Dear Dr. Johnson:

I am responding to your letter of May 28, 1986, which raised several important issues regarding the procedures EPA has developed for interacting with ATSDR in conjunction with reviews of exposure information under RCRA §3019. We discussed these issues in our meeting on July 7, 1986, with Mr. Porter.

Before responding to your letter, let me briefly explain how I view the process we use for reviewing Exposure Information Reports (EIR). The review of an EIR follows the same basic steps we use in reviewing a RCRA Part B Permit application, i.e., a general completeness review followed by a technical evaluation. The purpose of the EIR completeness review is to determine if the applicant has submitted all the necessary pieces of information. Because the EIR is based in large part on information from the Part B application, the EIR and Part B for a facility are generally reviewed concurrently. Once the EIR is determined to be complete, the permit writer will conduct a technical review and look for evidence of significant prior or continuing releases from the facility.

If the writer determines there is no evidence of a significant release, he will consider any impact of potential future releases and will consider the addition of special permit conditions to mitigate potential exposure. If significant releases are known (or suspected) to have already occurred, a more detailed examination of the exposure potential will be conducted and a health assessment may be initiated. If the EIR and Part B information submitted to date does not clearly show whether there is exposure from a release, the permit writer will request additional information from the applicant so a firm decision can be made.

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In response to your concern about ATSDR's role in this process, there are specific areas where EPA (and authorized states) will need ATSDR expertise and assistance. The prime areas is, of course, to conduct health assessments where there is known or probable exposure to the public from releases. In addition, we will ask ATSDR to provide technical assistance in defining what additional information to request from applicants where the level of public exposure is not clear from the information submitted to date.

In many cases, the Regions will turn to EPA Headquarters for assistance in defining and reviewing this additional information. As you know, within my office we have created Permit Assistance Teams (PATs) which are groups that draw on a variety of expertise as needed for the particular facility under review. Ralph Touch is one of the people we intend to include in the resource pool for these PATs. We will also continue to ask for Ralph's participation in PATs or workgroups that are developing general procedures and guidance to implement §3019.

We are asking the Regional Offices to provide us with a list of facilities where they expect to need ATSDR either to initiate a health assessment over the next six months, or to provide technical assistance for further defining and reviewing information from applicants where the level of exposure is not clear. We will share this information with you so that we can work together in defining the specific areas where we will need your help for these facilities.

As I understand your request, you believe ATSDR's role should be broader than I have outlined above. Specifically, you suggest ATSDR should also review all EIR's, and that EPA (and authorized States) should routinely consult with ATSDR in all cases where there is evidence of release, even if it is clear there is no public exposure. At this time, I do not believe ATSDR assistance in these activities is necessary (for example, ATSDR expertise would not be required in cases where there is a remote landfill which shows no evidence of release of hazardous wastes). If experience dictates otherwise, we will, of course, request the involvement of ATSDR in the EIR reviews. We will be happy to make all EIR's and other supporting information available to ATSDR. However, we would consider these reviews to be outside the scope of our Interagency Agreement and the Proposed Draft memorandum of Understanding, except in cases where we request your assistance.

Your letter also raised a question about the estimated cost range for ATSDR's services. There seems to be some confusion over the substances of the April 16, 1986, letter from Bruce Weddle to Ralph Touch. The purpose of that letter was to request ATSDR to review monitoring data compiled for the BKK landfill, rather than to request a health assessment. The questions to be addressed by ATSDR related to the adequacy and quality of the existing data, and the appropriateness of the procedures to be used by EPA contractors in evaluating the data. Ralph Touch estimated that this limited review of the BKK data would cost about \$3,000 and require three weeks to complete, therefore, we chose to use these specific numbers in our response. However, we recognize the potentially wide-range of costs for health assessments and potentially wide-range of costs for health between EPA and ATSDR for RCRA §3019. The Agreement indicates a range of \$2,000 to \$5,000. Although this range is lower than the \$3,000 to \$10,000 you suggest, the range in the Agreement is only an estimate and the higher range may be more accurate for some cases.

Please contact me if you have any further comments or questions.

Sincerely yours,

Marcia Williams, Director  
Office of Solid Waste

cc: Bruce Weddle  
Eileen Claussen

bcc: Ken Shuster            Peter Guerrero  
Art Glazer                Reva Rubenstein  
Terry Grogan             Jack Lehman  
Bob Kayser                Art Day  
Ralph Touch               Jon Perry