

Bloomer, Bryan

From: Ginsberg, Gary [REDACTED]
Sent: Friday, December 01, 2017 1:43 PM
To: Bloomer, Bryan [REDACTED]
Subject: Re: Comments due before Noon Eastern Time Friday on draft RTR panel report
Attachments: RTR Review Comments - 12-01-17 GG.docx

Follow Up Flag: Follow up
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Hi - my comments are attached. My biggest concern is that our report appears to have missed the point of Tier 1 screening, we don't call out the need for sensitivity analysis as a high priority (it gets lost in the weeds), and we don't give enough credit to what EPA has accomplished. Thanks much - Gary

From: Bloomer, Bryan <Bloomer.Bryan@epa.gov>
Sent: Wednesday, November 29, 2017 8:42 PM
To: jrturner@wustl.edu; Bloomer, Bryan
Subject: Comments due before Noon Eastern Time Friday on draft RTR panel report

Dear RTR Methods Review Panelists,

First of all, thank you to those of you who have already provided comments. I greatly appreciate it!

For those of you still working I want to thank you and remind you that comments are due to me in writing before noon Eastern Time this Friday, December 1. Please note the report as finally posted had a few minor formatting changes and is dated November 20th. Also please note that final version is only available as a PDF formatted file via the meeting website here:

<https://yosemite.epa.gov/sab/SABPRODUCT.NSF/MeetingCal/64CE76E2636EBDC3852581A00065CCA3?OpenDocument>

I will also share what I have been telling your fellow panelists who have called asking about my preferred format for submitted comments.

Put your comments in a memo, email, or letter to me for posting to the meeting website. The best way to help me rapidly process these comments over the weekend in preparation for the conference call Tuesday is to separate them as follows.

In the first section of your memo put any really "big" issues that you believe are overarching or pertain to the entire report. In a second section place any issues for specific chapters that you would like to see considered for adding to the consensus opinion for that chapter, or removed, or discussed as possibly not representing a consensus position. In a third section include a list of any editorial items you notice as you go through the report. If listing note chapter, page and line number. Some have suggested they will attach a track changes version with these small edits and just note that they are doing so in their comment memo. If you wish to provide additional comments individually attributed to you, then you may include a fourth section. The comments in this fourth section will be individual comments that you want on the record for the Agency and public to note or have available to consider but that do not rise to the level of text included in the report or that are not to be represented in the consensus opinion of the report.

If you have thoughts about the inclusions in the executive summary or letter to the Administrator please place those in a fifth section of your comment memo.

A reminder that the conference call is scheduled for Tuesday December 5th from 11 am to 3 pm Eastern Time. The call in number is 1(866)299-3188 and the conference code is 2025644222#.

And if you have any questions please let me know.

I appreciate your efforts and your timely delivery of your comments before noon on Friday.

Sincerely,

Bryan

RTR Review

December 5th 2017 Pre-Conference Call Comments

Gary Ginsberg

Preface: I am not commenting on the cover letter or ES at this time but my detailed comments below would reflect back to statements made in those sections, which should be obvious from the following.

Page 8, Line 15, potentially may want to add: “since the main focus of this tiered screening is on persistent and bioaccumulative toxicants emitted by stationary sources.” That would help clarify why the exposures are primarily via foods.

Page 8, Line 36: I wonder if here we should acknowledge that according to discussion with EPA at the in person meeting, it was stated that 30% were screened in tier 1 and 60-70% in tier 2 such that we give some credit to the claimed efficacy but require that this be documented in the RTR report. If so, then the next paragraph could begin with: “An improved document would report on tiered model performance in the following ways:

Page 8, Line 41: “Field measurements” sentence – do we know if such information is available or will the Agency have to collect new data for this purpose. I’m sure that the models are based upon actual data at some level of development and now have evolved to attempt prediction of many different sources and scenarios. We know that the use of conservative assumptions is inherent to the screening approach in order to be protective of public health and environment. Perhaps the best way to phrase this is that the Agency should document the level of uncertainty and conservatism built into the models – a model sensitivity analysis may suffice to get at what we are seeking rather than resource intensive field work to obtain new data at particular facilities, which may or may not be representative of other facilities or other days or times of year given the vagaries of air sampling around sources.

Page 9, Line 2 – A clarification is that we would like their analysis of the efficacy of the tiering framework to screen out facilities be done by source category so that one can determine whether some types of facilities

Page 9 – first para under Recommendations: this paragraph is problematical in a number of ways. First, EPA’s primary purpose is as a screening tool, not as a way to protect specific subpopulations. Second, just about all risk assessments need to consider the most highly exposed subpopulation to make sure they are considering the maximal use of the resource when making risk-based decisions. Third, I think the panel comes off as missing the point with

this first paragraph, especially in misquoting from page 7 of the RTR report – in that report EPA acknowledges that the former model from 2009 was too health protective and failed to screen out facilities. We are trying to judge whether this new version is any better, not the failings of the 2009 version. Tier 1 will of course be maximally health protective as it is a rapid, easy to apply screen which wants only the most obvious and low risk facilities to be eliminated from further consideration. The question for us is whether it reasonably accomplishes this goal and I think our request is valid that the agency provide examples of source categories which have gone thru some screening using this model be documented. If what they say in person – 30% eliminated in Tier 1 – is true, it may be fine as is.

Page 9, Line 22 – “without the water moving into the lake” – unclear

Page 9, Line 25 – in Tier 1 I don’t think EPA is necessarily shooting for more realistic assumptions – that comes in Tiers 2 and 3. In Tier 1 EPA assumes you take essentially all of the air deposition and put it into the soil and food a single receptor is contacting/eating, and asks do you have a problem. Its akin to a mass balance approach. If no problem, then we know that source cannot under any circumstance be an excessive health risk. This may be a reasonable premise for Tier 1 – the latter tiers are where I think we need to focus on how realistic.

Page 9 – Lines 38-40 – no need for this comment on farm locations as they won’t know where farms might be put in the future and the only reasonable approach is to locate them where there will be maximal deposition. The advent of small farming may place agriculture in suburban, industrial and even urban environments. EPA should not prejudge where farms may exist in the future based upon current or predicted land use patterns. However, we do know where water bodies are currently and thus where they will be in the future.

Page 10, Lines 13-14 – not sure exactly what is intended by this and where in the model one would use USDA agricultural data, but as I said above this could change in the future so I’m not sure I see the point.

Page 10, Lines 33-41 – this paragraph seems out of place as it appears targeted to Tier 1 assumptions which was dealt with earlier, and essentially restates the earlier concern, to which I have already provided comments above. Along these lines, our recommendation for sensitivity analysis in the next paragraph could show the degree of conservatism in Tier 1 – as such I think the recommendation on sensitivity analysis should be elevated to higher prominence in our document.

Page 12, Line 18 – remove “does”

Page 14, Line 25 – Tier 2 more health protective? I don’t think this is accurate – more realistic, yes but I don’t see how it could be more health protective than Tier 1.

Page 14, Line 42 – “highly unlikely” is too strong – what is unlikely about subsistence fishing at fishable lakes downwind of a stationary source? These receptors are not also farmers as in Tier

1. I think we should give Tier 2 the credit it deserves in making more realistic assumptions about exposure.

Page 15, Line 17 – I don't remember us agreeing that PAHs and dioxins accumulate more in benthic rather than water column fish – if we assert this, we should provide citations. Also, besides raising a few concerns, its not clear what this paragraph is asking EPA to do.

Page 15, Line 24 – its not clear to me how site-specific USGS data will help with runoff assumptions, but that's why I'm not a geologist. However, I recommend that we say more about how such USGS data can help, perhaps with a citation where this has been done before.

Page 15, Line 28 – not sure we should be recommending they do a systematic review on all the screening model parameters – this could be an endless task – maybe on the 2 or 3 parameters found to be most influential in sensitivity analysis? Or just the sensitivity analysis and better justification for one value vs another?

Page 17, Lines 38-42 – I think this para is talking about sensitivity analysis, not probabilistic, although it uses the latter term. Our document has already made numerous calls for probabilistic analysis but is light on calling out the need for sensitivity analysis.