

Our View of the Risk Assessment's Weaknesses

*Northwest Ind. Residents for Clean Air*

1. You state that the total cancer risk due to CDF emissions is less than that due to existing air quality. What is your point? It would be amazing if the emissions from one source of pollution, even a bad one, exceeded that of the sum total of the 20 or 30 already existing sources. Does this mean that EPA would only find it disturbing if the new source doubled the existing pollution? Or is it an attempt to use language in such a way that people get the false impression that they are safer than they really are?

2. Of the twenty sediment contaminants there were only health effects for Reference Concentrations for two, ethylbenzene and toluene. Does this mean that although the other eighteen must have some health effects, since they are unknown the risk assessment counts them as non existent?

3. Data was incomplete on contaminants already on the site.

4. You did consider a few other health effects beside cancer, but as you explained (and we do give you credit for honesty) your level of confidence in your data was not too high since it involved making projections on data from animals to humans and from low level exposures to high.

You had medium confidence on only two of the chemicals, low confidence on the data for five and the others were still under review or there was no information at all, which means that you had some degree of confidence in the one third of the chemicals which you knew something about but only medium confidence in one tenth of them. We know you took the most conservative view possible to try to make up for the lack of data, but we question whether that is adequate protection when you don't even have data for half of the toxics you're dealing with.

5. The entire risk assessment considered only inhalation of PCBs, not the increase of ingestion by mouth. Since they can enter the soil and affect both the roots of the plants and then those which volatilize from the soil can enter the stems and foliage of plants and experiments have shown that plants nearest the landfill will be much more affected than those at a distance this could constitute a considerable extra risk that is not considered in your risk assessment.

6. You stated that there was no definitive research of the effects of wetting and drying cycles. Did you consider the research done at NY SUNY which shows that addition of extra water combined with heat can result in as much as 70% volatilization? Do you consider it unreliable as compared with the data you are using? Or do your calculations admit the possibility of this much volatilization?

7. Why are you considering only the dirtiest, most outmoded technologies in dealing with the sludge? Was there any comparison of the effects of this method of disposal with any of the nine known technologies for treating PCBs on site? Why is the clam shell method of transporting the material preferable to the hydraulic method which we believe is much cleaner and which LTV has agreed to use?

8. And last but by no means least what consideration have you given or does EPA ever expect to give to your commitment to environmental justice. You have duly counted people and determined that the city's population is about 80% minority and that Central High School's is 95% minority and then agreed to the dirtiest, most polluting method of dealing with the toxics which are proposed to be deposited in their area. When we first learned that EPA had indeed classified our area officially as an environmental justice area we asked for a moratorium on new permits for pollution and were told that would not be legal. When we asked again what was the purpose of spending money to even determine if an area was poor or a minority area, we were told that in those cases EPA would make extreme efforts to see that they *were* polluted to a minimum degree and with the strictest possible regulations and supervision. Now the government proposes to be a partner with industry in a dirty method based on a questionable risk assessment ( as all of them turn out to be). What does this bode for our future?