

Comments on OMB Risk Assessment Bulletin

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Introduction

1. First paragraph. In addition to a requirement to estimate risks to health, safety, and the environment, many regulations also require the evaluation of adverse impacts to welfare, the community, or similar language.
2. “The process should be better understood, more transparent, and more objective.”
Comment: The word objective raises a red flag because it is often a code word for something that industry disagrees with, like the phrase ‘junk science.’
3. “OMB, in collaboration with OSTP, has a strong interest in the technical quality of agency risk assessment ...”
Comment: This sentence sounds like an attack on EPA, accusing it of poor technical quality. It would be better to remove the word ‘agency.’
4. The same paragraph says that “the increasing importance of risk assessment ... requires that the technical quality...”
Comment: Again, this sounds accusatory, reflecting an underlying industry-based push back against environmental regulations.
5. The goal of establishing “uniform, minimal standards” takes away the ability to be flexible across large Superfund sites, chemical regulation, air emission control, and a myriad of other types of state, federal, and Tribal risk assessments done for a myriad of reasons. This will hamstring the field of risk assessment.
6. This rule seems to take particular aim the Reference Doses and Cancer Slope Factors that are at the heart of protecting human health and the environment.
7. Section II says that all risk assessments must describe data, methods, assumptions, and so on. This is already a requirement, and it simply raises suspicions to restate common standards and practices of risk assessment.
8. Section II says that this rule does not apply to “inspections relating to health, safety, or environment.” This might or might not refer to RCRA, CERCLA, water quality, or other regulations. This is not clear.
9. Section V.6. says “If highly exposed or sensitive subpopulations are highlighted, the assessment should also highlight the general population to portray the range of variability.”
Comment: It cannot be stated strongly enough that this statement cannot in any way be applied to Tribal communities or traditional subsistence lifestyles. Tribes are NOT a high end of the general population and cannot be compared to the general population.