clearly be used for dose-response assessment for TCDD and related compounds, but even more broadly, "it is envisioned that the chapter also provides a paradigm in which dose-response data for other compounds can be analyzed," according to the draft. The chapter is consistent with EPA's recently proposed cancer risk assessment guidelines in employing mechanistic models to the extent possible. It also offers calculation of other dose quantities (the ED_{10}) that will be useful as a starting point for further risk assessment decisions and addresses the extent to which the mode of action of TCDD is understood.

EPA in Chapter 8 went "as far as we could" toward developing a biologically-based model," explains one agency scientist, adding that "This [chapter] will lay the groundwork for receptor-mediated research to develop a biologically-based model."

CITIZENS OUTRAGED AT EPA RISK LEVELS FOR FLORIDA SUPERFUND SITE

In response to the outrage of citizens at a Superfund site who are charging EPA with "environmental racism," the agency has agreed to reconsider the risk levels selected by agency headquarters and Region IV for cleaning up the Pensacola, Fla., site, and to examine "cumulative risk" issues at the site.

Citizens near the site — the former Escambia wood treatment facility — have mobilized against EPA's handling of the cleanup decisions, objecting to both the cleanup risk levels and the agency's plan for partially relocating residents. The dispute comes at a time when EPA has embraced a number of proposals for greater "stakeholder involvement" in risk decisions and may provide a test case of those processes. The Pensacola citizens have organized a group, Citizens Against Toxic Exposure (CATE), which, during a heated Aug. 23 meeting with Region IV officials, presented a petition signed by over 300 residents.

In an action plan that Region IV officials emphasize is "only interim," Preliminary Remediation Goals (PRG's) for the Escambia site's dioxin levels were set at a 10^{-4} (or one in 10,000) cancer risk level, a policy choice attacked by residents as unjustified. The 10^{-4} standard is technically within the guidelines of the National Contingency Plan (NCP), EPA's regulatory framework for Superfund cleanups, which allows for a range of 10^{-4} through 10^{-6} (or one in a million) but presents a higher risk standard than the guidance recommends and a level usually associated with industrial cleanups, not residential areas.

Region IV officials added 35 homes to a relocation plan in an August addendum to their original April plan, bringing the total households to be relocated to 100 and leaving nearly 250 remaining on or near the site. CATE President Margaret Williams charges that EPA has decided on partial relocation "based on bureaucratic goals as opposed to citizen safety" and goes on to argue that the current plan illustrates a continuing pattern of discrimination towards the nearly 100 percent African American community located near the site. Only 21 of the 100 homes slated for demolition under EPA's plan are based on the health risks posed to residents, according to Williams, who notes that, for the other 79, EPA's stated rationale is that it needs those areas for "engineering reasons" — to get heavy equipment in and out of the site or because it would "isolate" part of the community.

The dispute comes at a time when EPA has embraced a number of proposals for greater "stakeholder involvement" in risk decisions and may provide a test case of those processes.

CATE and other Superfund sources argue that the 10^{-4} risk level is not justified on two counts: 1) that it departs from the NCP guidance of 10^{-6} for residential areas; and 2) that it violates the NCP recommendation that a 10^{-6} risk level be used when multiple contaminants or multiple pathways of exposure are present on a site.

The citizens group secured a Technical Assistance Grant (TAG) from EPA — a grant program designed to assist community groups with technical questions raised at Superfund sites — which allowed them to select a number of new areas for soil testing. Region IV is proceeding with its planning on the basis of the cancer risk posed by dioxin levels. But CATE information and sampling suggests that high levels of other chemicals such as arsenic, dieldrin and benzo (a) pyrene are also present at toxic levels on the site and that these chemicals have migrated both by air and through surface water runoff to other residential areas near the site. CATE also objects to EPA's consideration of dioxin for cancer risks only and the agency's failure to consider the reproductive and developmental effects the chemical may have.

CATE is not alone in these arguments. In a July 8 letter, the Florida Department of Environmental Quality's Waste Management Director sent a letter to EPA Waste Management Division Director Richard Green stating that "the Department firmly believes that the remediation goals should address a final risk management goal of 10^{-6}. This is the only relevant and appropriate risk goal for the carcinogenic chemicals found at this site."

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Complicating the issue is the designation of the Escambia site as EPA's first and only "National Relocation Evaluation Pilot," which could set precedents for decision-making and implementation processes for relocations at Superfund sites elsewhere. EPA Region IV sources confirm that an original planning document was sent to EPA headquarters containing a 10^{-6} risk standard scenario (which, if accepted, would have meant relocation of all 350 households) but that it came back from the EPA Office of Solid Waste & Emergency Response (OSWER) with the assertion that the agency could select any goal within the 10^{-4} through 10^{-6} risk range and included the suggestion that the region use the 10^{-4} standard.

CATE members have called this a clear breach of President Clinton's 1993 commitment to environmental justice. EPA officials deny neglecting the community and object to charges of racism in the selection of risk levels in the proposed remedy. "These were internal planning documents developed for costing out different options," notes one source.

During the Aug. 23 meeting, EPA officials responded to citizens' concerns about the presence of multiple contaminants at the site by promising to "look into the problem." Officials also outlined a plan for more soil testing for residential areas south of, but not contiguous with, the site, such as the Goulding area not included in current relocation plans.

In addition to a litany of health complaints — from elevated cancer rates to frequent rashes, skin irritations and asthma — CATE members and residents point to the "undue emotional stress" the process has created in the community. Following EPA's "emergency removal" designation in 1991 — a Superfund process invoked when contaminant levels must be lowered immediately — preliminary testing was completed and workers dug up 250,000 cubic yards of contaminated soil and piled it up onsite. The "removal" process was never initiated and the contaminated soil remains onsite in a large mound, dubbed "Mt. Dioxin" by residents, covered by a tarp and visible to many from their homes and yards. Moreover, residents report, a gaping 40 foot hole in the ground where the removal took place remains uncovered, posing a threat to the community.

CATE and its legal and technical representatives argue that the risk assessment process proposed by EPA is only as good as the data and the assumptions that sustain it, such as: 1) which chemicals are deemed "worth" investigating; 2) the inability or unwillingness of EPA to account for cumulative exposures (which is particularly important to this community whose members have worked in and lived around the site for over 50 years); and 3) the inability of EPA risk assessment approaches to account for multiple contaminants and their interactions. For these reasons, CATE is calling upon EPA to "change the risk standard used in the planning documents and to relocate all 350 homes in the community before engaging in a lengthy and costly risk-assessment process."

Observers note that relations among stakeholders such as CATE, the State of Florida, and EPA are "very poor," with many Escambia residents espousing the belief that EPA is intentionally relocating only part of the community to divide CATE's momentum. The State of Florida is negotiating with EPA over what risk level is consistent with state standards.

EPA SEEKS INPUT ON FUTURE GUIDANCE IN ISSUING ECORISK GUIDELINES

EPA's Risk Assessment Forum (RAF) has issued for comment the agency's first-ever ecological risk assessment guidelines and in doing so is seeking input on a series of specific issues, including what additional ecological risk assessment topics require more detailed guidance.

The *Proposed Guidelines for Ecological Risk Assessment*, dated August 1996, were published in the *Federal Register* Sept. 9 for 90-day comment, ending Dec. 9, and are also being made available through the Office of Research & Development's Internet home page. The agency's proposal stresses that the guidelines are not detailed and prescriptive, but instead will allow each program and region to develop specific guidance suited to its needs. Moreover, while the document expresses EPA's preferences, the agency wants to avoid requiring specific procedures that could soon become outdated in the rapidly evolving discipline of ecological risk, the draft notes. In the future, the agency intends to publish a series of shorter, more targeted guidance documents on specific topics.

Consistent with the agency's ecological risk assessment framework, the guidelines describe each of three phases: 1) problem formulation, which provides the foundation for the entire ecorisk assessment by generating and evaluating preliminary hypotheses about why ecological effects have occurred, or may occur, from human activities; 2) analysis, during which technical data are evaluated to reach conclusions about ecological exposure and relationships between the stressor (chemicals, habitat destruction, etc.) and ecological effects; and 3) risk characterization, a final evaluation of the likelihood that adverse effects have occurred or will occur as a result of exposure to a stressor. The elements of each step are described in the guidelines.

Among the specific issues EPA singles out for reviewers to comment on is the question of whether the proposed

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