Gore's "Reinventing Government" initiative.

EPA managers close to the reorganization effort note that organizational change is always disconcerting and point out that "not knowing who your boss is going to be three months down the line is bound to be a stress." Managers have observed that it is difficult to assess how much of the dissatisfaction professional staff are feeling is a result of the stress from organizational change and how much is a result of the specific provisions in the reorganization plan. Even the union source acknowledges that there is "some of that [disgruntlement with change per se]" occurring, though the basic issues of how science will be impacted are not diminished by this factor.

Critics of the plan ask why some branches will be left unchanged while others are split apart. EPA scientists and union officials point out that under the plan, all exposure assessment — which is critical to risk assessment — will still be conducted outside the proposed RAD in the Exposure, Economics & Technology Division (EETD). Union representatives and scientists say they do not oppose functioning in interdisciplinary teams (although they do have concerns about such teams) but feel that their ability to maintain their scientific expertise would be enhanced if their administrative home remained their disciplinary home. The scientists are concerned that, once they are shifted around, they will face more difficulty "keeping current" in their scientific disciplines and may lose important mentoring relationships.

The reorganization plan envisions a new "cross-training" component as part of the interdisciplinary teams, a proposal that scientists and union officials believe could result in a decline in professional standards. According to union officials and others involved in the fracas, cross-training may mean that someone who is not a toxicologist will perform toxicological tasks when team positions are vacant. Managers agree that cross-training is a concern and will need to be monitored carefully under their plan.

John Carley, Streamlining Process Manager for the Office of Pesticide Programs, notes that EPA now has experience with piloting interdisciplinary teams and that the results — similar performance but with less supervision required than in existing management structures — are hard to oppose when an organization faces the prospect of eliminating entire layers of supervision. EPA must bring its supervisor-to-employee ratio into an average of one to 11 under the White House reinvention initiative, according to Carley.

Ecological scientists are particularly concerned that their fledgling efforts to build professional expertise and to elevate ecorisk issues within EPA will suffer setbacks under the reorganization plan. Environmental scientists are quick to point out that the effects of potential endocrine disrupting chemicals (EDCs), for example, were first empirically established in wildlife populations but that the research agenda for EDCs has been almost completely taken over by human health experts.

Announcements seeking to fill new branch chief positions were sent out Sept. 27, but implementation of the plan is being challenged by the union, which claims that the number of branch chiefs was not negotiated. Union officials have indicated that they have contacted the Federal Labor Relations Board — the public sector equivalent of the National Labor Relations Board — regarding the move. An EPA manager says that, despite concerns being raised, the effort will move forward.

EPA ANNOUNCES FULL RELOCATION AT FLORIDA SUPERFUND SITE

EPA Region IV Administrator John H. Hankinson, Jr. announced Oct. 3 that — "based on the community's unique environmental, health and safety factors" — the agency has decided to relocate all of the residents living around the highly contentious Escambia Treating Company Superfund site in Pensacola, Fla.

The Escambia site has provoked intense controversy among nearby residents, who have charged the agency with environmental racism and challenged the "acceptable risk" level chosen for the site (*Risk Policy Report*, Sept. 20, p11). The announcement that all residents will be moved comes at a time of increasing pressure from media reports, legal challenges, and Citizens Against Toxic Exposure (CATE), a group representing residents living near the site that ran a full-page ad in Florida editions of *USA Today* Oct. 1. The ad called for EPA to move all 358 families living near the site and reminded President Clinton of his 1993 statement on Environmental Justice: "No child should ever have to live near a hazardous waste site."

Although Hankinson's announcement makes reference to working with the Department of Housing & Urban Development (HUD), CATE representatives doubt whether HUD has the legal authority alone to move the families. Noting the fact that only 21 families are being relocated on the basis of health risk, CATE also cautions that although EPA may have made the right decision, they may have done so for the wrong reasons and set a negative precedent in the process. EPA has been heavily criticized for its choice of acceptable risk levels for its preliminary relocation decision — risk levels critics charge are typically used for industrial rather than for residential sites.

According to EPA Deputy Assistant Administrator for Solid Waste and Emergency Response (OSWER) Tim

DSW 133382

STLCOPCB4033340

Fields, CATE's assertion that only 21 families of 358 are being moved based on health risk is "inaccurate" and that "roughly a third" of the total are being moved for health reasons in addition to public welfare and engineering (or the need for remediation equipment and truck access) concerns. Fields notes that decisions made about acceptable risk issues at the Escambia site are consistent with those of other sites around the country like the Missouri dioxin sites.

Fields states that "tense and at times heated discussions" about the site did take place within and between Region IV and EPA headquarters. But, Fields points out, "whenever you are doing something new and innovative, like we are with the National Relocation Evaluation Pilot on this site, there are bound to be pressures and challenges because of the visibility of policy choices and their possible precedents. In the 16 years of the Superfund program, relocation alternatives have only been utilized 14 times (or less than once a year) and the possibility that they could be used more broadly and with more effectiveness than other remedies is receiving serious attention."

EPA Officials note that the final record of decision will be published in January 1997 and that residents will be able to relocate several months later.

INDUSTRY RISK COUNCIL WILL EXPLORE STAKEHOLDER INVOLVEMENT ISSUES

In the face of growing momentum for stakeholder involvement in risk assessment and risk management, the American Industrial Health Council (AIHC) has established an *ad hoc* working group to explore the council's position on stakeholder involvement, including how it should work, when it is useful, and other key questions.

Given the current state of the risk policy debate, stakeholder involvement is a priority science policy issue for AIHC, according to council representatives.

At a Sept. 26 press luncheon to describe current risk topics of particular importance to the broadbased industry risk assessment group, AIHC's Science Policy Committee Chair Steve Lewis of Exxon Biomedical Sciences, Inc., and Science Committee Chair Frederick Johannsen of Monsanto Company discussed stakeholder involvement, peer review, mechanistic data, and other topics on the cutting edge of industry interest.

Stakeholder involvement has been central in recent thinking about how to improve risk-based decisionmaking, winning the strong endorsement of, among others, the Commission on Risk Assessment & Risk Management and the National Research Council (*Risk Policy Report*, June 14, pp3,7). With the surge of interest in ensuring broad stakeholder participation in decisionmaking, AIHC recently established an *ad hoc* group to reach consensus on the issue. Stakeholder involvement requires only "an interest in the outcome of a decision," in contrast to peer review, in which scientific expertise in a discipline and not "affiliation" is the most fundamental issue, both Lewis and Johannsen agree.

Besides taking up stakeholder involvement — an effort just getting underway — AIHC's Science Policy Committee will be focusing on "a suite of peer review issues," according to Lewis. While most if not all groups support peer review, which is a major AIHC focus, there are at least two significant issues in this area that AIHC believes need fleshing out. First, there is a potential for peer review to "slow things dramatically," leaving decisions in limbo while peer review processes proceed. That issue is less difficult, however, than one which deeply concerns AIHC — the issue of "bias" and "conflict of interest." Lewis will head a group of people AIHC plans to convene over the next few months to help shape the council's views on how to prevent bias and conflict of interest issues from interfering with peer review, which AIHC regards as a critical advisory function that should not exclude anyone with the requisite expertise; transparency and full disclosure of affiliations are the critical safeguards.

AIHC's Science Policy Committee will also try to "capture a cameo of what's been learned in 10 years" about comparative risk assessment, an important issue in the congressional regulatory reform debate, according to Lewis. The "aggregate wisdom" of EPA's regions, the states, and others who have conducted comparative risk efforts "is a lot more than is apparent" from project reports, says Lewis.

In Johannsen's view, a vital development in toxicology that has emerged in recent years is the challenge to the paradigm under which effects in test animals are taken as fully applicable to human beings. Instead, pharmacokinetics, mechanistic studies, dosimetry studies, and other toxicological advances have made their way into risk assessment, both domestically and internationally, according to Johannsen. This newly emerging focus on the human relevance of animal data is a key focus of AIHC's Science Committee. Other key areas of focus will be the use of human data in risk assessments (which is not codified in guidelines), the use of transgenic animal models to replace one of two standard bioassays required by regulatory agencies, and an updated assessment of cancer rates to determine if they are rising or falling. Furthermore, industry still lacks a consensus on the Benchmark Dose method, which has clearly been misused in some instances, and AIHC's task force on BMD will seek to identify its uses and limitations as the agency tries to refine the method.

DSW 133383

STLCOPCB4033341