

153



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

*Good -
Eyes Only
to
Don Barnes
Hand Carried
Return*

MEMORANDUM

SUBJECT: Dioxin Risk Assessment

From: Eileen Claussen, Director *EC*
Characterization and Assessment Division

To: Marcia E. Williams, Director
Office of Solid Waste

We've looked fairly closely at the dioxin risk assessment paper prepared by Don Barnes. In general, we feel that the paper does a good job of assessing where there is adequate uncertainty in the risk assessment procedure to invite flexibility in a risk management situation. However, it might be useful for Don to provide more discussion of several points that we believe are important.

The area where there is the greatest room for movement is in the exposure assessment. This is really comprised of 2 areas that are important. The data suggest that weathered, contaminated soil has a different level of bioavailability of dioxin than other soils. This, combined with changes in the appropriate fish consumption scenario (in other words, better sampling of fish, etc.) may influence the final risk assessment for wastewaters applied to the land and discharged to rivers. (The bottom line here is perhaps 1 order of magnitude change.)

Another possible avenue for change lies in examining what "natural," background levels of dioxins are in humans, and using this as a point of reference from which to compare specific sources of contamination.

If we can move in these areas, and use them to change the specific exposure scenario that we ourselves used to arrive at the delisting levels, we may be in an excellent position to be sensible.