

US EPA ARCHIVE DOCUMENT

Day Two: September 12, 1996

Session Six: Questions and Answers

After each session, there was an opportunity for questions and answers and group discussions pertaining to the speakers' presentations.

Q (Arnold Kuzmack, U.S. EPA Office of Water): Dave, I could not tell on your mercury charts whether you were distinguishing inorganic from organic mercury. You really should.

David Charters:

We are not. That is a nice toxicological issue, but it is not a cleanup issue.

Q (Arnold Kuzmack): Whether or not the hazard quotient is really greater than one, I think, compels what kind of mercury it is. In terms of the process you are laying out, I noticed that at the step of risk characterization there was not a scientific management decision point (SMDP), and it strikes me as extremely important to have one.

David Charters:

The difference there is that the discussion on what is risk characterization is pretty much the risk assessors trying to figure out how it is done. In risk management, it is more consideration of the risk communication issues. We need to keep these separate. We do not want risk management and risk communication to be confused any more than has historically been done. So it is the same thing once again. It is whether it is in step seven or in step eight.

Q (Todd Bridges, COE Waterways): David, you did not say what you did with the threatened and endangered species. Did you treat them in the same way that you did the raccoon?

David Charters:

No, the threatened and endangered species were done through the two trust agencies, U.S. Fish and Wildlife and NOAA. We do not have a legal responsibility there, but we must comply with the spirit of that law in working with Fish and Wildlife and NOAA. It is not a unilateral EPA decision. At this point, those decisions have not been made.

Q (Participant): I noticed you used a LOAEL when you were calculating your hazard quotient rather than a NOAEL.

David Charters:

We had better information on the LOAEL. We also have the no-observed-adverse-effect level (NOAEL) and we can take it down to that. This was for illustration purposes. It is not the standard way that is taken. If you want to turn those into NOAEL numbers, multiply them by 10. What we are really looking for is not only to be reasonable, but also to use the best data available to address the question, "Is there a realistic probability of an adverse impact or not?" This is the real part of the risk assessment, not the screening anymore. We felt that we were working with the best information and that it was very solid.

