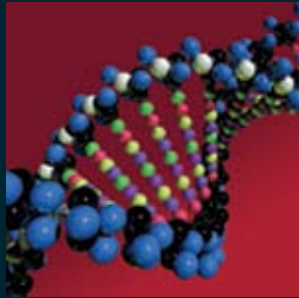


# Association of State and Territorial Solid Waste Management Officials



## The Dichotomy of IRIS

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# Key Points

- IRIS fulfills a need; particularly for state regulatory programs.
- Customers depend on IRIS as a primary science input in the decision-making process.
- The pace for issuing new IRIS files has slowed; particularly for “emerging contaminants”.
- The absence of IRIS files cost state agencies time and resources, plus they have to continually defend decisions.
- State agencies –and other key IRIS customers—should be part of the IRIS process.



# Introduction

- IRIS has tremendous name recognition, great credibility, and provides an essential service to a key EPA audience; state environmental regulatory agencies.
- In a time of strained EPA-state relations, IRIS sticks out as a product that provides a unique service: peer reviewed; agency consensus numerical values on 540 chemicals.
- Yet IRIS frustrates this audience and others by not expanding its service line, in particular by not issuing “files” on the chemicals of most concern.
- The dichotomy is that because IRIS has been successful its customers have high expectations, and it remains to be seen if the expectations can be met.



# Washington

- Abuzz about IRIS: Congressional hearings, GAO reports and testimony, accusations of lack of transparency, bill introduced, and Washington Post articles.
- IRIS reform has become a hot button issue with no shortage of opinions on who did what to cause the current predicament.
- Hopefully the attention focused on IRIS will result in an improved product.
- But the hearings and reports are not helping the state regulator set a drinking water quality value for key chemicals of concern.



# Who Uses IRIS

- Frequent customers use IRIS primarily for work purposes; have training in toxicology, chemistry and related scientific disciplines.
- Federal and state government, foreign governments, regional and global governmental organizations, industries that manufacture or use chemicals, trade associations representing those industries, consulting firms, academia, and research institutions.
- Use IRIS as a source of comprehensive information on a chemical; and to seek information for regulatory purposes.
- For domestic regulatory purposes there is no satisfactory alternative to IRIS. Other databases provide some assistance, but there is no substitute for an IRIS file.



# Expectations

- Files should be continually updated, the numerical value does not necessarily have to change but the file should present all available new information.
- The IRIS web site should be the repository of all things risk assessment.
- New files should be issued routinely, particularly for the emerging contaminants that states must address.



# Can Expectations Be Met?

## Continually Update the Information in Existing IRIS files

- Does not require changing the numerical value in the file.
- But it does require NCEA to cite (and link to) relevant scientific literature, including peer reviewed articles presenting research funded by regulated parties.
- The drafting of an IRIS file typically results in regulated parties funding research they anticipate will be used in the final version of the file.
- But research takes time and it is likely the file will be issued before the research is complete. But the research –provided it is peer reviewed—should become part of the IRIS file, regardless of whether it was funded by DoD, industry or an NGO.



# Can Expectations Be Met?

IRIS Web Site: Repository of all Things Risk Assessment.

- IRIS to be less insular; less of a NCEA site and more of a federal government risk assessment site.
- The recently revised IRIS web site makes strides in that direction but much more needs to be done.
- The site does not promote, or even necessary cite, studies that may challenge the traditional NCEA approach to conducting risk assessment.
- National Academy of Science Board on Environmental Studies and Toxicology (BEST) has conducted several studies addressing specific chemicals (including perchlorate), risk assessment methodologies, and research efficiencies.
- Institute of Medicine panel on decision-making about environmental threats to human health under various types of uncertainty.



# Can Expectations Be Met

## New Files Issued Routinely, Particularly for Emerging Contaminants

- Requires inter agency coordination and negotiation, which is not normally the realm of a science office.
- NCEA management has undoubtedly experienced what they believe is inappropriate pressure to modify draft IRIS files.
- OMB and other federal agencies (and certainly industry) have undoubtedly felt that NCEA has been intransigent and unwilling to accept the uncertainty of the science of risk assessment and the possibility that there is more than one right answer.
- The answer may be that a science office like NCEA should have the principal science input, but the decision must be made by a designated federal entity whose charge is to fully consider the risk assessment as well as the risk management considerations in making a decision.



# Conclusion

- IRIS program quality and timeliness can be enhanced by the early involvement of stakeholders; particularly from key customers, such as state agencies, and from parties that can and should contribute funding for research, including impacted federal agencies, industry and NGOs.
- With increased stakeholder involvement comes the need for increased transparency, thus, EPA should routinely convene workshops in which scientific information and interpretations are introduced by stakeholders and a record of the science input is created.