Chapter 9 Completing the Risk Assessment Report and Follow-On Activities

What's Covered in Chapter 9:

- 9.1 Conclusions
- 9.2 Activities Following Risk Assessment Completion

Our main purpose in developing the HHRAP was to provide you with the tools you need to efficiently complete quality, consistent, and defensible risk assessments. You can produce the risk assessment in a relatively short amount of time, rather than spending years determining which COPCs, exposure pathways, and receptors to include and evaluate.

It's important to note that final risk assessments might include both human health and ecological evaluations. In addition to available Agency guidance for conducting ecological risk assessments (U.S. EPA 1997e) and Volume 63, Number 93, of the Federal Register, we are currently finalizing an ecological risk assessment guidance document titled *U.S. EPA OSW Screening Level Ecological Risk Assessment Protocol* (U.S. EPA 1999a), prepared as a companion to this guidance.

PLEASE NOTE: for the purposes of this guidance, "we" refers to the U.S. EPA OSW.

The HHRAP is written for the benefit of a varied audience, including risk assessors, regulators, risk managers, and community relations personnel. However, the "you" to which we speak in this chapter is the performer of a risk assessment: the person (or persons) who will actually put the recommended methods into practice.

9.1 CONCLUSIONS

We recommend that each risk assessment include a Conclusions section. This section is included primarily to interpret the results of the risk and hazard characterization in light of the uncertainty analysis. We recommend that, at a minimum, it present and interpret all risk and hazard results

exceeding target levels. It might also identify receptors having the greatest risks and hazards, in addition to COPCs and exposure pathways contributing significantly to these risks and hazards. Finally, the Conclusions section is a place for you to present and defend your position on whether actual or potential releases from the facility you studied pose significant risks and hazards to human populations.

9.2 ACTIVITIES FOLLOWING RISK ASSESSMENT COMPLETION

As stated previously, we developed the HHRAP to promote a consistent approach for completing risk assessments that:

- Encourages the use of appropriate site-specific information early in and throughout the process;
- Provides a tool for completing quality and defensible risk assessments;
- Minimizes inefficient expenditure of time and resources by suggesting up front a process to determine which COPCs to consider, which exposure pathways, and receptors the risk assessment report to include and evaluate, and
- Provides a comprehensive explanation of the procedures and uncertainties involved in the process.

However, the risk assessment process does not end following the completion, submittal, and approval of the risk assessment report.

Facilities burning hazardous waste are also responsible for communicating the results of the risk assessment process to affected members of the community. One reason for our comprehensive explanation of the procedures and uncertainties involved in the process was to provide the facilities, risk assessors, and regulators with the tools they need to clearly communicate the procedures, results, and limitations of the risk assessment process. Communication is an ongoing process.

Finally, completing the risk assessment process involves using

- site-specific environmental data,
- various assumptions, and
- an evolving procedure for estimating risk.

We expect that facilities will periodically review each of these factors, and update the process with the latest facility-specific operating and emission information. Updating will help determine whether the best data and procedures are used to estimate the risk resulting from operating the facility hazardous waste combustor. The permitting authority might establish the period for this review in the operating permit. However, we recommend reviewing any significant changes involving newly available data or risk assessment procedures as they become available, to gauge if they significantly affect the outcome of the risk assessment process.