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ENVIRONMENTAL PROTECTION  
AGENCY

AUG 09 1984

CENTRAL DOCKET  
SECTION

PERSPECTIVES ON HOW EPA DECISION MAKERS ARE PRESENTED  
WITH RISK ASSESSMENT INFORMATION IN CONTEXT WITH OTHER  
INFORMATION IN ORDER TO MAKE RISK MANAGEMENT DECISIONS

### HISTORICAL BACKGROUND

- The Clean Air Act amendments of 1977 required EPA to decide, within two years, whether radionuclides should be regulated under the act.
- In November 1979, EPA listed radionuclides as hazardous air pollutants under Section 112 triggering a requirement to act within 180 days.
- In 1981, the Sierra Club sued EPA for failing to meet the deadline.
- On September 30, 1982, the Court ordered EPA to propose standards by March 29, 1983.

### LOGISTICAL AND STAFFING BACKGROUND

- After the 1977 amendments EPA assigned staff to work on the radionuclides issue.
- In FY 1982, EPA was cut about 25 positions and \$2 million from the effort – virtually bringing it to a standstill.
- Work began to resume on the project around the time of the court decision.

### SOURCE CATEGORIES UNDER CONSIDERATION

- Elemental phosphorus plants
- DOE facilities
- NRC licensed facilities and other Federal facilities (except UFC)
- Uranium mines
- Coal fired utility and industrial boilers
- Phosphate industry
- Metal and non-metal mines, mills, and smelters

- **Case study of the elemental phosphorus category at the proposed rule stage.**
- **Perspectives on relationships of case study to other categories and related issues.**

## THE EPA REGULATORY PROCESS

- **Lead Office (ORP)**
  - Prepare analysis and all documentation
- **Work Group (ORP, OCG, OLO, ORD, OAOQS, OSW, Regions, etc.)**
  - Provides advice and consistency of policy
- **Assistant Administrator**
  - Preliminarily decides the course of action and recommends to Administrator
- **Steering Committee (AA's offices)**
  - Ensures that all concerns have been addressed
- **Red Border (OGC, OPPE)**
  - Final policy review
- **OMB**
  - Executive Order Review
- **Administrator**
  - Final review and signature

### SCENARIO FOR THE CASE STUDY

- You are the Assistant Administrator or Administrator
- You are not a scientist
- The date is February 1, 1983
- The staff has been developing and analyzing data since the court order
- Several information meetings have been held on general radiation risk assessment methodology
  - Beir Reports
  - Linear non-threshold model
  - ICRP, NCRP models and methods