

Comments for OMB Proposed Risk Assessment Bulletin (2006)

From Arkansas Department of Environmental Quality (ADEQ)
Risk Assessment Section of the Hazardous Waste Division

In general, the proposed bulletin is informative and brings to light a few key issues dealing with the risk assessment process. That is, the risk assessment needs to be clearly understood and transparent, there are varying types of risk assessments performed depending on the need and practicality, and risk assessments can be an important tool used to shape the development of regulations and agency decisions.

This bulletin is a bit generic in terms of implementation and the actual risk assessment process. The overall message implied that the term “risk assessment” refers to any document that helps determine risk management practices to ensure safety to human health and the environment, regardless of the number of steps or types of procedures or guidelines used. On page eight, the term “risk assessment” is described to “include documents that evaluate baseline risks as well as risk mitigation activities.” It would be helpful to further define these two terms, or provide examples for these terms so that a more clear understanding is inferred. Different state agencies or entities may translate these terms differently, so a stated universal meaning would be useful. Also, throughout the document the mention of “uncertainty” within the risk assessment process is vague.

The bulletin provides a good introduction to those who may not be as familiar with the intended uses of a risk assessment. The language contained within this bulletin would be useful as a reference wherever applicable to support certain risk practices that we currently recommend in our state agency. Also useful are the goals stated in Section III. It is important for a technical team to keep all these goals in mind when utilizing a risk assessment as one tool in making the most advantageous decisions for a site under investigation.

The broad-range objectives set forth in this bulletin seem to encompass what the risk assessment process as a whole is moving towards. That is, integrating the risk assessment within all aspects of agency practices, including decision making from a budgeting and staffing point of view. While this document provides an ideal basis of theoretical guidance needed to utilize a risk assessment, it does not lay out all the technical aspects involved in the step-wise process. However, this bulletin does draw attention to the process and moves risk assessment one step closer to becoming clear, understandable, and tangible.