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Role of Risk Assessment in Regulatory Decision Making

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Overview

- Definition of risk assessment
 - Risk assessment paradigm: History and evolution
 - Role in regulatory decision making
- Critical components and terminology
- Fit-for-purpose concept
- Example applications
- Emerging challenges
- Resources
 - Training and tools
 - Collaboration and contacts

Disclaimer: These views are those of the author and do not represent US EPA policy.

Definition of Risk Assessment is Contextual

Engineering/ Structural

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Financial/ Business



Environment





Human Health



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• Qualitative and quantitative evaluation of the risk posed to human health and/or the environment by the actual or potential presence and/or use of specific pollutants

From EPA's "Terms of Environment" Glossary

> Human Health



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History and Evolution at EPA

- 1970: EPA established
- I975: First EPA chemical assessment (vinyl chloride)
- National Research Council (NRC) publications on risk assessment
 - 1983: Managing the Process the "Red Book"
 - 1989: Improving Risk Communication
 - 1994: Science and Judgment the "Blue Book"
 - 1996: Understanding Risk
 - 2007: Toxicity Testing in the 21st Century
 - 2008: Phthalates and Cumulative Risk Assessment
 - 2009: Science and Decisions the "Silver Book"



Risk Assessment Paradigm: Role in Regulatory Decision Making



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Why Do Risk Assessment?

- "...risk assessment should be viewed as a method for evaluating the relative merits of various options for managing risk" (Science and Decisions, 2009)
- To provide support for decisions to protect public health and the environment.
 - Complex and controversial

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- Risk assessment summarizes the science
- Risk assessment should continue to capture and accurately describe what various research findings do and do not tell us about threats to human health and to the environment, but only after the riskmanagement questions that risk assessment should address have been clearly posed, through careful evaluation of the options available to manage the environmental problems at hand.

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Updated Risk Assessment Paradigm (2009)



Revised Framework



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Risk Assessment in the Federal Government: Managing the Process (NRC 1983)

The Red Book Risk Assessment Paradigm shown by the red dashed lines.

Framework for Human Health Risk Assessment to Inform Decision Making EPA/100/R-14/001 April 2014 www.epa.gov/raf/frameworkhhra.htm

Planning and Scoping to Target Assessment



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Key Considerations for Planning and Scoping

- What decision is to be informed by risk assessment, when is the decision anticipated, and what are the risk management options?
- What legal/statutory requirements affect risk management options and level/type of analysis?
- What other considerations (e.g., environmental justice, life stage, cumulative risk, sustainability) or countervailing risks may influence risk management options and analyses?
- What assessments (e.g., risk, economic) are needed to address decision-making needs?
- What expertise, resources and timelines are available to conduct the assessments(s)?



Risk Assessment and Risk Management are Inter-related



- Risk assessors and risk managers need to have a good sense of when a decision is scientific judgment versus when it is a policy decision informed by science.
- Opinions vary on how separated risk assessment and risk management should be.
- The most current frameworks recommend an **iterative process**.
- Transparency is key.

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Evolution will Continue...

- Presidential Commission on Risk Assessment and Risk Management (CRARM)
 - Addressed residual risks from HAPs
 - Developed an integrated risk management approach
- Continued evolution at EPA
 - Integrate multiple chemical (cumulative) and aggregate (all routes) risk
 - Ecological endpoints
 - Wellness
 - Resiliency
 - Community-scale and national-scale assessments



Critical Components

Hazard Identification

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Exposure Assessment

Dose-response Assessment

Risk Characterization

Risk assessment is the evaluation of scientific information on:

- the hazardous properties of environmental agents,
- the extent of human exposure to those agents, and
- the dose-response relationship of their toxicity.

The product of the risk assessment is a statement regarding the probability that populations or individuals so exposed will be harmed and to what degree.

From EPA's Glossary of IRIS Terms

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Hazard

- The inherent toxicity of a compound.
- Hazard identification of a given substance is an informed judgment based on verifiable toxicity data from animal models or human studies.



(EPA's Glossary of Terms of the Environment)

Key Considerations in Determining Toxicity

- Effects What effects are observed from the data collected?
- **Toxicokinetics** What does the body do to the chemical?

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- Toxicodynamics What does the chemical do to the body?
- Mode of action How does the chemical act to produce an effect?
- Weight of evidence How likely is this chemical to cause non-cancer effects or cancer and under what conditions?
- Causality Framework A way to organize and evaluate toxicity information to assess causality given those data.

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Exposure

 Quantified as the amount of an agent available at the exchange boundaries or portal-of-entries of the organism (e.g., skin, respiratory tract, and GI tract).

Internal dose (µg / kg) or dose rate (µg / kg-day) Amount absorbed and available for interaction

Exposure or Applied Dose Ingested (μg / kg) Inhaled (μg / m³), or applied to skin

Exposure Assessment

 Identifying the pathways by which toxicants may reach individuals, estimating how much of a chemical an individual is likely to be exposed to, and estimating the number likely to be exposed (EPA's Terms of Environment).

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 The determination or estimation (qualitative or quantitative) of the magnitude, frequency, or duration, and route of exposure (EPA's Exposure Factors Handbook).

Exposure Specifications



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Exposure Medium and Route

- Inhalation air
- Oral water, soil, food
- Dermal soil, water, food, air

Exposure Duration

- Acute
- Short-term
- Longer-term
- Chronic (continuous)



Potentially Exposed Population

- Workers
- Emergency responders or victims
- Pregnant women
- Children or the elderly



Dose-response Assessment

 Evaluating the quantitative relationship between dose and toxicological responses.

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 A determination of the relationship between the magnitude of an administered, applied, or internal dose and a specific biological response..



- Response can be expressed as:
 - Measured or observed incidence or change in severity level of response
 - Percent response in a group of subjects (or populations)
 - Probability of occurrence or change in severity level of response within a population

Risk Characterization

 The last phase of the risk assessment process that estimates the potential for adverse health or ecological effects to occur from exposure to a stressor and evaluates the uncertainty involved.
 (EPA's Terms of Environment)

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 The integration of information on hazard, exposure, and dose-response to provide an estimate of the likelihood that any of the identified adverse effects will occur in exposed people.

(EPA's IRIS Glossary)



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EPA Role in U.S. Environmental Regulation

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- Conduct research
- Perform risk assessments
- Set national standards
- Monitor compliance
- Enforce national standards

States

- Develop state-level standards
- Monitor compliance
- Enforce state and national standards
- Issue permits

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Ambient and General Public Reference Values: Characteristics

- Exposure Type: Ambient
- **Duration:** Generally long-term
- Medium: Developed for air, water, and food
- Enforceability: Some are legally enforceable
- **Applicability:** Prevent harm from chemical exposures over the course of a lifetime; must protect sensitive subgroups
- Adaptability: Frequently developed for protection of human health and the environment













Reference Values: Levels of Enforceability

Exposure Standards

Relatively few

Mandated by statute and legally enforceable

Rigid development process

Developed by government agencies specified in statutes

Intended to protect health and the environment, but balances other considerations

Exposure Guidelines

Numerous

Not legally enforceable

Flexible development process

Developed by many types of entity

Intended to protect human health and the environment

Continuum of Confidence in Data and Concept of Fit-for-Purpose



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Exposure Standards

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Medium	Standard	Regulated Contaminants	Regulatory Authority
Air	National Ambient Air Quality Standards (NAAQS)	6 Criteria Pollutants in ambient air	EPA, as mandated by the Clean Air Act
	Permissible Exposure Limits (PELs)	~500 contaminants in workplace air	OSHA, as mandated by the Occupational Safety and Health Act
Water	Maximum Contaminant Levels (MCLs)	90 chemical, microbiological, radiological, and physical contaminants in drinking water	EPA, as mandated by the Safe Drinking Water Act
Food	Maximum Residue Limits (MRLs)	Hundreds of pesticide chemicals in food and feed commodities	EPA, as mandated by the Federal Food, Drug, and Cosmetics Act, as amended by the Food Quality Protection Act

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Criteria Pollutants Characteristics

- "Numerous and diverse mobile and stationary sources"
- Widespread exposure: millions of people, ecosystems
- Typically non-cancer health endpoints
- Typically human health data available
- Some produce ecological effects
- Different considerations apply to setting NAAQS versus to achieving them
 - Setting NAAQS: Health and environmental effects
 - Achieving NAAQS: Account for cost, technical feasibility, time needed to attain

Current Criteria Pollutants

- 6 criteria pollutants (EPA can modify list):
 - Ground-level (tropospheric ozone (O₃)
 - Particulate matter ($PM_{2.5}$ and PM_{10})
 - Carbon monoxide (CO)
 - Sulfur dioxide (SO₂)
 - Nitrogen







- Provide a concise review, synthesis, and evaluation of the most policy-relevant science to serve as the scientific foundation for review of the National Ambient Air Quality Standards (NAAQS) for criteria pollutants
- Prepared in close coordination with EPA office of air quality planning and standards

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- Most recently released February 2013
 - 4,000+ studies considered; 2,270 studies cited
 - I,038 new since 2006 Ozone Air Quality Criteria Document (AQCD)



- Implemented new weight of evidence framework for at-risk factors
 - Which individual- and pollutant-level factors result in increased (decreased) risk of an air pollutant induced health effect?
 - Four level classification of evidence for potential at-risk factors
- Multiple associated peer-reviewed journals



EPA's Integrated Risk Information System (IRIS)

- Supports EPA's programmatic actions and other entities.
- Intended to be the highest-quality, science-based toxicity reference values.
- Contains peer-reviewed, Agency-derived values.
- Derived for specific chemical substances.
- Based on review of all relevant toxicity, toxicokinetic, and mode of action (MOA) information.

General Public Reference Values: IRIS

Guideline	Organization and Context
RfD Reference dose for noncancer endpoints (ingestion)	United States Environmental Protection Agency (IRIS) values are:
RfC Reference concentration for noncancer endpoints (inhalation)	Developed to support hazard identification and dose- response assessment.
OSF Oral slope factor of cancer risk	Substance in a given situation. Used to form the basis for risk-based decision-making,
IUR Inhalation unit risk for cancer	regulatory activities, and other risk management decisions.

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Integrated Risk Information System



Review of the Integrated Risk Information System (IRIS) Process (NRC, May 2014): "EPA has made substantial improvements to the IRIS Program in a short amount of time"

IRIS Enhancements

- Development process <u>http://epa.gov/iris/</u>
 - Planning and scoping
 - Public meetings on released literature search and strategy, evidence tables, and exposure-response figures
- Improving the science
 - Systematic review
 - Concise, compact and clear document structure
 - SAB Chemical Assessment Advisory Committee (CAAC)
- Improving productivity and transparency
 - Workforce planning
 - Agency needs assessment
 - Stopping rules <u>http://www.epa.gov/iris/pdfs/IRIS_stoppingrules.pdf</u>



http://yosemite.epa.gov/sab/sabpeople.nsf/Web CommitteesSubcommittees/Chemical%20Assess ment%20Advisory%20Committee

Example Application: IRIS Reference Value Used to Establish Fish Advisory



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- IRIS includes an oral RfD for methylmercury
- RfD combined with exposure factors for ingestion and contaminant concentrations
- Result is general advice about fish consumption and location-specific advisories



Casmalia Resources in Santa Barbara County, CA

- Former hazardous waste management facility
- Chemicals of concern include pesticides, solvents, acids (including hydrogen sulfide), PCBs, and heavy metals
- IRIS values support decisions about remedial actions including landfill covers, groundwater monitoring, and site improvements







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Emergency Response Values: Characteristics

- Exposure Type: Workplace or general public
- Duration: Generally acute
- Medium: Generally concentrations in air or water
- Enforceability: Not legally enforceable
- Applicability: Inform emergency response and public health planning (e.g., determine egress and re-entry)
- Adaptability: Often specify levels of harm (e.g., mild or severe)











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Provisional Peer-reviewed Toxicity Values (PPRTV)

- Limited data sets
- Peer-reviewed with legal standing
 - Determine cleanup levels
 - Establish monitoring
- Superfund Technical Support Center
 - Human health
 - Ecological



Provisional Peer-Reviewed Toxicity Values for

Styrene-Acrylonitrile (SAN) Trimer (Various CASRNs)

Superfund Health Risk Technical Support Center National Center for Environmental Assessment Office of Research and Development U.S. Environmental Protection Agency Cincinnati, OH 45268







Emerging Challenges: New Data

- Current characterization context: Comprehensive scope of disease pathogenesis
- Increased sophistication of measurements

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- Growing understanding of mechanisms at molecular level (e.g., QSAR, HT and HTC assays
- Animal models of susceptibility
- Enhanced computational capacity (*in silico* models) to describe processes quantitatively



Emerging Challenges: Sensor Data and Citizen Science

- Factors influencing measurement
 - Detection limits
 - Location

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- Collection conditions
- Representativeness, relevance, utility
- Curation and data management
- Interpretation



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Application of Emerging Data in Risk Assessment

- Advance biotechnology and systems understanding → Pathway-based assessment to predict adversity
 - Protecting the public health and environment requires analysis, translation, and integration of data along source to effect pathways
 - Optimization of economic, environmental and societal concerns to support sustainability
- Requires transparent and tractable integration of diverse data types across scales
 - Spatial
 - Temporal
 - Biological

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Creating Context to Transition Risk Assessment

- Characterize dose-response using new endpoints with linkage to traditional outcome measures such as morbidity, mortality, histopathology and tumors
- Requires integration of diverse data sets across different domains (e.g., genomic versus population), methods (e.g., measurements / mining / models) and observational contexts
 - in vivo / ex vivo
 - Laboratory animal or other test species
 - Human and ecological
- **Repurposing** of data is typical problem area: Provide explicit evaluation of data quality, utility, and relevance to facilitate formal inferences
- Highlight how individual judgments concerning data on parameters for causality of specific steps influence the confidence in ultimate decision; emphasize accuracy and predictive power to establish confidence

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Multi-scale Data Integration

- **Disease-based context for other critical endpoints of interest**
 - Respiratory, liver, cardiovascular, ...
- Data from diverse sources and approaches
 - High Throughput/Content Screening
 - Adverse outcome Pathway/Mode of Action
 - **Biomonitoring**
 - Laboratory animal (ex vivo, in vivo)
 - Human (clinical, epidemiological)
 - **Clinical chemistry**
 - Virtual tissues

AOP and biomarkers serve to link elements and describe disease pathogenesis





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Multi-criteria Decision Analysis (MCDA)

 System construct to evaluate impacts of modifying factors, including data gaps, on resultant decision

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- Flexible clearly defines parameters included (or not) in process and aids transferability
- Transparent valuation of choices
- Stakeholder engagement



Kiker et al (2005) Integrated Environ Assess Management 1(2), 95.

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Cultural and Operational Needs

- Access to discover, collect, and integrate data in a coordinated fashion
 - Encourage data repositories with maintenance and management
 - Enhance open access and change publication practice
- Mitigating uninformed use of models
 - Making application limitations known
 - Documentation of parameter values
- Facilitating collaboration and accommodating confidentiality
- Repurposing of data for new analysis requires context for data (meta data) including annotation and curation history; also requires dedicated data managment
- Peer review: Transparency of assumptions and uncertainty propagation
- Visualization
- Simplicity of interfaces

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Resources: ORD



Mission statement

- Perform research and development
- Provide technical support
- Integrate the work of ORD's scientific partners
- Provide leadership in addressing emerging issues and in advancing the science of risk assessment

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ORD Research Programs

Air, Climate & Energy



Chemical Safety for Sustainability



Sustainable & Healthy Communities



Human Health Risk Assessment



Homeland Security



Safe & Sustainable Water Resources



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ORD Research Aligned with EPA Strategic Goals

Cross-Agency Strategies	EPA Goals 2014-2018	Research Programs
Sustainable Future	Addressing Climate Change and Improving Air Quality	Air, Climate & Energy
Visible Difference in	Protecting America's Waters	Water Resources
Communities New Fra of 	Cleaning Up Communities and	Sustainable and Healthy Communities
Partnerships High-Performing	Advancing Sustainable Development	Chemical Safety for Sustainability
Organization	Ensuring the Safety of Chemicals and Preventing Pollution	Human Health Risk Assessment
	Enforcing Laws, Ensuring Compliance	Homeland Security

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Resources: Databases

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Health & Environmental Research Online (HERO)

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HERONet Home

What is HERO?

The Health and Environmental Research Online is a database of scientific studies and other references used to develop EPA's risk assessments aimed at understanding the health and environmental effects of pollutants and chemicals. It is developed and managed in EPA's Office of Research and Development (ORD) by the National Center for Environmental Assessment

Risk Assessment Process (NCEA).

Transparency & Integrity

Glossary

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What data does HERO provide?

For each reference, HERO contains:

- · Reference type
- Citation elements: authors, title, year of publi reference, the citation will also include volum
- · Abstract or brief description
- · Topic areas that describe the reference (e.g.
- · Assessment(s) in which the reference was u

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AGRICOLA - Indexes literature from agriculture, ecology, and related disciplines

American Association for Cancer Research - content from the AACR

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Resources: Training

Risk Assessment Training and Education (RATE)

- Approximately 30 modules
 - General to detailed instruction on concepts and approaches
- Can be tailored to user needs
- Multiple international training events to date
 - Chile
 - Egypt
 - Europe
 - Saudi Arabia
 - New Zealand
- Exploring possibilities for web-based training in future

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Resources: Research and Tools to Advance Applications

- Exposure science and support
 - EPA ExpoBox enhancements: New tools
 - Updating of specific exposure factors
- Scientific workshops
 - IRIS process: NRC review
 - Specific assessment issues: Inorganic arsenic
 - Critical challenges: MOA for mouse lung tumors
- Reports
 - NexGen Report: Sets stage for new applications
 <u>http://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=286690</u>
- Interoperability and access:
 - IRIS web access, IRIS calendar, analysis tools,...
 - HERO support
- Publications (Available on Request)





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Resources: Bulletins, Blogs and Listservs

- Opportunities for public comment and peer review
 - IRIS Bi-monthly meetings
- Listservs
 - HHRA Bulletin (5,986 recipients)
 - BMDS-News (4,839 recipients)
 - IRIS Updates (1,608 recipients)
 - ExpoBox Bulletin (559 recipients)



Resources: EPA Risk Assessment Portal

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Protecting Worker Health



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