

## Cumulative Risk and Risk-Based Alternative Approaches

Subsection 22a-134tt(f)(3) requires the Department to “provide flexibility, when appropriate, for licensed environmental professionals to establish and implement risk-based alternative cleanup standards developed in consideration of site use, exposure assumptions, geologic and hydrogeologic conditions and physical and chemical properties of each substance that comprise a release...”. One such approach is through the development of a cumulative risk assessment process. While certain aspects of a cumulative risk assessment, such as the assessment of toxicology of a substance, are not well aligned with Connecticut law (CGS 22a-1i and 22a-134tt), other cumulative risk assessment approaches may fit well within the current statutory framework and become integral to a successful release-based cleanup program.

This subcommittee should discuss the following:

- What components of a cumulative risk assessment are LEPs qualified to perform under existing Connecticut law? Are there alternative exposure scenarios that may warrant evaluation and integration into the cleanup standards and what, if any, institutional controls would be necessary to keep these scenarios valid?
- Are there certain clean up standard risk adjustments that can be made by LEPs using a process similar to the “short forms” used in the Massachusetts Method 3 Risk Characterization process without the advice of a risk assessor or toxicologist?
- Which parameters can be altered and what is a reasonable range of values that can be adjusted within the confines of a short form process? Would any of these parameters require consultation with professions with expertise beyond the expertise required of LEPs? What guidance is needed to support the use of such short forms?
- How should fees to support DEEP and DPH review of cumulative risk assessments be structured? If a short form process is utilized in a release verification, what percentage of those verifications should be audited? What level of documentation is necessary to support those verifications?
- Outside of short form process, is there an intermediary process for risk assessments that can be completed more expeditiously by the regulated community than the current process and reviewed by the state agencies?
- The Massachusetts Method 3 Risk Characterization includes the assessment of risk to the environment. How should ecological risk be considered under a release-based program?

The charge to this subcommittee is to determine which components of cumulative risk assessment can be implemented without increasing the human health risk on sites that have been remediated.