



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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February 19, 2025

Via email

Licensed Site Professional Association
405 Concord Avenue #352
Belmont, MA 02478

ATTN: Mr. Joseph Roman, President
Ms. Wendy Rundle, Executive Director

Subject: Review of LSPA White Paper and Recent EPA Evaluations of Trichloroethylene

Dear Mr. Roman and Ms. Rundle:

I write to thank you and the Association for your important work, active engagement and contributions to the waste site cleanup practice. I also write to respond in writing to an outstanding request regarding MassDEP's current trichloroethylene (TCE) risk management framework at sites regulated under M.G.L. c. 21E ("Chapter 21") and 310 CMR 40.0000 ("MCP").

On November 23, 2023, the Licensed Site Professional Association (LSPA) submitted a White Paper to MassDEP's Bureau of Waste Site Cleanup (BWSC) and Office of Research & Standards (ORS) titled "*Recommendations for Risk Management Under the MCP for Trichloroethene Exposures Based on Updated Toxicological Information (LSPA, 2023)*". This document, prepared by the LSPA's Technical Practices Committee, provided the LSPA's evaluation of TCE-specific scientific evidence and proposed that MassDEP reconsider and re-evaluate the weight of evidence for TCE-induced congenital heart defects (CHD) and revise our current TCE risk management framework at MCP sites.

In your White Paper, you recommended that MassDEP change how the current (2011) U.S. Environmental Protection Agency's (EPA) Integrated Risk Information System (IRIS) reference concentration is used to derive an Imminent Hazard (IH) for trichloroethylene at MCP sites. You also recommended that MassDEP "exclude the developmental endpoint as a basis for risk management decisions." It was also further recommended that the developmental endpoint based on congenital heart defects not be used at MCP sites; instead, you recommended an Imminent

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Hazard value with a Hazard Quotient of ten be used for TCE at MCP sites based on the immunotoxicity endpoint listed in IRIS.

ORS has carefully evaluated your White Paper and its recommendations and based on that review MassDEP at this time will retain its current method for calculating an Imminent Hazard for trichloroethylene at MCP sites. This is described in the guidance provided in the MassDEP 2014 Fact Sheet for TCE for pregnant women and those who may become pregnant.

I have included the Final ORS Memo from Dr. Tom Angus, Ph.D., M.S.P.H., Senior Toxicologist at ORS, regarding this matter and the TCE Fact Sheet noted above for ease of reference.

<https://www.mass.gov/doc/tce-toxicity-information-implications-for-chronic-and-shorter-term-exposure-fact-sheet/download>

Please feel free to contact me, Mr. Thomas Angus at thomas.angus@mass.gov or Ms. Sandra Baird at sandra.baird@mass.gov should you have any questions or concerns regarding MassDEP's approach to the evaluation of the LSPA's TCE White Paper and/or MassDEP's reaffirmation to retain its approach for TCE evaluation at MCP sites across the Commonwealth.

Sincerely,



Millie Garcia-Serrano, M.P.H.
Assistant Commissioner, BWSC

CC:

Ken Marra, Director, Division of Policy & Program Development, BWSC

C. Mark Smith Ph.D., M.S., Director, Office of Research and Standards

Tom Angus, Ph.D., M.S.P.H., Senior Toxicologist, Office of Research and Standards

Sandra J.S. Baird, Ph.D., Chief, Toxicology Division, Office of Research and Standards

Wendy Heiger-Bernays, Ph.D., Chief, Research Division, Office of Research and Standards