



## Matrix of Potential Health Profile Options (May 22, 2008)

| Options (*options have not been approved by legal)         | Pros   | Cons   |
|--|--|--|
| No action  | Keep entire law intact.  | Health Profiles are costly to facilities with potentially no human health or environmental benefit. Facility, department, and DHSS waste of resources.   |
| Modify health profile process/guidance.                    | Could be a quicker fix.  | The law and regulations are too prescriptive to allow just this action alone. Would still need a regulation change.  |
| Variances  | Allow facilities to get out of the Health Profile requirements and allow for permit issuance/reissuance. | Only good for 1 year. Would have to renew yearly. Too much time spent on going through the variance process.   |
| Rescind/change law   | Change to the law could eliminate requirement for health profile altogether.                             | <ul style="list-style-type: none"> <li>• Uncertainty, you never know what could happen when you open up a law.</li> <li>• Likely to take longer than reg change.</li> <li>• More resources required than reg change- and you still have to pursue a reg change!</li> </ul> |
| Rescind/change regulations (options) based on current law: | Could make the regulations more useful and less expensive for facilities.                                | <ul style="list-style-type: none"> <li>• Takes potentially 2 years to modify the regulations.</li> <li>• Would likely require a legal re-interpretation of the current statute (statute is rather definite on the information required in a health profile).</li> </ul>    |

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| <ul style="list-style-type: none"> <li>• Change the profile to a Risk Assessment document, then tie any chemicals that come up as a flag back to actual health outcome data.<br/> <a href="http://www.epa.gov/oswer/riskassessment/ragsb/index.htm">www.epa.gov/oswer/riskassessment/ragsb/index.htm</a><br/> <a href="http://www.epa.gov/oswer/riskassessment/ragsa/pdf/preface.pdf">www.epa.gov/oswer/riskassessment/ragsa/pdf/preface.pdf</a><br/> and all other applicable parts.</li> <br/> <li>• Change the profile to a Health Assessment document.<br/> <a href="http://www.dhss.mo.gov/hazsubstancesites/ReportsConsults.html">www.dhss.mo.gov/hazsubstancesites/ReportsConsults.html</a></li> <br/> <li>• Create a registry by going door-to-door in a designated area (1-, 3-, 5-mile radius) around each facility to obtain name, address and contact info on residents. Administer initial health status questionnaire and collect environmental samples – water (air or soil?). Update annually by mail and collect environmental samples (some frequency – annually, every 2 or 5 years?).</li> <br/> <li>• Create a registry by going door-to-door in a designated area (1-, 3-, 5-mile radius) around each facility to obtain name, address and contact info on residents. Administer initial health status questionnaire and collect blood, urine (other biological samples?). Update annually by mail and collect biological samples (some frequency – annually, every 2 or 5 years?).</li> <br/> <li>• Create a registry by going door-to-door in a designated area (1-, 3-, 5-mile radius) around each facility to obtain name, address and contact info on residents and ask initial health status questionnaire. Update information and questionnaire annually by mail.</li> <br/> <li>• Create a registry by going door-to-door in a designated area (1-, 3-, 5-mile radius) around each facility to obtain name, address and contact info and update the information annually by mail.</li> </ul> | <p>More useful data, site specific information. Most facilities may already have this information and/or already conduct risk assessments.</p> | <ul style="list-style-type: none"> <li>• Could be costly if facilities do not already have one.</li> <br/> <li>• Costly, time consuming, etc.</li> <br/> <li>• Costly, time consuming, generating community concern when none is warranted, lack of control group for comparison, etc.</li> <br/> <li>• Costly, time consuming, generating community concern when none is warranted, lack of control group for comparison, etc.</li> <br/> <li>• Costly, time consuming, generating community concern when none is warranted, lack of control group for comparison, etc.</li> <br/> <li>• Costly, time consuming, generating community concern when none is warranted, lack of control group for comparison, etc.</li> </ul> |

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| <ul style="list-style-type: none"><li>• Increase emissions monitoring (by DNR or facility?) of air and water around each facility.</li></ul> | May already have this information, more useful data, site specific information. Possibility of identifying releases before, rather than after, there are health effects on nearby residents. |             |
| Other?   |  |             |