



#### Publication

## Recommendations for risk management under the MCP for trichloroethene exposures based on updated toxicological information-

Haley & Aldrich's [Jay Peters](#) and Marie Rudiman of EnviroRisk Solutions prepared a white paper for submittal to the Massachusetts Department of Environmental Protection (MassDEP) in late 2023. The paper, titled '[Recommendations for Risk Management Under the MCP for Trichloroethene Exposures Based on Updated Toxicological Information](#),' was submitted by the [Licensed Site Professionals Association](#). It addresses several critical issues related to trichloroethene (TCE) risk management under the Massachusetts Contingency Plan (MCP).-

In this paper, Jay and Marie leverage their technical expertise to propose more reasonable response actions at TCE-contaminated sites in Massachusetts. If MassDEP adopts the recommendations — which are based on their review of the science of TCE-related human health effects — fewer sites would fall under the "Imminent Hazard" designation and more sites could achieve a Permanent Solution Statement under the MCP. This would save time and money in response actions at TCE-contaminated sites while also protecting human health and the environment.—

The authors note that traditional measures for managing TCE-related health risks, especially developmental concerns such as congenital heart defects, are deeply rooted in studies that present significant scientific uncertainties. This white paper evaluates those traditional measures and sheds light on contemporary toxicological information. The authors also argue for updating the TCE risk management paradigm to focus on chronic immunological effects rather than on increasingly contested developmental concerns.—

This white paper can serve as a compass, providing guidance to MassDEP and other regulatory agencies toward a recalibrated risk management strategy that more accurately reflects potential risks. With it, MassDEP can create a risk management approach that is more scientifically substantiated and fosters both environmental responsibility and reasonable business responses.-

[Read](#) the full paper.-