

CCMA DRMP/DEIS Comments
Attention: Planning Coordinator
Bureau of Land Management
Hollister Field Office
20 Hamilton Court
Hollister, CA 95023

10 MAR -2 PM 1:07

RECEIVED
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLLISTER, CA 95023

Subject: Uncertainty in model

Referring to the Following Document/Email

Rick Cooper/CASO/CAIBLM/DOI

To Arnold Den/R9/USEPAJUS@EPA, Jere Johnson
cc Karl Ford/NOC/BLM/DOI@BLM
04/11/2008 01:42 PM
bcc Janet BedrosianfCASO/CNBLM/DOI

Subject Uncertainty in model

Jere and Arnold,

Just reading through the executive summary. The last paragraph places some doubt as to the adequacy of the model used. The risks could be lower or 0. I am aware that EPA has been consistent in mentioning this and it was in the previous draft.

*Uncertainty related to the toxicity parameters of the risk assessment includes the application of the IRIS and OEHHA asbestos toxicity models, which were developed from epidemiological studies of occupational exposures, to infrequent and episodic recreational exposures. This uncertainty could mean that the actual risks could be much lower than those estimated in the CCMA assessment **and perhaps zero**. Another uncertainty, adjustments for early-lifetime childhood exposures, could mean that the actual risks are higher than those estimated in the report.*

I am sure BLM will be asked "why make an emergency decision on a model that may not accurately portray the risks to the public?" The basis for the decision is the model's depiction that most of the activities exceed the acceptable risk range of 1 in 10,000.

Any thoughts on a response

Rick Cooper

Field Manager
Hollister Field Office
20 Hamilton Court
Hollister, CA 95023
phone: (831) 630-5010

Recommendation:

Alternative A represents the 'No Action' alternative and would reaffirm current management under the 1984 Hollister RMP (as amended). BLM would incorporate new health risk information into public outreach and education asbestos hazard information program to mitigate public health risk.

There is no evidence to substantiate that CCMA is a health risk.

A handwritten signature in black ink, appearing to read "Brian Jansen". The signature is stylized and cursive.

Brian Jansen
1017 Viewpointe Street
Soledad, CA 93960