

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

February 25, 2010

Subject: Air Sampling/Testing/Collection Method by EPA.
EPA's Asbestos Exposure and Human Health Risk Assessment for CCMA.
Exposure Assessment 4.0

Discussion: Air sampling done by the EPA does not replicate actual human breathing habits or patterns. Despite the EPA's best efforts the mechanized/computerized breathing apparatus used in their testing of CCMA cannot produce lifelike results. One issue is that their sampling device(s) are designed for occupational use not recreational use. Also, they do not account for slowed breathing, or when a subject instinctively holds their breath prior to entering or riding through a cloud of dust. The device used by the EPA utilizes a pump that draws air (inhales) 100% of the time and then they try to extrapolate numbers from those figures. Additionally, their testing methods used do not mimic an actual rider who instinctively avoids dust clouds as to improve visibility (to go around a cloud of dust), therefore the testing methods used by the EPA do not create/duplicate actual riding scenarios and do not reflect what an average subject might encounter.

Recommendation: Exclude all references from the EPA in the BLM's DEIS regarding air sampling/testing/collecting and personal exposure limits (PEL). Obtain an outside agency or independent contractor with extensive knowledge or experience in trail riding to perform the air sampling/testing/collecting on a recreational level that will accurately reflect scenarios encountered by an average OHV user in CCMA

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2/25/10

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