Message

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Sent: 4/10/2014 6:11:10 PM
To: Dina Johnson [DLJohnson@environcorp.com]
Subject: FW: Questions I would like addressed at the Public Meetings on the Draft Health Study

Never mind it is 4/6 for me too.

From: John Ray [mailto:bodinman2003@yahoo.com]
Sent: Sunday, April 06, 2014 6:22 AM
To: Greene, Nikia; Steve Ackerlund; dpowers@bsb.mt.gov; Karen Sullivan; Kelley Christensen; DalSoglio, Julie; Sparks, Sara; Vranka, Joe; mvincent@bsb.mt.gov
Cc: bodinman2003@yahoo.cm; Erik (Tester) Nylund; lscusa@mt.gov
Subject: Questions I would like addressed at the Public Meetings on the Draft Health Study

I would like the following questions addressed at the Public Meetings on the Health Study.

1. Butte was promised an independent peer review of the study. This independent peer review was supposed to be part of the process of developing and conducting the health study, It was not supposed to be an after the fact endeavor that would have no impact on the design and conduct of the study. EPA appears to be reneging on that promise. Now all the agency promises us is that at some time after the process is finished some condensed version of the study will be submitted for possible publication. It was also stated by EPA that this review would not change the study. Such a review will have no impact on the design and conduct of the study as EPA originally promised. What good is it? Why is EPA afraid to have its work independently reviewed? Having a condensed article published is not the kind of independent peer review EPA promised. What the pubic is left with is that the EPA and its associates will be reviewing their own work. What assurances can the public have that this report was done in an unbiased manner and done correctly? Without an independent peer review, the public can have NO such assurance. Why has EPA reneged on its promise? What is EPA afraid of discovering?

2. The purpose of the study is to demonstrate that the Residential Metals Abatement Program is working. I support the program but the methodology the study uses is faulty. It is an example of the "post hoc, ergo propter hoc" fallacy. On the one hand the study says the Residential Metals Abatement Program exists. On the other hand the study says that lead levels are dropping in Butte. The unproved assumption is that the first is the cause of the second. Yet, no methodology is utilized in the study to demonstrate this causal link.
How was this causality established?
Also, just because lead levels in Butte are approaching the national average, is the national average protective of human health? No data to warrant this conclusion is provided by the study.

3. By looking only at lead levels, the study does not give a big picture view of the entire toxics problem in Butte. We are told that the studies will be going on for some 30 plus years. By the time the studies are completed the point of the effectiveness of Superfund in Butte will be largely mute. We need some assurance for the residents of Butte currently alive that Superfund is working. This is just another example of the EPA dragging things out to the point that people either die or are no longer interested.

4. The study ignores environmental justice concerns. How is environmental justice incorporated into the design and execution of the health study?

5. Stacie Barry's peer reviewed study reached the conclusion that Superfund overall in Butte was not working and that public health was not being protected. We now have an EPA funded study that reaches the opposite conclusion. Why should we believe this EPA produced study? How is the EPA study better than the work that Stacie did? Is this EPA study simply a PR effort by EPA to refute Stacie's conclusions?

6. Why has EPA refused to change its action levels on lead to be congruent with the CDC recommendations? Is this a one size fits all approach?

7. What assurances can the public have that the toxics of concern have been properly characterized?

I will be raising other questions during the comment period but I think the above are a good place to start. Please address these at your public meetings.

Dr. John W. Ray