VIA EMAIL AND U.S. MAIL
Email copies to: Mark Biagoni, acting deputy director; Dr. Sven Rodenbeck, Petitions Coordinator

Dr. Patrick Breysse
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Dr. Breysse,

Please forgive me for taking the unusual step of reaching out to you directly. I was speaking recently with Dr. Christopher Weis of the National Institutes of Health, and he spoke so highly of you that I decided I would do so.

I am the editor of The Montana Standard in Butte, Montana, and the co-author of a book "An Air That Kills" (Putnam) about the environmental tragedy of Libby, Montana and the larger issue of asbestos-related disease in America. I was fortunate to be the editor for my co-author, the late Andrew Schneider, when Andy broke the story of the Libby disaster for the Seattle Post-Intelligencer in 1999 and thereafter.

Now, as editor of The Montana Standard, both Butte and Anaconda are in our circulation area, and I am deeply concerned about several potential public health concerns arising from the region's historical mining and smelting activity.

Starting with Anaconda: The National Cancer Institute has been studying the cohort of smeltermen from the Washoe Smelter in Anaconda for more than 50 years, and has found significantly elevated mortality due to occupational exposure to arsenic. What has been studied far less thoroughly is the effects of arsenic, lead and other heavy metals on the surrounding population. The smelter, one of the largest in the West, processed 8,000 tons of copper ore a day for some 80 years.

Anaconda is part of a cluster of Superfund sites along the upper Clark Fork River, including Butte, which have been called collectively the largest Superfund site in America. But the area has been administered not collectively but as individual operable units, resulting in wide disparities in the quality of remediation and restoration efforts.

Back in the early 2000s, ATSDR declared an agreed-upon remediation for Anaconda to be protective of human health. But in fact the remediation, which focused solely on arsenic, has been found to be deficient. In 2013, the Record of Decision in the unit was reopened because of the realization that the cleanup did not deal with significant lead issues. Now, up to 1,000 properties in Anaconda are scheduled to be re-remediated because of lead contamination - meaning that the initial remedy has left

unacceptable lead exposure in Anaconda for nearly two additional decades.

As far as we are able to determine no systematic health studies have been done on the residents of Anaconda - particularly the children - when it comes to lead exposure. Toxicologists have suggested that thorough and ongoing blood and urinalysis screening of the population is called for and indeed is the only way, at this juncture, to quantify exposures and make judgments about the health situation in this smelter town. I believe that falls clearly within the ATSDR's purview.

Even as the cleanup here in Butte lurches toward its third decade, nobody disputes that toxics - in great amounts - remain in this town, known as "the richest hill on earth" because of its rich mineral deposits but in fact home to a population high in poverty and lagging in public health.

Susan Dunlap, the newspaper's environmental reporter, recently contacted ATSDR about the incidence of multiple sclerosis and other neurological disease here. She correctly noted that "for years, people here have said there is a high rate of autoimmune disorders, such as multiple sclerosis and Parkinson's disease." She asked, "Why has ATSDR never done a study on this to determine if there is a noticeable cluster of these diseases?"

She added, "I see from research that ATSDR found a cluster of MS around a former zinc plant in DePue, Illinois; around a former Rochester, N.Y., zinc plant; and a suspected cluster around a former lead smelter in an El Paso, Texas neighborhood that was within the smelter's wind path. Why has there not been a larger study to investigate autoimmune disorders around smelters throughout the U.S. as a way to try to determine if metals smelters increase risk of neurodegenerative disorders?"

While the response she received was courteous and thoughtful, it did not directly address that last question, which seems important from a nationwide public-health standpoint. Also, the answer seemed to indicate that the reason ATSDR has not studied MS more closely in the Butte-Anaconda area is that nobody has asked the agency to do so.

I would, therefore, ask that you consider this letter a citizen request to study both the current levels of lead and arsenic exposure and the incidence of multiple sclerosis and other autoimmune and neurodegenerative disease in the Butte and Anaconda areas.

I understand that your agency's funding is inadequate to your mission and more uncertain than ever. That makes it all the more important, in my view, that ATSDR urgently undertake the same excellent job here that the agency did in quantifying the public-health dangers in Libby.

Sincerely yours,
David McCumber

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