



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 11, 2010

Ken Deeg

Re: Freedom of Information Act Request 09-RIN-00157-10

Dear Mr. Deeg:

This is in response to your Freedom of Information Act request requesting copies of "...all e-mails, including attachments, letters, memos, notes, and all correspondences between Jerelean M. Johnson of the Region 9 EPA office and Rick Cooper, Timothy Moore and Sky Painter Murphy of the Hollister BLM office regarding the 2007/2008 EPA asbestos study of the Clear Creek Management Area."

Enclosed you will find copies of some of the documents responsive to your request.

We are unable to provide you with the documents, or portions of documents, which have been determined to be exempt from mandatory disclosure by virtue of the Deliberative Process exemption of 5 U.S.C. 552(b) (5). An itemized list of the withheld material along with the basis for withholding is provided on the enclosure to this letter.

You may appeal this partial denial to the National Freedom of Information Officer, U.S. EPA, FOIA and Privacy Branch, 1200 Pennsylvania Avenue, N.W. (2822T), Washington, DC 20460 (U.S. Postal Service Only), FAX: (202) 566-2147, E-mail: hq.foia@epa.gov. Only items mailed through the United States Postal Service may be delivered to 1200 Pennsylvania Avenue, NW. If you are submitting your appeal via hand delivery, courier service or overnight delivery, you must address your correspondence to 1301 Constitution Avenue, N.W., Room 6416J, Washington, DC 20004. Your appeal must be made in writing, and it must be submitted no later than 30 calendar days from the date of this letter. The Agency will not consider appeals received after the 30 calendar day limit. The appeal may include as much or as little related information as you wish, as long as it clearly identifies the determination being appealed (including the assigned FOIA request number - 09-RIN-00157-10). For quickest possible handling, the appeal letter and its envelope should be marked "Freedom of Information Act Appeal."

Please contact Jere Johnson at 415-972-3094 or johnson.jere@epa.gov, should you have any questions concerning this matter.

Sincerely,

A handwritten signature in black ink that reads "Keith A. Takata".

Keith A. Takata
Director, Superfund Division

Enclosures: Index of documents withheld
Responsive documents and CD

FOIA 09-RIN-00157-10
 Index of documents withheld

E-mails

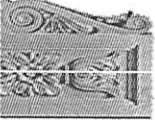
Sender	Recipient	Subject	Date	Size	Basis for Withholding
Jere Johnson	Rick Cooper	CCMA Risk Assessment – Tables and Figures	02/04/2008	1 page	Deliberative Process
Jere Johnson	Rick Cooper	CCMA Risk Assessment – Appendix E	02/04/2008	1 page	Deliberative Process
Jere Johnson	Rick Cooper	CCMA	02/13/2008	1 page	Deliberative Process
Jere Johnson	Wayne Nastri		02/21/2008	1 page	Deliberative Process
Jere Johnson	Nova Blazej	Request for meeting coming from BLM for conf call next week	03/04/2008	1 page	Deliberative Process
Rick Cooper	Jere Johnson	Final Comments on EPA Draft Risk Assessment	03/04/2008	1 page	Deliberative Process
Lynn Suer	Jere Johnson	CCMA Telecon Summary	03/12/2008	1 page	Deliberative Process
Jere Johnson	Janet Bedrosian	Latest Version of CCMA Report and Exec Summary	04/17/2008	1 page	Deliberative Process
Janet Bedrosian	Jere Johnson	Press Release, Comm Plan, Contact List	04/22/2008	1 page	Deliberative Process
Rick Cooper	Jere Johnson	BLM 0508 talk	05/06/2008	1 page	Deliberative Process
Rick Cooper	Jere Johnson	Korettoff	05/06/2008	1 page	Deliberative Process

Attachments

From	To	Document Title	Type of Document	Date	Size	Basis for Withholding
Jere Johnson	Rick Cooper	CCMARiskDocTables1through6	Pdf	02/04/2008	44Kbytes 15 pages	Deliberative Process
Jere Johnson	Rick Cooper	CCMARiskDocFigures2-15	Pdf	02/04/2008	93Kbytes 14 pages	Deliberative Process
Jere Johnson	Rick Cooper	CCMARiskDocAppendixE TablesE1toE284 012808	Pdf	02/04/2008	1033Kbytes 297 pages	Deliberative Process
Jere Johnson	Rick Cooper	CCMARiskDocExecSummary04Feb08	Pdf	02/04/2008	31Kbytes 2 pages	Deliberative Process
Jere Johnson	Rick Cooper	CCMARiskDoc04Feb08Draft	Pdf	02/04/2008	458Kbytes 28 pages	Deliberative Process
Sky Murphy	Jere Johnson	BLM Comments on Draft EPA Report_02spm	Word document	02/11/2008	66Kbytes 9 pages	Deliberative Process
Jere Johnson	Wayne Nastri		Word document	02/21/2008	34Kbytes 1 page	Deliberative Process
Rick Cooper	Jere Johnson	BLM Final Comments of EPA Draft Risk Assessment	Word document	03/04/2008	59 Kbytes 7 pages	Deliberative Process
Rick Cooper	Jere Johnson	EPA Response 030408	Word document	03/04/2008	290Kbytes 1 page	Deliberative Process
Rick Cooper	Jere Johnson	CCMARiskDocApril08ExecSummaryRC	Word document	04/14/2008	234 Kbytes 8 pages	Deliberative Process
Rick Cooper	Jere Johnson	CCMARiskDocApril08ExecSummary-KF	Word document	04/14/2008	232 Kbytes 8 pages	Deliberative Process
Jere Johnson	Janet Bedrosian	CCMARiskDoc17Apr08Draft	Word document	04/17/2008	8811 Kbytes 30 pages	Deliberative Process
Jere Johnson	Janet Bedrosian	CCMARiskDocExecSummary17Apr08Draft	Word document	04/17/2008	234 Kbytes 8 pages	Deliberative Process
Jere Johnson	Rick Cooper	CCMARiskDocFigures2-99Apr08	Pdf	04/21/2008	43 Kbytes 8 pages	Deliberative Process
Jere Johnson	Rick Cooper	DDMARiskDocFigures10-1524Mar08	Pdf	04/21/2008	42 Kbytes 6 pages	Deliberative Process

Attachments (con't)

<u>From</u>	<u>To</u>	<u>Document Title</u>	<u>Type of Document</u>	<u>Date</u>	<u>Size</u>	<u>Basis for Withholding</u>
Jere Johnson	Rick Cooper	CCMARiskDoc17Apr08Draft	Word document	04/21/2008	8811Kbytes 30 pages	Deliberative Process
Jere Johnson	Rick Cooper	CCMARiskDocExecSummary17Apr08Draft	Word document	04/21/2008	234 Kbytes 8 pages	Deliberative Process
Jere Johnson	Rick Cooper	CCMARiskDoc17Apr08DraftB	Word document	04/21/2008	217 Kbytes 30 pages	Deliberative Process
Jere Johnson	Rick Cooper	LMVersion	Word document	04/21/2008	234Kbytes 8 pages	Deliberative Process
Janet Bedrosian	Jere Johnson	Contacts_ClearCreek.4.22.08	Word document	04/22/2008	297 Kbytes 6 pages	Deliberative Process
Janet Bedrosian	Jere Johnson	CCMA Comm Plan 4.22	Word document	04/22/2008	77 Kbytes 9 pages	Deliberative Process
Janet Bedrosian	Jere Johnson	CCMA May 1 closures.4.22	Word document	04/22/2008	40 Kbytes 1 page	Deliberative Process
Janet Bedrosian	Jere Johnson	CCMA May 8 mtg.4.22	Word document	04/22/2008	42 Kbytes 1 page	Deliberative Process
Janet Bedrosian	Jere Johnson	CCMA May scoping mtgs.4.22	Word document	04/22/2008	44 Kbytes 1 page	Deliberative Process
Rick Cooper	Jere Johnson	Talkingpointsfor0508rev	Word document	05/06/2008	37 Kbytes 3 pages	Deliberative Process
Rick Cooper	Jere Johnson	CCMAInfoForResponseToDrIlgrenLtrToBLM11Mar09	Word document	04/08/2009	53 Kbytes 6 pages	Deliberative Process



Conference Call on CCMA Exposure Scenarios

Jere Johnson to: ricooper, Sross, JTjosvol

07/27/2007 03:37 PM

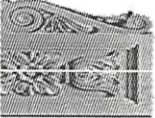
Cc: Carolin.Ziegler, Jeanne Geselbracht, Arnold Den, Daniel Stralka

We plan on distributing a matrix the week of August 13 with the proposed exposure scenarios for the CCMA Risk Assessment. We'd like to have a conference call to discuss the matrix on Thursday, August 23 from 10:00 to 12:00.

Please let me know if the date and time work for you. Rick - Please forward this e-mail to the rest of the involved BLM staff.

I'll forward contact info after we confirm the call. I'll be on vacation the next two weeks, so the info will come the week of August 13. Thanks!

Jere Johnson
Remedial Project Manager (SFD 7-2)
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3094
415-947-3526 (fax)



CCMA Exposure Scenarios and Conference Call

Jere Johnson to: ricooper, Sross, JTjosvol

08/16/2007 12:24 PM

Cc: Carolin.Ziegler, Jeanne Geselbracht, Arnold Den, Daniel Stralka

Attached is the first draft of proposed exposure scenarios for the CCMA risk assessment. Although we had some discussions internally about what should be included, with vacations and business trips I ended up putting this together on my own this week by just including what I thought would be useful and reasonable. Hopefully, I haven't missed the mark by too much. You can all straighten me out next week.

Everything in the draft scenario document, including the General Principles, is open for discussion. The conference call is on for August 23 from 10:30 to 12:00. Please let me who you expect to have participate from your agencies and whether they will be calling in from separate locations so I can determine whether we need to get a conference bridge line established. Also, of course, let me know if the time is no longer good for you. Thanks! JJ



CCMAExposureScenariosDraft1.doc

Jere Johnson
Remedial Project Manager (SFD 7-2)
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3094
415-947-3526 (fax)



Re: CCMA Exposure Scenarios
 Sky_Murphy to: Jere Johnson
 Cc: Rick_Cooper, George_Hill, Timothy_Moore

08/27/2007 01:55 PM

History: This message has been forwarded.

Dear Jere,

Please find attached a copy of the CCMA Exposure Scenarios Draft 2 with three revised scenarios (#5,6,&7) to be included in the EPA's Final Report.

Contacts for CCMA risk assessment input and RMP development include myself, Rick Cooper, George Hill, and Timothy Moore.

Please let us know if you have any further requests.

(See attached file: CCMAExposureScenariosDraft2.doc)

Sky Painter Murphy
 BLM Hollister Field Office
 20 Hamilton Court
 Hollister, CA 95023
 (831) 630-5039

Johnson.Jere@epam
 ail.epa.gov

08/22/2007 11:55
 AM

smurphy@blm.gov

To
 cc

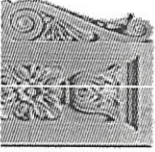
Subject
 Fw: CCMA Exposure Scenarios and
 Conference Call

Jere Johnson
 Remedial Project Manager (SFD 7-2)
 EPA Region 9
 75 Hawthorne Street
 San Francisco, CA 94105
 415-972-3094
 415-947-3526 (fax)

----- Forwarded by Jere Johnson/R9/USEPA/US on 08/22/2007 11:55 AM -----

Jere
 Johnson/R9/USEPA
 /US

To



Re: CCMA Risk Assessment 

Jere Johnson to: Rick_Cooper

10/18/2007 09:02 AM

Cc: Arnold Den, Carolin.Ziegler, Daniel Stralka, Jeanne Geselbracht, Jeff Scott, Jim_Abbott, JTjosvol, Mike_Pool, ricooper, Sross

Rick - We are still working on the report. There is additional data query/analysis underway so we can tease out the differences in seasonality, soil moisture, etc. We understand that BLM is anxious to receive the report and we are equally anxious to get it completed. I hope to have something to you in a few weeks. JJ

Jere Johnson
Remedial Project Manager (SFD 7-2)
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3094
415-947-3526 (fax)
Rick_Cooper@ca.blm.gov



Rick_Cooper@ca.blm.gov

10/17/2007 05:49 PM

To Jere Johnson/R9/USEPA/US@EPA

cc Carolin.Ziegler@CH2M.com, Arnold Den/R9/USEPA/US@EPA, Jeanne Geselbracht/R9/USEPA/US@EPA, JTjosvol@dtsc.ca.gov, ricooper@ca.blm.gov, Sross@dtsc.ca.gov, Daniel Stralka/R9/USEPA/US@EPA, Mike_Pool@blm.gov, Jeff Scott/R9/USEPA/US@EPA, Jim_Abbott@blm.gov

Subject CCMA Risk Assessment

What is the status of the CCMA Risk Assessment summary and our planned November public meeting?

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



CCMA Tech Memo 4

Jere Johnson to: Rick_Cooper, Sky_Murphy, Timothy_Moore,
Sross, JTjosvol

10/30/2007 10:56 AM

Attached is the CCMA Tech Memo for the September 2005 sampling event, and the supporting tables.



CCMA HHRA TM Sept 2005 Final.doc



CCMA HHRA Tech Memo 4 Tables.pdf

Jere Johnson
Remedial Project Manager (SFD 7-2)
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CCMA Draft Risk Assessment
Jere Johnson to: Rick_Cooper

02/04/2008 04:35 PM

Rick - Attached are the files for the CCMA Draft Risk Assessment. Please share with your staff. We are still tweaking the presentation of the information for the reports, but the conclusions are pretty well established.

I'm going to break the transmission up a bit, because some of the files are quite large. Appendix E, which contains all the calculations is coming today. I'll send the other appendices tomorrow.

We'll see you on the 12th, but feel free to call me with questions before then. JJ



CCMARiskDocExecSummary04Feb08.pdf



CCMARiskDoc04Feb08Draft.pdf

[attachment

"CCMARiskDocFigure1.pdf" deleted by Jere Johnson/R9/USEPA/US]

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CCMA Risk Assessment - Figure 1
Jere Johnson to: Rick_Cooper

02/04/2008 04:36 PM



CCMARiskDocFigure1.pdf

Jere Johnson
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BLM Comments re: CCMA Risk Assessment

Sky_Murphy to: Tim_Radtke, Karl_Ford

Cc: Jere Johnson, Jeanne Geselbracht

02/11/2008 04:11 PM

History:

This message has been forwarded.

Please find attached BLM's preliminary comments on the Draft CCMA Asbestos Exposure and Human Health Risk Assessment.

In general, the attached comments are divided between the Hollister Field Office's comments and comments from the BLM National Operations Center in Denver, Colorado.

BLM will meet with EPA Region 9 on Tuesday, February 12 to review these preliminary comments. Based on this review, BLM will refine comments and submit a final comment letter (asap) to EPA for consideration during preparation of the final CCMA risk assessment.

Thank you,

(See attached file: BLM Comments on Draft EPA Report_02spm.doc)

Sky Painter Murphy
BLM Hollister Field Office
20 Hamilton Court
Hollister, CA 95023
(831) 630-5039



Fw: Asbestos information

Nova Blazej, Jeanne Geselbracht, Jere
Rick_Cooper to: Johnson, Karl_Ford, Tim_Radtke%DOI,
Janet_Bedrosian
Cc: Mike_Pool, Jeff Scott

04/04/2008 01:11 PM

History: This message has been forwarded.

Additional information shared with BLM from Steve Koretoff.

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

----- Forwarded by Rick Cooper/CASO/CA/BLM/DOI on 04/04/2008 01:08 PM -----

Mike
Pool/CASO/CA/BLM/
DOI

04/04/2008 07:57
AM

To
Rick Cooper/CASO/CA/BLM/DOI@BLM
cc
Subject
Fw: Asbestos information

----- Forwarded by Mike Pool/CASO/CA/BLM/DOI on 04/04/2008 07:57 AM -----

<skorettoff@sbcglo
bal.net>

04/01/2008 07:41
AM

To
<Mike_Pool@blm.gov>
cc
Subject
Re: Asbestos information

Mike, thank you for getting back to me. I am requesting that yourself and



Uncertainty in model

Rick_Cooper to: Arnold_Den%EPA, Jere Johnson

Cc: Karl_Ford

04/11/2008 01:43 PM

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 reponse

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



Reply on Executive Summary

Rick_Cooper to: Jere Johnson, Mary Simms

Cc: Janet_Bedrosian, David_Christy

04/14/2008 04:02 PM

History:

This message has been forwarded.

See comments from Karl Ford and Hollister FO. We have already discussed some of these.

(See attached file: CCMARiskDocApril08ExecSummaryRC.doc) (See attached file: CCMARiskDocApril08ExecSummary-KF.doc)

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



CCMA Stuff
Jere Johnson to: Rick_Cooper

04/21/2008 11:01 AM



CCMARiskDocFigures2-9 9Apr08.pdf



CCMARiskDocFigures10-1524Mar08.pdf

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Draft and Exec Summary
Jere Johnson to: Rick_Cooper

04/21/2008 11:03 AM



CCMARiskDoc17Apr08Draft.doc CCMARiskDocExecSummary17Apr08Draft.doc

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Jere Johnson to: Rick_Cooper

04/21/2008 12:23 PM



CCMARiskDoc17Apr08DraftBLMVersion.doc

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Jere Johnson to: Rick_Cooper

04/21/2008 12:24 PM



CCMARiskDocExecSummary17Apr08Draft.doc

Jere Johnson
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Re: Fwd: Preliminary Report
 Rick_Cooper to: Steve Koretoff
 Cc: Mike Pool

05/06/2008 05:09 PM

Steve,

Sorry for delay. I have been working through my emails, meetings and phone calls.

The draft deliberations between Federal agencies/officials is not public information under FOIA. You need to touch base with EPA on release of any preliminary information. Jere Johnson of EPA is the remediation project manager. All her contact info is the EPA May 2008 Fact sheet for the risk assessment, on the EPA Region 9 website for CCMA..

I have the final assessment on CD and a hard copy. Willing to send either of these to you.

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

Steve Koretoff
 <skorettoff@sbcglo
 bal.net>

05/06/2008 11:51
 AM

Rick Cooper
 <rick_cooper@ca.blm.gov>, Mike Pool
 <mike_pool@ca.blm.gov>

To

cc

Subject

Fwd: Preliminary Report

This is my second request for the date that your office recieved the preliminary report on the risk assessment from EPA. I am now also requesting a copy of said report as well. Please remit.

Steve Koretoff

Note: forwarded message attached.

----- Message from Steve Koretoff <skorettoff@sbcglobal.net> on Sat, 3 May 2008 15:09:32 -0700 (PDT) -----



Number of Samples

Jere Johnson to: Rick_Cooper

05/19/2008 04:59 PM

Rick - The first file is Table 1 from the report which tallies all the samples which were collected. I did sums at the bottom of each column. The second file is the comparison of winter samples to all samples. It shows the percentage of winter to all samples for each category. JJ



CCMARiskDocTable1Activity-DateTable.xls ComparisonMeanUCLAll&OpenSeason.xls

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Fw: Re Critical Commentary on EPA CCMA Report [2008]

George_Hill to: Jere Johnson

06/24/2008 11:04 AM

History: This message has been forwarded.

Hi Jere

Not sure if you got this.....i'm sure there will be more to come.
They apparently went out and did there own sampling in March.

Thanks
George

----- Forwarded by George Hill/CASO/CA/BLM/DOI on 06/24/2008 10:51 AM -----

Mike
Pool/CASO/CA/BLM/
DOI

06/23/2008 07:05
AM

To
Rick Cooper/CASO/CA/BLM/DOI@BLM,
George Hill/CASO/CA/BLM/DOI@BLM
cc

Subject
Fw: Re Critical Commentary on EPA
CCMA Report [2008]

Rick/George - please ensure additional distribution to Ford, Ratke and your
EPA counterparts. As discussed, EPA will take the lead in addressing all
outside opinions/data regarding their findings during each stage of the
planning process. mp

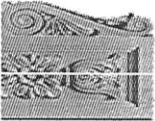
----- Forwarded by Mike Pool/CASO/CA/BLM/DOI on 06/23/2008 07:03 AM -----

DrEdIlgren@aol.co
m

06/22/2008 10:23
AM

To
Mike_Pool@ca.blm.gov
cc
cahormp@ca.blm.gov,
Rick_Cooper@ca.blm.gov,
Janet_Bedrosian@blm.gov,
damador@cwo.com

Subject
Re Critical Commentary on EPA CCMA
Report [2008]



Asbestos Information

Jere Johnson to: Rick_Cooper
Cc: Daniel Stralka, Arnold Den

07/01/2008 09:48 AM

Rick - There has been some interest in the materials that Dr. Ilgren recently provided to Mike Pool.

I just wanted to let you know that the article that Dr. Ilgren sent via pdf titled "Coalinga chry workers 22 June 08", which responds to claims of Eligman and Roberts regarding Coalinga chrysotile disease, is being recalled by Dr. Ilgren after Dr. Eligman's attorney contacted him regarding potential legal action for liable. I would expect that BLM will receive correspondence from Dr. Ilgren requesting that the article be disregarded. In addition, Dr. Eligman is also pursuing liable claims against Dr. Ilgren in England where Indoor and Built Environment is published.

I am also attaching for your information copies of correspondence and reports of studies that Union Carbide conducted in 1966 and 1971 regarding the toxicity of Calidria asbestos. CMS-100 in the second attachment is Calidria product.



UnionCarbideCorrReTestResults.pdf



UnionCarbideFibrogenicPotIPStudy.pdf



UnionCarbideCalidriaRatsLungsStudy.pdf

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Response to Dr. Ilgren
Jere Johnson to: Rick_Cooper

04/08/2009 04:21 PM

I got some verbal input from Arnold. Here's the current version. JJ



CCMAInfoForResponseToDrIlgrenLtrToBLM11Mar09.doc

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**Response to Steve Chappell e-mail regarding New England Journal of
Medicine article**

Jere Johnson to: Rick_Cooper

06/03/2009 03:45 PM

Cc: Daniel Stralka, Arnold Den, Lynn Suer

Rick - Hope you find this helpful. JJ



ResponseChappell21May09email.doc

Jere Johnson
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San Francisco, CA 94105
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Fw: North Carolina chrysotile study
Jere Johnson to: Rick_Cooper

02/08/2010 11:56 AM

FYI.

Jere Johnson
Remedial Project Manager (SFD 8-2)
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75 Hawthorne Street
San Francisco, CA 94105
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415-947-3526 (fax)

----- Forwarded by Jere Johnson/R9/USEPA/US on 02/08/2010 11:56 AM -----

From: Arnold Den/R9/USEPA/US
To: Jere Johnson/R9/USEPA/US@EPA
Date: 02/08/2010 11:47 AM
Subject: North Carolina chrysotile study

Jere

This is a very important paper as it further supports the South Carolina chrysotile study, with additional 3 No Carolina plants, that demonstrated that chrysotile causes lung cancer. Like the South Carolina study, this study used TEM to re analyze old PCM filters and tried to determine which fiber sizes were important for disease. The correlation was strongest for the PCM fiber size (like what we used in the CCMA studies, fibers >5 microns in L, 0.25 by 3 microns width and a 3 to 1 aspect ratio). Within the PCM fractions the longer and thinner fibers tended to be more toxic, however, the bottom line is that the PCM fraction of the total fibers has the strongest correlation with lung cancer, stronger than the shortest fibers and the PCM fraction is what was used in the CCMA risk assessment.

Arnold

Arnold
Arnold Den
Phone: 415 947 4191
Fax: 415 947 3583
Email: den.arnold@epa.gov

"Follansbee, Mark" From: Harper, Martin (CDC/NIOSH/HELD) [mai... 01/26/2010 07:31:40 AM
