

Jeffery C. Camplin, CSP
1681 Verde Lane, Mundelein, IL 60060

1-708-284-4563
Fax: 1-847-837-1852

Centers for Disease Control and Prevention
Management Analysis and Services Office
1600 Clifton Road, N.E., Mailstop E-11
Atlanta, Georgia 30333

February 7, 2006

Attention: Request for Information Correction Appeal Officer

Regarding: CDC/ATSDR Staff Misconduct
Request for Information Correction Appeal Follow-up
Camplin Appeal of Dixie E. Snider, Jr., M.D., M.P.H Response Letter
Illinois Beach State Park PHA of June 2000

Dear Sirs:

I submitted an appeal to you regarding the December 6, 2006 response signed by Dixie E. Snider, Jr., M.D., M.P.H., Chief Science Officer of CDC, to my request for information correction. I believe it is necessary to follow-up this appeal to head off further misconduct by Region 5 ATSDR and CDC Atlanta personnel in their attempts to continue to protect themselves and their Illinois partners: the University of Illinois at Chicago School of Public Health and the Illinois Department of Public Health.

I admonished and criticized Dr. Snider for blindly signing off on the December 6, 2005 response letter to my July 28, 2005 request for correction of the June, 2000 PHA for Illinois Beach State Park in Zion, Illinois. Since I submitted my December 22, 2005 appeal with ATSDR, I have discovered that, in fact, this letter was apparently authored with the assistance of ATSDR Associate Administrator for Federal Programs, Dr. Mark M. Bashor in cooperation with your Illinois partners at the Illinois Department of Public Health. What is more disturbing is that the draft work product was apparently reviewed by Labretta Lanier-Gholoston, Management and Program Analyst to whose office I submitted my appeal. The HSS policy clearly states that those who authored the initial December 6, 2005 response to me will not be involved in responding to my appeal request. This appears to be a gross violation of Agency policy and an obvious conflict of interest if Ms. Lanier-Gholoston or Dr. Bashor is involved to any degree in responding to my appeal. If this is true, is ATSDR/CDC organizational compliance of their agencies' policies that corrupt? Where is the internal oversight of your agency staff? I am asking the Office of the Inspector General to look into this apparent misconduct and violation of agency policy and the agencies role in a potential cover-up of past and ongoing inappropriate behavior.

Since I submitted by original appeal, I have been recently informed through the Illinois Department of Natural Resources that Region 5 ATSDR (apparently at the direction of CDC in Atlanta), is assisting the Illinois Department of Public Health, University of Illinois-Chicago, PSI Consultants, Brad Bradley of USEPA Region 5, Illinois EPA, and the Illinois Department of Natural Resources with formulating sampling and analytical protocols for conducting their own activity-based asbestos risk assessments at Illinois Beach State Park. The reality and deception is that this organized, exclusive group is operating in a clandestine manner, excluding the public from what should be an open and transparent process and producing skewed, biased work products. ATSDR/CDC is currently

participating in a group that has historically gone out of its way to exclude the public or avoid performing their work in an open and transparent manner while actively spending taxpayer resources. This is contrary to your ATSDR/CDC policies for conducting risk studies and casts doubt on the scientific integrity of this secret group, including your agency. This would now be the fourth time ATSDR has tried to help its Illinois Partners and the federal and state agencies with which they work to cover-up the massive asbestos contamination they are responsible for accelerating along the Illinois Lake Michigan shoreline. I, therefore, must act preemptively and bring light to current and anticipated future actions by your Agency and staff. This apparent cover-up must cease.

In a monstrously deceitful act, UIC's interim report for the Illinois Attorney General's Asbestos Task Force never mentioned the fact that tremolite asbestos was found on the Illinois shoreline. The identity of tremolite was buried in the laboratory data appendage. This willful omission has left people who visit Illinois beaches exposed to tremolite, potentially compromising public health. This arrogance and deception toward the citizens of Illinois by the IAG and UIC should not be tolerated. By participating in the review letter, ATSDR/CDC has become a facilitator of the deception.

First, it appears that my appeal will be conveniently deferred another 60 to 90 days to allow your ATSDR Region 5 and headquarters staff to further assist your Illinois partners in a unwise attempt to save face with the scientific manipulation and blunders conducted by their 2000 PHA and the recently released June, 2005 Interim UIC report. If you are contemplating further stall tactics by requesting additional time to review my appeal, I will not accept it. As a Safety and Health professional, I will consider any delay as an act of scientific fraud in an attempt to perpetrate a last ditch effort to cover-up potentially criminal acts by ATSDR and your Illinois partners that put the citizens of Illinois at further risk from tremolite asbestos. My July 28, 2005 request for correction and my December 22, 2005 appeal have provided enough information and time for even the most junior of staff members in ATSDR and CDC to make a proper and timely response. I assume a timely response will not be difficult for your agency to provide since your Chief Science Officer chose to initially respond to my original request. Anything less than a timely response to my appeal would be a bold move on the part of ATSDR and CDC to obstruct due process requiring further investigation into the motives of what appears to be such a shameful and transparent act. However, I request, per your own agency policy, that those ATSDR/CDC staff members and the Illinois partners involved in ghostwriting and reviewing the December 6, 2005 response for Dr. Snider, not have anything to do with reviewing or responding to my December 22, 2005 appeal.

Second, my original request of correction has nothing to do with the June, 2005 UIC interim report or the planned activity-based asbestos risk assessment scheduled by the state of Illinois for this spring at Illinois Beach State Park. Citing these ongoing studies as a reason not to respond to my appeal in a timely manner is an obviously deceptive move aimed to avoid a proper and timely response. This was already attempted in Dr. Bashor's apparent ATSDR authored response that was blindly signed off by Chief Science Officer Dixie Snider. I have succinctly articulated multiple reasons to ATSDR and CDC in my appeal for labeling the 2000 PHA as "no longer valid as a public health assessment." My appeal left no doubt that the 2000 PHA has no relationship to any other study and is no longer valid based on current asbestos risk protocols. There are no other legitimate excuses or delay tactics left in defense of the now-outdated June, 2000 PHA for Illinois Beach State Park. Respond to my appeal in a timely manner. Again, do not delay a full and complete response to my appeal.

Third, since ATSDR is compelled by some unknown force to remain actively involved in these covert activities, I request that you require your Illinois partners and ATSDR's Region 5 office to open up their closed and secretive activity-based asbestos risk assessment process planned for this spring at Illinois Beach State Park. The secrecy and unscientific approaches previously used to hide the

massive tremolite and other microscopic asbestos contamination from the Illinois-Wisconsin border down to the shores of Oak Street beach in Chicago must end. The Chicago Park District recently performed secret activity-based asbestos air tests last summer to claim the Chicago beaches were safe from asbestos accidentally found by your partially funded June, 2005 UIC interim report. Was it a coincidence that one of the major sources of past and current asbestos releases into Lake Michigan (Johns-Manville's former plant and Superfund site in Waukegan, IL adjacent to Illinois Beach State Park) currently uses the same consultant that performed the Chicago Park District's activity-based asbestos study? How can the public have confidence in a secret report conducted in Chicago with such an apparent conflict of interest? Why won't the Chicago Park District publicly release this secret study conducted by the asbestos consultant for the Johns-Manville's Superfund site (the polluter) for taxpayers to review? This Superfund site currently has an NPDES discharge pipe which discharges up to trillions of microscopic particles of asbestos per day which are carried by the currents southward toward Chicago, while waves wash those particles up on the beaches. Yet, your Illinois partners quote these surreptitious studies conducted by the asbestos consultants for Johns-Manville as science-based fact that supports their claims that beaches are safe from asbestos hazards for adults and children. You need to pay more attention to the motives, activities, and claims made by your Illinois partners regarding tremolite and other microscopic asbestos contamination along the Illinois Lake Michigan shoreline.

Finally, there is not enough scientifically valid testing of the Illinois Lake Michigan shoreline to properly characterize the concentration of contamination by tremolite and other microscopic asbestos fibers on the entire Illinois shoreline. The shoreline is a dynamic process, constantly changing based upon wave action, weather and seasons. Taking this into account, it appears the entire Illinois shoreline is contaminated with asbestos fibers, including tremolite, that are neither naturally occurring nor background, as local government officials espouse to cover up their own dumping and facilitation of dumping asbestos-contaminated sand dredging by others. This dredged sand is then distributed by the Lake Michigan waves and currents wash fibers up on the beaches throughout the Illinois shoreline.

A limited set of sampling data generated by a state of Illinois sponsored secret Asbestos Task Force can hardly be definitive in determining where activity-based risk studies should be conducted. The limited number of beach samples, the use of extensive compositing protocols, and significant issues with internal analytical laboratory quality control, require the use of more detailed sampling and analytical protocols to properly characterize the extent of tremolite and other microscopic asbestos contamination in shoreline sands. Your agency must demand additional, transparent, lakefront sampling using proper protocols and with public involvement, prior to overseeing any activity-based risk assessments. Otherwise, your agency's integrity will fall further by endorsing the use of this "junk science" in the interim June, 2005 UIC report, which ATSDR refuses to peer review. The fatal flaws of the sampling and analytical protocols found in the interim June, 2005 UIC report would have been easily identified by your agency as a significant problem nearly six months ago had ATSDR agreed to perform a scientific peer review of this limited document when you were asked to do so by UIC, back in June, 2005. Why is this non-peer reviewed, scientifically flawed document being propped up by your agency and used as a basis for the future activity-based risk assessment that is planned for this spring? Shouldn't you peer review it first?

ATSDR and CDC tout that risk assessments should be conducted in an open and transparent manner, inviting its most contemptuous challengers into the process. Your website states:

Recognize the importance of community input. Citizen involvement is important because (a) people are entitled to make decisions about issues that directly affect their lives; (b) input from the community can help the agency make better decisions; (c) involvement in the process

leads to greater understanding of - and more appropriate reaction to - a particular risk; (d) those who are affected by a problem bring different variables to the problem-solving equation; and (e) cooperation increases credibility. Finally, battles that erode public confidence and agency resources are more likely when community input isn't sought or considered.

I won't give you the indignity of quoting all of the points about public involvement in open and transparent risk assessments found on your website. It is clear your agencies, staff and funding is involved in the secretly conducted asbestos activities along the Illinois Lake Michigan shoreline. You have a responsibility to require this process to be conducted with public involvement, in an open and transparent manner. Once this fourth attempt to downplay asbestos risks to Illinois citizens is completed, a legitimate scientific peer review (including an analysis of sampling and analytical protocol) must be conducted by your agency of all past and current alleged risk-based testing and studies. This is necessary to sort out the facts (if any) from the fiction behind your Illinois partners' claims that there are no apparent asbestos hazards along the Illinois Lake Michigan shoreline.

If ATSDR/CDC is not actively and willfully involved in the apparent efforts to cover-up asbestos hazards in these reports on the Illinois shoreline, then you have been duped by your Illinois partners and their state and federal agencies with which the Illinois partners work. Either way, your agency needs to take immediate actions to protect its scientific integrity and ethics. It is obvious that ATSDR/CDC has been deficient in properly verifying or attempting a meaningful vetting of this process because the results are a tragic betrayal of the public by your agency. Illinois citizens have endured the incompetence of your Illinois partners and now deserve integrity and science to be brought into evaluating a serious public health emergency of microscopic tremolite and other toxic microscopic asbestos fibers on the Illinois Lake Michigan shorelines. The unprofessional conduct and actions of ATSDR/CDC and its Illinois partners are creating the perception of the Illinois beaches turning into a "Libby East," both in the health threats to citizens and indictments of those who fail to act on their knowledge of these hazards.

I look forward to a timely response to my December 22, 2005 appeal letter and an invitation to participate in the development of the protocols for the activity-based risk assessment being conducted at Illinois Beach State Park this spring. Please copy me on your correspondence with your Illinois partners in response to my requests.

Cordially,

Jeffery C. Camplin

Jeffery C. Camplin, CSP, CPEA

c: Office of Inspector General, Department of Health and Human Services
Michael O. Leavitt, Secretary of the U.S. Department of Health and Human Services
Julie L. Gerberding, MD, MPH, CDC Director and ATSDR Administrator
Howard Frumkin, MD, DrPH, ATSDR Director
Dixie E. Snider, Jr., M.D., M.P.H., CDC/ATSDR Chief Science Officer
Drue Barrett, PhD, Acting Associate Director, ATSDR Office of Science
Mark Johnson, ATSDR Region 5
Dr. Mark Bashor, Associate Administrator for Federal Programs
Labretta Lanier-Gholoston,