



MEMO

June 8, 2006

Office of Management & Budget
Office of Information and regulatory Affairs
725 17th Street NW
New Executive Office Building – Room 10201
Washington D.C. 20503
OMB_RAbulletin@omb.eop.gov

Re: Proposed Risk Assessment Bulletin

The Montana Department of Environmental Quality has reviewed the proposed risk assessment bulletin to determine its effect on the completion of risk assessments and subsequent management of state and federal superfund sites. As a result of our review we concluded that this bulletin will significantly increase the difficulty encountered in conducting risk assessments. This in turn will slow down progress on successfully identifying and reaching remediation goals for contaminated sites. Existing guidance and policies in use now took years to develop and were thoroughly researched and peer reviewed. These existing methodologies are widely used by state and federal entities. The Proposed Risk Assessment Bulletin proposed by OMB in the January 17, 2006, Federal Register (Volume 71, Number 10) bulletin ignores and may contradict much of this guidance. Any risk assessment guidance produced by OMB should be closely coordinated with EPA and seek further public comment. Both agencies should ensure that the outcome of the OMB process is a valid risk assessment process that can be consistently applied with confidence by all entities who utilize risk assessments in the course of sound decision-making. Existing contradictions between the agencies must be reconciled to achieve this goal.

Thank you for the opportunity to comment.

A handwritten signature in cursive script that reads "Sandi Olsen".

Sandi Olsen, Administrator
Remediation Division
MT Department of Environmental Quality

Cc: Richard Opper
Michael Trombetta
Denise Martin