

Debbie Kring
EPA Region VII
901 N. 5 St.
Kansas City, KS 66101-2907

December 24, 2008

Dear Ms. Kring:

The Omaha Healthy Kids Alliance (OHKA) is submitting the following comments and recommendations on the U.S. Environmental Protection Agency's (EPA) 2008 Proposed Plan for the Omaha Lead Site.

OHKA is concerned that EPA has not identified the most significant source of lead exposure in Omaha, did not evaluate locally available blood lead data, and did not perform additional risk characterization as called for in EPA's Interim Record of Decision (IROD). OHKA is recommending that EPA revise the Preferred Alternative to take into account local blood lead data, so that EPA's approach efficiently and effectively reduces and prevents blood lead poisoning, by selecting a cleanup value that accurately reflects soil exposure risk, while balancing risks from other sources. OHKA is also recommending that EPA modify the Preferred Alternative to incorporate OHKA as a key component of a comprehensive program and to select the comprehensive program as the final remedy.

Recommendation 1 – Include Douglas County Health Department Data on Lead Sources

EPA's Proposed Plan and supporting documents exclude readily available, local blood lead data. As EPA is well aware, the Douglas County Health Department, a key OHKA partner, maintains county-wide blood lead data, including data within the Omaha Lead Superfund Site. The Health Department also investigates individual childhood lead poisoning cases under their case management program. In these cases, the Health Department tests possible environmental lead exposure sources, such as paint and soil. Each year, the Health Department presents these data to EPA and the community at an Omaha Lead Site Community Advisory Group (CAG) meeting. In 2007, the Health Department reported identifying lead-based paint hazards in 94% of case management occurrences. It is important for EPA to recognize and utilize this information because this local data clearly identifies lead-based paint as a major source of childhood lead exposure in Omaha, rather than soil alone, as stated in EPA's Proposed Plan.

Omaha has made great strides in preventing childhood lead poisoning. Multiple entities have been working for years to reduce and prevent childhood lead poisoning in Omaha. As a result of combined efforts and increased

screening of children, blood lead levels in Douglas County have decreased from 21.2% in 1997 to 2.1% in 2007. Within the seven zip codes of the

Superfund site, blood lead levels have decreased to 3.7%, which is below EPA's Remedial Action Objective of 5% for the Omaha Lead Superfund site. This decrease is consistent with national blood lead declines, which the Centers for Disease Control and Prevention (CDC) attributes to national, state, and local efforts to remove lead from gasoline, food cans, and residential paint, as well as ongoing declines in the number of homes with lead-based paint.

OHKA strongly recommends that EPA incorporate local data on lead exposure sources into the Proposed Plan and identify lead-based paint as the key lead exposure source to children in Omaha. Further, OHKA recommends, based on local Douglas County Health Department data, that EPA restructure the proposed remedy to include OHKA as a major partner, alongside EPA, in a comprehensive program that will address lead-based paint as a primary source of lead exposure and bare soil and other media (e.g. water, imported candy, etc.) as secondary sources of exposure.

Recommendation 2 – Collect Additional Paired Data to Fully Characterize Risks

EPA's 2004 Interim Record of Decision (IROD) included additional characterization of lead exposure risks and review of blood lead data. Page 41 of EPA's IROD Responsiveness Summary states: "The EPA recognizes that the blood lead levels of children in Omaha have been decreasing; however, the reasons for this decline are unknown...EPA will collect additional data to better characterize the contribution of various lead sources to elevated blood lead levels..." Page 53 of the Responsive Summary states: "During the interim remedial action, EPA will review data regarding blood lead levels in children at remediated properties to preliminarily assess the impact on blood lead levels..." EPA did not complete these tasks. EPA only collected additional data from 98 out of 39,764 residential properties. EPA was unable to combine this new data with data collected for the 2004 Proposed Plan, and EPA did not collect paint or blood lead data at the 98 residential properties.

OHKA recommends that EPA review available local blood lead data, which indicate that lead-based paint is a primary source of lead exposure to children in Omaha. Because this local data conflicts with EPA's statements in the Proposed Plan that soil is the primary exposure concern, OHKA recommends that EPA carry out the provisions in the IROD and review existing local data, as well as collect additional paired data from all potential lead sources to fully characterize lead exposure risks. Additionally, OHKA recommends that EPA incorporate adjustments to the final remedy, based on this new risk characterization.

Recommendation 3 – Fulfill Commitment to Engage Other Entities

In the 2004 IROD, EPA committed to addressing all sources of lead exposure and implementing a comprehensive program. To do so, EPA pledged to: “seek to partner with other public and private entities to characterize and address all identified sources of lead exposure to the site community.” EPA also committed to acquiring funding for a comprehensive program, stating: “In cases where CERCLA authority is limited, the EPA will work with other interested parties and authorities to identify potential funding sources and mechanisms to address these other sources of lead exposure as part of a comprehensive lead-exposure reduction program.”

OHKA recommends that EPA fulfill its commitment in the IROD to engage other public and private entities in a comprehensive program, in order to characterize risks, identify lead exposure sources, and generate funding.

Recommendation 4 – Include Education as a Key Component

OHKA, the CAG, local organizations, and State leaders have consistently called for increased education at the Omaha Lead Superfund Site. During the public comment period on the proposed plan in 2004, a local citizen commented that education should be increased to provide information about lead hazards and how to address such hazards. EPA’s response, included in the 2004 responsiveness summary, was: “The EPA agrees with this comment and will increase the level of funding and support for these activities at the Site.” However, with the exception of additional funding spent on a television commercial in 2008, EPA has not followed through with this commitment. In August of 2006, the CAG formally requested that additional funding be directed towards education, specifically outlining key areas of education on which to focus, such as funding for community outreach workers. The CAG Education Committee, based on its work over an almost two-year period, recommended significantly increasing funding for education, citing research findings that education is effective at reducing childhood blood lead levels.

OHKA is a strong proponent of health education as a key method for reducing childhood lead exposure. OHKA recommends that EPA significantly increase funding for education, making education a key component of a comprehensive remedy for the Omaha Lead Superfund Site.

Recommendation 5 – Select OHKA (Omaha’s Comprehensive Program) as the Final Remedy

OHKA was created as a result of the CAG’s expressed desire that there be a comprehensive remedy for the Omaha Lead Superfund Site, by providing a collaborative, coordinated, and holistic approach to address all sources of lead exposure within Omaha. OHKA is a nonprofit, 501(c)(3) organization, guided by a board of directors, with input from community-based committees. The mission of OHKA is to provide a comprehensive approach through

collaboration, coordination, and education to prevent and eliminate childhood lead poisoning in Omaha. OHKA provides for coordination of services through the collaborative efforts of Omaha service providers, including the Douglas County Health Department; City of Omaha; EPA; University of Nebraska-Lincoln Extension in Douglas/Sarpy Counties; Nebraska Department of Environmental Quality; physicians and clinics; and community-based organizations.

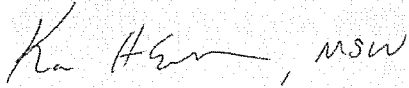
In 2004, the CAG was formed to discuss issues related to the Superfund site. The CAG brought together lead exposure prevention programs and agencies alongside many other stakeholders, including public officials, concerned citizens, community-based organizations, and business leaders. The CAG quickly identified a clear need and community desire for a comprehensive program to oversee collaboration of the programs already in existence, find additional resources where needed, and provide missing program links to address all sources of lead. Through numerous discussions in CAG Comprehensive Plan Committee meetings, and with the participation of EPA, the CAG recommended the formation of OHKA.

EPA, in conversations with CAG members and OHKA board members, led the community to believe that in order to fulfill the community's request for a comprehensive program, a 501(c)(3) designation would be necessary, as well as obtaining funding from multiple sources to demonstrate collaboration and impartiality. OHKA has achieved these benchmarks in a short period of time. OHKA is designated as a 501(c)(3) and has received funding from private partners and federal grants, including funding from: the City of Omaha, EPA, HUD, ClearCorps, Google, AmeriCorps, Union Pacific Railroad Company, and the William and Ruth Scott Foundation. OHKA has also achieved great success in bringing together partners across the community. OHKA and our partners came together to develop OHKA's strategic plan, which outlines clear goals and strategies to move forward with Omaha's comprehensive program. OHKA has already developed and implemented activities and programs, which would easily incorporate into a comprehensive remedy, such as: partnering with New Community Development Corporation to obtain HUD funding to address lead in housing, partnering with Girls Inc. to hold a lead poisoning prevention fair, assisting Boys Town with lead-related grants, creating a home dust test kit pilot program, hosting toy testing events across town, and establishing a single hotline number for Omaha lead information.

The groundwork has been laid. Working with EPA, Omaha created a nonprofit organization, perfectly poised to implement a comprehensive program for the Omaha Lead Superfund Site. OHKA strongly recommends that EPA move forward with selecting OHKA as the final remedy for the Omaha Lead Superfund Site.

We ask that EPA adopt the above recommendations. We are ready to work with EPA to achieve the goals of Omaha's Comprehensive Program. If you have any questions, please contact me at (402) 561-7596.

Sincerely,

A handwritten signature in black ink that reads "Kara Henner, MSW". The signature is written in a cursive style with a horizontal line underlining the name.

Kara Henner Eastman, MSW
Executive Director, Omaha Healthy Kids Alliance

cc: OHKA Board of Directors
Mayor Mike Fahey
Governor Dave Heineman
Senator Chuck Hagel
Senator-elect Mike Johanns
Senator Ben Nelson
Congressman Lee Terry
John Askew, EPA Region 7 Administrator
Bob Feild, EPA Region 7
Jon Gant, U.S. Dept. of HUD
Omaha Lead Site Community Advisory Group