

OLS
CAG

Omaha Lead Site
Community Advisory Group
P.O. Box 12282
Omaha, NE 68112

September 9, 2004

Ms. Debbie Kring
Remedial Project Manager
U.S. EPA, Region VII
901 North 5th Street
Kansas City, Kansas 66101-2907

Dear Ms. Kring,

Attached are recommendations from the Omaha Lead Site Community Advisory Group (CAG) regarding EPA's *Proposed Plan Residential Yard Soils, Omaha Lead Site*, dated July 16, 2004. The CAG appreciates the opportunity to comment on this document and looks forward to your response.

If you have any questions, please contact me at (402) 346-1100.

Sincerely,

Brenda Council
Facilitator

Cc: Mayor Mike Fahey
Governor Mike Johanns
Mike Linder, NDEQ
Dick Nelson, NHHS
Sue Dempsey, NHHS

The Omaha Lead Site Community Advisory Group (CAG) recommends that the EPA Preferred Alternative, as outlined in EPA's *Proposed Plan Residential Yard Soils, Omaha Lead Site* (dated July 16, 2004), include and fund a comprehensive approach to achieve the remedial action objectives.

The CAG recommends that such a comprehensive approach include but not be limited to the following components:

- **Fund a non-profit entity (501c3).** The Omaha City Mayor's office supports the establishment of such an entity. The CAG recommends that the Preferred Alternative allow for funding the essential needs of a non-profit entity, such as staffing, office space, and equipment, to support a comprehensive approach.

This entity proposes to oversee the coordination and collaboration of all the programs and agencies involved with the remediation program at the OLS. Most of the work would be done with the assistance of a Collaborative Council with membership from the community and all stakeholders. At a minimum, this would require a full-time Executive Director. (This would allow an Omaha point of contact for families.)

- **Public awareness/outreach programs.** The CAG recommends that the Preferred Alternative include culturally and linguistically appropriate programs that focus on the importance of having children and pregnant/nursing women tested for lead, the health risks of lead exposure to children and adults, potential pathways of exposure, awareness of the Superfund process, importance of access agreements, awareness of housing codes, etc., as well as the activities outlined in the Health Education chapter of the Proposed Plan.
- **Public education/training programs.** The CAG recommends that the Preferred Alternative include public education/training programs that provide culturally and linguistically appropriate education and training on safe gardening, how to safely live with lead, how to remediate lead in the environment (including home renovation and remodeling), as well as the activities outlined in the Health Education chapter of the Proposed Plan.
- **Blood lead screening and monitoring program.** The CAG recommends that the Preferred Alternative include a blood lead screening and monitoring program that (1) places emphasis on increasing the number of children less than 7 years old that are currently tested for lead, (2) includes monitoring and regular testing of children between 1 - 9 µg/dL, (3) provides screening to pregnant/nursing women, and (4) assures that children living in residences that have received soil removal are tested for lead.
- **In-home assessments in residences with children with blood lead levels at or above 10 µg/dL.** The CAG recommends that the Preferred Alternative include this item as currently described in EPA's Proposed Plan.

- **Exterior lead-based paint hazard controls.** The CAG recommends that the Preferred Alternative include implementation of exterior lead-based paint hazard controls consistent with U.S. Department of Housing and Urban Development (HUD) *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* (June 1995).
- **Interior dust testing program.** The CAG recommends that the Preferred Alternative include this item as currently described in EPA's Proposed Plan.
- **Interior residence cleaning.** The CAG recommends that the Preferred Alternative include this item as currently described in EPA's Proposed Plan.
- **Interior lead-based paint hazard controls.** The CAG recommends that the Preferred Alternative include implementation of interior lead-based paint hazard controls consistent with HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* (June 1995).
- **Resources to local agencies.** The CAG recommends that the Preferred Alternative, in consideration of protection of EPA's remedy, include elements that will assist in enforcing local housing codes, assist in enforcing rules and regulations of the Douglas County Health Department, and assist homeowners applying for funding to remove or stabilize lead hazards. In addition to protecting the remedy, these elements will allow for the leveraging of resources.