



Adi M. Pour, Ph.D.
Health Director
(402) 444-7471
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September 15, 2004
Ms. Debbie Kring
U.S. EPA, Region VII
Office of Public Affairs
901 North 5th Street
Kansas City, Kansas 66101

Access Medicaid Program
(402) 595-3870

Business Administration
(402) 444-7216

RE: Comments on Proposed Plan for the Omaha Lead Site

Child Care Nurse Consultant
(402) 444-6426

Dear Ms. Kring:

Epidemiology
(402) 444-7214

The Douglas County Board of Health (BOH) has reviewed the proposed plan for the above mentioned site. The BOH is generally in support of EPA's proposed preferred interim alternative designed to remediate yards that indicate the highest soil lead contamination, namely above 800 ppm, as well as continuing to remediate yards of residences above 400 ppm where children with blood lead levels at or above 10 ug/dL reside, until further data is available from the Phosphate Treatability Study. The BOH further supports a comprehensive approach and believes that the Record of Decision (ROD) should at least include:

Food and Drink
(402) 444-7480

- Establishment of a non-profit entity (501c3)
- Public awareness/outreach programs
- Public education/training programs
- Blood lead screening and monitoring programs
- In-home assessments in residences with children with blood lead levels at or above 10 ug/dL
- Exterior lead-based paint removal
- Interior dust testing program
- Interior residence cleaning
- Resources to local agencies to enforce local housing ordinances and regulations.

Health Data
(402) 444-7213

Health Promotion
(402) 444-7475

Lead Prevention Program
(402) 444-7825

Public Health Nursing
(402) 444-6427

Sanitation Control
(402) 444-7481

In addition, the BOH is recommending that EPA develop and implement a mechanism in their remedial design that is built on a strong partnership with the community and local governmental agencies to address each residence that receives yard remediation in a more comprehensive way. This mechanism would necessitate a formal process where the EPA contractor is required to form a team that would address each residence comprehensively, such as a) identifying all lead hazards at a residence; b) providing information and assistance to remediate all lead hazards; c) testing and monitoring of at least all children less than 6 years of age in the residence for elevated blood lead levels, etc.

Sanitary Engineering
(402) 444-7485

Such an approach would be innovative, comprehensive, protect the remedy, and most importantly result in the greatest benefit to public health.

Vital Statistics
(402) 444-7204

WIC
(402) 444-1770

The BOH appreciates the opportunity to comment on the Proposed Plan and is looking forward to a continuous close collaboration with EPA and the Douglas County Health Department to make this a healthier community.

Health Center Location:
42nd & Woolworth Avenue
Omaha, NE 68105

If you have any questions, please contact Adi Pour, Ph.D., Health Director, at (402) 444-7471.

Immunizations
(402) 444-6163

Dental Services
(402) 444-7349

Laboratory Services
(402) 444-7496

STD Control
(402) 444-7750

Travel Clinic
(402) 444-7207

Sincerely,
Marlene Wilken
Marlene Wilken, Ph.D.
Chairwoman
Douglas County Board of Health