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Prepared as Handout  
Omaha Lead Site Community Advisory Group  
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## **General Questions Regarding EPA's Feasibility Study, Residential Yard Soil, Omaha Lead Site**

MFG developed the following questions for the CAG to consider regarding EPA's Feasibility Study (FS). It is up to the CAG to decide which, if any, of these questions should be submitted to EPA for a response, and it is also up to the CAG to decide if there are additional questions that members would like added to this list.

1. It is stated in the FS that exterior paint will be removed primarily through power washing and will follow EPA and HUD guidelines and regulations. HUD guidelines strictly prohibit uncontrollable power washing of lead-based painted surfaces because such a practice creates large amounts of wastewater containing lead and can contaminate large areas.

**What will EPA do to ensure that paint chips and dust removed via power washing do not contaminate neighboring yards? How will EPA contain the wastewater that is generated so that it does not contaminate other properties?**

2. EPA indicates that removal of exterior lead-based paint will be conducted on a voluntary basis at homes at which soil cleanup actions are taken and lead-based paint is visibly flaking and deteriorating from 10 percent or more of the surface.

**How does EPA plan to protect its remedy at residents where the owner does not agree to have paint removed? How does EPA plan to protect its remedy at homes where neighboring properties that do not qualify for removals have flaking and deteriorating paint?**

3. EPA has not quantified the risks to workers and residents (both in Omaha and along the transport route) associated with excavation and transportation of lead impacted soils. Excavation activities have inherent potential risks to health of workers and residents, including increased dust levels and physical risks associated with heavy

equipment, the use of hand tools, and physical activity. Additionally, transport of materials increases the potential for injury from accidents as well as the potential for increased distribution of dust from lead contaminated soils. Increased vehicular/truck traffic within neighborhoods will also impact air quality and expose residents to increased air pollutants. Alternative 2 would take 60,000 truck trips to move the estimated 960,000 cubic yards of soil and Alternatives 3 and 4 would require 21,000 truck trips for the estimated 336,000 cubic yards of soil.

**How will risks associated with excavation and transportation of lead impacted soils to workers and residents be addressed? What will be the impacts to local neighborhoods and residents of increased truck traffic from implementation of EPA's proposed remedy?**

4. Disposal options presented in the FS for excavated soils are (1) design and construction of a soil repository, (2) disposal as beneficial fill in commercial land use projects, and (3) disposal in off-site sanitary landfills. The FS provides no specific details regarding potential locations for any of these options and does not provide sufficient detail to assess associated risks or costs of these options.

**If an on-site soil repository were to be created, where would it be located? Will the public have any input into decisions made regarding siting such a repository? If the soil is used as beneficial fill, what are the implications regarding risk to receptors living and working near the fill area? Will the public have any input into decisions made regarding the use of the soil as fill material?**

5. As for disposal of excavated soils in off-site sanitary landfills, the FS states that such disposal will require testing of soils for lead using the Toxicity Characteristics Leaching Procedure (TCLP). Soils from the Omaha Lead Site have the potential to contain other contaminants not related to lead such as waste oils, gasoline, solvents, pesticides, herbicides, and other non-industrial derived contaminants as a result of historic uses. Most disposal facilities would require testing for these types of materials prior to accepting soil for disposal, particularly for the quantity of soil being considered for this action.

**What consideration has been given to the logistics and costs of additional testing and the potential for rejection of excavated soils by the landfill?**

6. Lawn restoration is an element of Alternatives 2 through 4 presented in the FS. However, the FS provides neither the procedures that will be used to ensure the future vitality of restoration activities nor the potential costs to homeowners associated with

these activities.

**What will the initial watering requirements be for sod and hydro-seed and what will the cost be to homeowners? What types of upkeep and maintenance will be required, and what will the costs be to homeowners?**

7. EPA indicates in the FS that the remedial alternatives were developed to address contamination resulting from industrial operations and that contamination “solely from other sources, such as lead based paint, will not be addressed” by the alternatives. To meet this objective, EPA must determine whether contamination is from sources other than “industrial operations.” Current analytical technologies used to determine concentration (particularly Field XRF technology) do not provide information regarding the source of contaminants.

**At each individual property, how does EPA intend to determine whether contamination is from “industrial operations” or from “other sources”?**

8. Alternatives 2 through 4 include measures to address interior dust at homes that exceed the EPA and HUD standards via interior cleaning. The description does not specify if a determination will first be made regarding the source of the lead in interior dust. If lead-based paint is a contributing source to lead in dust, interior cleaning activities as proposed by EPA, will be ineffective at reducing blood lead levels. Without addressing the lead-based paint source, recontamination will occur.

**How will EPA determine if interior lead contamination in dust is due to exterior soil and not lead-based paint?**

9. EPA defers detailed analysis of institutional controls (ICs) in the FS stating that specific ICs will be documented as part of an Institutional Controls Implementation Plan. This tactic effectively eliminates the public’s opportunity to comment meaningfully on ICs that may be incorporated into the remedy. ICs by their nature can generally only be implemented by the state or local government and can be quite costly. In addition, legal access restrictions, such as those discussed in Section 4.1.2 of the FS, can devalue the property that is restricted.

**What potential impact in property value is expected at properties requiring institutional controls? What are the expected costs to the state and local governments for implementation of institutional controls?**

**10.** EPA has not provided sufficient data to indicate that soil removal or one-time interior dust removal will result in any significant reduction of blood lead levels in residents. EPA's OSWER Directive 9355.4-12 recognizes that in cases such as the OLS, where soil exposure to lead is only one of the pathways of exposure, it may be more protective and more appropriate to remediate the other sources of lead exposure instead of just soils. Appendix A-1 of the OSWER Directive states, "If interior lead-based paint is a major contributor, consider remediating indoor paint to achieve a greater overall risk reduction..."

**With known high instances of lead-based paint in residences in the OLS, there is a high potential for the incidence of elevated blood lead levels to remain the same after soil removal. As such, why do none of the alternatives presented in the FS include elements to address this known source of lead exposure?**