

**HOUSTON ENGINEERING**

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Consulting Engineering  
Services

August 20, 2004

Concerned Individuals and Organizations

Re: Omaha Residential Lead Contamination

Dear Concerned:

EPA continues to abuse truth, knowledge, and scientific analysis on the alleged Omaha residential lead (Pb, plumbum) contamination. They have lied, used misleading statements, and employed scare tactics.

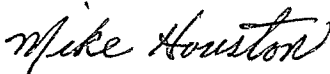
A recent Omaha World-Herald front-page headline was, "Lead panel's focus questioned". The 'lead panel' appears to be trying to approach the problem properly. Soil lead contamination in Omaha is not really a concern. About 75% of the residential lead in east Omaha comes from the combined following sources:

1. Natural – it is present in the area soils.
2. Past usage of leaded gasoline in automobiles. Also other fuels and lubricants.
3. Leaded outside paints on houses and other buildings. Inside paints also contribute.
4. Lead piping and lead in metals in general. In metal solders, ammunition, weights of various types, pencils, etc.
5. Water used for watering lawns, gardens, shrubs, and trees. Plus that for washing cars and vehicles.
6. Automobile batteries from leakage, over-filling, and washing them.

This leaves about 25% (or one-fourth) of the alleged contamination for all other sources. The former ASARCO refinery downtown is just one of several companies which should be considered as sources of lead from past years. In certain areas, and only in certain areas near the former ASARCO and Gould Battery plants, ASARCO may be responsible for 6 to 10% of the lead as an estimate.

Yet in the article, EPA lies to the extent of saying that up to three-fourths or up to 75% of the contamination came from ASARCO operations. Omaha needs to stop the community disruptions caused by EPA and the senseless waste of taxpayers money. Our funds are desperately needed in other areas. Many elderly are forced to buy either food or prescriptions. Many of these have already given up their cars and homes. Children and adults here in Omaha are going to bed hungry. The waste of EPA should not be tolerated.

Sincerely,



Michael C. Houston, P.E.

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August 23, 2004

Re: Addendum to "Omaha Residential Lead Contamination" Letter

The list of residential lead soil (Pb) sources should have included a very significant one that is being added here now in red:

1. Natural – it is present in the area soils.
2. Lead insecticides and pesticides used extensively in gardens, fruit trees, and on lawns.
3. Past usage of leaded gasoline in automobiles. Also other fuels and lubricants.
4. Leaded outside paints on houses and other buildings. Inside paints also contribute.
5. Lead piping and lead in metals in general. In metal solders, ammunition, weights of various types, pencils, etc.
6. Water used for watering lawns, gardens, shrubs, and trees. Plus that for washing cars and vehicles.
7. Automobile batteries from leakage, over-filling, and washing them.

Lead arsenate was a widely used insecticide around homes in the past. One soil sample or part of one composite sample taken from an area where lead arsenate was used can cause EPA to a false conclusion that lead is high at a residence when it is really not. The same applies to any other area where lead may be more concentrated. Samples of this type are not representative of the whole property.

EPA likely cannot scientifically prove that even 10% of residential soil lead comes from air pollution from all Omaha industries combined. UPRR should not be paying for the folly of EPA scare tactics. EPA has very wrongly blamed a single company, ASARCO, for up to 75% of residential lead contamination. AN OUTRIGHT LIE! EPA and the City of Omaha should owe ASARCO and other former river front industries millions of dollars for slander and for forcing them out of their plant locations. On ASARCO, 232 good-paying jobs were eliminated including engineers (my profession) and managers.

The time for Omaha to stop the massive wasted spending and community disruptions is now. The Superfund designation should be withdrawn just like Wichita did some years ago to save its industries and community integrity.

M. O. Houston, P.E.