

# STATE OF NEBRASKA

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## DEPARTMENT OF ENVIRONMENTAL QUALITY

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JUL 25 2001

Mr. Don Bahnke  
Project Manager-SUPR-FFSE  
Environmental Protection Agency Region 7  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101

RE: Review of July 3, 2001 Document entitled "Final Preliminary Assessment /Site  
Inspection Report Omaha Lead, Omaha, Douglas County, Nebraska  
EPA ID No. NESFN0703481

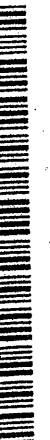
Dear Mr. Bahnke:

The Nebraska Department of Environmental Quality (Department) has reviewed the above-referenced document, a revised version of the January 19, 2001 document under the same EPA ID number, prepared on EPA's behalf by Black & Veatch Special Projects Corporation. Presented below are NDEQ's comments, questions and concerns which were stated in the Department's April 2001 letter to the EPA regarding the document but were not addressed in the current revision to the Department's satisfaction. Specific comments are referenced by report (draft or final) section and subsection heading as found in the report.

### Draft Document

#### 2.3 Previous Investigation

1. Page 7, Fifth Paragraph. The list of potential lead related users, manufacturers, sellers or generators (with addresses) should be included as a table in the report. A map including the location of these potential sources and a map including the general location of homes with EBL children and/or high lead soil levels would also be appropriate in this report. The map could show a relationship between the potential sources and the homes with EBL children and/or high lead soil levels.
  - If this information is not listed in the final document the Department believes that the information should be included in the attribution study.



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2. Page 8, Third Paragraph. Antimony is stated as a potential constituent attributable to the site. Please clarify why antimony is a potential contributable contaminant to the site. It is unclear if the issue is the toxicity or signature of antimony. Are there other possible sources of the antimony that need to be determined and evaluated?

- Antimony should be noted in the document to prevent this possible contaminant from being overlooked should the site require further investigation.

## **Final Document**

### **Comments 3 – 9.**

The Department believes that the document in its current form lacks the visual illustration necessary to denote the features described in the text. Visual illustrations of comments 3 – 9 would clarify issues of concern that the Department provided comment on in its April 2001 letter.

#### **2.1 Site Location and Description**

3. Definitions for the site in Sections 2.1 and 5.1 are not the same. Please clearly define the site.

#### **2.3 Previous Investigations**

4. Page 2-5, First Paragraph. The air dispersion model fallout results should be clearly plotted on a map along with the actual analytical results from the soil tests to see if there is a measurable or observable correlation to the ground deposition pattern of atmospheric lead simulated in the model.

#### **3.3 Trends in DCHD Blood Lead Measurements - 3.4 Trends in EPA's Soil Lead Measurements**

5. Please provide a map correlating EBL residences and non-foundation property sample results greater than or equal to 400 ppm lead.

#### **4.2 Groundwater Pathway Targets**

6. It is not clear where the municipal well(s), supplying the drinking water for the 568 people within a 4-mile radius of the former Asarco facility, is located. Please supply a map with the well(s) clearly illustrated.

### 5.1 Hydrologic Setting

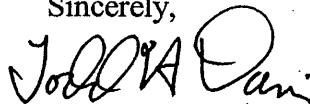
7. The 15-mile surface water pathway is not clearly illustrated. Please clarify where the fallouts (storm sewer outlets) are located along with the point(s) of origin, and surface water intakes.
8. The report does not include a wetlands map. The inclusion of a wetlands map would be helpful in clarifying the location of wetlands that are located along the 15 mile surface water pathway.

### 5.2 Surface Water Pathway Targets

9. Please define the "designated source" area(s).

If you have any questions regarding this letter, please call me at 402-595-1767.

Sincerely,



Todd Davis  
Program Specialist  
Omaha Field Office

Cc: Mike Felix  
Remediation Section Supervisor  
Waste Management Division

Theodore Huscher  
RAPMA Coordinator  
Waste Management Division

