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Memorandum

To: Don Bahnke  
From: Todd Davis  
Thru: Mike Felix  
Date: April 2, 2003  
RE: Comments and recommendations to the Omaha Lead RI/FS Work Plan

General Comment:

The Department appreciates the efforts the EPA has made through this process to ensure that communication between the EPA and the State of Nebraska is available. The Department would like this to continue.

Specific Comments:

1. Page 1-2, Task 8 – Discussion has taken place regarding the use of phosphate treatment as a potential remedial alternative at some of the properties. As such, a treatability study would most likely be necessary prior to selection as a remedy. The workplan should indicate that a treatability study will be performed.
2. Figure 2.1 – Include box from EPA WAM to NDEQ/NHHSS. This box signifies the sharing of information and review of draft documents for comment between the State of Nebraska and EPA.
3. Page 2-4 – Project Planning Efforts – As the scoping efforts will continue for the duration of the work assignment, the first bullet should indicate that NDEQ and NHHSS will also attend. Additional bullets should be added to the list to address development of a conceptual site model, identification of remedial action objectives and potential remedial alternatives, and identification of treatability studies that may be necessary.
4. Page 2-6 – Task 3 – Field Sampling Plan and QAPP. States that 12,000 residential properties will be tested. How was this number generated? Statistics? Budget? It would be helpful to indicate this in the plan for future reference.
5. Page 2-7 – States that 550 homes will have interior dust samples taken for sampling. How was this number generated? It would be helpful to indicate this in the plan for future reference.
6. Page 5-1 – Last sentence. This sentence should be revised to indicate that copies of each document will be provided to NHHSS, NDEQ Lincoln Office and NDEQ Eastern Field Office.
7. Figure 5-1, RI/FS Schedule – NDEQ requests that this schedule identify when a document is to be submitted to NDEQ/NHSSS, our review time frame, and when



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a revised document will be submitted. Our review timeframe will typically be 30 days. The schedule should also identify tasks associated with submittal, review and revision of the Field Sampling Plan, QAPP, Sampling Plan for the Risk Assessment, and the Risk Assessment Report. NDEQ also requests an updated timeline for the entire process through the final delisting of the site as previously provided in April, 2002.