

June 2, 2003

Don Bahnke
Superfund Division
U. S. Environmental Protection Agency, Region VII
901 N. 5th Street
Kansas City, KS 66101

RE: Remedial Investigation/Feasibility Study – Field Sampling Plan
Omaha Lead Refining Site, Omaha, Nebraska
Prepared by Black & Veatch Special Projects Corp., Overland Park, KS April 2003
Received May 14, 2003

Mr. Bahnke:

The Nebraska Health and Human Services (NHHSS) Risk Assessment Program has reviewed the above referenced document and would like to offer the following comments.


1. Please provide a glossary of technical terms and acronyms.
2. **Page 1-1, 1.0, first sentence.** This sentence should state that sampling will be for “select” metals only and why, only these metals, will be analyzed. Why is ASARCO the only PRP identified?
3. **Page 1-1, 1.0, second sentence.** This sentence should state that the information will be used “by the Nebraska Health & Human Services Risk Assessment Program” to develop a risk assessment “for lead” and to calculate a site-specific cleanup goal “for lead only”...
4. **Page 1-1, 1.1, third sentence.** Please elaborate how the *source area boundary* is determined.
5. **Page 1-1, 1.1, fourth sentence.** This sentence should state that samples will be collected from “a portion of” the residential yards. Please provide a definition for *XRF*.
6. **Page 1-1, 1.1, sixth sentence.** Please define *surface soil* by providing depths. Please provide a definition for *drip zone areas* and information as to why they are given special consideration. Please identify what percentage *12,000 residences*, equates to and why this number was selected (i.e., to support the data needs of the risk assessment, etc.).
7. **Page 1-1, 1.1, last sentence.** Please identify what percentage *550 residences*, equates to and why this number was selected. Please add the word “interior” before the word *dust*. Please also mention that the University of Nebraska - Omaha will be performing the demographic survey that and state that the Douglas County Health Department will be offering residential child blood lead screening for children 0-6 years of age in these homes.
8. **Figure 1-1.** Please include a color figure so that different lead concentrations can be identified.
9. **Page 1-2, first paragraph.** This paragraph should be simplified so it is easier to understand and terms such as *bullion*, *drosses* and *refining* included in the glossary.
10. **Page 1-2, third paragraph, first sentence.** Please reword this sentence to simply state that the former ASARCO property is located adjacent to the Missouri River in downtown Omaha.
11. **Page 1-2, fourth paragraph, first sentence.** Please remove.
12. **Page 1-2, fourth paragraph, second sentence.** Please edit this sentence to state that the contamination “of residential soils” may have been caused by....activities at the “former ASARCO site”.
13. **Page 1-2, fourth paragraph, third sentence.** Please edit this sentence to state that “this assumption” is based on
14. **Page 1-2, numbered items.** Please provide a summary of this information in an appendix or state that lead contamination was found in “residential” yards in the “surrounding area” and



- provide dates for the collection. Please edit item #2 to state the age of the children, "0-6 years-of-age" and provide dates for the collection. Please edit item #3 to include source and dates.
15. **Page 1-3.** Please provide references to the documents mentioned and where they can be viewed.
 16. **Page 2-1, second sentence.** Please edit this sentence to state the data is collected to develop a risk assessment "for lead" and to calculate a site-specific cleanup "level for this chemical".
 17. **Page 2-1, third sentence.** Please remove the third sentence.
 18. **Page 2-1, fifth sentence.** Please replace the words *this objective* with the words "these objectives".
 19. **Page 2-1, bullets.** Please indicate who will be completing each objective (i.e., B & V, UNO and DCHD). For bullet #1, please also include surface soil depth and state the percentage of yards that will be sampled. For bullet #2, please state what percentage of the homes will be tested. For bullet #4 please include the age range for the children to be tested.
 20. **Page 3-1, section 3.1, third sentence.** Please explain the reasoning for collection of a "drip zone" sample (the last sentence on this page could be moved up).
 21. **Page 3-1, section 3.1, third paragraph, fifth sentence.** How will the locations for the aliquots be determined? Randomly? Equally spaced within the quadrant?
 22. **Page 3-2, first paragraph.** Please provide definitions for "spectrometers", "calibration" and "bulk soil sampling" here or in a glossary of terms.
 23. **Page 3-2, item #1.** How will the "exact location" of each sample be determined? GPS?
 24. **Page 3-2, items #3 & 4.** It is unclear what is implied here. Please edit these two items to more clearly outline the collection procedure.
 25. **Page 3-3, section 3.2.** Please discuss how house cleaning will be addressed (i.e. what if residents dust and clean prior to the visit, etc.).
 26. **Page 3-3, first sentence.** Please edit this sentence to state the homes will be sampled for "interior" dust and that "UNO will administer" a demographic survey and "DCHD" will offer free blood lead screening for child residents "age 0-6 years of age in these homes".
 27. **Page 3-3, third sentence.** Please include the total number of homes on the site. Is 22,000 accurate?
 28. **Page 3-3, item #1.** Please explain why the hard floor surface is selected over a carpeted surface.
 29. **Page 3-4 and 3-5, items #3 and 4.** Please rearrange these two items.
 30. **Page 3-5, wipe sampling item #3.** Please simplify this explanation. Why do different template shapes need to be used?
 31. **Page 3-6, first paragraph.** Please explain what a "restricted area" is. Please simplify the explanation for determining which procedure will be used.

Please do not hesitate to call me at 402-471-8880 if you have any questions.

Sincerely,



Susan Dempsey, MS
Risk Assessor

xc: Dick Nelson, NHHSS

Todd Falter, NHHSS

Todd Davis, NDEQ

