



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

AUG 22 2002

Site:	Omaha Lead
ID #:	NESFN0703481
Break:	2.6
Other:	08/22/02

0724
-224

ACTION MEMORANDUM

SUBJECT: Request for a Time-Critical Removal Action at the Omaha Lead Site, Omaha, Nebraska; and Council Bluffs and Carter Lake, Iowa; and an Exemption to the Two Million Dollar and Twelve Month Limits for This Action

FROM: Don Bahnke, Remedial Project Manager *for*
Superfund Division *Bahnke*

THRU: Gene Gunn, Chief *Gunn*
Federal Facilities/Special Emphasis Branch

TO: Michael J. Sanderson, Director
Superfund Division



40051875
SUPERFUND RECORDS

Site ID#: ZY
Category of Removal: Time-Critical
CERCLIS ID #: NESFN0703481
Nationally Significant/Precedent Setting: No

I. PURPOSE

The purpose of this Action Memorandum is to request approval of a second time-critical removal action for the Omaha Lead Site (the Site), which encompasses eastern Omaha, Nebraska; Council Bluffs, Iowa; and Carter Lake, Iowa, and to request a 12-month, and \$2 million dollar statutory exemption for this action. The first removal action will continue to include child care facilities and residences where a child with an elevated blood-lead level lives (EBL residence) if the soil in the yard contains lead concentrations greater than 400 milligrams per kilogram (mg/kg). This removal action includes any residential property with one or more non-foundation soil concentrations greater than 2,500 mg/kg. The primary objective of this action is to eliminate or reduce the ingestion exposure due to the presence of high lead levels in the soils at the Site.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

The Site is located in the Omaha metropolitan area and encompasses Council Bluffs, Iowa; Carter Lake, Iowa; and eastern Omaha, Nebraska. ASARCO Incorporated (ASARCO) operated a lead refinery at 500 Douglas Street in Omaha for over 100 years beginning in the 1870s. The operation of the refinery ceased in 1997. As a routine part of the refinery operation, lead particles were emitted into the atmosphere at the refinery. In addition, the Gould, Inc. lead battery recycling plant was located at 555 Farnam Street in Omaha and was a secondary smelter of lead from discarded lead batteries, the Gould plant closed in 1982. The blast furnace used to smelt the lead at the Gould plant emitted lead particles into the air from that smelter. Several other facilities in the Omaha area used lead in their manufacturing processes. A few of these included Carter White Lead at 21st and Locust Streets which produced white lead paint bases and red lead and litharge protective coatings until 1936; Omaha Shot and Lead which later became Lawrence Shot and Lead, and then became National Lead Company which manufactured lead shot by melting pig lead; Grant Storage Battery Company; Storage Battery Factory; and Exide Corporation which manufactured lead storage batteries. Numerous other locations in the Omaha area such as foundries, iron works, metal salvaging companies, and other manufacturers used or processed lead at their facilities.

In May 1998, Mr. Frank Brown, President of the Omaha City Council, sent a letter to the United States Environmental Protection Agency (EPA) requesting the assistance of the EPA in addressing problems with lead contamination in the Omaha area. The EPA initiated a process to investigate the lead contamination using authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§ 9600, et seq., more commonly known as the Superfund Law. These actions are explained in more detail later in this memorandum.

a. Childhood Blood Lead

The Douglas County Health Department (DCHD) has operated a Childhood Lead Poisoning Prevention Program (CLPPP) for 25 years. Screening children ranging in age from six months to six years is one of the main functions of this program. Although the CLPPP finds children with blood-lead concentrations above 10 micrograms per deciliter ($\mu\text{g/dL}$) throughout the county, children living in certain zip codes within the Omaha metropolitan area exceed this level at a much greater frequency. All of these zip codes are located, in whole or in part, east of 42nd Street in Omaha, Nebraska. According to a November 1998 DCHD press release; the frequency of tested children exceeding 10 $\mu\text{g/dL}$ within these zip codes ranges from 20.6% in 68108 to 42.8% in 68110.

b. 1996 Residential Property Lead Assessment

In the fall of 1996, the DCHD began an assessment of 179 homes located in eastern Omaha. The goal of the assessment was to identify all sources of lead poisoning in each residence. The DCHD collected outdoor soil samples from 84 of the 179 residences. Twenty of the 84 exceeded the 400 mg/kg screening level for lead.

c. 1998 Residential Property Soil Lead Assessment

In the fall of 1998, the DCHD began a more thorough assessment of soil lead contamination at selected residences in east Omaha. Some of the residences evaluated in the 1996 assessment were also included in the 1998 residential soil assessment. In addition, properties that the DCHD had not previously evaluated were also included in the 1998 assessment. Yard soils from 22 of the 66 residences, that have been tested to date, have results above 400 mg/kg in the non-foundation areas. Foundation areas are defined as areas in close proximity to structures where the lead soil concentration could be influenced by leaded paint.

d. Ambient Air Monitoring

On October 5, 1978, the EPA promulgated a National Ambient Air Quality Standard (NAAQS) for lead. The standard is 1.5 micrograms (μg) of lead per cubic meter (m^3) of air averaged over a calendar quarter (40 C.F.R. Part 50.12).

Air monitoring stations were established in three locations near the ASARCO refinery and air samples were collected and analyzed at these three stations. The DCHD performed the monitoring of the ambient air quality around the ASARCO lead refinery. In 1984 an air monitor was placed along Abbot Drive immediately north of the ASARCO refinery. In the 37 quarters of monitoring conducted at this location between 1984 and 1996, the 1.5 $\mu\text{g}/\text{m}^3$ standard was exceeded 19 times with the highest concentration measured being 2.84 $\mu\text{g}/\text{m}^3$ in 1984. A second monitor was placed along the Missouri River front immediately south of the ASARCO refinery in 1990. The NAAQS standard was exceeded in 17 of the 23 quarters that monitoring was conducted at this location between 1990 and 1996. The highest quarterly concentration measured at the river front monitor was 6.47 $\mu\text{g}/\text{m}^3$ in 1994. In 1995, a third monitor was placed immediately northwest of the ASARCO refinery toward the Union Pacific facility. This monitor exceeded the NAAQS standard in all five quarters that monitoring was conducted at this location with the highest quarterly concentration coming in 1995 measuring 6.57 $\mu\text{g}/\text{m}^3$.

e. EPA Integrated Site Assessment

The EPA began sampling soil from child care facilities and selected residential properties in March 1999. Seventy-eight of the 364 licensed child care facilities tested have one or more non-foundation results greater than 400 mg/kg with a high concentration of 4,670 mg/kg. The locations of the 364 child cares are widely scattered over the

Omaha metropolitan area (including Council Bluffs, Iowa). There are additional child care facilities that have not been sampled by the EPA. Efforts to sample these child care facilities are ongoing.

One hundred thirty-four of the 282 EBL properties tested have one or more non-foundation soil analytical result greater than or equal to 400 mg/kg lead with a high concentration of 16,300 mg/kg. The locations of the 282 EBL properties are widely scattered over the Omaha metropolitan area. There are additional EBL properties that have not been sampled by the EPA. Efforts to sample these properties are ongoing.

Five hundred sixty-nine of the first 1,422 private residences tested have one or more non-foundation soil analytical result greater than 400 mg/kg lead. Unlike the child care facilities, the locations of the residential properties tested are not as randomly scattered over eastern Omaha and Council Bluffs. These residences were selected for sampling based on their location along the path of the prevailing winds leading from downtown Omaha. The EPA is continuing to sample additional residential properties.

2. Physical Location

The Site is located in the Omaha metropolitan area including Council Bluffs, and Carter Lake, Iowa. Specific boundaries of the site have not been defined because the sampling activities for the entire area of investigation are not complete. The map included as Attachment 1 shows the location of the child care facilities, EBL properties and residential properties where validated data has been obtained.

3. Site Characteristics

The Site location encompasses properties used for both commercial and residential purposes. Commercial properties are primarily located in the downtown Omaha and downtown Council Bluffs areas. In Omaha, residential properties are found at the edge of downtown and continue with increasing distance from downtown. In Council Bluffs and Carter Lake, residential and industrial properties are more intermixed. A large portion of the housing stock within the Site is composed of dwellings that were built before the use of lead-based paint was banned in 1978.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

Lead is a hazardous substance as defined by Section 101(14) of CERCLA and is listed at 40 C.F.R Part 302.4. Sampling and analysis has confirmed that the levels of lead in surface soils are high in several residential and child care facility locations. The lead levels at these locations are high enough to pose a threat to children playing in the yards. During the initial round of soil testing, 78 child care facilities and 134 EBL residences were found to have

non-foundation soil concentrations greater than 400 mg/kg with a high concentration of 16,300 mg/kg. EPA has cleaned up these properties and is currently searching for more residential properties that qualify for the removal action.

5. National Priorities List Status

The Site is currently proposed for listing on the National Priorities List. The public comment period for the listing closed on April 29, 2002, and numerous comments were received. The EPA is preparing responses to all comments.

6. Supporting Documentation

All reports of investigations, reports of sampling and analysis, and other relevant documents regarding the contamination at the Site will be contained in the Site's Administrative Record. The Administrative Record is located at the W. Dale Clark Library, 215 S. 15th Street, Omaha, Nebraska 68102.

B. Other Actions to Date

1. Previous Actions

The DCHD has tested blood-lead concentrations of children six months to six years of age for 25 years. Many of the children tested have blood-lead levels greater than acceptable levels. See Section II. A. for a discussion of other actions conducted at the Site.

In August 1999, using removal authority, the EPA finalized an Action Memorandum to address lead-contaminated soils at child care facilities and residential properties housing children with elevated blood-lead levels at the Site. The EPA began work on the child care and residential properties in October 1999 and all known active child care and EBL properties have been cleaned up. Sampling work is continuing in order to identify additional properties that may need to be addressed by that action.

No other response actions have been undertaken by the EPA at this site using CERCLA authority. The EPA is the lead agency for all on-site investigatory and removal program functions.

2. Current Action

Blood-lead testing in the area continues. Residential and child care facility yard sampling in connection with the on-site response actions is ongoing.

C. State and Local Actions to Date

1. State and Local Actions to Date

The Nebraska Department of Environmental Quality (NDEQ) has been actively involved with, and has provided support to, the EPA throughout the project. The NDEQ was extensively involved with ASARCO's efforts to reduce their air emissions of lead to below the national ambient air quality standard. When ASARCO decided to cease operations at its Omaha refinery, the NDEQ focused their efforts on closure activities at the former refinery. The NDEQ is the lead agency for the closure activities. Currently, all structures at the refinery are demolished and the planned closure activities are complete. The property where the former refinery was located is a city park. ASARCO's lead refinery property located at 500 Douglas Street in Omaha, Nebraska, is not part of the Site since it has been remediated under state authority.

The CLPPP implemented by DCHD is ongoing. In addition to screening children for blood-lead poisoning, the CLPPP manages the cases of all children found to have elevated levels of lead in their blood.

2. Potential for State/Local Response

The NDEQ, DCHD, and Nebraska Health and Human Services (NHHS) are expected to remain involved in a variety of future activities at the Site, including blood-screening, health education, and health assessments.

The EPA will coordinate all activities associated with this removal action with NDEQ, NHHS, and DCHD.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND
STATUTORY AND REGULATORY AUTHORITIES

Section 300.415(b) of the National Contingency Plan (NCP) provides that the EPA may conduct a removal action when it determines that there is a threat to human health or welfare or the environment based on one or more of the eight factors listed in Section 300.415(b)(2). The factors which justify a removal action at this Site are outlined below.

Threats to Public Health or Welfare

300.415(b)(2)(i) -- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants.

Concentrations of lead greater than 400 mg/kg have been found in one or more non-foundation samples collected from 78 child care facility yards, 134 EBL properties at the Site

with a high concentration of 16,300 mg/kg. In addition, 35 residential properties have been identified that have one or more non-foundation samples greater than 2,500 mg/kg. Children playing in and around the contaminated areas of the yards have the highest potential to be exposed. Under the first removal action, EPA has cleaned up the child care and EBL properties and will continue to identify additional properties that qualify for the clean up. EPA plans to perform soil testing within residential areas that may have lead contamination above 2,500 mg/kg. Approximately 2.5% of residential properties tested by EPA exceed this level.

300.415(b)(2)(ii) -- Actual or potential contamination of drinking water supplies.

The elevated concentrations of lead in soil is a potential continuing source of groundwater contamination. However, all properties at the Site are connected to municipal water distribution systems.

300.415(b)(2)(iv) -- High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.

Lead has been detected in surface soils above levels of concern. Lead-contaminated soils may migrate via airborne dusts, surface runoff, percolation into ground water, and by people and pets transporting soils/dusts into their homes from the affected areas.

300.415(b)(2)(v) -- Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

Weather conditions could cause the lead contamination to migrate. Wind could cause the lead-contaminated soils to migrate via airborne dusts. Rain or snow melt may cause the lead contamination to migrate via surface runoff and percolation into ground water.

300.415(b)(2)(vii) -- The availability of other appropriate federal or state response mechanisms to respond to the release.

There are no other state or federal authorities who are able to respond to the release of hazardous substances at the Site.

300.415(b)(2)(viii) -- Other situations or factors that may pose threats to public health or welfare of the United States or the environment.

In addition to the above-listed factors, the EPA considered studies conducted which assess the effects of lead on human health. The EPA also relies on widely accepted toxicological references and on case studies which assess human health effects.

Lead is a metal and a constituent of D008 hazardous waste. Lead is classified by the EPA as a probable human carcinogen and is a cumulative toxicant. The early effects of lead poisoning are nonspecific and difficult to distinguish from the symptoms of minor seasonal illnesses. Lead

poisoning causes decreased physical fitness, fatigue, sleep disturbance, headache, aching bones and muscles, digestive symptoms (particularly constipation), abdominal cramping, nausea, vomiting, and decreased appetite. With increased exposure, symptoms include anemia, pallor, a "lead line" on the gums, and decreased handgrip strength. Alcohol and physical exertion may precipitate these symptoms. The radial nerve is affected most severely causing weakness in the hands and wrists. Central nervous system effects include severe headaches, convulsions, coma, delirium, and possibly death. The kidneys can also be damaged after long periods of exposure to lead, with loss of kidney function and progressive azotemia. Reproductive effects in women include decreased fertility, increased rates of miscarriage and stillbirth, decreased birth weight, premature rupture of membrane, and/or pre-term delivery. Reproductive effects in men include erectile dysfunction, decreased sperm count, abnormal sperm shape and size, and reduced semen volume. Lead exposure is associated with increases in blood pressure and left ventricular hypertrophy. A significant amount of lead that enters the body is stored in the bone for many years and can be considered an irreversible health effect.

IV. ENDANGERMENT DETERMINATION

The actual release of a hazardous substance at this Site, if not addressed by implementing the response action selected in this amendment presents an imminent and substantial endangerment to the health of the public that comes in contact with the Site, and to public welfare and the environment. Federal and state agencies are recommending that immediate response actions be taken to reduce potential exposure.

V. EXEMPTION FROM STATUTORY LIMITS

It is anticipated that this response action will exceed both the \$2 million dollar and 12-month statutory limits.

Consistency Exemption

Continued response actions are otherwise appropriate and consistent with the remedial action to be taken at the Site. The removal of contaminated soils from highly contaminated residences will be consistent with future remedial actions at the site, but will not foreclose the need for the remedial action. The response action described in this Action Memorandum will eliminate the immediate risk posed by soil contamination at the highly contaminated residences (See Section III. above). Following completion of the described response action, site contaminants will be removed from the soil in yards eliminating the potential for exposure and migration of the lead in soils. Future remedial actions will provide a comprehensive plan to address the lead-contaminated soils in residential properties at the Site.

An exemption from the statutory limits are necessary for this action in accordance with CERCLA § 104 (c)(1), 42 U.S.C. § 9604 (c)(1).

VI. PROPOSED ACTIONS AND ESTIMATED COST

A. Proposed Actions

1. Proposed Action Description

Past sampling activities at this Site have documented the release of hazardous substances but have not necessarily defined the total areal extent. Sampling in connection with the integrated site assessment has identified 35 residential properties that have one or more non-foundation samples equal to or greater than 2,500 mg/kg. This represents approximately 2.5% of the 1,422 residential properties tested. The clean-up requirements will be the same as those used for EBL and child care properties.

The removal activities described by the Action Memorandum for the first removal action will continue with no changes. EBL properties and child care properties that have one or more non-foundation samples equal to or greater than 400 mg/kg will be cleaned up as they are found by EPA's sampling activities.

Excavation of contaminated soils to below action levels, disposal of excavated soils, and restoration of the excavated areas will be completed at each residence that is highly contaminated with lead (2,500 mg/kg or greater). Under the first removal action, excavation will continue to be done at those child care facilities and EBL residences where non-foundation soil lead concentrations exceed 400 mg/kg. Under this second action, excavation will occur at residential properties that are neither child cares nor EBL residences when non-foundation soil lead concentrations equal or exceed 2,500 mg/kg. Each property was or will be divided into four quadrants with the sampling completed at each quadrant. If a property had or has a play area or garden, samples were or will be collected from these areas. A foundation sample was or will be taken at each property. Once an action is triggered by having a non-foundation sample greater than 2,500 mg/kg, excavation activities will proceed at that location. Although residential properties qualify for the removal by having soil lead concentrations greater than 2,500 mg/kg, all soil with 400 mg/kg of lead or more will be removed from the property according to the following protocol.

For Highly Contaminated Residences (2,500 mg/kg or greater):

From 0-12 inches, excavation will proceed until a 400 mg/kg total lead cleanup standard is met.

At 12 inches, if levels exceed 400 mg/kg lead, a permanent physical barrier (heavy, brightly colored plastic mesh) will be installed.

For Garden Areas at Highly Contaminated Residences (2,500 mg/kg or greater):

From 0-24 inches, excavation will proceed until a 400 mg/kg total lead cleanup standard is met.

At 24 inches, if levels exceed 400 mg/kg lead, a permanent physical barrier (heavy, brightly colored plastic mesh) will be installed.

A risk-based screening level of 400 mg/kg has been developed by the EPA for standard residential settings. A clean-up level of 400 mg/kg for child care facilities and EBL residences has been established by the EPA Region VII for the prior removal action at this site. These levels are consistent with the revised interim guidance for lead-contaminated Superfund sites, Office of Solid Waste and Emergency Response Directive 9355.4-12. In addition, the EPA has coordinated with the Agency for Toxic Substances and Disease Registry regarding the 2,500 mg/kg clean-up level.

Toxicity Characteristic Leaching Procedure (TCLP) testing will be performed on the soils with high contaminant concentrations to determine if the soils will fail the TCLP test. All soils which fail the TCLP test will be treated until the soil passes the test. The excavated soil will be disposed at the Douglas County Landfill or at a location to be designated at a later date. All soil disposal will be in compliance with the land disposal restrictions for lead-contaminated wastes. The excavated areas will be backfilled with clean soil and the areas restored.

The proposed action will reduce the potential for human exposure to lead through contact with soils and will reduce the potential for lead transported off-site by surface runoff. Any off-site disposal facility will meet the applicable regulatory requirements for CERCLA off-site disposal.

All Site sampling activities for comparison to the cleanup levels will be conducted in accordance with the approved Quality Assurance Project Plan.

Monitoring and site control measures, such as dust suppression by spraying water and storm water runoff control measures, will be implemented to ensure that removal activities do not expose nearby populations and Site workers to harmful levels of contaminants.

Air monitoring will be conducted during the removal activities, if necessary, to ensure that airborne dusts do not contain harmful levels of lead. No visible dust will be allowed to leave the excavation areas.

2. Contribution to Remedial Performance

Removal assessment activities have not been completed. However, the early results from private residences indicate the presence of lead throughout the Site. Any future remedial action will be consistent with the actions described in this Action Memorandum.

3. Engineering Evaluation/Cost Analysis (EE/CA)

An EE/CA will not be prepared for this time-critical removal action.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

Section 300.415(j) of the NCP provides that fund-financed removal actions under Section 104 and removal actions pursuant to CERCLA Section 106 shall, to the extent practicable considering the exigencies of the situation, attain ARARs under federal environmental or state environmental facility citing laws. The following specific ARARs have been identified for this action:

- * Subtitle D of the Resource Conservation and Recovery Act (RCRA), Section 1008, Section 4001, et seq., 42 U.S.C. §6941, et seq., State or Regional Solid Waste Plans and implementing federal and state regulations.

All excavated soil disposed in a sanitary landfill will comply with Subtitle D requirements. If other disposal alternatives are used, Subtitle D of RCRA may be applicable.

- * Occupational Safety and Health Act, 29 C.F.R. part 1910 will be applicable to all actions.

Requirements of 29 CFR Part 1910 will be followed.

- * Subtitle C of RCRA, 42 U.S.C. Section 6901, et seq., 40 C.F.R. Part 260, et seq. and implementing federal and state regulations for contaminated soils that exhibit the characteristic of toxicity and are considered RCRA hazardous waste.

Subtitle C of RCRA is potentially applicable for the removal of soils contaminated with heavy metals, particularly if these soils exceed the TCLP regulatory threshold. Any wastes exceeding the TCLP regulatory threshold will undergo treatment on site in accordance with the substantive requirements of RCRA before being transported to a sanitary landfill or a repository. Wastes will not be stored on site for longer than 90 days after excavation.

- * Department of Transportation (DOT) regulations, 49 C.F.R. Parts 107, 171-177.

DOT hazardous material transportation regulations may be relevant and appropriate for transportation of the contaminated soils to the disposal facility.

A copy of the Action Memorandum dated August 2, 1999, was provided to the Nebraska Department of Environmental Quality in August 1999. NDEQ identified the following state ARARs in a September 9, 1999, letter which are applicable to this removal action. These ARARs are:

- * Title 129 - Nebraska Air Quality Regulations
- * Title 128 - Rules and Regulations Governing Hazardous Waste Management in Nebraska

- * Title 132 - Integrated Solid Waste Management Regulations
- * Title 119 - Rules and Regulations Pertaining to the National Pollutant Discharge Elimination System

5. Project Schedule

Response activities performed under the first removal (see attached August 2, 1999 Action Memorandum) were initiated in 1999, and are continuing. The EPA has performed removals on all known active child care and EBL properties. It is possible that approximately 1,250 of the 50,000 residential properties in the investigation area may have one or more non-foundation soil-lead concentrations equal to or greater than 2,500 mg/kg. Based on this possibility, EPA plans to perform removal actions at the first 250 highly contaminated residential properties including the 35 which have already been confirmed. These residential yard removal activities will be performed as they are identified by sampling activities. It is anticipated that the remainder of these highly contaminated properties will be addressed using remedial authority. The work identified by this Action Memorandum will take approximately three years to complete. If other areas are discovered which require additional work this may affect the time to completion.

B. Estimated Costs

The costs associated with this proposed removal action are estimated below. One thousand two hundred fifty additional properties are expected to qualify for the clean up outlined in this action. As mentioned, it is possible that some of the activities described by this Action Memorandum may be included in the final remedy for the site. Therefore, it is possible that removal funding will not be needed to perform cleanup activities at all of the highly lead-contaminated residential properties. This cost estimate is for the clean up of approximately 300 properties.

Extramural Costs:

Removal Costs	\$3,750,000
Contingency (20%)	<u>\$ 750,000</u>
Total Extramural Costs	\$4,500,000

TOTAL EXTRAMURAL COSTS \$4,500,000

These costs do not include intramural costs. Refer to the Confidential Enforcement Addendum for intramural direct and indirect costs. The EPA direct and indirect costs, although cost recoverable, do not count toward the total removal project ceiling for this removal action.

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will continue to potentially expose residents, particularly children, to the contaminated soils exceeding the federal action levels in their residential yards.

VIII. OUTSTANDING POLICY ISSUES

None.

IX. ENFORCEMENT

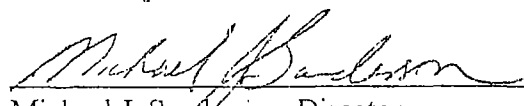
See attached Confidential Enforcement Addendum.

X. RECOMMENDATION

This decision document represents the selected removal action for the contaminated soils in residential yards at the Omaha Lead Site in Douglas County, Nebraska; and Pottawattamie County, Iowa. The removal action was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the early results from the integrated site assessment. The removal project ceiling, if approved, will be \$4,500,000. This amount comes from the Regional Removal Allowance.

Conditions at the Site meet NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed removal action.

Approved:



Michael J. Sanderson, Director
Superfund Division

8-22-02
Date

Attachments: Map
Action Memorandum dated August 2, 1999
Enforcement Addendum