



City of Omaha  
Mike Fahey, Mayor

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December 30, 2008

Ms. Debbie Kring  
U.S. Environmental Protection Agency  
Office of Public Affairs  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101

Re: Proposed Final Remedial Action for Omaha Lead Site

Dear Ms. Kring:

The purpose of this letter is to provide comment on EPA's Proposed Plan for the Final Remedial Action for the Omaha Lead Site.

As Mayor of the City of Omaha, I am very concerned that the Final Remedial Action Plan has broadened in physical scope but yet fails to put more emphasis on health education and a comprehensive plan to address high levels of lead in children. In 2002, the City of Omaha agreed to allow about 27 square miles of the City to be listed as a lead superfund site to specifically address child blood-lead levels. To date EPA has spent approximately \$100 million to replace 4,200 yards, stabilize exterior lead-based paint of 600 residences, provide limited health education, and perform a treatment study.

The cost estimate for this final proposed action is \$254 million and could potentially go higher. Unfortunately, this expenditure or the plan itself fails to recognize lead-based paint as another primary source for elevated lead in children. Despite the community's specific request, EPA's risk assessment did not include analysis of lead-based paint impacts.

The Douglas County Health Department has thousands of child blood-lead tests and years of study that shows lead-based paint as a primary source of elevated blood levels in Omaha. The studies show further evidence that blood-lead levels have decreased in Omaha, consistent with national trends. Within the superfund site, the blood-lead levels have decreased to 3.7 percent which is well below EPA's remedial action objective of 5 percent for the site. The actual measurement of impact on Omaha children shows that health education, testing, and addressing lead-based paint exposures is the most effective approach.

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As you can see, we believe there is a great amount of data to support our position for the need to incorporate lead-base paint as another source for elevated lead in children. I believe it is critically important that rather than concentrate solely on soil remediation, EPA revise the Preferred Alternative to address lead paint exposure and increase funding for a comprehensive program that includes health education.

I would also like to express my displeasure with the EPA for refusing to grant Senator Nelson's request to review the documents for an additional 45 days. As you know, December is a busy time of the year due to the holiday season. With this in mind, I believe the City of Omaha should have been given more adequate time to read through the documents than the 15 days allotted by the EPA.

I appreciate the opportunity to provide public comments on EPA's Proposed Plan, and encourage you to give serious consideration to these comments. Working together on a comprehensive plan to reduce blood lead levels in children will have a far reaching impact on our City, neighborhoods and communities.

Very truly yours,



Mike Fahey, Mayor  
City of Omaha

PDK/dlm

c: Nebraska Department of Environmental Quality  
Douglas County Health Department  
Lt. Governor Rick Sheehy  
Senator Ben Nelson  
Senator Chuck Hagel  
Congressman Jeff Fortenberry  
Congressman Lee Terry  
Congressman Adrian Smith