

City of East Helena

APR 12 2007

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April 10, 2007

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P&E
Site # RH File 1.07.06.00
Confidential: Yes No
Admin. Record: Yes No
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Dear John Wardell and Scott Brown:

The City Council of East Helena has been involved in its area's Superfund Cleanup since inception. The City Council wants to be on the record as having unanimously voted in support of Alternative 2R of the Proposed Record of Decision by the EPA.

It is our belief that the blood lead studies show that the clean up program has been a success. The children in East Helena have lower blood levels than the national average. When the program started, the action plan was to clean a yard if any quadrant contained lead levels in excess of 1000ppm. This action level has remained to date. The information provided during the public meeting in East Helena on January 25, 2007, clearly demonstrates that no benefit would be gained by changing that action level.

During the presentation the IEUBK model was discussed. If one had limited, or no background data, it might seem reasonable that the numbers produced from that model could be accurate. However, since many years of data does exist, it seems more reasonable that existing information should be included in the model. The numbers from the blood level studies obviously demonstrate and substantiate the success of the existing action plan and action level. As stated by doctors from the EPA itself, there would be no expectation of improved blood lead levels by cleaning up yards with over 500ppm lead instead of 1,000ppm. If indeed any substantive probability of enhancing the children's health had been shown to result from lowering the action level, the City Council would be supportive of doing so. However, given the information at hand, this late stage of the program is not the time to change the plan. **1070600**



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It is the City Council's belief that yard cleanup at the existing action level in conjunction with the Lead Education Program appears to be the reason the program has been such a success. The evidence just doesn't support changing that action level when there is no expectation of blood level improvement. Nor does it support the expenditure of many more thousands of dollars.

The City Council is hopeful you will choose Alternative 2R of the Proposed Record of Decision. It is time for the superfund status of the City of East Helena to come to an end and allow us to look forward to the future.

Sincerely,



Terrie Casey, Mayor

cc: Sandra Olson, DEQ
Daryl Reed, DEQ