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Scott Brown
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Helena, MT 59626

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on proposed plan
from the Montana
State epidemiologist

APR 16 2007

Dear Mr. Brown:

I am writing in response to "Plans for a final cleanup of East Helena's residential soils and undeveloped lands" which EPA announced in January 2007 for the East Helena Superfund Site (Operable Unit No. 2). My comments concern the parts of the plan that, in my view, are the most important for protecting the public's health with regard to exposure to lead.

While it would be ideal to eliminate lead and other heavy metals from areas both exterior (e.g., soil) and interior (e.g., dust or old paint) to living units, it is not feasible to achieve this ideal. In contrast, the plan proposed by the EPA appears to be feasible. The plan includes cleanup of a residential yard in which any quadrant has soil with lead concentration exceeding 1000 ppm. Cleanup in those yards would include all areas with lead concentrations exceeding 500 ppm.

I agree this reduction in soil lead concentration is desirable. However, because it is impossible to remove all lead-bearing soils, there will continue to be risk of ambient exposure in people's living environments from contaminated dust (not to mention lead-based paint), and continuing efforts to minimize those exposures will be important. As long as any lead concentration is detectable in interior dust, the following parts of the EPA proposed plan are essential for protecting the public health:

- A. Continue the existing East Helena Lead Education and Abatement Program, and
- B. Establish institutional controls that prevent disturbances of contaminated soil that would remain in East Helena, and prevent human exposure to interior household dust during renovation or demolition of existing housing stock in East Helena.

Achieving these two parts of the EPA proposed plan must have the highest possible priority. To the extent funds are available to implement and evaluate implementation of the proposed plan, these funds need to be preferentially targeted to these two components of the plan.

Sincerely,

Steven D. Helgeson, MD, MPH
State Medical Officer

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cc: Melanie Reynolds, MPH
Health Officer, Lewis and Clark County Health Department

