

# City of East Helena

ENVIRONMENTAL  
PROTECTION AGENCY

APR 04 2008

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406-227-8686

April 1, 2008

John F. Wardell  
Director  
Montana Office of the US EPA  
10 W. 15<sup>th</sup> St.  
Helena, MT 59626

Dear John Wardell,

I am writing to request the EPA come to a resolution regarding the Record of Decision for the East Helena ASARCO site. The residents of the city have been waiting since last September when we were told a final decision would be made. We were then told it would be moved to December, and then March. Most recently, we have been told, it has once again been put on hold. It would seem that with all the years of scientific studies and information that has been gathered, we should be able to move forward to a Record of Decision. As the evidence from the blood lead levels demonstrate, we are well below the national average. It seems obvious that the remediation that has been completed, along with the education program, we have achieved what we were striving for, to ensure the health of the children of our community. The concerns of MIDEQ and Lewis and Clark City County Health Board are not reasonable. The action levels to which the yards and surrounding areas have been remediated are an adequate level. There is nothing to demonstrate that making these levels more stringent will achieve a greater level of success regarding the health of the children. Since our blood lead levels are lower than the national average and much lower than when East Helena was designated a Super Fund site, what is to be gained by changing the standards at this time?

The land that is known as K&R subdivision, where East Valley Middle School and several blocks of housing is now located had varying levels of lead, cadmium and arsenic. The ground was deep till plowed, mixing the soils with a good end result. This is a relatively inexpensive manner of treatment that is very effective. By utilizing this type of treatment, it made development of the area affordable, which in turn, led to affordable housing. This same type of treatment could be used on the land to the west of the city, known as Lamping field, as well as other undeveloped land surrounding the city. This property could give the city a "hand up" if reasonable methods of remediation can be used. If developers could purchase this property, the city is willing to annex the area, providing water, sewer and other city services. The location of this is ideal for development. The area closest to the highway could be used for commercial purposes, which could help to offset the loss of tax base to the city, as well as School District #9. The area to the north could be used for residential housing.




We Support Fair Housing

John Wardell  
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We aren't asking to have the rules bent or changed to accommodate the city. We are asking that the same standards that were initially placed continue to be utilized to the end of the project. Both MDEQ and Lewis/Clark City County Board of Health were involved from the beginning. There is no logic in changing the standard at this time and nothing to be gained. We are in a holding pattern until there is a Record of Decision. We would like to move forward, looking to the future. This could involve Brownfield's grants, which we don't qualify to apply for, because we are designated a Super Fund site. We encourage you to continue to move forward to a final decision and not allow other entities to influence your decision.

Sincerely,



Terria Casey  
Mayor

CC: Carol Rushin