



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

August 31, 2001

Dan Vornberg  
Doe Run Resources Corporation  
Vice President of Environmental Affairs  
The Doe Run Company  
Suite 300  
1801 Park 270 Drive  
St. Louis, Missouri 63146

Re: Herculaneum Lead Smelter  
Roadway Contamination

VIA TELEFAX AND FIRST CLASS MAIL

Dear Dan,

The purpose of this letter is to follow-up on our telephone conference this morning, during which we discussed issues related to lead contamination that has recently been discovered along the primary transportation route serving Doe Run's Herculaneum smelter. As we advised you this morning, analytical results from sampling performed by both EPA and MDNR indicate that there are high levels of lead along this transportation route. We believe that several immediate steps need to be taken to address the existing contamination on the roadway and to ensure that trucks leaving the Doe Run facility do not contribute additional contamination that would further aggravate the situation.

You indicated that Doe Run would begin immediately to implement the following actions to address our concerns:

Enhance procedures at the facility to clean vehicles leaving the property so that the sources for additional lead materials to contaminate the roadway is eliminated. These enhanced procedures will include visual inspections of each vehicle leaving the facility, washing of the bed and sides of the trucks as needed (in addition to the existing tire wash station), and taking additional steps to help to ensure that each truck is covered prior to leaving the facility. You indicated that you will begin working to implement these procedures today.

Vacuum the transportation route, including adjacent streets and sidewalks that have lead contamination resulting from trucks leaving the facility. The vacuuming will be

performed by a large, high efficiency vacuum truck. A water wash system may be utilized in conjunction with the vacuum truck. You indicated that this would be done sometime early next week.

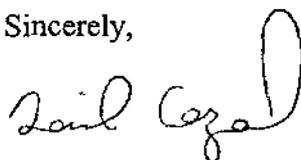
Evaluate methods of reducing dusts generated from the off-loading of materials at the facility, discuss your proposal with EPA and MDNR, and then implement agreed-upon dust reduction measures.

As we discussed, Joe Davis, who is an EPA On-Scene Coordinator and who has experience in conducting this type of response action, will be traveling to your facility to provide oversight of these activities, as well as to offer advice or assistance to you. We would appreciate it if you would keep Joe apprised of your progress in implementing the measures described above.

We also had some preliminary discussions with you this morning concerning the need for air monitoring along the transportation route, and the need for expedited characterization and cleanup of residential yards in close proximity to the transportation route. We agreed to have a follow-up conference call to discuss those issues next Friday, September 7, 2001, at 10:30 AM.

EPA greatly appreciates your cooperation in immediately committing to implement measures to address our concerns about this lead contamination. If anything in this letter inaccurately describes the commitments you made this morning, or if you have any other questions or concerns about this matter, please contact me at (913) 551-7587, or Tony Petruska at (913) 551-7637.

Sincerely,



Dave Cozad  
Associate Regional Counsel

cc: Tony Petruska, EPA  
Joe Davis, EPA  
David Mosby, MDNR  
Denise Jordan-Izaguirre, ATSDR  
Angela Minor, MDOH