



THURMAN
LAW FIRM

301 Main Street · PO Box 800 · Hillsboro, MO 63050
(636) 797-2601 x114 phone · (636) 789-5733 fax · senkel@thurmanlaw.com

October 1, 2013

VIA U.S. MAIL and EMAIL: dennis.stinson@dnr.mo.gov

Mr. Dennis Stinson
Chief, Superfund Section
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65012

RE: Shapiro Brothers Facility (M.W. Recycling)
(City of Crystal City)

Dear Mr. Stinson:

I write on behalf of the City of Crystal City following review of the draft of the “Interior Dust Cleaning Work Plan for Residential Area Near the Shapiro Brother’s Festus Site” prepared by AMEC Environment & Infrastructure, Inc., on behalf of M.W. Recycling (as received under cover of your email correspondence of September 16, 2013).

The City has the following comments and suggestions for your consideration.

1. The Work Plan indicates that the target residential parcels are only those parcels in which SU2 concentrations exceeded 400 mg/kg lead. The Work Plan should be amended to specifically indicate that target parcels also include properties where total yard concentrations exceeded 400 mg/kg lead.
2. The Work Plan does not address the cleaning of heating, air conditioning and ventilation (HVAC) systems or ductwork and air vents/grilles in the homes. The accumulation of dust in horizontal runs of ductwork as well as on interior components of HVAC systems may be as prevalent as the dust on the surfaces proposed for cleaning throughout the home. The Work Plan should be amended to include HVAC, ductwork and air vent/grille cleaning so that entrenched lead dust accumulated in these systems and components does not become re-introduced into interior areas of the homes following remediation. The Work Plan should be amended to include a protocol which defines the process by which these components will be cleaned. Additionally, following this cleaning process, air filters in the HVAC systems shall be carefully removed, bagged, disposed of and replaced.
3. Section 3.1.4.1 of the Work Plan indicated that blinds or shutters and similar window coverings will be excluded from the wet wiping cleaning activities. The Work Plan should be amended to include these surfaces in the wet cleaning activities, or if they are not hard surfaces, in the HEPA vacuuming activities.

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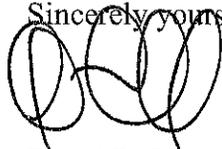
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4. The Work Plan does not include a specific cleaning protocol for area rugs, carpets, draperies, curtains and upholstered furniture. The Work Plan should be amended to include such a protocol to define the process by which these components will be agitated and the rate at which HEPA vacuuming shall be conducted on these surfaces.
5. The Work Plan states that interior dust cleaning will be conducted only after exterior soil remediation has been completed. The Work Plan should be amended to demark a buffer area between exterior soil remediation activities and interior dust cleaning activities.
6. Section 3.1.6 of the Work Plan cites an environmental professional who will be collecting the clearance samples. The Work Plan should be amended to indicate that the individual collecting the clearance samples should be a Missouri-licensed lead inspector or risk assessor. Further, in accordance with Chapter 15 of the HUD Guidance, the clearance sampling should be conducted by an independent third party not associated with the indoor remedial activities. Additionally, the analyses of these samples should be conducted by a third party National Lead Laboratory Accreditation Program (NLLAP) laboratory.
7. The header of the Work Plan indicates the location of this project is Collinsville, Oklahoma. Additionally, the document header indicates a Shaw project number and the date of December 2012. This erroneous and possible remnant information should be corrected.
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As always I thank you and the Department for your time and efforts in putting the safety and well-being of our residents as your primary concern.

Sincerely yours,



David P. Senkel

DPS/mkj

cc: The Honorable Thomas V. Schilly
Mayor, City of Crystal City, Missouri
and Mr. Jason Eisenbeis,
City Administrator, City of Crystal City, Missouri