

Exhibit 2

Jim Silver

To: David Cozad/CNSLR7/USEPA/US@EPA

08/30/01 05:28 PM

cc: Robertw Jackson/SUPR/R7/USEPA/US@EPA, Joe
Davis/SUPR/R7/USEPA/US@EPA

Subject: Herculaneum Street Contamination

Dave, following is a brief summary of my activities associated with the survey performed at Herculaneum on August 29, 2001. If you have any questions please contact me on my cell phone at 314.223.5007

I received a call from Bruce Morrison that there was a problem with piles of lead contaminated material in the streets of Herculaneum and he asked if I could accompany Dave Mosby, MDNR to survey the area. I contacted Mosby and we made arrangements to meet at my office on August 29. Mosby arrived at my office at 0900 August 29 and we traveled to Herculaneum and arrived at 1000. We parked at the intersection of Station St and Broad St where Mosby indicated he had taken a sample the previous week. At that location was a small (2'x6"x1") pile of fine grained dark colored material. At 1015, using a 700 series Niton XRF, I took a reading to determine the lead level in the material. The lead level of that pile was 294,000 ppm. I moved to another small pile approximately 10' west of that location and took another reading. The lead concentration in that pile was 229,000 ppm. Because of the amount of material in the street, we surmised that it must be coming from the trucks traveling into and out of the plant. So we decided to sample the roadway from the plant to Hy 61 on the route the trucks were taking. The next reading was taken at the intersection of Brown and Curved Streets and the lead levels were 175,000 ppm on the east side of the street and 67,000ppm on the west. The next reading was taken west of there on Brown Street next to the Amvets building. The lead concentration there was 67,500. Across the street from the Amvets is a city park with a boat ramp. Here a reading was taken in the soil in the lawn area and lead at 4,250ppm was detected. We moved further west and took a reading on Joachim Ave. next to a pay fishing lake, there the lead level was 38,800ppm. At Joachim Ave. and Highway 61 lead was detected at 37,700ppm. In all of the areas with the very high lead levels the same fine grained, dark material could be seen. All of the sampling performed to that point had been along the truck hauling route. All of the streets passed through residential areas. We then decided to test some areas away from the haul route and not close to the smelter. We tested at the intersection of Scenic and Riverview at two locations and found lead levels of 1170ppm and 1030ppm and at the intersection of Lake Dr. and Commercial Boulevard where the levels were 4000ppm and 3600ppm. We began working our way back toward the smelter, but not on the truck haul route. At Crain and Joachim Avenue the lead level on the west side of the road was 1910ppm and 2060ppm on the east side. The next reading was taken at the intersection of Reservoir and Broadway and found lead levels of 2860 ppm on the sidewalk. Another sidewalk reading was taken at Curved Street, 100 yds west of the plant and lead levels were found to be 8300ppm. That concluded the survey.

As we were preparing to leave a street sweeper was observed on Broad Street, a short distance from the plant.