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September 24, 2001

Steve Mahfood, Director  
Department of Natural Resources  
205 Jefferson St.  
Jefferson City, MO 65109

Dear Mr. Mahfood:

**Subject: Herculaneum Missouri Lead Contamination Public Health Risk**

Due to the recent discovery of extremely elevated levels of lead contamination on some streets, yards, and play areas in Herculaneum, I believe risks to the public's health, especially pregnant woman and children through age six, are clear and present and are an imminent and substantial endangerment. Because of this public health risk, I am requesting that your agency take all necessary and appropriate actions to eliminate this source of exposure.

We are aware that the U.S. Environmental Protection Agency has sent a letter to the Doe Run Companies, directing them to assess this risk in a manner more expeditious than that originally agreed to in The Administrative Order on Consent for Doe Run's Herculaneum Lead Smelter. We agree with and support that effort. Those planned assessment activities alone, however, will not reduce this health risk unless swift and appropriate follow-up activities are taken based on the results of that assessment.

According to information provided to us, levels of contamination recently discovered on and along some streets in Herculaneum range between 30,000 parts per million (ppm) and 300,000 ppm, at the city park road site and lead smelter entrance, respectively. The agreed upon clean-up level for residential yard soil exposure to lead has been determined to be 400 ppm. Thus, the newly discovered contamination is between 75 and 750 times higher than the clean-up level. It is also important to note that the post remediation clean-up level for in-door residential dust contamination is 400 ug/ft<sup>2</sup> for window wells, 250 ug/ft<sup>2</sup> for window sills, and 40 ug/ft<sup>2</sup> for floors.

I request that your agency ensure that specific actions be taken to limit children's exposure to the lead concentrate recently found along city streets, in play areas and wherever else it may be found. These actions must substantially reduce the public health risk caused by this contamination.

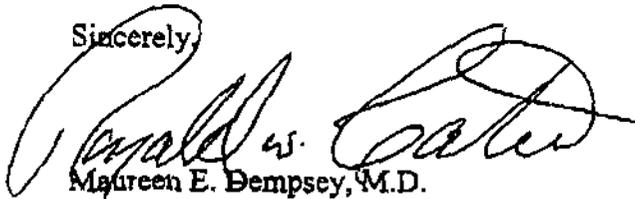
Children exposed to lead levels as high as these could be expected to have blood lead levels elevated much sooner and much higher than that caused by similar environmental exposures in Missouri. Environmental exposure to lead poses a risk to children's developing nervous systems, which could permanently impair their mental development. Children and adults who experience excessively high body burden lead levels may also experience permanent damage to their nervous systems up to and including paralysis and death.

The Department of Health and Senior Services is charged to assure that the public has access to appropriate lead screening, counseling and medical care. Therefore, the Department of Health and Senior Services will administer a complete residential census of the community and will again offer free blood lead level screening. We plan on this activity beginning by October 9, 2001. This data will aid your agency in prioritizing the clean-up activities for this community. We will continue our risk assessment, consultation, and education activities in this community. Those activities however, are not adequate in the long term to protect these Missourians from this health risk.

The physical removal of lead contamination in this community must be accelerated. We are also committed to continue helping you in these efforts to substantially reduce the public health risk caused by this contamination and any recontamination in any other way we can.

Please contact Gary McNutt, Director of our Section for Environmental Public Health at 573-751-6102 to contribute to any new initiatives you may implement regarding the on-going problems caused by lead exposure in Herculaneum.

Sincerely,



Maureen E. Dempsey, M.D.  
Director

MED/PRW:slh

C: Pamela Rice Walker  
Gary McNutt