UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

APR 10 1997

MEMORANDUM

SUBJECT: Response to National Remedy Review Board Recommendations on the Tar Creek Superfund Site

FROM: Myron O. Knudson, P.E., Director
Superfund Division (6SF) FOR

TO: Bruce K. Means, Chair
National Remedy Review Board (5202G)

This is in response to the National Remedy Review Board's (Board) memorandum of March 4, 1997, regarding the Tar Creek Superfund Site, Ottawa County, Oklahoma (Site). Specifically, this memorandum provides Region 6's response to the recommendations by the Board following its review of the proposed remedial action for the residential areas of the Site. The Board's recommendations and the Region's response are as follows:

Recommendation: Given the widespread distribution of chat mining wastes throughout the community and the resulting potential for multiple pathway exposures, the Board recommends that the Region clarify the relationship of this action to future actions the Region may take to address remaining contamination at the site (e.g., chat piles, tailings ponds, undeveloped land, industrial properties, etc.).

Response: The residential soils operable unit is a response to a portion of the widespread contamination resulting from the past mining activities. The potential for recontamination of remediated residential properties to levels above health risk based levels from other yet unremediated contamination remaining at the Site (e.g., chat piles) is small for most of the properties. For the other properties, the potential for recontamination will be controlled by appropriate dust and erosion control measures. The proposed plan represents a final action for the residential properties addressed by the response. Other future response actions will be required to address the remaining contamination at other areas of the Site.

Recommendation: In view of this contamination and uncertainties in implementing the remedy (e.g., the ability to secure access to all contaminated residential properties), community protective measures are likely to play an important supplemental role at this site in protecting human health. The Region should therefore include in the preferred alternative (Alternative 2 in the proposed plan for the Site) the provisions for counseling and

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public education (e.g., emphasizing proper personal hygiene and the importance of removing indoor dust).

Response: The Region concurs with the recommendation and has modified the preferred alternative accordingly. Specific details of the community protective measures will be developed during the remedial design phase.

Recommendation: The Region should make it clear to residents that there may be a residual indoor dust threat following soil excavation, that normal household cleaning will reduce the contamination to a protective level, and that the Region will loan high efficiency particulate vacuum cleaners (HEPA vacuums) to residents to expedite this process, if this service is not provided by others.

Response: The Region concurs and will implement this recommendation.

Recommendation: The Region should encourage the Bureau of Indian Affairs and the State to address potential recontamination sources (e.g., to control redistribution of chat around residences, potential deterioration of exterior lead-based paint, etc.).

Response: The Region concurs and will implement this recommendation.

Recommendation: Given the preliminary results of a recent blood lead study which indicate that a significant portion of the children in the Tar Creek area already experience elevated blood lead levels, the Board encourages continued blood lead monitoring of children through the State and local health agencies. Such monitoring would help local public health officials track the overall success of multi-jurisdictional efforts to reduce childhood lead exposures in Tar Creek.

Response: The Region concurs and will encourage continued blood lead monitoring of the children in accordance with the recommendation.

The Region will coordinate its efforts to implement the Board's recommendations with the Region's Board representative and with the Accelerated Response Center at Headquarters.

If you have any questions concerning this matter, please call (214) 665-6701.