Missouri Department of Health and Senior Services
P.O. Box 570, Jefferson City, MO 65102-0570 Phone: 573-751-6400 FAX: 573-751-6010

Ronald W. Cates
Interim Director

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ALPD ADMINISTRATION

January 3, 2003

Mr. Jim Werner, Director
Air and Land Protection Division
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: Reoccupation of residences in Herculaneum, Missouri

Dear Mr. Werner:

We have recently received a copy of a letter from Mr. Clifton Gray of the Doe Run Company to Ms. Denise Jordan-Izaguirre of the Agency for Toxic Substances and Disease Registry requesting her "perspective from a health agency standpoint" about the possibility that Doe Run be allowed to rent Herculaneum homes they own that are presently vacant, but which they claim have been cleaned (copy attached).

We believe it is important that the Department of Natural Resources (DNR) be provided the Missouri Department of Health and Senior Services' (DHSS) opinion about the human health risk possible from reoccupying these residences. This is consistent with our working relationship in which DHSS provides health/risk assessment public health consultation to DNR so they may make appropriate risk management choices.

At the present time, we do not have enough information regarding this subject to render a public health opinion. Our reasons for this are:

1. The source of the contamination still exists. The smelter is still operating; and thus still emitting lead and other metals;

2. We cannot determine if recontamination will occur or the rate of recontamination because the recontamination studies underway in Herculaneum, MO are not complete;

3. We have not been provided any post-cleanup interior sample analysis data for the homes in question; and

4. The workgroup tasked with determining site-specific clean-up levels and cleaning methods has not provided an opinion about how clean the homes ultimately need to be or what cleaning method(s) needs to be implemented to reach these levels.

Given the above, we simply do not have enough data to formulate a scientifically justified public health opinion on the reoccupation of these vacant homes. If you have any questions, please feel free to contact Mr. Scott Clardy at (573) 751-6111.

Sincerely,

Bryant McNally, J.D., M.P.H.
Director, Division of Environmental Health
and Communicable Disease Prevention

WBM:SAC:GMC

Attachment

cc: Dave Mosby, DNR
Shelley Woods, AGO
Denise Jordan-Izaguirre, ATDSR
Gene Gunn, EPA
Scott Clardy, DHSS
Barbara Wood, DHSS