

C O M M U N I T Y UPDATE

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ASARCO RESPONDS TO RESIDENTIAL STUDIES

Asarco has called for EPA to significantly revise its residential cleanup studies, including several of the proposed cleanup alternatives.

"We think the studies need major improvements so residents can get a clear picture of the situation before a cleanup alternative is selected," said Tom Aldrich, Asarco site manager.

Asarco prepared its response with support from health and environmental consultants. The comments were submitted during EPA's formal comment period that ended last month. Here is a summary of the major points made in Asarco's comments.

HEALTH RISKS

There is no evidence of any adverse public health effects in Ruston or north Tacoma as a result of smelter operations or the amount of arsenic in the soil, according to numerous epidemiological studies conducted on the area. EPA's studies did not turn up any new evidence that would indicate a health problem. Instead, EPA looked at hypothetical risks using agency risk assessment procedures.

Asarco believes that EPA's risk assessment is overly conservative and overestimates risks to public health and the environment. In its study, the kind of health risks from exposure to arsenic are only possible for a resident who lives on a site where arsenic soil concentrations are highest from birth to age 30, rarely leaves the area, eats soil and dust year-round and is one of the few people who is unable to detoxify arsenic. *This person simply does not live in the area.*

Under Superfund law, EPA is required to look at health and environmental risks that may result from any cleanup activities.

EPA has not analyzed the risks of various alternatives, especially those involving digging up and removing soils from the community. The risks posed by extensive soil excavation in the community, such as traffic and other accidents, may be greater than those in the "no action alternative."

PUBLIC OPINION

EPA did not consider community opinion adequately. Most residents, about 68 percent, are opposed to cleanup alternatives that involve having soil removed from their yards, according to a recent poll conducted by Elway Research. This kind of public opposition allows EPA to select a more practical cleanup alternative for Ruston.

SITE INVESTIGATION

EPA's remedial investigation report suggests more severe impacts from arsenic than were found, according to Asarco's environmental consultants. Average arsenic and lead concentrations were much lower than those cited in the report. In fact, about 710 acres of the 950-acre study area is below EPA's proposed action level of 230 ppm.

There are about 41 acres in the study area targeted for cleanup where lead levels are higher than 500 ppm, but arsenic is lower than 230 ppm. EPA assumes these higher lead levels were a result of Asarco's smelter when it's more likely that the lead is from other sources.

CLEANUP ALTERNATIVES

EPA's study presents a range of alternatives, however, EPA's analysis of alternatives ignores several important analysis required by the National Contingency Plan (NCP), the regulations that govern Superfund. The NCP calls for evaluations

to include: 1) risks to the community; 2) potential impacts to workers; 3) potential environmental impacts during implementation; and 4) time until protection is achieved.

Although the feasibility study includes an alternative that uses only community protection measures (CPMs) such as public education, it is impossible for decision makers and the public to consider this alternative seriously because EPA did not provide enough detail. In order for residents to evaluate how CPMs would work, EPA should provide more specific examples.

The feasibility study does not provide the type of cost/benefit analysis required by state and federal regulations. Alternatives may be eliminated if their costs are greater than

Continued on back page

INFORMATION CENTER CELEBRATES FIRST YEAR

More than 400 people have visited the Asarco Information Center since it opened last March.

"Asarco opened the center so residents would have a place to go for all kinds of information about the local Superfund cleanup," said Tom Aldrich, Asarco site manager. "The response has been great. Some people come in because they have specific questions, others just want to browse. Either way, they seem to appreciate the facility."

The center is located at 5311 North Commercial Street in Ruston. Residents should call ahead to confirm that the center is open. The number to call is 206-756-5436.

RESIDENTS FAVOR OPTION #3 FOR RUSTON AND NORTH TACOMA CLEANUP

Capping and sodding is the “people’s choice” for cleaning up residential soils in Ruston and north Tacoma, according to comment cards received by Asarco.

During EPA’s public comment period on the six cleanup alternatives outlined in its residential study for Ruston and north Tacoma, readers told Asarco which cleanup option they preferred. Of the 39 comment cards sent to Asarco, more *Community Update* readers favored the third alternative, which calls for replacing exposed soil areas with new sod and grass, than any other alternative. The people who chose this alternative believe it would adequately clean up residential areas with minimal inconvenience to residents. It also was cited as the most cost-effective cleanup solution.

Several people indicated that they believe there is more than one good cleanup solution, and a few suggested combining a couple of the options to arrive at the best alternative. For example, one woman preferred alternative #3 but wanted to incorporate public education activities from alternative #2.

Asarco has forwarded residents’ comments to EPA. The agency is required by law to consider them before issuing a preferred cleanup alternative, which is expected to happen sometime this summer. Residents will then have 60 days to comment on the proposed cleanup option.

If you haven’t yet submitted your thoughts about the cleanup alternatives, but would like to, please use the reply card attached to the bottom of this newsletter and return the card to Asarco. The postage is paid by the company.

HERE IS A PRELIMINARY TALLY OF VOTES FOR EACH ALTERNATIVE:

**ALTERNATIVE #1
NO ACTION:**
7

**ALTERNATIVE #2
LIMITED ACTION:**
2

**ALTERNATIVE #3
CAPPING AND SODDING:**
16

Here’s what a few of you had to say about EPA’s proposed cleanup alternatives (all gave permission):

“Alternative # 1. The top soil in our area seems to be all right. We have loads of flowers that grow very well here. We also have a garden in the backyard and it always produces nice vegetables. Our shrubs and trees are growing very nicely, so I do not wish to have anything done to my soil here.”

— **Charles Kelley**

“Yes on proposals 1 and 3. A definite no on all other proposals.”

— **An Affected Property Owner**

“I opt for proposal #2 of EPA’s cleanup proposals. Removing dirt and hauling it to another site only contaminates another area — if indeed the levels of arsenic are significant at all! I believe EPA is too demanding.”

— **Catherine Slearin**

“We owe it to future generations to choose alternative #6 — let’s go forward with a clear conscience and leave all this behind us once and for all.”

— **Angela Wayno**

**ALTERNATIVE #4
EXCAVATION AND
ON-SITE DISPOSAL:**
2

**ALTERNATIVE #5
EXCAVATION AND
OFF-SITE STORAGE:**
4

**ALTERNATIVE #6
EXCAVATION OF SOIL
TO BACKGROUND LEVELS
OF ARSENIC:**
8

“I think #2 or #3 would be acceptable. We are anxious for something to be done soon. This seems to be dragging on too long. Alternative #3 is our first choice.”

— **Mrs. Ken Rees**

“Having reviewed the cleanup alternatives we would favor #3 — the Capping and Sodding proposal. We feel this alternative would provide equivalent protection to the excavation proposals, at much lower cost and much lower trauma to the neighborhood. Moreover, it might help to beautify the area with grass and shrubs.”

— **Stephen and Hilda Elder**

“To completely eliminate the danger of arsenic the arsenic must be completely removed. Although option #6 may be the most effective and costly, it is also the most responsible and practical solution.”

— **David Simon**

“Alternative #3 sounds as if it would be best to solve the problem.”

— **Robert Heinzman**

RISK ASSESSMENT COMPARISON

Environmental Toxicology International (ETI), an ASARCO consultant, and EPA have both completed risk assessments for the Ruston/north Tacoma area. These studies evaluate the potential for health risks due to arsenic in the soils and identify possible cleanup levels. The risks predicted in these assessments

are not actual risks; they are hypothetical risks based on assumptions about a person's exposure to a certain material. There are several methods for preparing risk assessments, so studies on the same area can arrive at different conclusions. ETI and EPA used different assumptions to complete their risk assessments. Therefore, the

results are very different. ETI's assumptions are based on current scientific information, whereas EPA assumptions incorporate conservative policy decisions as well as the scientific data.

The following information outlines the assumptions used by both parties.

EXPOSURE PARAMETERS	ETI ASSUMPTIONS	EPA ASSUMPTIONS
<ul style="list-style-type: none"> Soil intake—the amount of soil swallowed each day for children and adults 	<ul style="list-style-type: none"> Adults—55 mg/day Children—85 mg/day 	<ul style="list-style-type: none"> Adults—100 mg/day Children—200 mg/day
<ul style="list-style-type: none"> Exposure frequency—how often someone is exposed to soil or dust on their property 	<ul style="list-style-type: none"> Adults—28% of the time Children—100% of the time during spring and summer and 50% during the fall and winter Exposure is reduced during cooler months as well as during the time adults spend at work and school-age children spend at school 	<ul style="list-style-type: none"> Everyone is exposed 96% of the time, or 350 days a year Exposure is unaffected by season or the time adults spend at work and school-age children spend at school
<ul style="list-style-type: none"> Absorption—the amount of arsenic or lead that is absorbed into the body each day through eating, swallowing or breathing soil or dust 	<ul style="list-style-type: none"> 40% of the arsenic is absorbed 	<ul style="list-style-type: none"> 80% of the arsenic is absorbed
<ul style="list-style-type: none"> Soil concentration—the average level of arsenic in the soil that people are exposed to over time 	<ul style="list-style-type: none"> 150 ppm—404 ppm 	<ul style="list-style-type: none"> 140 ppm—1600ppm

Asarco welcomes your input...

Please use this card to ask questions or comment on the residential cleanup.

Name _____

Address _____

City/State/Zip _____ Phone _____

Your comments may interest other *Community Update* readers. May we reprint your name and comments in future issues? Yes No

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URINARY ARSENIC TESTING NOW AVAILABLE

Urinary testing, one of the most accurate methods for determining short-term exposure to arsenic, is now being offered by the Tacoma-Pierce County Health Department.

The health department began its urinary testing program last month and is giving priority to children under 12 years of age. So far, a total of 40 people have been tested, including 12 adults and 18 children. People tested receive a copy of their results, and follow-up monitoring is provided if

results show elevated urinary arsenic levels. EPA considers a urinary arsenic level to be elevated when it is above 40 parts per million (ppm). So far, none of the participants have shown an elevated urinary arsenic level.

Asarco helped fund the study by providing the health department with a \$60,000 grant. Interested residents are encouraged to call Norm Payton with the Tacoma-Pierce County Health Department at HRT 591-6553 for more information.

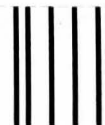
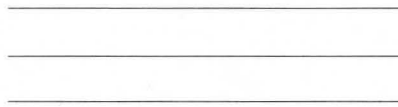
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their overall effectiveness. Asarco's consultants believe that EPA has underestimated the costs of excavation alternatives and overestimated their benefits to public health.

ASARCO CONCLUSIONS

Because of the above factors, Asarco has encouraged EPA to develop new alternatives that more appropriately address site conditions and are more practical to implement in the community.

If you would like to read a copy of Asarco's full comments on the residential study, please stop by or call the Asarco Information Center at 756-5436.



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