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

JUN 0 4 2018

Certified: 7015 1520 0003 3991 0008

(b) (6) [redacted]

RE: Wilcox Oil Company Superfund Site -Lead Interim Action and Remaining Concentrations

Dear Mr. (b) (6) [redacted]:

Thank you for taking the time to talk with Todd Downham and I on May 31, 2018, regarding the Source Control Proposed Plan for the Wilcox Oil Company Superfund Site. During our conversation, we discussed the proposal for the lead additive area located on the southern portion of the property. We explained that this early action is focused on removing the highest lead levels in the source area and is not targeting all areas where lead might be present. Because we are targeting only the source area, the proposal is to remove material that exceeds a worker health-based level of 800 milligrams per kilogram (mg/kg) to a depth of 2 feet.

During the field investigations, additional data collected from the lead additive area indicate lead is present above the residential human health screening range of 200- 400 mg/kg at levels as high as 105,000 mg/kg. Data also indicate that the lead can be dissolved into solution indicating that treatment of the lead source is required prior to offsite disposal.

Lead at these levels is not considered safe for residential uses, especially for small children. This area should remain undisturbed and access to this area should be avoided. The proposal is to remove lead source material exceeding 800 mg/kg which is protective of worker safety. Because the final risk assessment for lead has not been completed, the lead concentrations remaining after this interim action (i.e., up to 800 mg/kg) may not support residential use.

Until a complete site investigation and human health risk evaluation are complete, the location of the contamination, the amount of the contamination, and the potential health risks associated with that contamination is unknown. We expect that our investigation will continue into the year 2020/2021, and our complete understanding of any potential health risks will remain unknown until then. Currently, we understand that the property is vacant and is not your primary residence. Until a final risk assessment and final decision document are completed, we strongly suggest that you not use this property for residential use.

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We appreciate your understanding and willingness to work with us through this process. Based on our conversation, it is our understanding that there will be no residential use of the property until we complete the risk assessment and develop a final site-wide cleanup action that will be protective for future expected uses. If this is not your understanding of our conversation, please contact me at your earliest convenience.

Thank you for your continued interest and support for this project. Should you want to discuss the data presented in this letter, please contact me at 214-665-8143, or 1-800-533-3508, or contact Todd Downham, Oklahoma Department of Environmental Quality at 405-702-5136.

Sincerely,

Katrina Higgins-Coltrain
Remedial Project Manager
Superfund Division, LA/NM/OK Section