

G. Fred Lee & Associates

27298 E. El Macero Dr.
El Macero, California 95618-1005
Tel. (530) 753-9630 • Fax (530) 753-9956
e-mail: gfredlee@aol.com
web site: <http://www.gfredlee.com>

January 28, 2003

RI/FS Work Plan Addendum, Resolution to RPMs' Comments

Julie Roth, Executive Director
DSCSOC

Julie,

Recently I received a copy of a January 22, 2003, letter from Jeffrey Bold on behalf of Brian Oatman, addressed to Patti Collins, devoted to resolution of RPM comments on the RI/FS Work Plan Addendum. Yesterday I provided DSCSOC with detailed comments on the inadequate, inappropriate and distorted information that UCD and its consultants had provided on the deficiencies in the draft RI/FS Work Plan Addendum. My comments are applicable to the same issues in the January 22, 2003, letter.

In this letter Bold/Oatman states, "*As discussed with the RPMs, UC Davis proposes to use these responses and resolutions to comments as the final RI/FS Work Plan Addendum.*" If I understand this statement, UCD considers that its responses to the comments made by the RPMs and DSCSOC have been adequately addressed, and that there is no need for further discussion.

If my understanding is correct, then UCD has significantly misjudged the situation with respect to DSCSOC's position on the adequacy with which UCD has addressed concerns of DSCSOC in implementing the RI/FS Work Plan. As I discussed in my comments, there are major technical problems/deficiencies with the work that has been done, which need to be addressed if the public is to support the position that the LEHR Superfund site has been adequately investigated. This issue needs to be resolved.

As I have indicated to you, the US EPA is holding a national TAG workshop in Albuquerque in late February 2003. US EPA TAG holders and their advisors from across the country will be meeting to discuss problems they are encountering with how Superfund sites are being investigated and remediated, relative to providing public health and environmental protection. I have been invited to present a discussion of these issues relative to the LEHR site situation, where many of the issues that I have raised in past and again in recent correspondence will be discussed at the TAG workshop. This effort will likely lead to a professional paper that will be published in the proceedings of the workshop and/or in a national refereed journal. I hope that this effort will lead to more appropriate Superfund site investigation than has been conducted thus far at the LEHR site.

If there are questions about this matter, please contact me.

Fred