DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Agency for Toxic Substances and Disease Registry Atlanta, GA 30333

June 14, 2013

Steve Wolfe, OSC U.S. Environmental Protection Agency- Region 5 Superfund Emergency Response 25063 Center Ridge Rd. Westlake, Ohio 44145

Dear Steve:

USEPA Region 5 and several other agencies received a letter from the Dewsnup, King & Olsen law firm (dated April 10, 2013). The correspondence included a report from Joel B. Hebdon, entitled "PCB Indoor Dust Sampling Plan", dated February, 2013. This report describes the collection of samples of dust in the attics of residential homes in Clyde, Ohio to determine the presence of PCBs and other contaminants.

We cannot comment on the validity of the sampling approach and results in this report. ATSDR does not evaluate attic dust for cumulative airborne or incidental ingestion exposures, since this is not an area where occupants spend significant time unless it is used as a living space. The data cannot be used to establish a completed human exposure pathway or to determine health risk and cannot help to evaluate cancer risk in the household or community.

In reviewing the data package, we did notice the units for the Preliminary Remediation Goals (PRGs) listed in the Analytical Results table of the report are not correct. PRGs are values which represent clean up goals that are protective of health. While the dust sample results are presented in units of $\mu g/kg$ wet weight, the PRG values for the Pesticides, PCB, and SVOC chemicals are reported in units of mg/kg. To make the units for the PRG values the same as the dust samples, the PRG values should be multiplied by 1,000. For example, all of the benzaldehyde detections are below the PRG, which is actually 7.8 E+06 $\mu g/kg$.

We also notice that the level of lead detected in the dust sample in one of the homes is 26,600 mg/kg. This concentration of lead in a dust sample may be an indication of a lead hazard within this home. The most common source of indoor lead is associated with lead-based paint. This

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home should be evaluated for lead hazards, particularly if young children are present. The homeowners should be referred to the Sandusky County Health Department for follow-up.

Please contact Mark Johnson at 312-353-3436 or <u>mdjohnson@cdc.gov</u> if you have any questions.

Sincerely

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Richard Gillig Chief, Central Branch Division of Community Health and Investigation,