

March 20, 2018

Ms. Anne Idsal
Regional Administrator
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733



RE: Docket ID EPA-HQ-OLEM-2017-0611;
Notice of Proposed Rulemaking – Lane Plating Works, Inc.

Dear Ms. Idsal:

The City of Dallas (City) appreciates the opportunity to comment on the Notice of Proposed Rulemaking for the proposed inclusion of Lane Plating Works, Inc. (Lane Plating) on the National Priorities List (NPL) as a Superfund site. The City supports the listing of Lane Plating as a Superfund site and rapid federal funding for full and complete remediation.

Lane Plating is located at 5322 Bonnie View Road, Dallas, Texas, and operated for approximately 90 years. It closed when the operator, Stag Management, Inc., declared bankruptcy in October 2015. From November 2015 until July 2016, the Texas Commission on Environmental Quality (TCEQ) conducted short-term response actions to address hazardous substances¹ left onsite and initiated an investigation of potential impacts to on and off-site soil and surface water quality. In late 2016, EPA conducted a supplemental emergency response action at Lane Plating that resulted in disposal of liquid wastes, impacted soils, and municipal solid waste that the operator abandoned on-site.

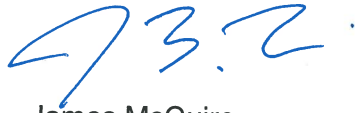
The City supports the proposed listing because listing on the NPL will benefit the City and its residents provided that additional investigation and remediation is funded. Lane Plating is located adjacent to residences, City parkland, and sensitive habitats near the Trinity River. Although the City has worked with EPA and TCEQ to ensure that the site is secured and immediate hazards are abated, potential additional impacts from Lane Plating could pose a risk to human health and the environment. However, inclusion on the NPL would make the site eligible for funds to fully investigate and implement a permanent remedy to protect human health and the environment for the long term.

In addition, the community supports a rapid cleanup at Lane Plating. The City hosted two community meetings (April 2017 and February 2018) to update the public regarding the status of Lane Plating. Area residents were primarily concerned with having a contaminated site in proximity to parks, schools, and residential neighborhoods. NPL listing and federal funding are necessary to quickly address those concerns.

¹ The chemicals of concern at Lane Plating include antimony, arsenic, cadmium, cyanide, chromium, copper, lead, mercury, nickel, and zinc. These chemicals are commonly used in the metal plating process.

The City is committed to improving the health and quality of life for its residents and looks forward to a continued partnership with the EPA. If you have any questions, please feel free to contact me at 214-670-1200 or james.mcguire@dallascityhall.com.

Sincerely,



James McGuire
Managing Director, Office of Environmental Quality
City of Dallas