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Summary of OSWER Directives:
***Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA
Corrective Action Facilities***
and
***Clarification to the 1994 Revised Interim Soil Lead Guidance for
CERCLA Sites and RCRA Corrective Action Facilities***

In August of 1994, EPA released the *Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities* outlining an approach for determining protective levels of lead and planning cleanup where multiple sources of lead are present. EPA's *Clarification to the 1994 Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities* (August 1998) provides further direction on "... (1) using the IEUBK model and blood lead studies, (2) determining exposure units to be considered in evaluating risk and developing risk management strategies, (3) addressing multimedia lead contamination and (4) determining appropriate response actions at residential lead sites." The guidance and the clarification to the guidance complement and are referenced in EPA's *Superfund Lead-Contaminated Residential Sites Handbook* (August, 2003).

The guidance clearly states that risk from other sources of lead, specifically lead-based paint, should be evaluated, and if present, addressed. The guidance, citing the *Urban Soil Lead Abatement Demonstration Project* (Three Cities Study), states that, "preliminary findings suggest that any strategy to reduce overall lead risk at a site needs to consider not only soil, but these other sources [dust and paint] and their potential exposure pathways." The guidance suggests collecting site-specific data, including dust, water, paint, and blood lead data to evaluate these risks. The clarification to the guidance reaffirms that site-specific data should be collected to evaluate risks and states, "... data from yards and other residential media (for example, interior dust and drinking water) should be input into the IEUBK model to provide a preliminary remediation goal (PRG) for the residential setting."

After evaluating risks from lead exposures, the guidance suggests appropriate corrective action for sites with multiple sources of lead. The guidance advises that the goal of EPA is to reduce the risk of elevated blood lead levels, and as such, recommends a remediation approach that addresses sources of lead exposure in addition to soil, including lead-based paint. The guidance even concludes that, "Addressing exposure from other sources of lead may reduce risk to a greater extent and yet be less expensive than directly remediating soil."

The clarification to the guidance further explains the extent to which sources of lead exposure other than soil may be addressed. The clarification to the guidance states, “Superfund dollars *may* however be used in limited circumstances to remediate exterior lead-based paint in order to protect the overall site remedy (i.e., to avoid re-contamination of soils that have been remediated)...” The clarification to the guidance further recommends that, “EPA Regions identify and coordinate... with other authorities and funding sources... to design a comprehensive, cost-effective response strategy that addresses as many sources of lead as practicable.”