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SOIL CLEANUPS FOR LEAD-CLEANUP STANDARDS FOR CLEAN
CLOSURE

May 25, 1989

MEMORANDUM

SUBJECT: Comments on the Proposed OERR and OWPE Lead
Cleanup Policy Memo

FROM: Sylvia K. Lowrance, Director
Office of Solid Waste (OS-300)

TO: Robert Duprey
Acting Deputy Assistant Administrator

In response to your question concerning the OERR and OWPE policies on soil cleanups for lead, I'd like to briefly describe OSW's approach to setting lead cleanup standards. The current OSW interim policy is stated in the Clean Closure guidance (52 FR 8706 3/19/87), the Subpart S Corrective Action draft proposal, and the RCRA Facilities Investigation guidance (Draft as of 1/25/89) is to use background soil levels for lead and any other constituents for which an Agency recommended health based exposure limit (RfD, Cancer Potency Factor) is not available. We have reiterated this policy to the Regions and have provided some guidance on how to determine background levels.

We recognize that background levels of lead in soil will vary from location to location. In some cases, they may be as high as the Superfund proposed levels of 500-1000 ppm, while in other cases they are likely to be somewhat lower. Currently, an Agency Workgroup chaired by ORD is developing a health-based guidance document for lead. The Science Advisory Board is reviewing their efforts. Once this guidance has been developed, we anticipate that the Superfund and RCRA programs will adopt it and will thereby become consistent in their cleanup policies for lead.