



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON D.C. 20460

JAN 26 1990

OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

OSWER Directive # 9355.4-02A

**MEMORANDUM**

SUBJECT: Supplement to Interim Guidance on Establishing Soil Lead Cleanup Levels at Superfund Sites

FROM: Henry L. Longest II, Director /s/  
Office of Emergency and Remedial Response

Bruce M. Diamond, Director /s/  
Office of Waste Programs Enforcement

TO: Directors, Waste Management Division, Regions I, IV, V, VII, and VIII  
Director, Emergency and Remedial Response Division, Region II  
Directors, Hazardous Waste Management Division, Regions III and VI  
Director, Toxic Waste Management Division, Region IX  
Director, Hazardous Waste Division, Region X

The purpose of this directive is to reiterate that OSWER Directive #9355.4-02, titled "Interim Guidance on Establishing Soil Lead Cleanup Levels at Superfund Sites" and dated September 7, 1989, is a guidance document and not a regulation. As is the case with other guidance documents, this guidance should not be used as a regulation.

The lead level range provided in the directive is to be considered by a Regional Administrator in arriving at cleanup levels to be entered into Records of Decisions for individual Superfund sites. The directive is not binding in formulating individual cleanup levels.<sup>1</sup> The directive is clear on its face

---

<sup>1</sup> The "Effective Date" provision of the directive should not be read to suggest that the directive has regulatory impact. The provision simply clarifies that the directive does not require or contemplate that Agency decision makers will re-open Records of Decisions already entered into in order to consider the data provided in the directive.

that it provides only "interim guidance," that EPA is continuing to evaluate studies on the toxicity of lead, and that the guidance may be revised as additional information becomes available with respect to the bioavailability of lead in soil. Moreover, the directive plainly states that site-specific conditions and data may be taken into account in setting soil cleanup levels for individual sites, which may be above or below the levels set forth in the directive, and that the administrative record for any particular site should include site-specific information as well as background documents on the toxicology of lead.

In summary, the cleanup levels for a particular response action must be based on the entire administrative record for that response action, of which the guidance will typically be only a part.