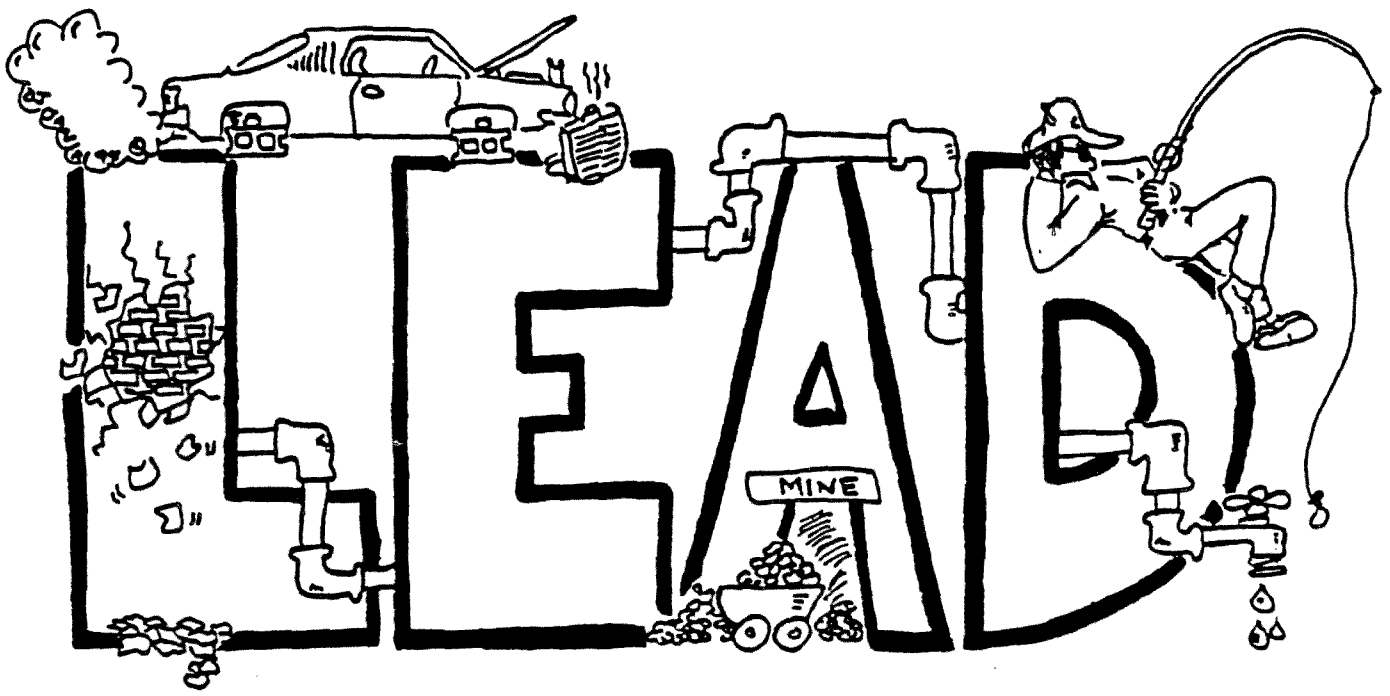

MULTI-MEDIA STRATEGY

US ENVIRONMENTAL PROTECTION AGENCY

REGION 8

DENVER, COLORADO

FORWARD

Lead is a highly toxic heavy metal which is essentially indestructible and is ubiquitous in the environment. Children are particularly susceptible to lead poisoning. Lead poisoning is very wide spread and not solely a problem of inner city or minority children. According to the Center for Disease Control (CDC), **"Lead poisoning is one of the most common and preventable pediatric health problems today".**

This document describes the U. S. Environmental Protection Agency (EPA), Region 8's strategy for significantly reducing the incidence of elevated blood lead (EBL) levels in children in the Region and unacceptable exposures to lead (Pb) that are anticipated to pose risks to children, human health, and the environment.

Since lead is a multi-media pollutant, the strategy addresses lead contamination across all appropriate programs. The strategy also focuses on intra and inter agency coordination with Federal, state, local, and Tribal agencies and organizations.

The lead program is an evolving program. This document is a living document and will be revised periodically to reflect changes in laws and regulations, new technology, etc.

William P. Yellowtail
Regional Administrator

TABLE OF CONTENTS

TABLE OF CONTENTS (CONTINUED)

TABLE OF CONTENTS (CONTINUED)

LIST OF APPENDIXES

List of Acronyms

AO	Administrative Order
ASARCO	Company name
CAA	Clean Air Act
CD	Consent Decree
CDC	Centers for Disease Control
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CPSC	Consumer Products Safety Commission
DOL	Department of Labor
EBL	elevated blood lead
EPA	Environmental Protection Agency
EISC	Environmental Information Service Center
GAO	Government Accounting Office
GIS	Geographic Information System
HUD	Housing and Urban Development
LBP	lead-based paint
LCCA	Lead Contamination Control Act
LCR	Lead and Copper Rule
LDR	Land Disposal Restrictions
m3	cubic meter
MACT	Maximum Achievable Control Technology
NAE	National Action Element
NAAQS	National Ambient Air Quality Standards
NIOSH	National Institute for Occupational Safety and Health
NLIC	National Lead Information Center
NPL	National Priority List
OPPTS	Office of Prevention, Pesticides and Toxics Substances
OSHA	Occupational Safety and Health Administration
Pb	Chemical symbol for lead
ppb	parts per billion
PWS	Public Water System
RMCOEH	Rocky Mountain Center for Occuapational and Environmental Health
RI	Remedial Investigation
RPM	Remedial Project Manager
SDWA	Safe Drinking Water Act
SIP	State Implementation Plan
TCLP	Toxic Characteristic Leaching Procedure
Title X	Residential Lead-based Paint Hazard Reduction Act of 1992 (part of the Housing and Community Development Act of 1992)
RCRA	Resource Conservation and Recovery Act
RLTC	Regional Lead Training Center
TSCA	Toxic Substances Control Act
USPHS	U. S. Public Health Service
ug	microgram

List of EPA Region 8 Organizational Acronyms

8ART	Region 8 Air, Radiation and Toxics Division
8ART-AP	Region 8 Air, Radiation and Toxics Division, Air Programs Branch
8ART-TS	Region 8 Air, Radiation and Toxics Division, Toxic Substance Branch
8ENF	Region 8 Office of Enforcement
8ESD	Region 8 Environmental Services Division
8ES-MEB	Region 8 Environmental Services Division, Multi-Media Enforcement Branch
8OEA	Region 8 Office of External Affairs
8HWM	Region 8 Hazardous Waste Management Division
8HWM-ER	Region 8 Hazardous Waste Management Division, Emergency Response Branch
8HWM-FF	Region 8 Hazardous Waste Management Division, Federal Facilities Remedial Branch
8HWM-HW	Region 8 Hazardous Waste Management Division, Hazardous Waste Branch
8HWM-SM	Region 8 Hazardous Waste Management Division, Superfund Management Branch
8HWM-SR	Region 8 Hazardous Waste Management Division, Superfund Remedial Branch
8MT	Region 8 Montana Operations Office
8RC	Region 8 Office of Regional Counsel
8WM	Region 8 Water Management Division
8WM-DW	Region 8 Water Management Division, Drinking Water Branch

REGION 8 LEAD (Pb) STRATEGY

I. PURPOSE

The purpose of the Region 8 Lead Strategy is to present a coordinated and multi-media method for addressing significant health and environmental problems resulting from lead pollution in Environmental Protection Agency (EPA) Region 8.

II. PROBLEM DEFINITION

Lead is a highly toxic heavy metal. As an element, lead is essentially indestructible, and as a result of industrialization, is ubiquitous in the environment. It has no known physiologic value. It produces a spectrum of adverse effects, both acute and chronic. Adverse effects include peripheral and central nervous system dysfunction, anemia, and in extreme cases, mental retardation and death.

Children are particularly susceptible to lead poisoning. For the most part, lead poisoning is silent, and most children show no symptoms. Lead poisoning is very wide spread and not solely a problem of inner city or minority children. No socioeconomic group, geographic area, or racial or ethnic population is spared. According to the Center for Disease Control (CDC) **"Lead poisoning is one of the most common and preventable pediatric health problems today".**

III. GOAL

The goal of the Regional effort is to reduce lead exposures to the fullest extent practicable in Region 8, with particular emphasis on reducing the risk to children.

IV. OBJECTIVES

The Regional effort is and will continue to be focused on two major objectives; to significantly reduce:

A. The incidence of elevated blood lead (EBL) levels in children in the Region, taking into account the associated costs and benefits, and

B. Through voluntary and regulatory actions, unacceptable lead exposures that are anticipated to pose risks to children, the general population, or the environment.

V. MAJOR NATIONAL ACTIVITIES

A. Environmental Protection Agency's (EPA's) National Lead Strategy

EPA's National Lead Strategy, dated February 21, 1991, is made up of eight major National Action Elements (NAEs) that are summarized in the following sections.

1. NAE #1 - Develop Methods To Identify Geographic "hot spots"

A major element of the EPA National Lead Strategy is to develop technical methods to locate and map regions, cities, neighborhoods, and homes with high lead concentrations or EBL levels ("hot spots"). EPA is also assisting other Federal agencies, as well as state and local governments, in employing these methods to identify high exposure localities and situations. Data from a number of sources covering a range of pathways and media is being mapped into a Geographic Information System (GIS). Together with demographic information, GIS data is being used to determine geographic areas with the highest at-risk populations. This identification of specific high exposure areas is critical to ensuring the resources expended on education, prevention, and abatement activities are properly focused.

2. NAE #2 - Develop And Transfer Abatement Technology

Developing and disseminating cost-effective methods and tools to abate "in-place" lead exposure sources are crucial to ensure the use of safe, effective, and cost-efficient methods. This is important because: (1) significant reductions in lead exposures usually entail abatement (including in-place management); and (2) most actual abatement operations will be conducted at the state and local level by property owners. EPA is developing and disseminating technical assistance materials and capabilities to assist in these efforts. Most of EPA's present efforts in this area address the abatement of lead-based paint (LBP). This includes the development of model training materials and the establishment of university-based training centers for the dissemination of materials, as well as providing funding to organized labor organizations to encourage proper training. Many other efforts are listed in the strategy discussing abatement activities.

3. NAE #3 - Implement Lead Pollution Prevention Program

While the major tasks in reducing risks from lead are to abate or control lead that is already deposited in the environment, the lead pollution prevention program will seek to reduce future exposures associated with the continued use of lead. This program includes: (1) exploring market-based incentives to limit or eliminate lead use and exposure; (2) using regulatory mechanisms to reduce the use of lead in current and future products where risks outweigh the benefits; and (3) identifying and encouraging cleaner technologies for mining, smelting, and processing lead. The Agency's goal is to go beyond existing regulatory requirements to reduce lead releases.

4. NAE #4 - Minimize Human And Environmental Exposures Through Traditional Control Mechanisms

This activity includes controlling lead contamination in water, air, soil, dust, and other media by setting performance standards and other regulatory approaches. Lead presents human and environmental risks through a wide range of media. EPA has clustered together the current and prospective rules and policies addressing risks from these media. This will allow EPA and the public to review the regulatory programs of each of EPA's program offices as a cohesive whole and minimize the transfer of lead pollution risks from one medium to another.

5. NAE #5 - Encourage The Availability Of Environmentally Sound Recycling

In order to reduce human and environmental risks associated with the production of lead, and to provide for safe disposition of spent lead products, EPA encourages environmentally sound lead recycling programs. In addition to this support, this activity includes efforts to coordinate and sequence the efforts of EPA offices dealing with other aspects of the lead problem with these recycling efforts to ensure that all actions are consistent and are not detrimental to the recycling programs.

6. NAE #6 - Develop And Implement A Public Information And Education Program

Informing and educating the public about sources of lead exposure, how to reduce or avoid exposure, and approaches to preventing the introduction of additional lead into the environment are essential to the success of EPA's lead strategy. Activities include outreach to the public, industry, retailers, recyclers, labor, environmentalists,

states, and the press. Public information and education tools may include guidance documents and brochures, specialized seminars and conferences, speeches, and videos, as well as press releases and conferences.

7. NAE #7 - Integrate Enforcement

EPA is initiating a cross-media lead enforcement initiative, including coordinated inspections and analysis of data, which is anticipated to culminate in nationwide filing of enforcement cases. This effort will be focused on improving compliance with regulations affecting major sources of lead emissions, as well as dealing with lead issues in general.

8. NAE #8 - Coordinate Research Programs

A wide range of research is needed to assist in the achievement of the goals of EPA's lead strategy. Some research requirements are specific to a particular program office, while others will be more general in application. EPA intends to review, coordinate, and prioritize the need for research activities to establish an agenda for research activities during the coming years.

B. Summary of Lead Reduction and Control Acts and Regulations

1. Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X) Implementation

The Housing and Community Development Act of 1992 was signed by President Bush on October 28, 1992. Title X of this Act contains the Residential Lead-Based Paint Hazard Reduction Act.

a. Title X: Subtitle A

Subtitle A (Sections 1011-1021) of Title X deals with LBP hazard reduction. The Department of Housing and Urban Development (HUD) is the lead agency for most sections of this subtitle.

b. Title X: Subtitle B

Subtitle B of Title X amends the Toxic Substances Control Act (TSCA), creating Title IV: Sections 401-412. It covers lead exposure reduction. EPA is the lead agency for the majority of sections in this subtitle.

Specifically, this subtitle requires EPA to promulgate regulations governing LBP activities to ensure that individuals engaged in such activities are properly trained, training programs are accredited, and contractors are certified. It also requires EPA to promulgate certain regulations within 18 months, establish fees for accredited trainers and contractors, and develop a program to support lab Pb testing activities. In addition, children and occupational lead exposure studies, and various public education and outreach activities are required.

Language in the subtitle encourages states to develop and implement the training accreditation and certification programs. Incentives for the states to do so include HUD and EPA grants to develop and carry out authorized programs, grants from EPA and the National Institute for Occupational Safety and Health (NIOSH) to train and educate workers and supervisors engaged in LBP activities, and state (in lieu of Federal) fee collection.

The states have 24 months after promulgation of final regulations to apply for program authorization. EPA is required to administer accreditation and certification enforcement programs in states that do not have an EPA approved program which is at least as protective of human health and the environment as the EPA model accreditation plan.

c. Title X: Subtitle C

Subtitle C (Sections 1031-1033) of Title X deals with worker protection. The Department of Labor (DOL), Occupational Safety and Health Administration (OSHA), and NIOSH are the lead agencies for this subtitle.

d. Title X: Subtitle D

Subtitle D (Sections 1051-1053/1056) of Title X deals with research and development. HUD and the Government Accounting Office (GAO) are the lead agencies for this subtitle.

e. Title X: Subtitle E

Subtitle E (Section 1061) of Title X deals with reports. HUD is the lead agency for this subtitle.

2. Toxic Substances Control Act (TSCA)

TSCA was signed into law on October 11, 1976. TSCA section 6 authorizes the Administrator to promulgate regulations to control any chemical or substances which "... presents or will present an unreasonable risk of injury to health or the environment ..." Lead is one of the substances which is being or proposed to be regulated under TSCA. Examples are lead in fishing sinkers, solder, and water pipes and fixtures.

3. Lead Contamination Control Act of 1988 (LCCA)

The LCCA requires the identification of water coolers that are not lead-free, repair or removal of water coolers with lead-lined tanks, a ban on the manufacture and sale of water coolers that are not lead free, the identification and resolution of lead problems in schools' drinking water, and the authorization of additional funds for lead screening programs for children.

4. Lead and Copper Rule (LCR)

Under the Safe Drinking Water Act, EPA promulgated the LCR. The LCR set the action level for lead in drinking water at 15 ppb. Utilities must ensure that water from the customer's tap does not exceed this level in at least 90 percent of the homes sampled. If water from the tap does exceed the limit, then the utility must take certain steps to correct the problem. Utilities must also notify citizens of all exceedances of the action level.

5. Safe Drinking Water Act (SDWA)

In June of 1986, Congress enacted the Safe Drinking Water Act Amendments of 1986. Two key sections of the law constitute the "lead ban". The provisions provide a prohibition on use of pipe, solder, or flux in public water systems that is not "lead free", has special public notice requirements for lead, provides for state enforcement of prohibitions and special public notice for lead, and has a definition of "lead free" materials.

6. Clean Air Act (CAA)

Regulations under the Clean Air Act set an ambient air standard for lead which should not be exceeded. Areas which may possibly exceed the standard are monitored for lead concentrations in the air. It exceedances are measured, the state must develop an enforceable plan to reduce lead emissions in the "non-attainment area." Second, for many years regulations under the Clean Air Act have mandated

lower amounts of lead in leaded gasoline, in addition to requiring the automobile industry to produce vehicles which operate on unleaded fuels. Third, Title III of the 1990 Clean Air Act Amendments will result in three new air toxics standards which relate to lead. These standards will involve primary lead smelting, secondary lead smelting, and lead acid battery manufacturing.

7. Resource Conservation and Recovery Act (RCRA)

Lead - as the metal, inorganic salt or organic lead - is regulated under the RCRA program. Under RCRA, hazardous wastes are either defined as a listed waste or can be hazardous through testing of certain physical or chemical characteristics. Lead has been used as the basis of listing for a number of wastes. Residuals from a number of commercial chemical products containing lead are U-listed wastes (e.g. U144 - lead acetate and U145 - lead phosphate).

Total lead is a toxicity characteristic to determine if a waste is hazardous. This means that a waste is hazardous if testing using the Toxic Characteristic Leaching Procedure (TCLP) shows levels at or above a standard of 5 mg/l total lead.

The TCLP rule is very broad and extends to almost all classes of wastes. Levels approaching the 5 mg/l standard have been measures in target and gunnery range soils, sediments, lead-based paint clean-up wastes, and demolition debris. Once a lead-bearing waste stream is determined to be hazardous, it is subject to Land Disposal Restrictions (LDR). For lead under the TCLP, the required treatment is some form of solidification/stabilization prior to land disposal, so that the measured levels are below the regulatory threshold. Individual listed wastes containing lead must meet their own LDR treatment standards. There is also a special category of mixed radioactive wastes containing lead, which have separate treatment standards under the LDR program.

With the implementation of lead-based paint clean-ups, there will be substantial amounts of lead-bearing wastes generated. Although individual homeowner wastes are exempt from RCRA regulations, individuals have experienced difficulties in locating proper disposal facilities.

8. Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)

CERCLA amended by Superfund Amendments Reauthorization Act (SARA) in 1986, authorizes EPA to investigate and clean up hazardous waste sites, and to order potentially responsible parties to perform or fund such cleanups.

C. Federal Interagency Task Force

The Interagency Task Force is a Federal lead activities coordination and information group co-chaired by EPA and HUD. A list of Federal agencies on the Task Force is included in Appendix A. The Federal Interagency Task Force meets once a month. Copies of the Task Force's meeting minutes and pertinent documents are provided to the Regional Lead Contact in the Toxic Substances Branch.

D. Federal Programs and Activities Resource Guide

The Resource Guide to Federal Programs and Activities for the Prevention of Childhood Lead Poisoning from Residential Exposure to Lead-Based Paint was published in March of 1993 (it replaced the National Implementation Plan that was promulgated in May of 1992). The Resource Guide provides an overview of the coordination of EPA, HUD, and the Centers for Disease Control (CDC) strategies, describing activities in five areas:

1. Lead indicator monitoring;

2. Public awareness enhancement;

3. Testing and abatement capacity development;

4. Abatement technology evaluation; and

5. Private prevention initiatives development.

The Guide also provides a synopsis of the previous fiscal year Federal activities related to residential lead-based paint.

E. National Lead Information Campaign

The National Lead Information Campaign is a Federally sponsored effort to inform and educate the public about the hazards of lead in the environment. A major element of the campaign will be the use of radio, print, and television public service announcements. The initial emphasis of the campaign is to increase the lead hazard awareness of parents and potential parents of young children.

F. National Lead Information Center

The National Lead Information Center (NLIC) is the focal point for the conduct of the National Lead Information Campaign. The Center operates a toll-free hotline and provides callers with lead information and a list of state lead contacts. The current capability is primarily geared to the needs of the general public.

G. National Lead Clearing House

The National Lead Clearing House also supports the National Lead Information Campaign. The Clearing House operates a toll-free hotline and is staffed to respond to callers seeking lead information, with a capability to support the technical community as well as the general public.

VI. MAJOR REGIONAL ACTIVITIES

A. Region 8 Support to EPA's National Strategy

The Region 8 organizations that are currently or plan to conduct activities that provide Regional support related to the lead pollution problem are described in the following sections. An overview of these activities is shown in Attachment B.

1. Region 8 Support to NAE #1 - Develop Methods to Identify Geographic "Hot Spots"

a. Water Management Division (8WM)

Information from the monitoring required by the Lead and Copper Rule under the Safe Drinking Water Act and the Lead Contamination Control Act could possibly be used to help identify "hot spots", but no use has been made of it to date.

b. Air, Radiation and Toxics Division (8ART)

The Air Programs Branch (8ART-AP) identifies a geographic area as a "hot spot" or non-attainment area when it exceeds the National Ambient Air Quality Standards (NAAQS) criteria. Non-attainment areas are identified through source recognition and monitoring.

The Toxic Substances Branch (8ART-TS) is working with representatives from Region 8 states that have conducted blood lead sampling. The states' data, currently consisting of inputs from Colorado, Montana, North Dakota, and Utah, has been compiled to provide a Regional perspective of where "hot spots" are located.

c. Hazardous Waste Management Division (8HWM)

The Superfund Remedial Branch (8HWM-SR) identifies National Priority List (NPL) sites where lead is a contaminant as geographic "hot spots". Remedial Investigations (RIs) at the NPL sites involve very extensive data collection, including sampling for lead in soils, house dust, paint, and drinking water. In general, extensive analysis and mapping of the data is accomplished to determine the extent of the contamination, and to develop alternative approaches and associated costs. A significant expertise in the residential soils area has been developed within the Division and the Montana Operations Office because of the work on several large lead contaminated sites in the Region.

2. Region 8 Support to NAE #2 - Develop and Transfer Abatement Technology

a. Water Management Division (8WM)

Region 8 does not develop abatement technology for the drinking water program; however, the Region helps transfer information to the states. The Drinking Water Branch (8WM-DW) recently hosted a corrosion control training class.

b. Air, Radiation and Toxics Division (8ART)

The Toxic Substances Branch (8ART TS) is working with the Office of Prevention, Pesticides and Toxic Substances (OPPTS) in the development of the Model Course Curricula for various lead training programs. The Branch is also working with the Region 8 states to develop and implement state training and accreditation programs.

c. Hazardous Waste Management Division (8HWM)

The Superfund Remedial Branch (8HWM-SR) identifies remedial alternatives for residential, lead contaminated soil found at NPL sites. Standard approaches, called "presumptive remedies", have been developed to allow experience at one location to be used at another. Two forums, the Superfund Mine Waste Advisory Group and the Large Area Lead Sites Work Group, provide the primary vehicles for sharing abatement technology.

3. **Region 8 Support to NAE #3 - Implement Lead Pollution Prevention Program**

a. Water Management Division (8WM)

The SDWA Lead Ban bans the use of leaded solder and lead service lines in plumbing used for drinking water. Although all Region 8 states have implemented this ban, the Drinking Water Branch occasionally is called upon to provide information about the program.

b. Air, Radiation and Toxics Division (8ART)

The Air Programs Branch (8ART-AP) is continuing to monitor and implement the national program to remove lead from gasoline.

It is expected that the Air Programs Branch will also be involved in the development and implementation of three new standards under Title III of the Clean Air Act (CAA). These standards will involve primary lead smelting, secondary lead smelting, and lead acid battery manufacturing. The primary focus of the standards will be to minimize emissions of lead into the air.

In addition, the Air Programs Branch is involved in the New Source Reviews, which address the issue of emissions before a source becomes operational.

4. **Region 8 Support to NAE #4 - Minimize Human and Environmental Exposures Through Traditional Control Mechanisms**

a. Water Management Division (8WM)

The Lead and Copper Rule requires monitoring by all public water systems. Those systems that exceed the action level must install corrosion control in the system to reduce corrosion of lead materials and hence human exposure through drinking water. The Region oversees the delegated program in five states and directly implements the program in Wyoming (regulates the PWSs directly). Similarly, the Lead Contamination Control Act requires schools to monitor for lead at water coolers and replace those that exceed an action level. States are responsible and EPA does little oversight.

b. Air, Radiation and Toxics Division (8ART)

The Air Programs Branch (8ART-AP) will be responsible for Regional enforcement of the National Ambient Air Quality Standards (NAAQS) of 0.75 ug/m3 (monthly average) and the Maximum Achievable Control Technology (MACT) standard when they are promulgated. The schedule for promulgation of the applicable MACT standards is November 15, 1994 for Secondary Smelters; November 15, 1997 for Primary Smelters; and November 15, 2000 for Lead Acid Battery Manufacturing.

5. Region 8 Support to NAE #5 - Encourage the Availability of Environmentally Sound Recycling

Region 8 currently has no on-going or planned lead related activities supporting NAE #5.

6. Region 8 Support to NAE #6 - Develop and Implement a Public Information and Education Program

a. Office of External Affairs (8OEA)

The Environmental Information Service Center (EISC), in the Office of External Affairs, will serve as the primary Region 8 central point of contact for callers and walk-in visitors. In this capacity, it will be involved in advancing communications for lead-related activities. EISC will work in close coordination with other EPA staff functions to develop communication methods and products to meet the public's need for lead-related information.

b. Water Management Division (8WM)

The Drinking Water Branch (8WM-DW) currently and expects to continue to be involved in monitoring the regulatory program that requires individual PWSs exceeding the prescribed lead level to provide public education within 60 days of the exceedance. The materials needed to support a information program currently are readily available from many different sources. Therefore, the Branch does not plan to develop any further educational information.

c. Air, Radiation and Toxics Division (8ART)

The Toxic Substances Branch (8ART-TS) has established and is maintaining an information data base, primarily in the lead based paint area, to respond to questions resulting from the National Lead Education Campaign.

The Toxic Substances Branch has also established and is maintaining liaisons with the Primary State Lead Contacts designated by the states' governors in response to a request from Administrator Browner. These contacts are being kept apprised of the National Lead Information Campaign and been supplied with educational materials from EPA and other sources for distribution to local health agencies and the general public. These contacts will also be the primary focus of training and accreditation programs developed under Title X.

The Branch has also established and is maintaining liaisons with the Rocky Mountain Center for Occupational and Environmental Health (RMCOEH), University of Utah, (Regional Lead Training Center [RLTC] supporting Region 8). Information about the RLTC training schedules has been developed and is updated for distribution to interested parties.

The Branch has and will continue to work with other Federal and state agencies which are involved in lead issues within the Region.

d. Hazardous Waste Management Division (8HWM)

The Office of External Affairs (8OEA) has assigned a Community Relations Coordinator to each NPL site. Remedial Project Managers (RPMs) also are very involved with the public at the superfund sites. A major component of the Coordinator's activities at sites with lead exposures is providing information and education about the sources of lead and potential exposure routes to the general population.

At sites with lead contaminated residential soil, community acceptance is very important criteria used in selecting a remediation approach. Because solutions can often be disruptive to the day to day life in the affected communities, significant effort is expended in working with the public to implement an acceptable solution.

7. Region 8 Support to NAE #7 - Integrate Enforcement

a. Water Management Division (8WM)

The Drinking Water Branch (8WM-DW), PWS Integrated Enforcement Section currently enforces the LCR in all

Region 8 states. All states in the Region, except Wyoming, will be assuming responsibility for the LCR by December 7, 1994. Major violations to the LCR are being addressed with an Administrative Order.

b. Air, Radiation and Toxics Division (8ART)

The Air Programs Branch (8ART-AP) will be responsible for monitoring enforcement of the National Ambient Air Quality Standards (NAAQS) by the states in the Region based on each State Implementation Plan (SIP). The Branch will be enforcing the MACT standards after they are promulgated and implemented.

The Toxic Substances Branch will be responsible for implementing, administering, and enforcing a Federal accreditation program in non-approved states.

c. Hazardous Waste Management Division (8HWM)

The Superfund Remedial Branch (8HWM-SR) typically uses either an Administrative Order (AO) or a judicial Consent Decree (CD) as the enforcement vehicle for enforcement or Potential Responsible Party at lead contaminated NPL sites. AOs or CDs are used to compel the responsible party or parties to perform studies and/or implement the selected remedial approach.

8. Region 8 Support to NAE #8 - Coordinate Research Programs

a. Air, Radiation and Toxics Division (8ART)

The Air Programs Branch (8ART-AP) is monitoring an independent emissions quantification and characterization study being conducted independently by ASARCO in Montana.

B. Region 8 Support to Title X Implementation

These organizations currently or plan to support other major National activities related to the lead problem.

1. Air, Radiation and Toxics Division (8ART)

The Toxic Substance Branch (8ART-TS) is providing direct support to OPPTS in developing the regulations required by Title X. In addition, the Branch is providing Regional representation on the Title X Enforcement Advisory Working Group.

Regionally, the Toxic Substances Branch has supplied the Primary State Lead Contacts and Tribal governing bodies with a Title X information package. These contacts are being kept apprised of the status and schedule for development of regulations under Title X.

After it is determined which states and/or Indian Tribes are interested in developing and implementing Title X programs, the Branch will work with interested states and/or Tribes in putting together an authorization package and/or grant requests.

C. Region 8 Support to Other Major National Activities

These organizations currently or plan to support other major National activities related to the lead problem.

1. Air, Radiation and Toxics Division (8ART)

The Toxic Substance Branch (8ART-TS) has participated and plans to continue to support, as resources allow, OPPTS initiatives dealing with lead in plumbing fixtures and lead in solder used in drinking water systems. Program development will be under TSCA.

D. Regional Lead Initiatives

These organizations currently or plan to conduct specific Regional initiatives related to the lead problem.

1. Water Management Division (8WM)

The Drinking Water Branch (8WM-DW) provided support for corrosion control training given for all Region 8 states in the summer of 1993. EPA's Washington Office of Ground Water and Drinking Water was the lead in developing the materials for this training.

VII. EPA REGION 8 PROGRAM COORDINATION

Within Region 8, an Internal EPA Region 8 Lead Working Group has been formed to coordinate the multi-media activities relating to lead. The Toxic Substances Branch (8ART-TS) provides the chair for this Working Group.

The following Regional organizations participate in this Working Group: Office of Regional Administrator Enforcement (8ENF), Office of External Affairs (8OEA), Office of Regional Counsel (8RC), Water Management Division (8WM-DW), Air, Radiation and Toxics Division (8ART-AP and 8ART-TS), Hazardous Waste Management Division (8HWM-ER, 8HWM-FF, 8HWM-HW, 8HWM-SM, and 8HWM-SR), and Environmental Services Division (8ES-MEB).

A. EPA Region 8 Intraagency Coordination

During FY 1994, EPA Region 8 cosponsored, with EPA Regions 9 and 10, the first annual Tri-Regional Lead Conference. In addition to EPA, HUD, OSHA, and CDC participated in the conference. Thirteen of the 14 states in Regions 8, 9, and 10 attended the meeting, as well as the four RLTCs. This conference focused on providing a dialog between Federal and state agencies involved in lead activities and forum for the interchange of information and experience between the participants in implementing lead programs. Another tri-regional conference will be held during FY 94.

B. EPA Region 8 Coordination With Other Federal Agencies

Liaison has been established within the Region with the Consumer Products Safety Commission (CPSC), U. S. Public Health Service (USPHS), National Institute of Standards and Technology (NIST), General Services Administration (GSA), U.S. Army, Federal Highway Authority, Bureau of Land Management (BLM), National Park Service (NPS), Bureau of Reclamation (BOR), Fish and Wildlife Service, CDC, NIOSH, OSHA, and HUD offices. Additional interfaces will be established with other agencies as needed.

C. EPA Region 8 Coordination With State and Local Agencies, and Indian Tribes

1. EPA Region 8 Coordination With State Agencies

In May 1993, Administrator Browner requested each state governor designate a state lead contact under Title X. Colorado, Montana, North Dakota, South Dakota, and Wyoming have designated state lead contacts for the Title X program. Interfaces have been established with the state lead contacts.

2. EPA Region 8 Coordination With Local Agencies

Interfaces have been established with various local agencies within the Region, primarily in support of their outreach activities. Liaison has also been established with the Rocky Mountain Center for Occupational Safety and Health (RMCOEH) at the University of Utah which is the Regional Lead Training Center (RLTC) for Region 8. Additional interfaces with other local agencies will be established as the need arises.

3. EPA Region 8 Coordination With Indian Tribes

The Toxic Substances Branch is working with the Regional Indian Coordinator to identify and establish interfaces for Title X lead activities with the Tribes.

D. EPA Region 8 Identification of Appropriate Contacts

Appendix C is a list of Federal and state lead contacts for the various lead activities.

APPENDIX A

FEDERAL INTERAGENCY LEAD-BASED PAINT TASK FORCE

Environmental Protection Agency (EPA CO-CHAIR)

Department of Housing and Urban Development (HUD CO-CHAIR)

Architect of the Capitol

Consumer Product Safety Commission (CPSC)

Department of Agriculture (DOA)
- Farmers Home Administration (FmHA)

Department of Commerce
- National Institute of Standards & Technology (NIST)

Department of Defense (DOD)

Department of Energy (DOE)

Department of Health and Human Services (HHS)
- Agency for Toxic Substances and Disease Registry (ATSDR)
- Center for Disease Control and Prevention (CDC)
- National Institute for Occupational Safety & Health (NIOSH)
- Food and Drug Administration (FDA)
- Health Resources and Services Administration (HRSA)
- Maternal Child Health Bureau (MCHB)
- National Institute of Health (NIH)
- National Institute of Environmental Health Sciences (NIEHS)

Department of Labor (DOL)
- Occupational Safety and Health Administration (OSHA)

Department of State (DOS)

Department of Veterans Affairs (DVA)

National Aeronautics and Space Administration (NASA)

Resolution Trust Corporation (RTC)

Smithsonian Institution

APPENDIX B

REGIONAL SUPPORT ACTIVITIES

Table B-I EPA Region 8 Support to Lead Related Activities

Activity	Region 8 Office												
	A	B	C	D	E	F	G	H	I	J	K	L	M
National Action Elements													
#1-Develop methods to identify geographic "hot spots"	●	●							●				●
#2-Develop and transfer abatement technology		●							●				●
#3-Implement lead pollution prevention program	●												●
#4-Minimize human and environmental exposures through traditional control mechanisms	●												●
#5-Encourage the availability of environmentally sound recycling													
#6-Develop and implement a public information and education program		●							●		●		●
#7-Integrate enforcement	●								●				●
#8-Coordinate research programs	●												

Key

A	8ART-AP	Region 8 Air, Radiation and Toxics Division, Air Programs Branch
B	8ART-TS	Region 8 Air, Radiation and Toxics Division, Toxics Branch
C	8ENF	Region 8 Office of Enforcement
D	8ES-MEB	Region 8 Environmental Services Division, Multi-media Enforcement Branch
E	8HWM-ER	Region 8 Hazardous Waste Management Division, Emergency Response Branch
F	8HWM-FF	Region 8 Hazardous Waste Management Division, Federal Facilities Remedial Branch
G	8HWM-HW	Region 8 Hazardous Waste Management Division, Hazardous Waste Branch
H	8HWM-SM	Region 8 Hazardous Waste Management Division, Superfund Management Branch
I	8HWM-SR	Region 8 Hazardous Waste Management Division, Superfund Remedial Branch
J	8MT	Region 8 Montana Office
K	8OEA	Region 8 Office of External Affairs
L	8RC	Region 8 Office of Regional Counsel
M	8WM-DW	Region 8 Water Management Division, Drinking Water Branch

● Current and/or planned activities

Table B-I EPA Region 8 Support to Lead Related Activities (continued)

	Region 8 Office												
Activity	A	B	C	D	E	F	G	H	I	J	K	L	M
Title X Implementation													
Regulation development		●											
Enforcement Advisory Working Group		●											
Other Major National Activities													
Lead in Plumbing Fixtures Working Group		●											
Lead in Solder Working Group		●											
Regional Initiatives													
Regional Lead Working Group	●	●	○	○	○	●	●	○	●	○	●	●	●

Organization key

A	8ART-AP	Region 8 Air, Radiation and Toxics Division, Air Programs Branch
B	8ART-TS	Region 8 Air, Radiation and Toxics Division, Toxics Branch
C	8ENF	Region 8 Office of Enforcement
D	8ES-MEB	Region 8 Environmental Services Division, Multi-media Enforcement Branch
E	8HWM-ER	Region 8 Hazardous Waste Management Division, Emergency Response Branch
F	8HWM-FF	Region 8 Hazardous Waste Management Division, Federal Facilities Remedial Branch
G	8HWM-HW	Region 8 Hazardous Waste Management Division, Hazardous Waste Branch
H	8HWM-SM	Region 8 Hazardous Waste Management Division, Superfund Management Branch
I	8HWM-SR	Region 8 Hazardous Waste Management Division, Superfund Remedial Branch
J	8MT	Region 8 Montana Office
K	8OEA	Region 8 Office of External Affairs
L	8RC	Region 8 Office of Regional Counsel
M	8WM-DW	Region 8 Water Management Division, Drinking Water Branch

● Current and/or planned activities

○ *No active group participation, supplied information only*

APPENDIX C

EPA AND FEDERAL, STATE, AND TRIBAL Pb CONTACTS

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