TESTIMONY OF
WILLIAM K. REILLY
ADMINISTRATOR
U.S. ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE
SUBCOMMITTEE ON TOXIC SUBSTANCES, ENVIRONMENTAL
OVERSIGHT, RESEARCH AND DEVELOPMENT
OF THE
COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS
UNITED STATES SENATE

FEBRUARY 21, 1991

Mr. Chairman and members of the Subcommittee, I want to thank you for the opportunity to appear before you today to talk about the Agency's comprehensive strategy and activities to reduce risks associated with exposure to lead.

Over the last two decades the federal government has taken a number of key actions to reduce risks associated with lead exposures. It has banned the use of lead in house paint and in the solder and pipes used in public drinking water systems. It has encouraged the phaseout of solder in food cans. EPA's major contribution to these efforts was aggressive action to virtually remove lead from gasoline.

These actions have been very effective in reducing major sources of exposure. As a result, there have been dramatic reductions in average blood lead levels over the past 10 to 20 years from 15 ug/dl to 5 ug/dl. Deaths from lead poisoning, which up to 20 years ago were not uncommon, have been almost eliminated. However, continuing scientific research has demonstrated that harmful effects may occur at blood lead levels previously considered safe. Based on this new information, our threshold level for lead toxicity concern has declined steadily

over the past decade. Experts agree that a large number of children are still at unacceptable levels of risk. While much has been accomplished, clearly much remains to be done.

As you heard in testimony before this Subcommittee in March and June of 1990, lead poses a substantial public health threat -- and our children are the most vulnerable. The experts testified that lead exposures to infants and young children are particularly widespread and serious, and demand attention from federal, state and local governments, health care and environmental professionals, and concerned parents and citizens.

Lead causes a broad range of health and environmental problems. It is toxic to both humans and animals, and produces chronic, as well as acute, effects. As an element, lead is indestructible and, after millennia of use, is ubiquitous in the environment. EPA has long recognized that lead is a significant health and environmental problem -- in fact, it is one of the nation's most toxic multi-media contaminants.

**THE AGENCY'S LEAD STRATEGY**

In order to reduce lead exposure, the Agency has a number of ongoing efforts that cut across EPA program offices and often involve our regional offices, other federal agencies, and the states. Many of these efforts were described in our testimony before you last year. Today, I would like to outline the Agency's new comprehensive, cross-media strategy for lead, which I directed EPA senior managers to develop last year in consultation with other federal agencies, such as the Centers for

Disease Control (CDC) under the Department of Health and Human Services (HHS) and the Department of Housing and Urban Development (HUD).

I realized that an extraordinary effort to coordinate Agency activity would be necessary in this case, because in addition to its severe toxicity, lead is truly a multi-media contaminant. Accordingly, the Agency plans to address unacceptable lead exposure by coordinating the use of its authorities across programs to further reduce risks from lead. This strategy will ensure that the efforts conducted by EPA in cooperation with other federal agencies, state and local governments, and the private sector will control lead pollution problems in a unified and coherent way.

I have designated the Office of Pesticides and Toxic Substances (OPTS) to coordinate the development and implementation of this Agency-wide strategy. Under their various statutory authorities, the Office of Pesticides and Toxic Substances, the Office of Water, the Office of Solid Waste and Emergency Response, and the Office of Air and Radiation are working together to implement a consolidated plan for significantly reducing lead exposures from different media. In addition to traditional regulatory and enforcement programs, EPA offices are coordinating non-regulatory activities, including integrated risk management, public education, and research efforts.

EPA is also working with other agencies to implement a coordinated federal program to control risks from lead -- efforts

which are particularly important since many of our activities are highly interdependent. EPA and HUD have established a Memorandum of Understanding to govern EPA technical support to HUD in the detection, measurement, and abatement of lead-based paint hazards in housing. EPA is also working closely with CDC, the Consumer Product Safety Commission (CPSC), the Occupational Safety and Health Administration (OSHA) and the National Institute of Standards and Technology (NIST) through an interagency task force, which we co-chair with HUD.

I believe that EPA's lead strategy is a solid, ambitious, and comprehensive plan for lead risk reduction. It includes a commitment to an impressive number and wide variety of activities. It reflects what we know today about lead contamination, and what we still need to learn through research, to increase the effectiveness of our efforts. It will continue to evolve as we learn more about lead hazards and better identify inspection, control, and abatement technologies to address them. Although the details of our strategy may well change over time, I do not expect our overall goal to change.

The Agency has focused its strategy on the goal of reducing lead exposure to the fullest extent practicable, with particular emphasis on reducing the risk to children. To achieve this goal, we have set two objectives: Our first objective is to significantly reduce the incidence of elevated blood lead levels above 10 ug/dl in children, while taking into account the associated costs and benefits. (The 10 ug/dl level is subject to

revision in light of a forthcoming CDC report.) We estimate that approximately 15 percent of U.S. children have elevated blood levels above 10 ug/dl, and one percent above CDC's current level of concern, 25 ug/dl. EPA supports CDC's efforts to identify, through surveillance programs, individual children with blood lead levels above 25 ug/dl. These children should have their sources of lead abated on a priority basis.

Our second objective is broader: to significantly reduce, through voluntary or regulatory actions, unacceptable lead exposures that are anticipated to pose risks to children, the general population, or the environment. In pursuing this objective, we will base our decisions on an assessment of the benefits to society against the costs associated with such changes in product uses. This second objective focuses attention on ways to cut emissions, expand recycling, and reduce risks from uses of lead. It is based on several characteristics of lead pollution:

- Scientific experts are finding that adverse health effects occur at lower and lower levels of lead;
- Current lead exposures are already above acceptable levels in many locations, and increased use may increase them further; and
- Lead which is newly introduced into the environment may pose potential for additional human exposure and ecosystem damage in the future, since lead is indestructible.

This approach also recognizes that background levels will become more important as we better control existing pathways of exposures.

In pursuing both of these objectives, we will base our decisions on an assessment of the benefits to society against the costs associated with any changes in product uses.

The Agency's strategy is based on our overall understanding of the lead problem. There are three major sources of lead exposure today: (1) lead-based paint; (2) urban soil and dust (depositions from paint, gasoline and industrial sources); and (3) drinking water, primarily from leaching solder, brass fittings, and service lines. These sources are considered major because many people are generally exposed; other sources can result in high exposures in individual cases. The first two sources, lead-based paint and urban soil and dust, are by far the largest contributors to risk. In contrast, lead in drinking water affects nearly everybody, but at relatively low levels. In specific cases, however, it can also be a significant contributor to high exposure levels.

From a strategic point of view, it is important to note that the bulk of the current problem comes from regional exposures to high levels of lead previously deposited when lead was used more extensively. Therefore, reducing elevated blood lead levels in children requires that we turn our efforts first toward management or abatement of in-place lead.

The extent and severity of lead exposures from other sources

is either limited to relatively small populations or, in other cases, is uncertain. Such sources include stationary point sources, sewage sludge disposal (especially incineration), Superfund National Priority List sites, municipal waste combustors, mining sites, occupational exposures, and certain product uses -- for example, imported food cans, hobbyist paint and solder uses, and remaining small uses of leaded gasoline. In any case, contributions from these sources add to the total lead body burden and are therefore of potential concern.

EPA has identified several cross-media activities that will help focus our planning and future risk reduction efforts. These activities will improve the public's understanding of risk and how to minimize that risk, and also help our state, local, and private sector partners improve their capabilities to identify hazards and reduce risk. These action elements are:

Develop methods to identify geographic lead "hot spots". Our asbestos experience tells us that the federal government cannot abate the risks from diffuse sources effectively or efficiently. However, it can play a vital role in developing the necessary tools to identify priority areas requiring attention. An important part of EPA's lead strategy is to develop techniques that will assist other federal agencies, and state and local governments, to locate and map the regions, cities, neighborhoods, and homes with high lead concentrations or children at risk. To accomplish this, EPA will work with other agencies, e.g., with CDC on

its planned screening initiative. EPA's Region 5 has begun a multi-year project to collect and map information on lead exposures from multiple pathways to target high-risk neighborhoods. This project represents a pilot effort to develop new methods, including coordination with state and local authorities, and to promote abatement and in-place management activities.

**Develop and transfer abatement technology.** In order to ensure that safe, effective, and cost-efficient technical tools are available, we have to develop, evaluate, and disseminate cost-effective methods and tools to abate in-place lead exposure sources. This element includes assessment of methods for in-place management, including cost and long-term efficacy. In this area, EPA's initial efforts have been focused primarily on lead-based paint. We have been coordinating our efforts with HUD and NIST, and I will discuss that cooperation in more detail later in this testimony.

**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 additional lead from being introduced into the environment are essential to overall risk reduction. EPA is particularly concerned that, whatever activities government implements with regard to in-place lead, we need to properly inform people about how to

reduce exposure and avoid actions that will increase risk.

**Implement a Lead Pollution Prevention Program.** Given the major sources of lead exposure, the Agency's principal tasks are to abate and control lead that is already in the environment. However, we think it is also prudent to direct attention to reducing lead production and consumption which are likely to add to future exposures and unacceptable risks. One aspect of this activity is the Administrator's Industrial Toxics Project, which aims for dramatic voluntary emissions reductions over the next few years for 17 chemicals, including lead. Other aspects include exploring market-based incentives, promoting recycling, identifying and encouraging cleaner technologies, and regulating some high-exposure uses.

**Encourage the availability of environmentally sound recycling.** In order to reduce risks to populations and ecosystems from lead, the Agency seeks to encourage environmentally sound recycling. This element is also meant to ensure that the collective impact of pollution control activities does not have a negative effect on safe recycling or net risk.

**Minimize lead pollution through traditional control mechanisms.** This element involves EPA's traditional "end-of-pipe" regulatory approaches. It focuses on cross-program planning within EPA to ensure that offices are using compatible assumptions and approaches, and that program-

specific activities are coordinated to maximize risk reduction.

Coordinate research programs. A focused, integrated research program is critical to developing sound regulations and a balanced approach to risk reduction. EPA programs are working to set priorities for research and coordinate activities within and outside the Agency. It is particularly necessary to coordinate with other government agencies (federal, state and local) and the private sector on matters relating to testing and abatement.

Integrate enforcement. EPA is initiating a cross-media approach to enforcement activities, including coordinated inspections, analysis of data, and filings for noncompliance cases.

## CURRENT ACTIVITIES

Let me now describe our efforts to address the three major sources of lead associated with past practices -- lead-based paint, urban soil, and drinking water. I then will outline other important elements of our control program, medium by medium, and turn to our pollution prevention program for lead.

### A. LEAD-BASED PAINT

Lead-based paint is the most significant source of lead exposure to children. It is responsible for a large percentage of elevated blood lead levels in children (i.e., >10 ug/dl), and most very high levels (above 25 ug/dl) in children are due to this source. EPA is working very closely with HUD to provide

technical support for the development of a national lead-based paint program. A technical working group, co-chaired by HUD and EPA, provides a mechanism for coordination and communication among federal agencies involved in lead paint issues. This task force also includes participation from CDC, OSHA, the National Institutes for Occupational Safety and Health (NIOSH), CPSC, NIST, the Agency for Toxic Substances and Disease Registry (ATSDR), and the National Institute for Environmental Health Sciences (NIEHS).

Last December, with the release of HUD's Comprehensive and Workable Plan for the Abatement of Lead-based Paint in Privately Owned Housing, Secretary Kemp invited EPA and other agencies to form a federal task force to help HUD implement the plan. Creation of this policy level task force underscores the continuing close coordination and communication among federal agencies on these issues.

EPA is aware that cognizance of this potential health hazard is not sufficient to protect the public; the technical means and the infrastructure to support a national lead-based paint control and abatement effort must be available. EPA, in its support role to HUD, has a number of initiatives planned to ensure that efforts to reduce exposure to lead-based paint are technically sound and feasible. Lessons learned through our experience with the asbestos program is particularly important to our research planning and our nationwide exposure reduction effort for lead-based paint.

In FY 1991, Congress provided EPA with $4 million for lead-based paint abatement, control, and compliance activities, of which $1.5 million was earmarked specifically for worker training. Working closely with HUD, we have developed an agenda that complements initiatives underway at HUD, including:

1. Investigation of the long-term efficacy of the various abatement techniques (including encapsulation, removal, enclosure, and replacement) as performed by HUD in their Federal Housing Administration (FHA) Demonstration Project. This work will tell us how abatement methods hold up over time in reducing exposures.
2. Investigation of the long-term efficacy of other control and abatement methods, including repair and maintenance as performed in Baltimore, and low-cost abatement techniques as performed in other urban areas. These techniques, in contrast to the full abatement approach used in HUD's demonstrations, were applied in such a way that we can evaluate their individual efficacy, and thereby set priorities to give preference to extreme health hazards.
3. Evaluation of various lead measurement methodologies, including spot test kits and portable and non-portable x-ray fluorescence analyzers for measuring the lead content of paint. We are working closely with NIST in these efforts.
4. Development of a laboratory accreditation implementation plan, including the development of protocols and standard

reference materials for the different analytical methods. NIST is involved in this effort, especially in the development of standard reference materials.

5. Development of testing protocols to evaluate the effectiveness and durability of certain encapsulants.

6. Continued consideration of the applicability of the Resource Conservation and Recovery Act (RCRA) to wastes generated from abatement. A report to Congress is currently undergoing Agency review. We will collect additional data to estimate the cost of treating abatement waste as hazardous, and to evaluate how costs will affect the number of abatements that can be undertaken.

Other activities that are necessary to develop the infrastructure for a nationwide lead-based paint program include:

1. Completion of model training courses that establish state-of-the-art abatement practices and procedures for lead inspectors, abatement supervisors, project designers, and workers. We are working with OSHA to develop training programs for workers.

2. Establishment of training centers to disseminate the training courses. These centers would provide a geographically diverse network to help provide training courses where they are needed.

3. Development of a risk communication strategy to get accurate information to the public. Many aspects of exposure to lead-based paint are currently unknown, and our research

efforts will help answer some of these questions. We realize that getting the correct information to the public is a primary responsibility of the Agency.

4. Development of a community-based primary prevention guide for lead poisoning, that will be developed through an EPA grant to the Alliance to End Childhood Lead Poisoning.

Of the $1.5 million that was ear-marked for worker training, EPA will use a large percentage of the funds to provide worker training grants to labor and contractor groups for the delivery of the new model courses. In addition, the Agency is considering the establishment of a flagship lead center to foster information transfer and stimulate quality training by other institutions. It is also considering seed grants to help develop state lead training programs.

B. URBAN SOIL

Another area of concern is lead-contaminated urban soil. Soil may be contaminated by non-industrial sources of lead, such as paint, gasoline, and household wastes, or by industrial sources, such as battery recycling sites, mining and milling sites, and smelters. Lead-contaminated soil might contribute as much as thirty percent of exposures leading to elevated blood levels in children.

EPA's Office of Emergency and Remedial Response is conducting a $15 million study of soil contaminated by non-industrial sources in Boston, Baltimore, and Cincinnati. With advice from CDC, the Department of Agriculture, and other

Agencies, EPA is conducting this pilot study to evaluate the effect on children's blood lead levels when lead-contaminated soil and dust are removed.

This study, which will be completed by late 1992, has three components: 1) pre-abatement monitoring for blood lead levels and environmental lead in soil, dust, water, and paint; 2) abatement of soil and dust contaminated with lead; and 3) post-abatement monitoring. All three cities have completed pre-abatement monitoring and are in the process of abatement. EPA intends to establish a joint effort with HUD, CDC, and ATSDR to promote and assist a broader effort to identify the locations, extent, and severity of lead-contaminated soil.

C. DRINKING WATER

While virtually everyone is exposed to some lead in drinking water, average exposures from drinking water are not very high. We estimate the average contribution to a child's blood level to be approximately 1.0 ug/dl, but a small fraction of the population may be exposed at much higher levels. As with soil and paint contamination, exposures caused by drinking water are due primarily to past practices, especially the use of lead in solder and pipes in household plumbing and water distribution systems. EPA is considering how to reduce risks through a regulatory control program as well as research and education.

In 1988, EPA proposed revisions to the National Primary Drinking Water Regulation for lead under the Safe Drinking Water Act (SDWA). Lead occurs in drinking water primarily due to

corrosion of lead-bearing materials in water supply distribution systems and in household plumbing. The highest exposures occur in areas with corrosive waters, especially in urban areas with lead service lines, and in buildings with lead solder, brass faucets, or drinking water coolers with lead-lined tanks. Concentrations vary widely.

The major provisions of our proposed revisions required water suppliers to monitor lead levels in high-risk homes, under conditions expected to produce the highest concentration of lead (i.e., in first-flush, standing water). The proposal also required water suppliers to lower corrosivity of the water and to conduct public education if lead concentrations were above target levels. EPA plans on promulgating the final rule by the end of April. We estimate that actions by water suppliers to comply with the new rule will result in the average blood lead level among children not exposed to paint or soil contamination hazards dropping from 5.3 to approximately 4.7 ug/dl. (As noted earlier, this estimate refers to <u>average</u> blood lead levels.) In some cases, where drinking water contributes a larger share to total body burden, the drop would be sharper.

EPA's Office of Drinking Water has conducted a pilot public education program in Raleigh, North Carolina, that resulted in simple behavioral changes that can help people avoid elevated lead exposures from drinking water. As part of the final rulemaking, EPA is developing brochures and other communication materials from this pilot study for use by water suppliers. In

addition, EPA will use university-based centers to train water suppliers, engineers, and regulators on practical ways to minimize the corrosiveness of water and reduce lead levels in drinking water.

EPA's Office of Drinking Water developed an extensive program to help schools correct lead contamination problems in accordance with the Lead Contamination Control Act (LCCA) of 1988. This program includes: distributing guidance and a testing protocol to monitor for and remedy excessive lead levels in drinking water; conducting training on proper testing and remediation procedures; publishing brands and models of water coolers that contain lead; and listing certified analytical laboratories. Our guidance and training has been disseminated to thousands of schools across the United States.

To further assist action by schools, EPA recently completed a video on testing and remediation of lead contamination in school drinking water. We also are evaluating the sensitivity of field test kits that can reduce the costs of monitoring lead in water for schools, as well as the general public. EPA's Office of Drinking Water also was instrumental in the consent agreement between CPSC and a leading manufacturer to recall water coolers that failed EPA's recommended action level; that office also continues to oversee state implementation of the 1986 ban on lead plumbing products. The Agency is reviewing the need for additional rulemaking that would effectively eliminate further use of lead-containing solder and fixtures. Finally, a Safe

Drinking Water Hotline has been established to provide information to hundreds of callers each month on the LCCA, the lead ban, and other aspects of lead in drinking water.

D. OTHER ELEMENTS IN THE REGULATORY PROGRAM

Through its various statutory authorities, EPA is pursuing other traditional regulatory mechanisms (aside from those in drinking water), most of which EPA has discussed in previous testimony. Because lead presents risks through a wide range of media, the Agency has clustered together the rules and policies addressing lead risks from these various media. This approach will allow the Agency and the public to review the regulatory programs of each of EPA's program offices as a cohesive whole, and it will help ensure that lead pollution is not simply transferred from one medium to another.

Because EPA has outlined individual program activities in previous testimony, I will cover only a few of the more important elements now.

The Toxic Substances Control Act (TSCA)

EPA's Office of Toxic Substances is investigating the use of TSCA rulemaking to support the lead-in-water program. All of our actions under TSCA will require a balancing of the benefits of reduced lead exposure with the costs associated with reducing or eliminating uses of lead in specific products. One potential rulemaking would minimize the amount of lead that is leached from brass and bronze plumbing fixtures. Studies indicate that these fixtures can be a significant source of lead in drinking water.

The second rulemaking being investigated would limit the sale of lead solder, or use other mechanisms, in order to extend coverage of the Safe Drinking Water Act ban on lead solder used to join pipes.

EPA will assess specific products and uses of lead in order to determine if the health or environmental risk is "unreasonable" and should be regulated under the Toxic Substances Control Act. The Agency also is exploring a rule to require advance notice from anyone intending to manufacture or process lead for a new use, thus giving the Agency an opportunity to review the intended new use and, if appropriate, limit or ban it.

Another initiative under TSCA is to investigate how to encourage the availability of environmentally-sound lead recycling. Recycling lead acid storage batteries is important because of the sheer volume of lead involved -- 80 percent of domestic lead is used in batteries. Recycling is beneficial because it reduces the risks from the amount of lead discarded in the environment and the amount of virgin lead that must be mined. Approximately 80 to 95 percent of spent batteries currently are recycled; however, lead acid batteries still comprised 65 percent of all lead in municipal solid waste in 1988.

EPA offices have agreed on a consolidated plan designed to increase and maintain lead battery recycling in an environmentally sound manner and thereby reduce the introduction of lead into all media. In fact, a cluster of rules across the Agency is based on lead battery recycling. In January 1991, EPA

began a regulatory negotiation process to further investigate this issue and arrive at a recommended solution.

National Ambient Air Quality Standards (NAAQS)

Current EPA activity under the NAAQS falls in two general categories: compliance with existing standards, and revising the standards. The current lead NAAQS was set in 1978 at a quarterly average of 1.5 ug/m$^3$. The reduction of lead in gasoline, EPA controls on categories of stationary sources, and controls on individual industrial sources through state implementation plans have been the principal mechanisms for widespread attainment. These actions, particularly the lead gas phasedown, have resulted in major reductions in air lead emissions and children's blood lead levels. However, available data indicate that near some lead smelters, refineries, and remelters, the NAAQS are not being attained.

The number of children exposed in these non-attainment areas is small compared to the number of children at risk from the major lead sources discussed earlier. However, for these children, non-attainment of NAAQS can add significantly to their blood levels. Consequently, EPA's Air Office has developed a compliance strategy to bring these areas into attainment, which in some cases requires enforcement action, and in other cases requires revisions to the state implementation plans. EPA estimates that the number of affected children with blood lead levels greater than 10 ug/dl would be reduced about 50 percent, if the current NAAQS were attained in all areas of the country.

The Clean Air Act requires EPA to review the NAAQS every five years and make appropriate revisions. Scientific and technical assessments were completed in January 1990. EPA has been working on its final analysis of the appropriate level to achieve the health level recommended by the Clean Air Science Advisory Committee (CASAC). We have analyzed the effect of a NAAQS revision by reviewing 42 lead point sources and estimating the number of children living near these sources who would have blood lead levels greater than 10 ug/dl at each of the alternative NAAQS levels under consideration. We expect that our analysis and reviews will be completed by October 1991.

E. **ENFORCEMENT**

While working to tighten lead emissions and exposure controls on the various sources just described, we also want to ensure that facilities are complying with existing limits. The EPA Office of Enforcement is working with our Regional offices and headquarters programs to implement a lead enforcement initiative that will assist in coordinating inspections and analyzing data collected from major sources of lead emissions. One focus will be the use of the Clean Air Act to reduce air emissions of lead from primary and secondary lead smelters, with an emphasis on compliance with State Implementation Plan (SIP) lead emission limits. Our enforcement office also will focus on violations of lead limits in National Pollutant Discharge Elimination System (NPDES) permits for industrial and municipal wastewater discharges and pretreatment requirements for

industrial users of municipal wastewater treatment systems. RCRA actions against primary and secondary lead smelters are another potential avenue of enforcement. We also are exploring the possibility of developing lead enforcement cases in other environmental media. This spring, EPA will be filing enforcement actions against sources of lead emissions that are out of compliance with SIP limits.

F. POLLUTION PREVENTION

While the major tasks in reducing risks from lead involve control and abatement of lead that is already deposited in the environment, EPA is concerned that many existing uses of lead, irrespective of current exposures, eventually may give rise to exposures of concern. The use of lead in products presents two types of exposures: 1) exposures that occur from specific lead products during or immediately following production or use; and 2) potential future exposures that might occur after disposal of a lead-bearing product.

Pollution prevention in this context, means finding innovative ways to decrease or eliminate unacceptable exposures that we anticipate to pose risks from lead use, rather than relying solely on "end-of-pipe" controls to limit emissions. It must play an important role in achieving this objective. Because EPA believes that pollution prevention can benefit both the environment and the economy, the Agency's policy will be designed to maximize private sector initiatives by working with industry to achieve reasonable pollution prevention goals. This approach

should encourage more businesses to identify and profit from opportunities for prevention, which in turn will yield significant public dividends in the form of increased environmental protection.

It could also include a variety of TSCA rules, including rules that would restrict or eliminate some lead uses, based on a balancing of the societal benefits of these reductions against their associated costs. Specifically, EPA is developing its strategy to encourage recycling and reduce unnecessary or nonessential uses. At the same time, EPA believes that there is a continuing need for a strong regulatory and enforcement program under existing statutory authorities, because they provide further incentives to prevent pollution.

## CONCLUSION

EPA has done a great deal over the past two decades to address lead pollution problems. Much more needs to be done, and we have many efforts underway. In order to move efficiently to higher levels of protection for public health and the environment, EPA has taken a comprehensive assessment of the problem and formulated a strategy that will bring together both our traditional pollution control authorities across the Agency and new concepts of pollution prevention.

This strategy also will result in a coordinated effort to better reduce harmful exposure to lead in our society. It will recognize the need for close coordination and cooperation with

the other federal agencies that play major roles in this important effort to protect public health and the environment.

Thank you again for the opportunity to speak before this subcommittee.