



January 4, 2023

Barry Breen, Principal Deputy Assistant Administrator
EPA Mail Code 5101T
1301 Constitution Avenue, NW
Washington, DC 20004
Breen.Barry@epa.gov

Sent by email only.

Re: Agency investigation into uncontrolled release of lead to water and surface soil from lead-sheathed telecom and power cables

Dear Deputy Assistant Administrator Breen:

Thank you for promptly initiating an Agency investigation into uncontrolled release of lead to water and surface soil from lead-sheathed telecom and power cables as requested by Environmental Defense Fund (EDF), Below the Blue, and Clean Water Action on July 17, 2023.

We appreciate you sharing the October 19th update and making the preliminary results public for [West Orange, New Jersey](#) and [Coal Center/California, Pennsylvania](#). We look forward to learning more in the coming months.

This letter is to inform you that effective December 22, 2023 Tom Neltner, who has directed our work on lead, left EDF to launch Unleaded Kids, a new non-profit dedicated to reducing children's exposure to lead and other harmful chemicals and will serve as its Executive Director. EDF will continue to collaborate closely with Mr. Neltner in his new capacity at Unleaded Kids for all our lead work. Please continue to rely on him in his new capacity as the point person for any follow-up on this issue. He will continue to coordinate with the four groups listed in this letter. His new contact information is tneltner@unleadedkids.org, 317-442-3973.

In a different, but related matter on lead, we would also appreciate an update on the agency's [Soil Lead Guidance for Hazardous Waste Sites](#) that has been under review by the Office of Management and Budget since June 12, 2023, more than six months ago. From the preliminary results and discussions that Mr. Neltner has had with agency staff, it appears that the EPA's regional offices have different approaches to the investigation that we find difficult to understand. The investigations are also based on twenty-year-old guidance ([OSWER 9285.7-50](#)) that does not

reflect the current evidence of the risks posed by lead and lead-contaminated soil. Finalizing the guidance pending at OMB would be an important step forward.

EDF will continue its long-standing work, anchored in science, to protect children, vulnerable populations, and communities from exposure to lead, a neurotoxin for which there is no safe exposure level and no safe blood levels. Please reach out should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Vogel". The signature is fluid and cursive, with the first name "Sarah" being more prominent than the last name "Vogel".

Sarah Vogel
Senior Vice President, Healthy Communities
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