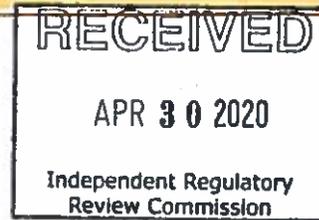


Stephen Hoffman

#3251

From: ecomment@pa.gov
Sent: Thursday, April 30, 2020 11:50 PM
To: Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Administration of the Land Recycling Program (#7-552)

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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Administration of the Land Recycling Program (#7-552).

Commenter Information:

Rachel Kaminski
(gtloriverwards@gmail.com)
2323 E. Dauphin St.
PHILADELPHIA, PA 19125 US

Comments entered:

Good morning,
My name is Rachel Kaminski and I'm one of the founding members of Get the Lead OUT-Riverwards Philadelphia. Our mission is to end childhood lead poisoning in the Riverwards by advocating for responsible demolition and excavation, increasing blood testing rates and ensuring intervention services to any child with elevated levels, educating caregivers of 0-6 year olds and ensuring playgrounds and public spaces are lead free.
Lead has always been an issue and will continue to be until we make efforts to remove it. The uncomfortable truth is that we are all in the shadow of its historical legacy. It's been in our gas, in our paint, and in our pipes, so now it's in our soil, in our dust, and in our water. We live with it daily and sometimes forget it's even there. It's the invisible poison that effects everyone and we only react to once it's too late.
One of our biggest concerns for this amendment pertains to the handling of non-residential soil. While this proposal changes the standard cleanup for non-residential soil, there is no guarantee that a site will remain non-residential.
In Philadelphia, developers build wherever there's space and will file for variances in order to do so. Right now, we and the local neighborhood association are working with a developer who is trying to demolish and build on the ground of an old galvanization factory. This site has large quantities of lead (among other harmful materials such as arsenic) at least nine feet deep. Five or ten years ago, no one would have thought that Philadelphia would be going through such a

housing boom. Yet here we are, demolishing old factories and building on land that is toxic. While this amendment maybe be for non-residential now, there is no telling what that land will be used for in the future. By not looking ahead, we will be falling into the same trap our forerunners did and essentially making this "tomorrow's problem". We need to have more foresight than this.

Beyond the potential problems of the future, we are also alarmed by the "non-residential" designation. This label applies not only to industrial properties, but also to commercial and business properties that could be used by at-risk populations. The most at risk are children 6 years of age and younger. The Center for Disease Control (CDC) has stated the there is no safe amount of lead and even small amounts can be harmful to childhood development. As such, we are troubled that this amendment would be changing the standard to leave more, not less, lead in the ground. The current clean up standard is 1,000 ppm. As such, there would be less remediation at these non-residential sites because remediation would only occur if the site in question is over 2,500 ppm.

We are also unsettled that the proposed amendment doesn't included updated information on the target blood concentration for lead from the CDC. The current proposed cleanup standard is based on a target blood lead level of 10 µg/dL (micrograms of lead per deciliter). Meanwhile, the CDC has been using 5 µg/dL for case management since 2012 and they are considering lowering it even further down to 3.5 µg/dL.

In conclusion, we are asking that you oppose this amendment to Chapter 250. We all have been living with the repercussions of lead from our predecessors. You have an opportunity to look ahead and protect future generations instead of leaving it as "tomorrow's problem". Thank you for your time.

-Rachel Kaminski
Get the Lead OUT- Riverwards Philadelphia

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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