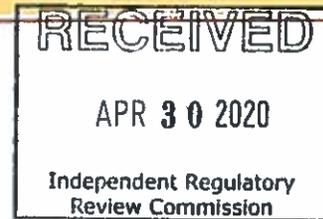


Stephen Hoffman

3251

From: ecomment@pa.gov
Sent: Thursday, April 30, 2020 4:54 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)

CAUTION: **EXTERNAL SENDER** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



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:

Steve Perzan
(sperzan@msn.com)
118 W. Nedro Ave. Apt B
Philadelphia, PA 19120 US

Comments entered:

RE: Direct Contact Numerical Value for Lead in Nonresidential Soil

I recently learned of a proposal by the Pennsylvania Department of Environmental Protection, through the Environmental Quality Board (EQB), to increase the current allowable lead cleanup level of surface contaminated soil at nonresidential sites from 1,000 ppm to 2,500 ppm. This represents an increase of 150% and represents a threat to the health and safety of all workers at such sites.

This proposal by the Environmental Quality Board is froth with all kinds of increased liability risks and discriminatory work practices that may arise particularly for women who are pregnant and working at these sites.

The target blood concentration proposed by the Department of Environmental Protection is one-half the reference value that the Centers for Disease Control and Prevention uses to address lead in children. The state should be using the current science to set cleanup levels. The new proposal is not protective of public health and in particular to the reproductive rights of women, and will certainly result in discriminatory hiring practices against them, especially for those pregnant or seeking to become pregnant. Moreover, there is increased potential for life-long birth defects for the developing child that will certainly be open to liability suits for any company

engaged in lead surface cleanup.

Lead is a highly toxic chemical that causes harm to the central nervous system. At peril to our State of Pennsylvania and all its citizens DO NOT INCREASE THE ALLOWABLE SURFACE LEVEL OF LEAD SOIL CONTAMINENTS AT NON-RESIDENTIAL CLEANUP SITES!

Thank you

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov