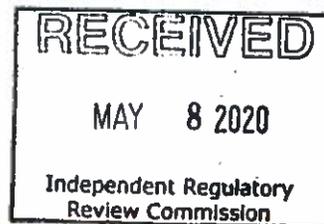


3251

Form Letter A 61-97

Stephen Hoffman

From: Edinger, Laura <ledinger@pa.gov>
Sent: Friday, May 8, 2020 2:52 PM
To: IRRC
Cc: Laura Campbell
Subject: Updated form letter numbers for EQB #7-552



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Good Afternoon,

As previously reported, two form letters were received for Proposed Rulemaking – Administration of the Land Recycling Program (EQB #7-552).

Form Letter A received a total of 97 email messages.
Form Letter B received a total of 25 email messages.

Thank you,
Laura

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Form Letter: Please Maintain Current Standard

Proposed Rulemaking: Administration of the Land Recycling Program (#7-552)

Dear Environmental Quality Board,

I oppose the Pennsylvania Environmental Quality Board's proposed 150% increase in the nonresidential Medium-Specific Concentration (MSC) for lead in nonresidential surface soil. Lead is prevalent in many areas throughout Pennsylvania, due in part to the historical legacy of industrial facilities, the burning of leaded gasoline, and the use of lead paint. The "nonresidential" designation applies not only to industrial properties, but also to commercial and business properties that could be used by at-risk populations.

The EQB's newly proposed cleanup standard of 2,500 ppm for lead in nonresidential surface soil is two-and-a-half times the current standard of 1,000 ppm. The proposal is flawed scientifically because it does not include updated information on the target blood concentration for lead from the Centers for Disease Control and Prevention (CDC).

In numerical terms, the proposed cleanup standard is based on a target blood concentration of 10 µg/dL for lead, even though the CDC has been using 5 µg/dL for case management since 2012. Far from justifying this choice, EQB's proposal absurdly states that "[t]hese proposed changes, based on new information, would protect public health and the environment."

We all know that lead is a highly toxic chemical that causes harm to the central nervous system. Please do not increase the health threat in Pennsylvania. Thank you.