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Stephen Hoffman

Form Letter A 98

From: EP, RegComments <ra-epregcomments@pa.gov>
Sent: Monday, June 7, 2021 8:21 AM
To: IRRC; Iversen, Sarah A.; Troutman, Nick; Eyster, Emily; Glendon King; environmentalcommittee@pahouse.net; Environment-Committee@pasenate.com
Cc: EP, RegComments; Laura Campbell
Subject: Post-Public Comment Period: Form Letter A - Proposed Rulemaking: Administration of the Land Recycling Program (#7-552)
Attachments: Form Letter - 7-552 - Please Maintain Current Standard.pdf

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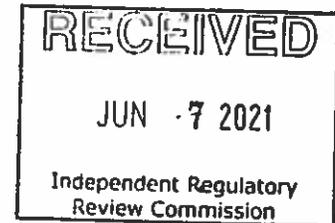
Good morning,

Attached is a form letter DEP received regarding Proposed Rulemaking: Administration of the Land Recycling Program (#7-552). We labeled this letter "Please Maintain Current Standard."

We received **1** copy of this form letter in the past week, after the close of the public comment period on April 30, 2020.

Thank you,
Laura

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In order to prevent the further spread of COVID-19, all DEP offices will remain closed until restrictions are lifted. In the meantime, I will be working remotely to continue the mission of the Pennsylvania Department of Environmental Protection and frequently retrieving emails. Thank you for your patience.

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.

