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**NURSELEDCARE.ORG**

April 29, 2020

Pennsylvania Department of Environmental Protection  
Rachel Carson Building  
400 Market Street  
Harrisburg, PA 17101  
Attention: Michael Maddigan, Environmental Group Manager

*Submitted via: [ahs.dep.pa.gov](http://ahs.dep.pa.gov)*

To Whom It May Concern,

On behalf of the National-Nurse Led Care Consortium (NNCC), I thank you for the opportunity to comment on the proposed rulemaking concerning the Administration of the Land Recycling Program. NNCC stands in strong opposition to the proposed 150% increase in allowable concentration of lead in surface soil after cleanup at nonresidential sites (from 1,000ppm to 2,500ppm), and urges the Department of Environmental Protection to maintain the current 1,000ppm maximum.

Founded in 1996, the NNCC is a 501(c)(3) nonprofit dedicated to advancing nurse-led models of care through policy, technical assistance and consultation, and innovative programming. Headquartered in Philadelphia, NNCC works in cross-sector partnerships to create and manage community-based programs that address public health issues important to the vulnerable populations served by its members.

NNCC has provided environmental health programming in southeastern Pennsylvania for two decades, including several projects that focused on lead poisoning prevention and elimination. These programs include Lead Safe Babies, HomeSafe, Healthy Homes for Childcare, and a recent three-year Lead and Healthy Homes program, which provided lead education to over 1,400 families, environmental inspections for 172 families with lead-poisoned children, and over 20,600 supplies to reduce indoor environmental hazards. In our current Safe and Healthy Homes program (2016-present), NNCC provides direct home visiting services and manages community partners across Philadelphia and Delaware County, who provide direct education, home assessments, and safety installations to low-income families. To date, NNCC and partners have reached over 950 families with home assessments and education on reducing environmental health hazards; identified and addressed over 4,300 hazards; and provided safety installations for more than 50 households.

NNCC remains invested in lead safety throughout the Philadelphia region, and believes that a change in the acceptable surface soil lead level for nonresidential sites presents a public health threat to Philadelphians, especially pregnant people. The proposed change from 1,000ppm to 2,500ppm is based on outdated guidance from the Centers for Disease Control and Prevention (CDC). Current CDC recommendations state that 5 µg/dL is the threshold blood lead

concentration for higher risk in children and fetuses, not 10 µg/dL as the proposed rule implies. This means that a pregnant person accessing or working at nonresidential sites, such as commercial and business properties, would not receive the basic public health protections for her fetus that the regulations are intended to guarantee.

The department may argue that this figure is irrelevant because of soil-to-groundwater numeric values. However, the proposed regulations do not appropriately ensure that this would be the case, and only require the use of such a value in certain circumstances.

Lead exposure causes devastating health effects for children and their families, including irreversible damage to the brain and nervous system, slowed growth and development, and hearing and speech problems. No level of lead concentration in the blood is safe for children and fetuses. NNCC urges the Department of Environmental Protection to protect Pennsylvania families, and to maintain the current standard for surface soil lead cleanup at 1000ppm.

NNCC appreciates the opportunity to comment on this proposed rulemaking. Should you have any questions, you may reach me at [shexem@ncc.us](mailto:shexem@ncc.us) or (215) 731-7148.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Hexem Hubbard".

Sarah Hexem Hubbard, Esq.  
Executive Director  
National Nurse-Led Care Consortium