



## Comments of the Science and Environmental Health Network

Submitted to: EPA Public Hearing on National Ambient Air Quality Standards for Lead.  
St. Louis, MO, June 12, 2008.

Dear EPA:

I am submitting these comments on behalf of the Science and Environmental Health Network (SEHN), a national non-profit organization with an office in St. Louis. I am the Associate Director of SEHN, and also the mother of a 1-year-old child. It is in both of these capacities that I speak to you today.

EPA's own scientists recognize that the proposed new standard of 0.1 to 0.3 micrograms of lead per cubic meter is not safe for children. But I am not here to quibble over decimal points. I am here to say that quibbling over decimal points when it comes to children's health, instead of just doing the right thing and lowering the standard as much as possible, is *factually ridiculous* and *morally outrageous*.

It is *factually ridiculous* because every child, like my son, is exposed to thousands of potentially hazardous substances every day, including several different sources of lead. We don't know what the cumulative impact of this is on their developing bodies. It is imperative for the EPA to lower the airborne lead levels as much as possible, since children are simultaneously exposed to lead in paint, toys, vinyl backpacks, jewelry, lunchboxes, diaper bags, and many other sources. Every time we leave the house my baby is breathing mercury from power plants, diesel particulates from trucks, soot from cars, pesticides from parks, and many, many other toxins. Looking at the airborne lead standard in isolation, in terms of real children's health, just makes no sense.

Quibbling over decimal points is *morally outrageous* because we're talking about the actual health and brain power of actual children. My child can't consent to breathing lead in the air; and as his mother, I certainly don't consent to it. I can create a little bubble in my own home and feed my child organic food, limit the plastics in my home, and scrub my tub with baking soda and vinegar. But the second we go outside I lose control of his environment, and this is where you take over. It is your job to protect these children.

Protecting the public's health, especially the health of the most vulnerable such as small children, is a proper function of government. As parents, we look to you for leadership on these issues. I urge you to restore the EPA to its original mandate and place our health and environment as your highest priority.

In the face of all of these cumulative impacts to children's health, we must take precautionary action and err on the side of safety. I urge you to follow the advice of EPA scientists and set the NAAQS lower than 0.2 micrograms per cubic meter, measured as a monthly average.

Thank you for considering my comments.

Sincerely,

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Katherine Silberman, JD  
Associate Director