



USC University of Southern California

DEPARTMENT OF PREVENTIVE MEDICINE

June 10, 2016

Chairman Luis A. Alejo
Assembly Environmental Safety & Toxic Materials Committee
1020 N Street, Room 171
Sacramento, California 95814

Re: Keeping Communities Safe: Oversight Of Lead Testing And Clean Up Plans Around Exide

Dear Chairman Alejo:

I respectfully submit these comments on behalf of the Community Outreach and Engagement Core of the Southern California Environmental Health Sciences Center, based at Keck School of Medicine of the University of Southern California. In summary, it is important to increase the transparency of the Exide cleanup, assure that the closure and remediation activities do not further contaminate soil, air or people, and that the community is involved and informed at every stage of the process. Specifically, I offer the following recommendations:

1. Chronic low-level lead exposure is a public health crisis. There are no safe levels of exposure, particularly among young children. The prevention of lead poisoning requires prevention of exposure through the identification and control of lead sources in the environment, in air, food, water, and dusts and soils as well as paint. Lead is one of the few contaminants where there is extensive data – from hazardous waste manifests to air quality data to blood levels in children. Yet, this data, to my knowledge, has not been combined or leveraged to identify neighborhoods of concern, or areas to prioritize investigations.
2. Further, public access to any of this data on lead exposures is extremely limited. In order to improve accountability and transparency of public agencies, it is critical to openly share information about facilities using toxic metals like lead and arsenic. There needs to be rapid response to community concerns, especially in environmental justice neighborhoods. In addition, it is essential to share in an open and timely fashion the levels of lead in the soil in the community. The permitting process for hazardous waste generators (such as Exide) must be made transparent so that the public can readily access permits. In this case, the state's hazardous waste agency allowed Exide to operate for years without a full permit.
3. Third, agencies need to collaborate. It appears that the disaster around Exide was facilitated by the lack of discussion between air quality, environmental and public health entities. Aside from Exide there are 100s of other facilities that currently use and emit lead. A statewide taskforce on



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preventing Pb exposures that cuts across agencies is necessary to avoid situations like Exide moving forward. Further, it is imperative to develop methods for active surveillance of Pb exposures.

4. Finally, in regards to remediation, DTSC should assume protective and proactive approaches. Resources need to be leverage to address the multiple exposure pathways to toxic metals in the community. The remediation should extend indoors to the dust – and practices in place to prevent the transport of contaminated soil in the cars and homes of the cleanup workers.

Respectfully,

A handwritten signature in black ink, appearing to read "J. Johnston".

Jill Johnston, PhD

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