

American Academy of Pediatrics

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AIR RESOURCES DIVISION

October 5, 2016

Felice Janelle, Planning Analyst
New Hampshire Department of Environmental Services
6 Hazen Drive, PO Box 95
Concord, NH 03302-0095
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Dear Ms. Janelle,

This letter concerns recent legislation that reversed the ban on incineration of construction and demolition (C&D) debris. State law will allow incineration of C&D debris at the Wheelabrator incinerator in Concord.¹

It is important for the New Hampshire Pediatric Society (NHPS) to weigh in on this issue to help ensure there are no increased lead emissions in New Hampshire as a result of this change in law.

The enclosed statement from NHPS regarding childhood lead poisoning in New Hampshire² makes clear the serious and long-term effects associated with lead exposure and explains how old housing stock in New Hampshire contributes to exposure risks:

1. New Hampshire's pediatric elevated blood lead level rates are 2.5 times the national average.
2. There is "no safe level of lead exposure" according to the Centers for Disease Control and Prevention (CDC).
3. The CDC has identified "the negative impact that lead exposure has on children's cognitive abilities, speech and language, hearing, visual-spatial skills, attention, impulse control, social behavior, emotional regulation, and motor skills."
4. Buildings constructed before 1978 may contain lead-based paint.

The NHPS statement also references the *NH Childhood Lead Poisoning Screening and Management Guidelines*.³ It is noteworthy that page 14 lists waste incineration as an industrial source of potential lead exposure, stating "industries that release lead into the environment may increase the likelihood of exposure for children in the surrounding community."

Eliminating lead exposure hazards in old housing stock is clearly a benefit. However, burning lead-contaminated debris from demolition sites creates exposure risks. **It is imperative that there are no additional lead exposure risks for New Hampshire children as a result of burning C&D debris at the Wheelabrator incinerator.**

Thank you for the opportunity to provide this information. Please keep NHPS informed of your department's position on this issue.

Sincerely,
New Hampshire Pediatric Society

¹ State of New Hampshire. *Title X – Public Health, Chapter 125-C, Air Pollution Control Section 125-C:10* (effective August 23, 2016). The Wheelabrator incinerator in Concord is the only facility in New Hampshire that meets the criteria in Section 125-C:10-c (III).

<http://www.gencourt.state.nh.us/rsa/html/X/125-C/125-C-10-c.htm>

² Staro, William, MD. "Recent Changes to NH's Childhood Lead Poisoning Law: What Granite State Pediatricians Need to Know." *The Granite State Pediatrician* (March 2016): 1-7.

<http://www.dhhs.nh.gov/dphs/bchs/clpp/documents/gspnewsletter-reprint-3-16.pdf>

³ New Hampshire Department of Health and Human Services. *New Hampshire Childhood Lead Poisoning Screening and Management Guidelines* (Revised January 2015): 1-44. www.dhhs.nh.gov/dphs/bchs/clpp/documents/screening.pdf