

Remarks by Peter Grevatt

Hill Briefing on Sources of Pollution and Safe School Siting

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Thank you and good morning. I am very pleased to be here with you today for several reasons. First, as a parent of two school age children, I share with everyone here a vital interest in protecting our children in every way possible, and that of course includes protecting them from environmental risks where they go to school.

Second, this forum is a very important event for EPA. As you know from my introduction a moment ago, EPA Administrator Jackson recently directed me to chart a path forward for EPA on children's environmental health issues. The Administrator is committed to making children's environmental health a priority at EPA and helping to promote environmental equity in all of our programs. She expects EPA to provide practical and useful information to community members to allow them to fully engage in our efforts to protect the environment and public health.

I am reaching out to a wide range of experts and advocates to gather a diverse set of perspectives on the most important children's environmental health issues – including those where we have the largest gaps in knowledge and those where we have the greatest opportunity to make a real difference through near-term actions. One of the common themes I am hearing is the importance of EPA and other federal Agencies in ensuring protection of children, teachers and staff in and around schools.

Administrator Jackson recognizes the importance of EPA's work on schools. As she said yesterday on Healthy Schools Day, "EPA's mission is to protect the American public where they live, work and play – and that certainly includes protecting children where they learn. Our nation's

children, parents, and educators deserve to know that their schools provide a safe and healthy environment”.

EPA has many important activities going on across multiple programs related to protecting children, teachers, and staff in and around schools. These include the recently announced air monitoring effort at 62 schools around the country as well as the development of model guidelines for the siting of school facilities, the primary reason we are here today.

I want to first briefly touch on the ongoing school air monitoring initiative as there is a tremendous amount of attention on the air quality around our children’s schools. As part of this initiative to protect children where they learn, EPA, in partnership with state and local air pollution control agencies, will monitor the outdoor air around 62 schools in 22 states for pollutants known as air toxic pollutants.

Our Agency considered a number of factors in selecting schools to monitor including results from an EPA computer modeling analysis, the mix of pollution sources near the schools, results from an analysis conducted for a USA Today series on air toxics at schools, and information from state and local air pollution control agencies.

Monitoring at the schools will be phased in over the next three months, depending on whether states have monitoring equipment available that can be moved quickly to a school on the list. In fact, monitoring has already begun at two schools in Tennessee – at Lakeview Elementary School in New Johnsonville and Ashland City Elementary School in Ashland City.

Monitors will be in place at each school for 60 days to provide a picture of outdoor air quality around the schools. The monitors will sample air quality on 10 different days during that time. The samples will be analyzed by the laboratories EPA uses for air quality analysis.

EPA will analyze the air toxics data and use it to make projections of the potential for long-term health concerns related to cancer and the other chronic health effects.

EPA is committed to getting the results of the monitoring to parents and the communities quickly.

EPA will take appropriate action based in response to the sampling results. If our analysis shows a low potential for health concerns at a particular school, we may stop monitoring at that school. On the other hand, if potential health concerns are high, we will take steps to attempt to mitigate the pollution causing the concern. It is also possible that the initial phase of the testing may not allow us to estimate the potential for health concerns. In that case we may continue monitoring.

If we find reason for concern, you can be certain that EPA will work with our state and local partners to address them. This may include bringing enforcement actions if appropriate. We may also find that some problems may be difficult to quickly resolve.

In addition to collaborating with our state and local pollution control agencies, we are working in partnership with a network of children's environmental health experts to ensure that any health concerns are properly communicated and addressed. The Pediatric Environmental Health Specialty Units are located in each of our 10 EPA regions and are staffed with health professionals like Dr. Jerry Paulson, who can help parents and community members interpret the study results.

This monitoring initiative is just one of many ways EPA is working with state and local partners to create healthy school environments.

Congress included in the Energy Independence and Security Act of 2007 a set of provisions addressing Healthy High Performance Schools, including a requirement that EPA develop, within 18 months, voluntary model guidelines for the siting of school facilities. The Act stated that guidelines are to take into account four elements: the special vulnerability of children to environmental contaminants; modes of transportation available to children and staff; energy efficiency; and the use of a school as an emergency shelter.

EPA is hard at work on the development of these guidelines and with your help and input, we will complete the guidelines as fast as we possibly can. While EPA's work on the guidelines did not begin in earnest until January of this year, we are now starting the process of inter-agency discussions, and we are eager to work with interested partners and stakeholders to get their input into this process. We are still too early in the

process of developing the guidelines for me to be able to give you a complete picture of the details of what will be included. However, I want to give you a sense of what we hope to be able to accomplish with the guidelines, their scope, how we intend to involve various stakeholders in the guideline development process, as well as when we expect to have a draft available for review and input.

One of the things that is readily apparent is the tremendous amount of high-quality, thoughtful work has already been done in this area by many organizations, including the Center for Health, Environment and Justice, Rhode Island Legal Services, and other non-governmental organizations. Additionally, some states, such as California and New Jersey, already have comprehensive school site selection procedures in place.

So let me assure you that we are learning from this body of work and it is playing an important role in our internal discussions. To help ensure that we take full advantage of the extensive knowledge others already have, we will be setting up meetings with stakeholders in the coming weeks to have focused discussions on the school siting issues. I am confident that you will see many of the lessons learned from the past represented in the draft guidelines.

School siting is fundamentally a local land use decision, and I want to be clear from the outset that EPA will work in support of local or state authorities as they weigh the many important factors that must be considered in their school siting decisions.

Of equal importance, however, is EPA's recognition that the guidelines present a unique opportunity for EPA and other Federal agencies to make recommendations that will help communities, states, and tribes think about school site selection in a more comprehensive way that focuses on environmental health issues as a central part of the school site selection process.

Cost will of course always remain a major determinant in siting decisions. However, school siting decisions present opportunities for integrating many community goals, including:

- providing a safe and healthy learning environment for children;

- creating green, high performance schools that take advantage of the latest technology and integrated design principles to produce healthy and exceptional learning environments while at the same time saving energy, resources and money;
- integrating smart growth principles to create sustainable neighborhoods and build schools that promote walking and biking, reduce driving and air pollution, and are part of a community's fabric;
- addressing disparities among socio-economic groups.

Of course, we understand that of interest to many of you here today is what EPA will say about siting schools on or near sites that have been contaminated with environmental pollutants or that are close to sources of potential contamination of air, water, or soil.

In many areas, there is very limited land available for schools, particularly when considering other important school location criteria such as proximity to students, transportation, existing infrastructure, and other community resources.

Consequently, in most urban communities, it is possible that a prospective parcel of land being considered as a school site will have been used for other purposes in the past, and some of these uses may have left residual contaminants. In addition, potential school sites in urban, suburban or rural areas may be located near potential sources of air, water or land contamination.

These kinds of sites raise extremely difficult issues. Cleaning up contaminated sites and returning them to beneficial re-use is at the heart of several national site cleanup programs. In some cases cleanup actions will leave a site in a condition that supports unrestricted uses such as schools. In other cases, particularly if contamination remains, restrictions are placed on the site regarding how it may safely be used in the future.

At the same time, we are aware that when it comes to schools and other places where children spend much of their time, an abundance of caution is called for.

These issues are at the heart of some intensive conversations yet to come, and which we want and need the stakeholder community to be a part of.

What I can tell you with certainty is that the guidelines will emphasize the importance of conducting a timely, thorough, and transparent assessment of the potential risks of candidate sites, and the importance of involving the community throughout the process.

By timely, I mean, for example, building time into the site evaluation process to allow for the environmental and safety assessment to be completed before a commitment to a site is made;

By thorough, I mean a site evaluation that broadly looks for all potential health and safety risks associated with the site and considers those risks along with other criteria and factors;

By transparent, I mean a process that is designed to instill community confidence in the site selection, and community support for the end result.

EPA is a strong proponent of inviting stakeholders into the process, whether at the local level, or in development of our own guidelines and policies, because stakeholder involvement results in a better product.

The statutory language directs EPA to consult with the Department of Education and the Department of Health and Human Services, and EPA has already begun discussions with them to involve them in the guideline development process.

I also expect EPA's Children's Health Protection Advisory Committee to play an important role in development of the guidelines. I will work with Agency staff to identify current advisory committee members as well as individuals from other stakeholder organizations with experience and expertise on siting issues to identify a process whereby interested stakeholders can contribute to the development of the guidelines. Based on this input, the Advisory Committee will be able to provide balanced, expert advice to the Administrator, and enable EPA to move forward on this important issue.

EPA expects to have an initial draft of the guidelines available for public review and comment this summer, and intends to widely publicize the

availability of the draft to ensure that a broad spectrum of input is received. Let me assure you that when the draft is released, it will represent only a starting point for discussion and not EPA's final position with respect to these issues.

Before I close, I want to make one more important point. While we have been focusing today on the siting of new school facilities, it is critically important that we all remember that there are approximately 120,000 existing public, private, tribal, charter and Department of Defense schools in the United States, and there are many other potential environmental risks to students and staff that require our attention and vigilance. These risks include indoor air pollution, exposure to pesticides, diesel exhaust from idling school buses, nearby air pollution sources and hazards from old chemicals left in school laboratories.

Bringing all of these existing schools into good condition has been and remains a priority for EPA, and I strongly encourage you to engage in the many programs available to reduce children's exposure to environmental hazards in our existing schools.

Let me say in closing that our goal is clear, and one I believe we all share: better outcomes for kids, and better outcomes for communities.

Thank you again for inviting me to this forum. I look forward to the discussion to follow.