



Lead-Free NJ Comments on Docket ID no. EPA-HQ-OLEM-2024-0374 National Priorities List for Historic Potteries - Trenton

Lead-Free NJ supports the proposal to list the Historic Potteries site in East Trenton on the National Priorities List. Docket ID no. EPA-HQ-OLEM-2024-0374.

Lead-Free NJ is grateful to the East Trenton Collaborative, Lead-Free NJ Trenton Community Hub, the City of Trenton, the New Jersey Department of Environmental Protection (NJDEP), and the Environmental Protection Agency (EPA) for their joint efforts to investigate lead in soil contamination in Trenton and pursue funding and remediation to address this pervasive legacy environmental justice issue. Lead-Free NJ is grateful to the residents of the East Trenton neighborhood who participated in soil testing to inform this listing, joined community meetings to provide input and ask questions, and shared information regarding the identified contamination, lead exposure prevention and remediation efforts with their neighbors and community stakeholders.

Lead-Free NJ supports the proposal because:

- **Trenton residents face a disproportionate exposure to lead.**
 - The New Jersey Department of Health reported¹ that for state fiscal year 2022 (the most recent data publicly available), among large municipalities, **Trenton had the highest percentage of children with elevated blood lead levels at 6.1%**. The report also notes that only 35% of children were screened, indicating that the exposure may be even higher.
 - Furthermore, data from the EPA Environmental Justice Screen² indicates that Trenton is in the 90th percentile for EJ Index lead paint (**a greater share of homes that are likely to have lead paint**) due to the age of housing stock.
 - According to the water utility Trenton Water Works³, **thousands of lead service lines**, the greatest contributor to lead exposure in drinking water, are found in Trenton.
 - According to the Trenton Department of Health, **other sources of lead exposure** can include cookware, food, and even toys.
- **Lead is a toxin, unsafe at any level, and exposure is cumulative.** This is documented by the US Centers for Disease Control and Prevention (CDC)⁴ and the Agency for Toxic Substances and

¹ Childhood Lead Exposure in New Jersey Annual Report State Fiscal Year 2022:

<https://www.nj.gov/health/childhood-lead/documents/childhood-lead-2022-annual-report.pdf>

² EJScreen: Environmental Justice Screening and Mapping Tool: <https://www.epa.gov/ejscreen>

³ Trenton Water Works Lead Program: <https://www.twwleadprogram.com/>

⁴ About Childhood Lead Poisoning Prevention: <https://www.cdc.gov/lead-prevention/about/index.html>

Disease Registry⁵. Because exposure can occur often and from multiple sources, we must use every resource available to eliminate any source of lead exposure.

- **Lead exposure in Trenton is an environmental, racial, and economic injustice** disproportionately impacting a predominantly Black and Brown and low-income community. In Trenton, 45% of residents are Hispanic and 42.2% are Black⁶. The median household income in Trenton is \$49,117, less than half of the NJ state median income of \$99,781⁷.

Lead-Free NJ requests that EPA consider the following in its plan:

- **Center equity, environmental, racial, and economic justice by facilitating community input.** Assistance in setting up a [Superfund Community Advisory Group \(CAG\)](#) and [technical assistance](#) in the form of the Technical Assistance Services for Communities (TASC) Program or a Technical Assistance Grant (TAG) Program. Ensure a plan is in place to provide assistance, education, and resources to minimize any possible displacement effects and maximize stability and community involvement through the community advisory group.
- Prioritize **proposal adoption, funding, and planning to occur as fast as possible**, recognizing the urgency of reducing lead exposure in an overburdened, environmental justice community that is inequitably impacted by the environmental hazard of lead.
- Plan to **address community concerns about access to blood lead level testing including for adults**. As residents learn about potential lead exposure through soil, they should have access to resources to take care of their individual health, including blood lead level testing for all residents. The EPA should collaborate with decision-makers who can influence this need including the CDC, state and local health departments, healthcare providers, and insurance providers.
- Plan to **address community concerns about actionable items to help people protect their individual health** if they learn that they have been exposed to lead, like increasing access to nutritional foods high in calcium and iron. The EPA should collaborate with decision-makers who can influence this need including the school district, state and local government, and local social service providers.
- Prioritize funding that supports **soil remediation for the whole East Trenton neighborhood**, regardless of individual results, to avoid the potential of cross-contamination.
- Plan to **address outdoor and indoor lead paint hazards in addition to soil hazards** to ensure that the clean up is truly long term. If outdoor lead paint is present and contaminates soil that has been remediated for lead hazards, then the hazard will reoccur. Indoor lead paint hazards if left intact, will also continue to be a source of exposure. The EPA should provide this remediation, or closely collaborate with partners who can.
- Plan to **hire local residents for the long-term removal plan and** provide the necessary training to ensure that local residents are qualified to be hired for these jobs. We request consideration through EPA's [Superfund Job Training Initiative](#) (SuperJTI), a job readiness program that provides

⁵ Toxicological Profile for Lead: <https://www.atsdr.cdc.gov/toxprofiles/tp13.pdf>

⁶ US 2020 Census

⁷ American Community Survey 1-year estimates

training and employment opportunities for people living in communities affected by Superfund sites.

Lead-Free NJ is a statewide collaborative that unites community organizations, grassroots groups, community members, and decision-makers with policy-oriented organizations to effect change at the local and state levels. We envision neighbors, friends, families, faith leaders, professionals, and elected officials working together to eliminate lead exposure in New Jersey.

Sincerely,

Sheryl Snider, Lead-Free NJ Community Hub Leader in Trenton

Debbie Mans, Lead-Free NJ Steering Committee Co-Chair

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