

# NCHR Letter Concerning Lead in DC Public School Playground

National Center for Health Research: May 2, 2019

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Dear Mr. Kihn and Dr. Ferebee:

I am writing on behalf of the National Center for Health Research (NCHR) to express strong concerns about the report released today that demonstrates high levels of lead in the rubber shred from the playground at Janney Elementary School in Northwest.

NCHR is a nonprofit think tank that conducts, analyzes, and scrutinizes research, policies, and programs on a range of issues related to health and safety. We do not accept funding from companies that make products that are the subject of our work.

The new report, which used independent professional laboratories to evaluate the components that are visible in breaks in the playground at Janney, found that 8 of the 34 samples (24%) had levels of lead that were over 1,951 ppm. The highest level of lead found was over 59,000 ppm. We can compare this to EPA's standard for lead in soil in a playground, which is 400 ppm and the Consumer Product Safety Commission's standard for lead in consumer products intended for children is 100 ppm in all accessible parts.

At Janney, the average lead for all samples, including the samples with low levels of lead, was 2,417 ppm, which is more than 7 to 19 times the EPA and CPSC standards, respectively.

These very high levels are of great concern because children are being exposed in 3 ways:

1. When they play on the playground, breathing in the lead dust;

2. When their skin or clothes come in contact with the rubber shred that is now on the surface rather than below the “poured in place” surface; and
3. When they put pieces of shred, some of which are pretty colors, in their mouths.

Studies have shown that swallowed rubber shred that can apparently be digested and thereby expose the child to the lead.

These results were so frightening, that I included them in my testimony before the U.S. Consumer Product Safety Commission at their annual meeting yesterday.

Experts agree that there is no safe level of lead exposure. Children exposed to even low levels of lead can be harmed, including attention-related behavior problems and poorer cognitive abilities. It can also delay puberty, reduce growth, and may affect kidney function. Exposure as a child can lead to lifelong health effects.

We understand that the school system and government of the District of Columbia have many urgent issues, but since the dangers of lead are so well understood, surely lead in the playground requires your immediate attention.

Sincerely,

Diana Zuckerman, PhD  
President

## References

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3. Consumer Product Safety Commission. Total lead content business guidance & small entity compliance guide. <https://www.cpsc.gov/Business–Manufacturing/Business-Education/Lead/Total-Lead-Content-Business-Guidance-and-Small-Entity-Compliance-Guide>