

ALA American Library Association

January 31, 2021

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
via Regulations.gov

Re: Strategy to Reduce Lead Exposures and Disparities in U.S. Communities
86 FR 59711, Docket ID No. EPA-HQ-OLEM-2021-0762

Dear Administrator Regan,

The American Library Association (ALA) respectfully submits these comments in response to the Environmental Protection Agency's (EPA) request for comments on its draft *Strategy to Reduce Lead Exposures and Disparities in U.S. Communities*.

ALA urges EPA to implement strategies to reduce potential lead exposures for library users and workers.¹ Additionally, ALA encourages EPA to consider libraries as potential partners in public outreach and education about lead hazards and assistance.

Americans, including vulnerable populations such as young children and pregnant people, come to America's 120,000 public, school, academic, and special libraries² billions of times annually. For instance, Americans visit public libraries 1.2 billion times each year, including 81 million attendees at children's programs.³ In addition, libraries employ more than 360,000 workers.⁴

EPA's draft strategy recognizes that older buildings are more likely to include potential sources of lead exposure from lead-based paint or plumbing. Many library buildings date from these age periods. For instance, the average public library building is more than 40 years old, including hundreds of buildings that are more than 100 years old. While potential sources have likely already been abated in many libraries, the availability of funding and assistance from EPA can ensure abatement as appropriate in all potentially-affected buildings.

Lead-based paint and libraries

Some libraries have been affected by lead-based paint and needed to undertake costly remediation efforts and close temporarily or permanently. For example, the North Park branch of the Buffalo & Erie County (NY) Public Libraries, built in 1928, permanently closed in 2008 due to elevated levels of lead dust in the library's building and soil resulting from lead-based paint.⁵ The Milton H. Latter Memorial Library branch of the New Orleans (LA) Public Library, built in 1907, underwent lead paint remediation that required the library to close for a month in 2013.⁶

Similarly, the Orange (NJ) Public Library, built in 1901, was closed for two months in 2010 to remediate lead paint at a cost of \$43,000.⁷

Drinking water and libraries

In addition, some libraries have been affected by lead in drinking water. In 2016, the District of Columbia Public Library found seven drinking fountains and taps that exceeded the EPA's maximum lead contamination level in the Martin Luther King Jr. Memorial Library, built in 1972; the Lamond-Riggs branch library, built in 1983; the Southwest branch library, built in 1965; and the Georgetown branch library, built in 1935. The library took the affected outlets out of service and remediated them.⁸ In 2014, after the city of Flint, MI, changed water sources without appropriate precautions, the Flint Public Library noticed concerns with the library's water and switched to bottled water months before EPA detected dangerous levels of lead in Flint's tap water.⁹

Lead education and libraries

Finally, some libraries have delivered public outreach and education activities to inform the public about lead hazards and assistance. In 2021, the Indianapolis (IN) Public Library became a distribution point for free lead screening kits.¹⁰ Also in 2021, the Wyomissing (PA) Public Library presented an educational program about the hazards of lead-based paint.¹¹

Conclusion

ALA encourages EPA to consider libraries in its lead abatement and outreach efforts, as part of overall policies to promote safe, healthy, and sustainable environments for library workers and users. If we can provide more information, please contact Gavin Baker (gbaker@alawash.org).

Sincerely,



Kathi Kromer
Associate Executive Director, Public Policy and Advocacy
American Library Association

The American Library Association ("ALA") is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. For more than 140 years, the ALA has been the trusted voice for academic, public, school, government and special libraries, advocating for the profession and the library's role in enhancing learning and ensuring access to information for all.

Endnotes

¹ ALA has supported these efforts in Congress, for instance, by endorsing H.R. 3423, the Safe Drinking Water in Public Playgrounds, Parks, and Libraries Act (117th Cong.).

² <https://libguides.ala.org/numberoflibraries>

³ <https://www.ims.gov/sites/default/files/2021-08/fy19-pls-results.pdf>

⁴ <https://www.ala.org/tools/libfactsheets/alalibraryfactsheet02>

⁵ <https://www.buffalolib.org/locations-hours/north-park-branch>;
<https://www.buffalolib.org/sites/default/files/users/npk/files/Full%20North%20Park%20Library%20Building%20Evaluation%20Report.pdf>; https://buffalonews.com/news/local/former-north-park-branch-library-to-become-italian-american-cultural-center/article_b0e84906-f730-5c7e-a7d4-05be84a118c1.html

⁶ <https://uptownmessenger.com/2013/07/latter-library-to-close-for-90-days-for-lead-remediation-final-renovations/>

⁷ https://www.nj.com/news/local/2010/08/orange_library_reopen_after_1e.html

⁸ https://www.washingtonpost.com/local/dc-politics/dc-revises-lead-contamination-rules-after-libraries-tested-above-federal-guidelines/2016/06/22/c4b22d3c-3895-11e6-9ccd-d6005beac8b3_story.html

⁹ <http://listserv.occlists.org/scripts/wa.exe?A2=PUBLIB;7bdf903.1601&S=>

¹⁰ <https://www.wibc.com/news/local-indiana/lead-screening-kits-offered-at-13-indianapolis-public-libraries/>

¹¹ http://www.wyopublib.org/adults_leadpaint.shtml