

Via Electronic Mail

January 4, 2021

Kevin Cranston, MA DPH Assistant Commissioner
Dr. Larry Madoff, MA DPH Medical Director
Massachusetts Department of Public Health
250 Washington Street
Boston, MA 02108

Re: *Urging appropriate priority for LSPs, as essential workers, to receive COVID-19 vaccines*

Dear Assistant Commissioner Cranston and Dr. Madoff:

The LSP Association (LSPA) is the non-profit association of Licensed Site Professionals (LSPs) and related practitioners. LSPs are the scientists, engineers, and public health specialists licensed by the Commonwealth to work on behalf of property owners, tenants, and other involved parties to oversee the assessment and cleanup of oil and hazardous materials released to the environment. In the 25+ years since the inception of this Massachusetts-specific, innovative, semi-privatized program, LSPs have helped clean up over 40,000 waste sites statewide so they are available for productive re-use.

LSPs (also called hazardous waste site cleanup professionals) were created under the amended version of MGL c.21E passed in 1992, and their work is conducted in compliance with the public health and environmental safety regulations of the Massachusetts Contingency Plan, also called the MCP (310 CMR 40.000). LSPs are licensed by the Board of Registration of Hazardous Waste Site Cleanup Professionals in compliance with 309 CMR.

On March 23, 2020, the Baker-Polito Administration issued a list of “Covid-19 Essential Services” that designated essential services and workforces necessary to continue to operate during the Covid-19 emergency. The seventh bullet under “Public Works” refers to “Licensed site clean-up professionals and other workers addressing hazardous spills, waste sites, and remediation.”

Since then, LSPs and related practitioners have continued to carry out their work to ensure public health, safety, and environmental protection. This involves a variety of typical work situations, including but not limited to, where LSPs and related practitioners must:

- Collect indoor air and oil samples at residences with home heating oil spills;
- Assess for the presence of Per- and Polyfluoroalkyl Substances (PFAS) in public and private water supplies;
- Collect indoor air and water samples at commercial buildings and industrial facilities where contamination is suspected or present;
- Work alongside first responders such as Fire and Police at roadside spills or industrial fires; and
- Investigate, assess, and, if necessary, remediate the release of oil and hazardous materials into the air, surface water, and groundwaters of the Commonwealth.

For the reasons set forth above, the LSPA strongly urges the Massachusetts COVID-19 Vaccine Advisory Group to consider appropriate Covid-19 vaccine priority for LSPs and other workers who address spills of oil and hazardous materials, and conduct waste site assessment and remediation. These professionals should be prioritized in Phase 2 of the Commonwealth's vaccine distribution timeline, as they are no less essential to public health and safety than sanitation, public works and public health workers, or water and wastewater utility staff.

Thank you for your consideration of our views. Please don't hesitate to contact us for further information.

Respectfully,

THE LSP ASSOCIATION, INC.



Michele Paul, LSP, President



Wendy Rundle, Executive Director

Cc: Kathleen A. Theoharides, Secretary, EOE&EA
Martin Suuberg, Commissioner, MassDEP