CHILDREN'S ENVIRONMENTAL HEALTH & PROTECTION ADVISORY COUNCIL

July 8, 2025

Dr. Thomas Taylor
Superintendent, Montgomery Public Schools
Thomas_W_Taylor@mcpsmd.org

RE: School Construction and Student Health

Dear Dr. Taylor:

The Maryland Children's Environmental Health & Protection Advisory Council (CEHPAC) respectfully submits this letter requesting your prompt action to protect children from hazards associated with construction.

Established by the Maryland General Assembly pursuant to Health-General §§13-1501—1506, CEHPAC's goal is to enable children in Maryland to grow up in a safe and healthy environment. Our duties include:

- Review and comment on existing rules, regulations, and standards to ensure that they adequately protect the health of children from environmental hazards by considering the special vulnerability of children, which arises because of their developing physiology and because their exposures can differ greatly from those of adults;
- Recommend uniform guidelines for State agencies to follow to help reduce and eliminate children's exposure to environmental hazards;
- Educate others regarding the environmental hazards that impact children's health and the means to avoid those hazards; and
- Provide any other relevant information that will assist in protecting children's health.

The Council has heard that students at a high school in your district have experienced symptoms typical of exposure to poor air quality, harmful fumes, and chemicals. The source of these environmental exposures appeared to be ongoing school construction.

We support the statements made by the Mid-Atlantic Center for Children's Health and the Environment (MACCHE) in the attached correspondence. CEHPAC agrees with MACCHE's recommendation to "consider an alternate schedule for school construction that does not include when school is in session," and supports the implementation of such an approach for schools currently undergoing construction, as well as for future multi-year projects. Planning and executing school construction projects with children's health at the forefront is essential to preventing the risk of both acute and chronic health problems in Maryland children.

As MACCHE pointed out, children are not little adults, and following OSHA laws does not guarantee they will be protected.

Sincerely,

Megan Weil Latshaw, PhD MHS
Commission Member

Attachments

cc: Meena Seshamani, MD, PH.D, Secretary, Maryland Department of Health
Serena McIlwain, Secretary, Maryland Department of the Environment
Dr. Carey M. Wright, Maryland State Superintendent of Schools
Dr. Joshua L. Michael, President, State Board of Education
Dr. Kisha Davis, Health Officer, Montgomery County

December 20, 2024

Dr. Thomas Taylor
Superintendent, Montgomery Public Schools

Dear Dr. Taylor,

I am writing as a children's environmental expert who has had several contacts by a parent of children attending Poolesville High School in Poolesville, Maryland. The children have had repeated exposures that have caused health problems. Poolesville High School is part of the Montgomery County Public Schools System, and the school has been under construction for expansion and renovation of the school since the fall of 2021. During this time the students have attended school while construction continues in and around the building.

It is important to note that the U.S. Environmental Protection Agency's document, "Sensible Guide for Healthier School Renovations: Key Environmental Health Considerations When Renovating Schools" was published in 2016 during the planning phases of the school's construction.[1] In this document it states, "It is a best management practice to conduct construction activities outside of the school year whenever possible to reduce impacts to students and staff.[1]" The school is not occupied for 3 months during the summer, weekends, and other school holidays. For the schools' graduating class of 2025 they have been exposed to a variety of toxicants for the past four years of their Poolesville High School education.

Children, including adolescents (age 13-18 years old), are more vulnerable than adults to environmental exposures because their bodies are still developing. Children's central nervous, immune, reproductive, respiratory, and digestive systems continue to develop through 18 years old.[2]

When considering environmental exposures, it is important to remember that the students at Poolesville High School have not yet physically developed effective mechanisms to detoxify hazardous environmental exposures that have been noted to occur during the construction at the school. While some Safety Data Sheets (SDS) report the materials are not hazardous, these findings have been determined by animal testing (such as mice and rats) or on adults, not high school students. Exposure to children can lead to irreversible damage that can last a lifetime.[2]

Additionally, the Occupational Safety and Health Administration (OSHA) data that is used to determine safely and working protections are for adult workers and the children within the school are not given the personal protective equipment required by OSHA that the construction worker use.

There have been reports of children experiencing headaches, burning eyes, nausea, and difficulty breathing from the odors in the wings of the school that were under construction. When the children are removed from the school setting, the symptoms are reduced or disappear completely. These are typical symptoms of poor air quality from environmental exposure. This not only interferes with children's learning, but as stated, children's bodies are continuing to develop, and these exposures are not supporting a healthy learning environment of future for the children. Additionally, these are warning signs that the students are not in a healthy environment. Prolonged exposure could lead to serious health problems that may not be evident until several years later.

In many communities in our region (EPA Region 3: Pennsylvania, Maryland, Delaware, Virgina, West Virginia, and the District of Columbia) school renovation or rebuilding older schools the students have been moved to another facility, or the new school is built adjacent to the older school reducing the risk of environmental exposures in the building where students are learning. Then, students are not subjected to the environmental exposures while trying to learn within a construction site.

When it comes to environmental exposures it can be challenging to precisely determine the amount of exposure outside a controlled laboratory setting. But we understand enough about childhood development and the chemicals used to state that this is not a safe situation. To be clear; it is not possible to accurately state that there is no health risk to the children. Although others may say there is no health risk to children, that is not true. There is no data to support this statement; because all testing has been done on animals and adults, not children.

Finally, our youth trust that the adult decision-makers will provide a safe learning environment. Please consider an alternate schedule for school construction that does not include when school is in session.

Sincerely,

Ruth McDermott-Levy, PhD, MPH, RN, FAAN
Professor and Co-director, Mid-Atlantic Center for Children's Health and the Environment
(Pediatric Environmental Health Specialty Unit, Region 3)
1-833-362-2243
macche@villanova.edu
Villanova University M. Louise Fitzpatrick College of Nursing
800 E. Lancaster Avenue
Villanova, PA 19085

833-362-2243 (toll free)
macche@villanova.edu

1. U.S. Environmental Protection Agency. Sensible Guide for Healthier School Renovations: Key Environmental Health Considerations When Renovating Schools, 2016. https://www.epa.gov/sites/default/files/2016-01/documents/schools_renov_brochure-8_5x11_final.pdf

2. American Academy of Pediatrics. Council on Environmental Health. Background: Addressing Environmental Health in Primary Care. In: Etzel RA, ed. Pediatric Environmental Health, 4th Edition; Itasca, IL: American Academy of Pediatrics; 2019, 17-31.

Information about Dr. Ruth McDermott-Levy, PhD, MPH, RN, FAAN and the Mid-Atlantic Center for Children's Health and the Environment (MACCHE)

Dr. Ruth McDermott-Levy, PhD, MPH, RN, FAAN is co-director of the Mid-Atlantic Center for Children's Health and the Environment at Villanova University, M. Fitzpatrick College of Nursing. She has practiced in the field of nursing over 40 years with 25 years in environmental public health.

MACCHE is one of 10 pediatric environmental health specialty units in the United States. We serve the District of Columbia, Maryland, Virginia, Delaware, West Virginia, and Pennsylvania. We provide education and consultation about environmental health issues affecting children. We are funded by the Agency for Toxic Substances and Disease Registry (ATSDR), a part of the US Centers for Disease Control & Prevention (CDC), and by the US Environmental Protection Agency (EPA). The recommendations that we make are our own and do not represent the policy of ATSDR or EPA.

cc Montgonery County Board of Education

Adnan Mamoon, Deputy Director, Facilities Management