

# 1 One in four US Households likely in violation of new US soil lead standard

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3 Filippelli, Gabriel M.<sup>1</sup>, Dietrich, Matthew<sup>2</sup>, Shukle, John<sup>3</sup>, Wood, Leah<sup>1</sup>, Margenot, Andrew<sup>4</sup>,  
4 Egendorf, S. Perl<sup>5</sup>, Mielke, Howard W.<sup>6</sup>

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6 <sup>1</sup> Department of Earth and Environmental Sciences, Indiana University, Indianapolis, Indiana,  
7 USA (gfilippe@iu.edu)

8 <sup>2</sup> Independent Researcher ([dietrimj17@gmail.com](mailto:dietrimj17@gmail.com))

9 <sup>3</sup> ZevRoss Spatial Analysis, 209 N. Aurora St, Ithaca, New York, USA

10 <sup>4</sup> Department of Crop Sciences, University of Illinois Urbana-Champaign, Urbana, Illinois, USA

11 <sup>5</sup> Department of Environmental Studies and Science, Pace University, New York, NY, USA

12 (pegendorf@pace.edu)

13 <sup>6</sup> Affiliated, Tulane University School of Medicine, New Orleans, LA, USA

## 14 15 16 **Abstract**

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18 Lead exposure has blighted communities across the United States (and the globe), with much of  
19 the burden resting on lower income and communities of color. On January 17, 2024, the US  
20 Environmental Protection Agency (USEPA) has, after more than 30 years, lowered the allowable  
21 level of lead in residential soils. Our analysis of tens of thousands of citizen-science collected  
22 soil samples from cities and communities around the US reveals the scale of the soil lead  
23 problem, and the challenge that the USEPA will face in implementing its new soil standard.  
24 Under this standard, we find that nearly one quarter of households may contain a soil lead  
25 hazard. Extrapolating across the nation, that equates to nearly 30 million households needing to  
26 mitigate potential soil lead hazards, at a potential total cost of 290 billion to - \$1.2 trillion. We do  
27 not think this type of mitigation is feasible at the massive scale required and we have instead  
28 focused on a more immediate, far cheaper strategy: capping current soils with clean soils and/or  
29 mulch. At a fraction of the cost and labor of disruptive conventional soil mitigation, it yields  
30 immediate and potentially life-changing benefits for those living in these environments.

## 31 32 **Keywords**

33 Lead, soil, contamination, lead poisoning, USEPA

## 34 35 **Synopsis**

36 The USEPA recently reduced its soil lead standard. We find that nearly one in four households  
37 may now contain a soil lead hazard, challenging the current expensive approach to mitigation.

## 38 39 **Introduction**

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41 Lead exposure has blighted communities across the United States, with much of the burden  
42 resting on lower income and communities of color. The reasons behind this disproportionate  
43 exposure are myriad, including Redlining and other societal shifts during the 20th century, but  
44 the results are manifest in lower educational outcomes and lower economic potential for exposed  
45 communities. Despite immense current federal efforts to “get the lead out,” our national lead  
46 problem is nowhere near over.

47  
48 With the Clean Air and Clean Water Acts, US policy began severely limiting the production and  
49 use of lead in infrastructure and consumer products, including water pipes, paint, and gasoline  
50 that have been historical sources of lead entry into the environment. The results have been  
51 stunningly successful and quite positive overall—with a decline in the percentage of children  
52 affected by lead (by modern standards) from nearly 100% of the population in the 1970s to about  
53 1% today. However, these improvements in health outcomes are not shared equally, and many  
54 urban children are still exposed to lead at unsafe levels. Notably, this continuing toxic exposure  
55 does not primarily come from the pipes, paint, and gasoline targeted by the Clean Air and Water  
56 Acts. Degradation of aging lead-based paint on pre-1980s housing, and past deposition from  
57 leaded gasoline and industrial emissions, means that urban lead is now in the soils and dust upon  
58 which neighborhoods are built, children play, and food is grown. In other words, our modern  
59 lead problem is a legacy of historical contamination: the lead is still largely “out there” and  
60 posing continued risks to communities.

61  
62 In recognition of this continued exposure from soil, and the dust generated from those  
63 contaminated soils (e.g., Laidlaw et al., 2012), on January 17, 2024, the US Environmental  
64 Protection Agency (USEPA) has, after more than 30 years, lowered the allowable level of lead in  
65 residential soils. The original allowable level, below 400 parts per million (ppm, or mg/kg) of  
66 lead in soil, was based on the science of the time, linking contaminated soils to average blood  
67 lead levels of children living in these locations. While the Centers for Disease Control and  
68 Prevention has continuously ratcheted down the blood lead standard for children’s health, from  
69 10 micrograms per deciliter in the 1990s to the current 3.5 micrograms per deciliter health safety  
70 standard, the soil standard has remained unchanged, until now. In recognition of this public  
71 health prevention mismatch, several states, including California and Minnesota, instituted lower  
72 more protective soil lead standards. Why then has the USEPA soil lead standard lagged behind?  
73 We propose that it is simply the immensity and ubiquity of the problem.

## 74 75 **Results and Discussion**

76  
77 Our analyses of tens of thousands of citizen-science collected soil samples from cities and  
78 communities around the US (MapMyEnvironment, 2024) and supplemented by similar sample  
79 sets from colleagues around the country reveal the scale of the soil lead problem. These samples  
80 don’t come from Superfund clean-up sites, but rather from the soil around real residential  
81 properties nationwide that people live in a call home.

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83 The new USEPA soil screening level has been set at 200 ppm for residential properties. At  
84 residential properties with multiple sources of lead exposure, the USEPA will generally use 100  
85 ppm as the screening level. This is heading closer to the standard adopted by California (80 ppm)  
86 and those of many other countries. The change is welcomed by environmental health  
87 professionals around the country, as it reflects our knowledge of today’s major lead exposure  
88 sources being largely soil-based. But our analysis of the on-the-ground reality suggests why it  
89 has taken the USEPA awhile to lower this protective standard—namely, once the threshold for  
90 lead in soils is lowered, the agency needs to consider providing guidance and resources to every  
91 household whose soils exceed the new threshold. The scale is astounding, and the nation’s lead  
92 remediation efforts just became substantially more complicated.

93  
94 Our nationwide analysis of our citizen science database of 15,595 residential soil samples reveals  
95 that in the US, just over 12% of residentially collected soils (including from yards, gardens,  
96 driplines, alleys, etc.) exceed the previous standard of 400 ppm (Table 1; Fig. 1). This alone is a  
97 startling finding, but when the standard is decreased to the new 200 ppm screening level, nearly  
98 one quarter of households contain a lead hazard. Extrapolating across the nation, that equates to  
99 roughly 29 million households (out of 123.6 million total based on the 2020 census) needing to  
100 mitigate potential soil lead hazards. As that level drops to the screening level of 100 ppm for  
101 residences with multiple lead exposure sources, which just over 40% of household soil samples  
102 exceed, the number goes up to nearly 50 million households.

103  
104 The integrated dataset upon which these analyses were conducted does include some differences  
105 in sampling protocols, sampling dates, and sampling dates for various municipalities. For  
106 example, the cities of Chicago, Indianapolis, and New Orleans utilized similar citizen-science  
107 approaches for collecting large numbers of samples that represent community-scale lead  
108 distribution, which we feel is highly representative of household exposure potential. One  
109 outcome of this approach is that these municipalities have a much higher percentage of  
110 household soils that have high lead values, including Chicago with 53% of household soils above  
111 the new 200 ppm standard (Table 1). Meanwhile, other municipalities have soil samples that are  
112 either collected by researchers to identify hotspots and backgrounds (i.e., South Bend) or were  
113 specifically focused on urban background locations (Table 1). Samples were collected at various  
114 times over the past 15 years, and lead concentrations might have changed due to land use  
115 practices, disturbance, and/or new additions of lead (e.g., from deteriorating lead-based paints). It  
116 is thus difficult to fully assess city-specific soil lead burdens, both because of the limitations of  
117 the citizen science dataset upon which this analysis is based (i.e., uneven sampling throughout a  
118 city) and because there is no other systematic, comprehensive measurement of residential soil  
119 lead values across the US.

120  
121 Our citizen science initiatives are intended to empower people with knowledge about lead  
122 exposure risks at their homes and in their neighborhoods. While these initiatives have provided  
123 us with far more data points than we could have collected ourselves, the voluntary nature of  
124 citizen science means that the distribution of data points is not homogenous. In metro areas with  
125 high levels of participation (New Orleans, LA; South Bend, IN; Indianapolis, IN; Chicago, IL),  
126 we can be more confident in our assessment of the overall soil lead burden than in metros where  
127 data is scarce. Likewise, our extrapolations of the numbers across the US are subject to the  
128 limitations of the dataset and should therefore be considered preliminary. We anticipate that the  
129 new USEPA soil lead screening level of 200 ppm will raise awareness of the ongoing lead  
130 problem and increase participation in our citizen science initiatives. This, in turn, will grow our  
131 dataset and improve projections. In the meantime, these preliminary results are nevertheless  
132 illustrative of the massive scale of the task ahead in light of the new USEPA soil standard.

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134 These results indicate that soil lead in residential neighborhoods can be an issue, and we don't  
135 really know which particular households, besides older homes being a general risk factor (e.g.,  
136 Dietrich et al., 2023a), have the greatest risk potential. This is due both to the paucity of publicly  
137 available data for lead and to the very small spatial scale at which lead hotspots occur—even  
138 within a household itself (Dietrich et al., 2023b). Thus, the real cost of mitigating this soil lead

139 problem is unknown. At a typical per household rate of \$10,000 - \$30,000 for a soil lead  
140 remediation (which involves removal of contaminated soil and replacement with clean soil; e.g.,  
141 Abreu Environmental, 2024), the projected price tag for mitigating all households in the country  
142 estimated to have soil above the new USEPA standard is a staggering \$290 billion to - \$1.2  
143 trillion. Additionally, removing and bringing in soil mined from other places for so many millions  
144 of households seems infeasible, economics aside. Lastly, soil remediation is extremely  
145 disruptive, and if done poorly, can scatter lead contaminated soils and dust to adjacent  
146 properties and homes.

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148 We do not think this type of mitigation is feasible at the massive scale required and we have  
149 instead focused on a more immediate, far cheaper strategy: capping current soils with clean soils  
150 and/or mulch. At a fraction of the cost and labor of disruptive conventional soil mitigation, this  
151 approach has long been advocated by one of us (Mielke) and, although imperfect, it yields  
152 immediate and potentially life-changing benefits for those living in these environments.

153  
154 Covering contaminated soils rather than removing them is not a permanent solution, since the  
155 clean soil or mulch can be disturbed, exposing the lead-contaminated soil underneath. However,  
156 even the act of covering polluted soil with clean soils will permanently dilute the lead  
157 concentration of the total soil profile if soil perturbation occurs. Given that nearly all the  
158 anthropogenic lead is captured in the upper 10 inches of soils (e.g., Filippelli and Laidlaw, 2010)  
159 adding another 10 inches of clean soil (i.e., geogenic or naturally occurring lead levels of 18-22  
160 ppm) on top will cut the total soil lead concentration by half. Here, the adage rings true: the  
161 solution to pollution is dilution. This simple, affordable, scalable approach provides immediate  
162 results, making it a powerful solution in this new phase of our ongoing mission to “get the lead  
163 out.”

164  
165 While the general idea of capping lead polluted soils with uncontaminated soil is viable, there are  
166 locations where readily available uncontaminated soil is more difficult to come by than other  
167 areas. Thus, while effective and cheaper than entire lead remediation efforts of both soil removal  
168 and capping, a concerted effort does have to be made on a case-by-case basis as to the most  
169 effective means for bringing in uncontaminated capping material. In some areas, such as the  
170 Mississippi River Delta, where fresh, uncontaminated alluvium is readily available, that may be a  
171 cheap and accessible capping material. Other locations, such as New York City (NYC Office of  
172 Environmental Remediation, 2024), have invested in urban soil banks which also have the  
173 potential to mitigate soil lead exposure (Egendorf et al., 2018). However, in other areas, such as  
174 arid mining towns in the western US, other capping material like biochar, mulch, or crushed  
175 limestone may be cheaper and more readily available. Regardless of where the capping material  
176 comes from, it should undergo quick, yet effective screening to ensure it is not contaminated  
177 with lead or other heavy metals, which a handheld X-Ray fluorescence device can easily provide  
178 within minutes.

## 179 **Conclusions**

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183 Given the scale of the urban soil lead contamination issues and the disproportionate exposure  
184 potential faced by environmental justice communities, this issue finally needs to be fully

185 grappled with. The USEPA has taken a critical first step by developing and implementing new  
186 soil lead screening standards—it is now up to the network of people concerned about soil lead  
187 exposure to consider reasonable, feasible, and equitable ways to reduce exposure and to regain  
188 the vitality, health, and fertility of this critical resource of the commons.

189

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191

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199 References

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Table 1

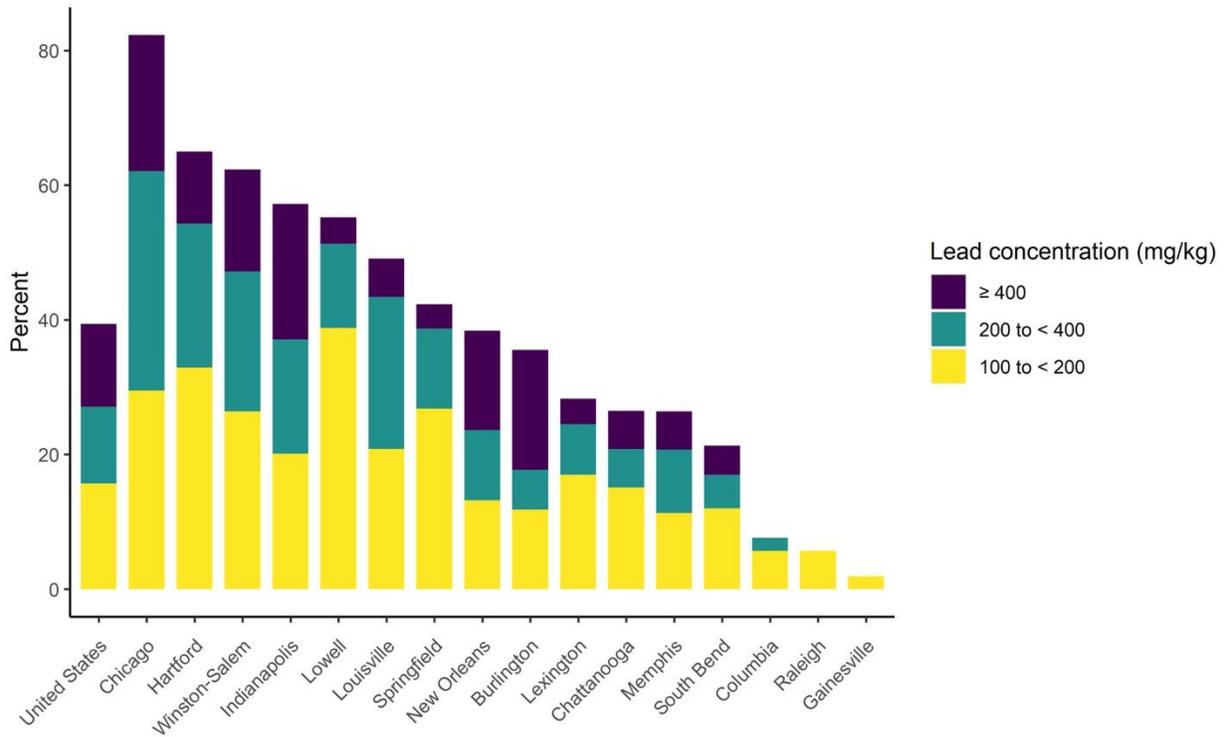
	n	Soil Lead (mg/kg)							
		≥ 400		200 to < 400		100 to < 200		< 100	
		%	n	%	n	%	n	%	n
United States	15595	12.3	1933	11.4	1789	15.7	2475	59.8	9398
New Orleans, LA	5434	14.8	805	10.4	566	13.2	718	61.6	3345
South Bend, IN <sup>a</sup>	4905	4.3	216	5.0	249	12.0	604	76.4	3836
Indianapolis, IN	2641	20.1	530	17.0	448	20.1	531	42.8	1132
Chicago, IL	1187	20.2	240	32.6	387	29.5	350	17.7	210
Burlington, VT	523	17.8	94	5.9	31	11.8	62	63.8	336
Springfield, MA	166	3.6	6	11.9	20	26.8	45	56.5	95
Lowell, MA	152	3.9	6	12.5	19	38.8	59	44.7	68
Hartford, CT	139	10.7	15	21.4	30	32.9	46	34.3	48
Winston-Salem, NC <sup>b</sup>	53	15.1	8	20.8	11	26.4	14	37.7	20
Chattanooga, TN <sup>b</sup>	53	5.7	3	5.7	3	15.1	8	73.6	39
Louisville, KY <sup>b</sup>	53	5.7	3	22.6	12	20.8	11	50.9	27
Memphis, TN <sup>b</sup>	53	5.7	3	9.4	5	11.3	6	73.6	39
Lexington, KY <sup>b</sup>	53	3.8	2	7.5	4	17.0	9	71.7	38
Columbia, SC <sup>b</sup>	53	0.0	0	1.9	1	5.7	3	92.5	49
Raleigh, NC <sup>b</sup>	53	0.0	0	0.0	0	5.7	3	94.3	50
Gainesville, FL <sup>b</sup>	53	0.0	0	0.0	0	1.9	1	98.1	52

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<sup>a</sup>Samples taken in a gridded pattern throughout St. Joseph County, and thus represent a mix of urban, suburban, and rural sampling locations.

<sup>b</sup>Samples specifically collected to represent “urban background” locations, and thus not near typical urban lead sources (USEPA 2023).

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**Fig. 1:** Percentage of samples within each city and the United States from Table 1 that exceeded 100 mg/kg lead, binned by concentration category.