

May 23, 2010

Mrs. Patricia O'Neill, Chair, Board of Education  
Dr. Jerry Weast, Superintendent of Schools  
Montgomery County Board of Education  
850 Hungerford Drive  
Rockville, Maryland 20850

Dear Ms. O'Neill and Dr. Weast,

We appreciate you taking time to respond to the Young Activist Club on their ongoing efforts to get permission to purchase and install a dishwasher at Piney Branch ES. There is overwhelming community support for this project, as evidenced by the funds raised, the petition signatures, and the turnout at the March 23rd forum. County and State officials support the project, as do many within MCPS. We are puzzled by the Board's refusal to represent the community on this issue. You must be frustrated, as we are, by the amount of time that MCPS staff, and now apparently the Board, is spending continuing to fight this small project.

You state in your April 15th letter to the County Council members supporting our project that the proposal has been "extensively considered and analyzed." Unfortunately, MCPS never responded to the point-by-point response the Piney Branch ES PTA and the Young Activists submitted, explaining the discrepancy between the two cost estimates and why our lower cost estimate is more accurate. (This response is available online at <http://www.youngactivistclub.org/feb-2010-rebuttal-to-mcps>.) Instead, MCPS stated in a memo that they would not respond, and would not send any representative to the community forum to explain the MCPS cost estimate. We appreciate that two Board members did come to the forum, and were put in the difficult position of representing MCPS. Chris Barclay acknowledged publicly at the forum that the MCPS estimate might not be accurate.

We believe the MCPS estimate is grossly inflated. The experience of four Chicago area schools seems to mirror our situation. The school district there quoted dishwasher prices as high as \$80,000, arguing that a move to washable trays was too expensive. However, reality proved otherwise. Far less money was used to outfit four Oak Park schools with trays, dishwashers and the power to run them, and each school saved about \$2,500 this year. The dishwashers averaged about \$3,100. (See Monica Eng, "Schools' lunch waste piles up: Nearly 250,000 foam trays are tossed out daily in Chicago -- a problem the district says is too costly to fix," Chicago Tribune, February 8, 2010, available at <http://www.chicagotribune.com/health/chi-100208cps-food,0,6459114.story>.)

You also state that the pilot would not yield "sufficient environmental benefits" to "justify the additional costs and staff efforts" associated with the pilot. As repeatedly stated, the Piney Branch PTA is eager to sign a Memorandum of Understanding with MCPS indicating that all costs of the pilot will be covered by the PBES PTA. If at any

time, for any reason, the funding runs out or the pilot hits any other insurmountable problem, we simply remove the dishwasher, and go back to using Styrofoam trays at the school. There are no dire "risks" of that scenario.

There are, however, risks involved with continued use of polystyrene food service ware. Despite your belief that FDA-approved materials are safe because they are regulated, science and history of regulatory process prove otherwise. There are two issues. One is the contamination of food directly with styrene, a known neurotoxin. According to a 2000 World Health Organization report, "The ability of styrene monomer to migrate from polystyrene packaging to food has been reported in a number of publications and probably accounts for the greatest contamination of foods by styrene monomer." (See Styrene Chapter, Air Quality Guidelines-2nd Edition, WHO Regional Office for Europe, Copenhagen, Denmark, 2000.) This is of special interest to our school system given that we're talking about a young population still developing as well as a diverse student population that is significantly low-income, both populations who can least handle associated health risks. A growing student body with neurological health issues will eventually translate into higher special education needs and costs to the MCPS school system. Covering the costs of special needs students is already a huge challenge for our school system. The body of knowledge linking plastics use to health related problems continues to grow and is alarming. For example, evidence now shows that chemicals in plastics play an important role in the global epidemic of obesity. Newsweek covered this story last September 11th in its article, "Born to be Big: Early exposure to common chemicals may be programming kids to be fat." (available at <http://www.newsweek.com/id/215179>). Products approved in the marketplace today may well likely be banned tomorrow as policy keeps pace with science.

Secondly, your assumption that polystyrene is safe to burn is false. Waste incineration is not safe and is recognized as a source of air, water, and soil pollution. According to the U.S. EPA, "Despite recent toughening of emission standards for MSW [municipal solid waste] combustion, the process creates significant emissions, including trace amounts of hazardous air pollutants. Burning MSW produces nitrogen oxides and sulfur dioxide as well as trace amounts of toxic pollutants, such as mercury compounds and dioxins." (See EPA's Clean Energy web site at: <http://www.epa.gov/cleanenergy/energy-and-you/affect/air-emissions.html>.) Just last month, EPA held a stakeholder conference call to discuss a set of regulatory proposals under the Clean Air Act to address emissions from solid waste incinerators like the Montgomery County facility. Also last month the EPA ordered air pollution limits tightened on the Baltimore trash incinerator after finding the state improperly relaxed them and did not require adequate monitoring of the plant's toxic emissions. (See Timothy Wheeler, "Air pollution limits tightened on Baltimore incinerator: EPA says Maryland improperly relaxed permit on trash-to-energy plant," Baltimore Sun, April 19th, 2010.) Polystyrene is not safe to burn. The National Bureau of Standards Center for Fire Research has identified 57 chemical byproducts released during the combustion of polystyrene foam. (See The Firefighters Against Parkinsons' web site at <http://www.firefighterswithparkinsons.net/index.cfm?section=10&pagenum=208>.)

The pilot itself will not cost MCPS one cent. We continue to assume that the Board will see this as a bright spot of good news for the community in the midst of a terrible budget situation. We all understand that putting dishwashers into multiple schools would require significant funding, and that if dishwashers are found, in the pilot, to be an appropriate part of the solution to the Styrofoam tray problem, it would take time before other schools could install dishwashers.

You state that dishwashers are “not viable” to replace polystyrene trays. Since many school districts around the country have found otherwise, the basis of this statement remains unclear. The point of a pilot project would be to garner the relevant information on staff time, water and electricity use, the realities of hard tray use by students, etc. With this data, MCPS could make an informed decision about whether dishwashers should be part of the solution or not. If dishwashers are found to incur significant unforeseen costs or problems, this result will be equally useful spurring development of alternative solutions to the styrene issue.

You state that the Young Activists “chose not to pursue other options” and that this has put them in a “difficult position.” The option suggested by Board members was to spend the funds raised by our community for this pilot on “piloting” the use of recyclable fiber-based trays. We know these trays are more expensive than polystyrene trays: we do not need a pilot to determine that. Using the funds on single-use trays would not yield any new or significant information to help MCPS solve the polystyrene problem—it would not be a pilot. We would support MCPS shifting to the use of compostable trays, only if they were composted on-site (and the compost used on school grounds) as they are in some other schools. However, the community donated funds to the Young Activists for a dishwasher pilot, so to then use the funds on disposable trays that we know are more expensive than the current trays, would be grossly inappropriate. The only other option raised at the Forum, was having students bring hard trays home to wash and bring back to school each day. This is not a viable alternative because it out-sources the responsibility for tray-washing and tray-transportation to families and young children. More importantly, about half the students at PBES are on the reduced federal meal program, making this population the least likely to have the resources to absorb this extra cost and responsibility.

The PBES PTA and its Young Activist Club are happy to be part of any and all discussions of any and all options to rid MCPS lunchrooms of polystyrene. We are also happy to be part of the larger discussion of ridding the food service industry of polystyrene, though logically, we are focused on schools and see no reason why schools, which serve the most vulnerable population, should not lead on this issue by piloting solutions. The funding offered by our community is designed precisely to help research a possible solution, before we are forced into quick and expensive action by inevitable legislation.

The community is enthusiastic about and deeply appreciates all of the many environmental improvements to schools listed in your letter. Ironically, MCPS has used the argument that they do not want one dishwasher plugged into one school, because they

cannot immediately replicate this pilot project in all schools. The idea that we have eight schools with solar panels, and 18 schools with LEED certification (or plans for it) underscores the fact that this type of visionary improvement cannot be implemented in all schools simultaneously, nor should it be. If we can install solar panels in eight schools, why is it so impossible to give permission to install one fully-funded dishwasher?

In a budget cycle that is more than tight, it is unfortunate that the Board would support MCPS in blocking a partnership among parents, students, environmentalists in the community, local grantmakers and local businesses to fully fund this pilot. We know that parents at other schools have funded numerous structural school improvements, improvements that benefited only a single local community, without yielding the kind of data this pilot will produce to benefit decision-making for the entire county.

We are not asking MCPS to venture into uncharted territory here. All across the country, indeed the world, governments and institutions and the private sector are acting to eliminate unhealthy chemicals and practices. MCPS has acknowledged that polystyrene is problematic and that we need to find alternatives.

It remains unclear to our community, and to the environmental community, where the risk lies in allowing this pilot to go forward.

Sincerely,

Ally Zevin and Adrienne Tilton  
PBES PTA Co-Presidents

Brenda Platt and Nadine Bloch  
Co-Leaders, Young Activist Club

Susan Katz Miller  
Advisor and Supporter, Young Activist Club

Cc:

Montgomery County Board of Education  
Montgomery County Council  
Takoma Park Mayor Bruce Williams  
Takoma Park City Council  
Maryland State Senator Jamie Raskin  
Maryland State Delegate Heather Mizeur  
Maryland State Delegate Sheila Hixson  
Maryland State Delegate Tom Hucker  
Piney Branch ES Principal, Mr. Generlette