



ADRIAN DOMINICAN SISTERS
1257 East Siena Heights Drive
Adrian, Michigan 49221-1793
517-266-3400 Phone
517-266-3524 Fax
Portfolio Advisory Board

May 17, 2001

Ann Brown, Chairperson
U.S. Consumer Product Safety Commission
Washington, DC 20207-0001

Dsear Chairperson Brown,

The Portfolio Advisory Board (PAB) of the Adrian Dominican Sisters supports the petition for rulemaking filed by the Healthy Building Network and the Environmental Working Group, which seeks an immediate ban on copper-chromium arsenate (CCA) treated wood for use in playground equipment, and to begin a review of the safety of this wood for general use.

The Adrian Dominician Sisters, a community of approximately 1000 women religious, have in their collective mission a commitment to healing of the planet. Of particular concern is the impact of environmental degradation on those most vulnerable such as children. Through the office of the Portfolio Advisory Board, the Adrian Dominicans work to advance corporate social responsibility.

In addition to the health risks posed to children and adults who come in contact with arsenic treated wood in playgrounds equipment, picnic tables, decks etc., we are concerned that at the end of their useful lives, these products continue to pose risks to the health of workers engaged in wood reclamation, recycling or chipping. The disposal of these products in unlined construction and demolition landfills, or municipal solid waste incinerators, also creates further risks to human health and the environment. Precautionary action taken at the point of manufacture is the safest, most efficient way to eliminate this long chain of avoidable risks.

As an organization dedicated to reducing environmental and public health risks, we are concerned about the large volumes of arsenic leaching from CCA treated wood in to ground and surface waters. Precautionary action taken at the point of manufacture is the safest way to eliminate this long chain of avoidable risks.

Sincerely,

Margaret Weber
Coordinator of Corporate Responsibility
Portfolio Advisory Board



May 21, 2001

Amy Brown, Chairperson
U.S. Consumer Product Safety Commission
Washington, DC 20207-0001

Dear Chairperson Brown,

Architects/Designers/Planners for Social Responsibility (ADPSR) urges the Consumer Product Safety Commission to grant the petition for rulemaking filed by the Healthy Building Network and the Environmental Working Group that seeks an immediate ban of copper-chromium arsenate (CCA) treated wood for use in playground equipment and to begin a review of the safety of this wood for general use.

For the past 18 years ADPSR has been raising awareness of critical social and environmental issues and promoting solutions for a more sustainable world. The organization provides education and advocacy on ecological architecture, community development, and related issues. This letter is on behalf of the Northern California Chapter (ADPSR NorCal) which is the largest and most active chapter, offering resources to professionals and public throughout the greater San Francisco Bay Area. These resources include a monthly lecture series, exhibits, seminars, conferences, information hotlines, consulting, publications, and a library. The Board and membership consists of many individuals who are considered pioneers and experts in the field of sustainable design and construction. Many are nationally and internationally known, consulting on projects to all levels of government and private companies on issues related to people's health, safety and well being in buildings.

We provide access to unbiased information on building toxins to a wide variety of concerned citizens and building professionals. This information covers the full life cycle of a product or material. For example, pressure treated wood, used in most wood playground equipment, for decks, picnic tables, and tree houses, is highly toxic and leaches arsenic out of the wood, contaminating the children, the ground around the play area, and leaches into the aquifer. It is such an environmental and health threat that its use has been banned in other countries. By 1993 the EPA had banned the use of arsenic in pesticides, except pressure-treated wood. Common sense dictates that instead of worrying about exposing our children to CCA, the product not be used or available in the first place. We urge you to take action at the Federal level to help protect our children.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim D. Stensland", is written over a faint circular stamp.

Jim D. Stensland
Member, Board of Directors



Boston Women's Health Book Collective

c/o Boston University School of Public Health
715 Albany St, Talbot Bldg West-1, Room 120
Boston, MA 02118 USA
ph.(617) 414-1230
fax.(617) 414-1233
office@bwhbc.org
www.ourbodiesourselves.org

21 May 2001

Ann Brown, Chairperson
U.S. Consumer Product Safety Commission
Washington, DC 20207-0001

Dear Chairperson Brown:

The Boston Women's Health Book Collective (BWBHC) urges the Consumer Product Safety Commission to grant the petition for rulemaking filed by the Healthy Building Network and the Environmental Working Group, which seeks an immediate ban on copper-chromium arsenate (CCA) treated wood for use in playground equipment and to begin a review of the safety of this wood for general use. The BWBHC is a non-profit, public interest organization that provides quality information on women and health and a feminist critique of health and medical care systems. As part of a national and a global women's health movement, we highlight in all our work the role of poverty and societal oppression as major determinants of health and encourage women to organize for social change.

In addition to the health risks posed to children and adults who come in contact with arsenic treated wood in playgrounds equipment, picnic tables, decks etc., we are concerned that at the end of their useful lives, these products continue to pose risks workers and consumers. Workers and volunteers engaged in wood reclamation, recycling or chipping, and consumers of recycled or chipped wood are unlikely to be aware of the arsenic risk. The disposal of these products in unlined construction and demolition landfills, or municipal solid waste incinerators, also creates further risks to human health and the environment. Precautionary action taken at the point of manufacture is the safest, most efficient way to eliminate this long chain of avoidable risks.

Sincerely,

Judy Norsigian
Executive Director

CENTER FOR ENVIRONMENTAL HEALTH

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Foundation*

*Organizations listed for
identification only

Ann Brown, Chairperson
U.S. Consumer Product Safety Commission
Washington, DC 20207-0001

Dear Chairperson Brown,

The Center for Environmental Health urges the Consumer Product Safety Commission to grant the petition for rulemaking filed by the Healthy Building Network and the Environmental Working Group, which seeks an immediate ban on copper-chromium arsenate (CCA) treated wood for use in playground equipment and to begin a review of the safety of this wood for general use.

In addition to the health risks posed to children and adults who come in contact with arsenic treated wood in playground equipment, picnic tables, decks etc., we are concerned that at the end of their useful lives, these products continue to pose risks to workers and consumers. Workers and volunteers engaged in wood reclamation, recycling or chipping, and consumers of recycled or chipped wood are unlikely to be aware of the arsenic risk. The disposal of these products in unlined construction and demolition landfills, or municipal solid waste incinerators, also creates further risks to human health and the environment. Precautionary action taken at the point of manufacture is the safest, most efficient way to eliminate this long chain of avoidable risks.

The Center for Environmental Health protects the public from environmental and consumer hazards. We are committed to reducing the use of toxic chemicals and to reducing exposures to toxic chemicals by directly influencing corporate behavior in the public interest.

Sincerely,

Michael Green
Executive Director

528 61ST Street, Suite A ❖ Oakland, CA 94609

Phone (510) 594-9864 ❖ Fax (510) 594-9863 ❖ ceh@cehca.org ❖ www.cehca.org

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Center for Health Care

KEEPING BIG INSTITUTIONS ACCOUNTABLE TO EVERYDAY PEOPLE

May 23, 2001

Ann Brown, Chairperson
U.S. Consumer Product Safety Commission
Washington, DC 20207-0001

Dear Chairperson Brown,

The Center for Health Care is writing to endorse and fully support the petition for rulemaking filed by the Healthy Building Network and the Environmental Working Group, which seeks an immediate ban on wood treated with Chromated Copper Arsenate (CCA), for use in playground equipment, and a review of the safety of this wood for general use. We strongly urge the Consumer Product Safety Commission to move as quickly as possible to grant this petition and begin the rulemaking process, so that we can protect our children from needless exposure to arsenic.

The Center for Health Care is a non-profit organization, based in Boston, that is dedicated to improving public health among disadvantaged communities.

Across America, children are being needlessly exposed to arsenic. As you may know, virtually all wooden playground and park equipment (e.g., picnic tables) in the nation is injected with the toxic pesticide Chromated Copper Arsenate ("CCA"), to kill insects and prevent rot. CCA is also found in backyard decks, gazebos, boardwalks, highway guard rails, fences, posts, utility poles and other outdoor wood.

As you know, arsenic is a hazardous substance. At high doses, arsenic is an acute poison that can cause death. Chronic exposure to small amounts of arsenic can cause cancer, neurological problems, numbness, paralysis, and other health problems. Children are particularly vulnerable.

Recent studies conducted in Connecticut, Florida, California, and Maine show that the arsenic applied to playground and park equipment can be easily transferred to hands from simple contact with the wood surfaces. Significant amounts of arsenic are released from pressure-treated wood and can end up on children's hands and in their mouths.

In Connecticut, the state's Department of Public Health has issued a fact sheet warning parents that "arsenic is easily taken up onto hands from simple contact with the wood surface" of equipment treated with CCA. Connecticut's fact sheet further states

that "it is important to prevent exposure because arsenic can cause cancer and other health effects. Young children are most at risk."

Several communities here in Massachusetts are beginning to take action to convert their playground and park equipment to arsenic-free alternatives. Last week Cambridge unanimously voted to place a moratorium on the use of arsenic-treated wood. Worcester has converted all of its playgrounds and parks to arsenic-free alternatives. And the city of Boston is making plans to stop its use of wood with arsenic. In Florida several playgrounds have been closed due to arsenic contamination. As a result, Governor Jeb Bush recently announced a Florida moratorium on the purchase of arsenic-treated wood. The Minnesota state House recently passed legislation that would prohibit state agencies from purchasing wood treated with arsenic. And the Wisconsin state Senate will consider similar legislation in the coming weeks.

Several countries, including Switzerland, Vietnam and Indonesia, have also banned CCA-treated wood, and a number of other nations, including Japan, Denmark, Sweden, Germany, Australia and New Zealand, have significantly restricted the use of CCA-treated wood.

In addition to the health risks posed to children and adults who come in contact with arsenic-treated wood in playground equipment, picnic tables, decks etc., we are concerned that at the end of their useful lives, these products continue to pose risks to workers and consumers. Workers and volunteers engaged in wood reclamation, recycling or chipping, and consumers of recycled or chipped wood are unlikely to be aware of the arsenic risk. The disposal of these products in unlined construction and demolition landfills, or municipal solid waste incinerators, also creates further risks to human health and the environment. Precautionary action taken at the point of manufacture is the safest, most efficient way to eliminate this long chain of avoidable risks.

Again, we urge the CPSC to grant this petition for rulemaking and begin the phase-out of CCA-treated wood. Thank you very much for your consideration.

Sincerely,

John O'Connor
Executive Director

Center for Maximum Potential Building Systems

Sustainable Planning & Design Since 1975

8604 F.M 969 • Austin, Texas 78724

512/928-4786 • 512/926-4418 (f) • center@cmpbs.org

19 May 2001

Ann Brown, Chairperson
U.S. Consumer Product Safety Commission
Washington, DC 20207-0001

Dear Chairperson Brown,

On behalf of the Center for Maximum Potential Building System, I am urging the Consumer Product Safety Commission to grant the petition for rulemaking filed by the Healthy Building Network and the Environmental Working Group. This petition seeks an immediate ban on copper-chromium arsenate (CCA) treated wood for use in playground equipment, and calls for the CPSC to initiate a review of the safety of CCA wood for general use. Center for Maximum Potential Building Systems, established in 1975, is a non-profit sustainable planning and design firm engaged in research, education and demonstration initiatives.

Our experience over 25 years has found that too often conventional building materials through their life cycle do pose risks to the public health and the environment. As the documentation submitted by HBN and EWG demonstrates, CCA-treated wood is dangerous. In addition to the health risks posed to children and adults who come in contact with arsenic treated wood in playgrounds equipment, picnic tables, decks, etc., we are concerned that at the end of their useful lives, these products continue to pose risks to workers and consumers. Workers and volunteers engaged in wood reclamation, recycling or chipping, and consumers of recycled or chipped wood are unlikely to be aware of the arsenic risk. The disposal of these products in unlined construction and demolition landfills, or in municipal solid waste incinerators, also creates further risks to human health and the environment. Precautionary action taken at the point of manufacture is the safest, most efficient way to eliminate this long chain of avoidable risks.

Sincerely,

Gail Vittori
Co-Director