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May 23, 2001

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

Dear Chairperson Brown,

The Clean Water Action Alliance of Massachusetts 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 or 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 Clean Water Action Alliance of Massachusetts is a non-profit environmental organization with over 30,000 members. We particularly focus on environmental threats to human health and have worked on the issue of arsenic in drinking water for many years.

Since Clean Water Action has worked to lower the allowable levels of arsenic in drinking water for a decade, we are particularly concerned that the children are being exposed to arsenic through playground equipment, picnic tables, and other common uses.

It has been known for a long time that arsenic is a cancer-causing agent, and now we are learning that its carcinogenicity is even greater than previously recognized. With the rates of childhood cancer at their highest ever (incidence of cancer in children under 14 increased almost 21% between 1975 and 1998) it is unconscionable that we are knowingly exposing children to a potent carcinogen in their playground equipment when there are an array of safer alternatives.

It is an outrage that playground equipment, constructed for the sole purpose of providing play-space for children, should be made using materials that threaten their health. Prevention of harm to the children should be a top priority. Please support this ban and comprehensive review.

Sincerely,

Lee Ketelsen New England Director

Western Massachusetts Office:
160 Main Street, Suite 6 • Northampton, MA 01060-3127 • (413) 584-9830 Fax: 586-7180

National Office:

4455 Connecticut Ave., NW, Suite A300 • Washington, DC 20009-2328 • (202) 895-0432 Fax: 895-0438 Recycled Paper



May 21, 2001

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

Dear Chairperson Brown,

Clean Water Action 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.

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

Alternative treatment for wood gives us the ability to immediately phase-out the use of CCA and protect the children and adults who use playgrounds, picnic tables, and decks from the known harmful effects of arsenic.

Clean Water Action is a 700,000-member, national organization of diverse people joined together to protect our environment, health, community and economic well-being. Primary goals include: clean, safe and affordable water; prevention of health-threatening pollution; and empowerment of people to make democracy work. Clean Water Action organizes strong grassroots coalitions and campaigns to elect environmental candidates.

Sincerely,

Lynn Thorp

National Campaigns Coordinator

202-895-0420 ext. 109

lthorp@cleanwater.org

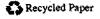
NATIONAL OFFICE

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May 23, 2001 Ann Brown, Chairperson U.S. Consumer Product Safety Commission Washington, DC 20207-0001

Dear Chairperson Brown,

California Clean Water Action 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 or 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.

Clean Water Action's mission is to educate and mobilize communities on behalf of clean safe water from the watershed to the water tap. Our organization is dedicated to reducing the risk posed by arsenic in drinking water supplies. 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,

Marguerite Young

Consience

California Director



May 21, 2001

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Clean Water Action Chesapeake has 47,000 members in Maryland, Virginia, Delaware and the District of Columbia who are joined together to protect our environment, health, community and economic well-being. Primary goals include: clean, safe and affordable water; prevention of health-threatening pollution; and empowerment of people to make democracy work. Clean Water Action organizes strong grassroots coalitions and campaigns to elect environmental candidates.

Sincerely,

Andrew Fellows

Chesapeake Program Director

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afellows@cleanwater.org

NATIONAL OFFICE

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May 23, 2001

Ann Brown, Chairperson
U.S. Consumer Products Safety Commission
Washington, DC 20007

Colorado Clean Water Action is a non-profit citizen's environmental organization working locally, statewide and nationally to promote clean and safe water, the control of toxic chemicals and the protection of our natural resources through the development of sound environmental policies. We support the recommendations regarding arsenic treated wood that are raised in the petition filed by the Healthy Building Network and the Environmental Working Group.

Colorado is third fastest growing state in the nation. That not only means more people but more houses and more buildings. Our concern is that do-it-yourselfers add decks, outdoor furniture, line their gardens and even build playhouses and play equipment for their children and grandchildren with pre-treated arsenic treated wood without knowing its health dangers. Because Colorado is an arid state, using arsenic treated wood which is suppose to prevent rot in humidity is an unnecessary exposure to a known carcinogen.

Sincerely,

Carmi McClean
Director
Colorado Clean Water Action



#### CLEAN WATER ACTION ALLIANCE

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

May 21, 2001

Dear Chairperson Brown,

The Clean Water Action Alliance of Minnesota 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 or 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. Clean Water Action Alliance is Minnesota's largest membership-based environmental organization representing over 45,000 families and 30 organizations on issues affecting the environment and public health.

As an organization dedicated to reducing the risk posed by arsenic in drinking water supplies, we are concerned about the large volumes of arsenic leaching from CCA treated wood in to ground and surface waters. 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,

State Director

Clean Water Action Alliance of Minnesota

CC:

Representative Jean Wagenius CWAA Board and Council



May 21, 2001

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

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Clean Water Action Pennsylvania has over 60,000 members who are joined together to protect our environment, health, community and economic well-being. Primary goals include: clean, safe and affordable water; prevention of health-threatening pollution; and empowerment of people to make democracy work. Clean Water Action organizes strong grassroots coalitions and campaigns to elect environmental candidates.

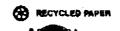
Sincerely,

Bob Wendelgass
PA State Director

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## Clean Water Action

May 21, 200

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

Dear Chairpe son Brown,

Texas Clean Vater Action urges the Consumer Product Safety Commission to grant the petition for rulemakilly filed by the Healthy Building Network and the Environmental Working Group, which seeks h immediate ban on copper-chromium arsenate (CCA) treated wood for use in playground disciplinate and to begin a review of the safety of this wood for general use.

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candidates.

Texas Clean Vater Action has over 70,000 members in Houston, San Antonio, Austin, Dallas, Ft. Worth, sevel more communities who are working together to protect our environment, health, community de deconomic well-being. Primary goals include: clean, safe and affordable water; prevention of health-threatening pollution; and empowerment of people to make democracy work. Clean Water Action organizes strong grassroots coalitions and campaigns to elect environmental

Sincerely,

Sparky Anderson

Texas Program Director

512-474-064

2520 pngview St #315 Austin Texas 78705 (512) 474-0605 Fax: (512) 474-7024



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Providence, RI 02909
(401) 331-6972 (401) 331-7072 fax

May 21, 2001

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

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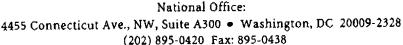
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Clean Water Action Rhode Island has members who are joined together to protect our environment, health, community and economic well-being. Primary goals include: clean, safe and affordable water; prevention of health-threatening pollution; and empowerment of people to make democracy work. Clean Water Action organizes strong grassroots coalitions and campaigns to elect environmental candidates.

Sincerely,

Sheila Dormody
State Director
sdormody@cleanwater.org



www.cleanwateraction.org

