

**ECOLOGY CENTER**

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Ann Arbor, Michigan 48104  
734.761.3186  
734.663.2414 (fax)

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

May 21, 2001

Dear Chairperson Brown,

The Ecology Center 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 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 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 protecting the public from environmental health threats, 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.

Sincerely,

Mary Beth Doyle, MPH  
Environmental Health Project  
Ecology Center



YEARS OF ENVIRONMENTAL ACTION

# FORESTETHICS

5215 BALLARD AVE NW  
SEATTLE, WA 98107

[www.forestethics.org](http://www.forestethics.org)

(206) 781 1152

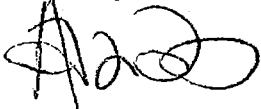
May 22, 2001

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

Dear Chairperson Brown,

**ForestEthics** urges the Consumer Product Safety Commission to grant the petition for rulemaking, filed by the Healthy Building Network and the Environmental Working Group, seeking an immediate ban on copper-chromium arsenate (CCA) treated wood for use in playground equipment and a review of the safety of this wood for general use. The ForestEthics mission is redirecting markets to ecologically sustainable, environmentally responsible wood products. We aim to educate consumers that their wood and paper product consumption endangers indigenous cultures, local communities and, ultimately, all life on Earth. We support the HBN/EWG petition because arsenic wood endangers its consumers and other users of this wood.

Sincerely,



Aaron L. Jackson, J.D.  
Forest Campaigner  
ForestEthics



May 18, 2001

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

Dear Chairperson Brown,

Generation Green 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. Generation Green and its 20,000 member families advocate for corporate and governmental policies that protect children from environmental hazards.

As an organization concerned about children's special vulnerability to toxic chemicals we are very concerned about the presence of arsenic in play equipment, an environment specifically designed for children. All efforts should be made to insure that children's play areas are safe.

Sincerely,  
*Rochelle Davis*  
Rochelle Davis  
Executive Director



May 21, 2001

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

Dear Chairperson Brown:

The GrassRoots Recycling Network 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 GrassRoots Recycling Network (GRRN) is a North American network of waste reduction activists and professionals dedicated to achieving a sustainable economy based on government, corporate and individual accountability for waste. We are a network of local, state, regional and national organizations, businesses and individuals using grassroots advocacy, organizing and activism to change corporate behavior and public policies to eliminate waste, and to foster community solutions. GRRN was founded in 1995 by members of the Sierra Club Solid Waste Committee, the Institute for Local Self-Reliance, and the California Resource Recovery Association.

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. Disposal of these products in 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,

A handwritten signature in black ink that reads 'Bill Sheehan' followed by a horizontal line.

Bill Sheehan, Ph.D.  
Executive Director



May 21, 2001

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

Dear Chairperson Brown,

Great Lakes United 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. Great Lakes United is a binational coalition representing two hundred organizations dedicated to protecting and preserving the Great Lakes basin from toxic pollution.

As an organization dedicated to reducing the risk posed by toxic substances 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 the long chain of avoidable risks.

We also firmly believe that the use of arsenic treated wood poses great risk to children and adults who come in contact with arsenic treated wood used in playgrounds equipment, picnic tables, and decks. We urge you to take immediate action to eliminate the use of CCA treated wood, our children are depending on you.

Sincerely,

Alexandra McPherson  
 Clean Production Coordinator

**An international coalition to conserve and protect the Great Lakes/St. Lawrence River ecosystem**

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May 18, 2001

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

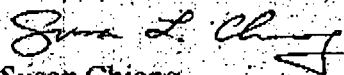
Dear Chairperson Brown,

Greenaction for Health and Environmental Justice urges 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 as well as a thorough review of the safety of this wood for general use.

Greenaction is a diverse, multiracial organization engaging in action campaigns for healthy communities and environmental justice. As an organization dedicated to reducing the risk posed by toxic chemicals to public health, 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.

In addition to the health risks posed to children and adults who come in contact with arsenic treated wood through items such as playground equipment, picnic tables, and decks, we are concerned that these products continue to pose risks to workers and consumers even at the end of their useful lives. 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. Again, precautionary action taken at the point of manufacture is the safest, most efficient way to eliminate this long chain of avoidable risks. Thank you for your time and for your consideration of this extremely important public health issue.

Sincerely,

  
Susan Chiang  
Community Health Advocate

1540 Market St., Suite 325, San Francisco, CA 94102

Telephone: 415-252-0822 Fax: 415-252-0823



[www.greenaction.org](http://www.greenaction.org) e-mail: [greenaction@greenaction.org](mailto:greenaction@greenaction.org)



# GREENPEACE

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1-800-326-0959 • [www.greenpeaceusa.org](http://www.greenpeaceusa.org)

May 23, 2001

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

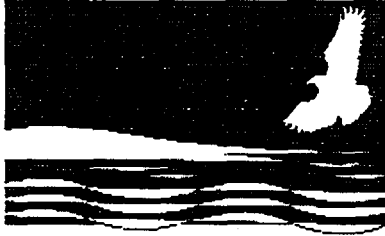
Dear Ms. Brown:

Greenpeace 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 used in playground equipment. We also urge the CPSC to begin a review of the safety of this wood for general use. Greenpeace is an international organization that works to protect the planet from toxic contamination. Greenpeace is concerned about the continued use of arsenic poses serious health risks to the users of this treated wood.

1. 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 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.
2. As an organization dedicated to eliminating the risk posed by toxic chemicals, 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.

Sincerely,

Lisa Finaldi  
Toxics Coordinator  
Greenpeace USA



**Haverhill Environmental League**  
c/o 20 Montvale Street, Haverhill, MA 01835

May 22, 2001

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

RE: Rulemaking petition on CCA wood

Dear Chairperson Brown:

The Haverhill Environmental League 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) pressure treated wood for use in playground equipment and to begin a review of the safety of this wood for general use.

The Haverhill Environmental League is a grass roots citizens' group concerned with all aspects of the environment including air quality, water quality, and conservation of natural resources.

The League is especially concerned with the additional risks of exposure that CCA wood poses to uninformed children and adults as users of playground installations as well as risks to installers. Unfortunately this is a product that continues to poison, long after that quality serves the original intent. The associated risks with arsenic contaminated soil in playgrounds and the continuing threat to contaminating ground water are preventable by using readily available substitute products.

We respectfully ask the Commission to grant the petition for rulemaking. Thank you for your consideration.

Good Health,

A handwritten signature in black ink that reads "Brent Baeslack". The signature is written in a cursive style.

Brent Baeslack  
Chair