

## **People for the Environment**

55 Bradstreet Rd.  
North Andover, MA 01845

May 17, 2001

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

Dear Chairperson Brown,

People for the Environment is a grassroots organization of over 300 citizens concerned about environmental issues in the Merrimack Valley of Massachusetts. As co-chair of this organization, I urge the Consumer Product Safety Commission to grant the petition for rulemaking filed by the Healthy Building Network and the Environmental Working Group.

The Merrimack Valley has a finite water resource that is threatened daily by the cluster of incinerators and other polluters in the region. As such, our organization is gravely concerned about arsenic in drinking water supplies and about the large volumes of arsenic leaching from CCA treated wood into ground and surface waters.

Sincerely,

Joan Kulash, Co-chair

## ***Regional Environmental Council***

**Box 255 Worcester, MA 01613**

**Phone: 508/799-9139 \* Fax: 508/799-9147**

May 22, 2001

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

Dear Chairperson Brown,

The Regional Environmental Council 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 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.

The Regional Environmental Council is a non-profit grassroots organization focusing on education and advocacy on a wide variety of environmental issues. We are particularly active around urban environmental issues and are based in central Massachusetts. We have been in existence for 30 years and currently represent several hundred families in greater Worcester, Massachusetts.

We are very conscious of the need to protect inner-city youth from additional toxic exposures and avoid using arsenic-treated wood in our urban gardens programs. In addition to the health risks posed to children and adults who come in contact with arsenic treated wood in playgrounds equipment, picnic tables, and decks, we are concerned that at the end of their useful lives, these products continue to pose risks workers and consumers.

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. As our membership is impacted by the pollution of a nearby trash incinerator, we feel it particularly urgent to remove arsenic-treated products from the solid waste stream.

Precautionary action taken at the point of manufacture is the safest, most efficient way to eliminate this long chain of avoidable risks.

Sincerely,

Peggy Middaugh, Executive Director  
Regional Environmental Council



May 18, 2001

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

Dear Chairperson Brown,

Salem Sound 2000, a coastal watershed association on the North Shore 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. 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 is necessary to ensure the safety of our children.

Salem Sound 2000 has been working to improve public health for over ten years in a predominately urban watershed. In addition to the health risks posed to children and adults who come in contact with arsenic treated wood in playground equipment and picnic tables, we are concerned about the large volumes of arsenic leaching from CCA treated wood into our ground and surface waters. Precautionary action taken at the point of manufacture is the safest way to eliminate this long chain of avoidable risks.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Dunn", is written over a light-colored background.

Cindy Dunn, Esq.  
Executive Director



VERMONT  
PUBLIC  
INTEREST  
RESEARCH  
GROUP

May 22, 2001

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

Dear Chairperson Brown:

The Vermont Public Interest Research Group (VPIRG) is a non-profit environmental and consumer advocacy organization with 20,000 members across Vermont. We join the Environmental Working Group and the Healthy Buildings Network, in petitioning the Consumer Product Safety Commission (CPSC) to enact an immediate ban of copper-chromium-arsenate (CCA) treated wood for use in playground equipment and to begin a review of the safety of CCA-treated wood for general use, on grounds that the continued sale of these items violate provisions of the Federal Hazardous Substances Act and the Consumer Product Safety Act.

We urge the CPSC to review the current scientific knowledge regarding arsenic's cancer-causing potential and endocrine disrupting properties, to examine studies indicating far higher potential exposures from playground equipment than previously recorded, and to assess children's cumulative exposure to arsenic from CCA treated lumber in multiple settings. We believe that this review will support an immediate ban on the use of CCA treated lumber in playground equipment, and that it will indicate a need for more stringent restrictions on general uses of this wood. Because alternatives to CCA lumber are commercially available, the risks presented by its use for playground equipment can and should be avoided starting now.

Thank you for your consideration of this urgent petition.

Sincerely,

Sarah O'Brien  
Environmental Health Advocate



Watchdogs for an Environmentally Safe Town  
P.O. Box 690  
Westminster, MA 01473

May 22, 2001

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

Dear Chairperson Brown,

W.E.S.T. (Watchdogs for an Environmentally Safe Town) would like to urge 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 mission of W.E.S.T. is to enhance the quality of life for the present and future residents of Westminster including its natural resources and to lend assistance to any community requiring our guidance when requested.

Having worked on more than 32 projects in 11 years, the basic interest of our organization always leads back to water and the protection of it. In recent years the problem of arsenic in a communities drinking water supplies seems to be cropping up all too often. All of the grassroots organizations need to keep a watchful eye to curb the use of CCA treated wood.

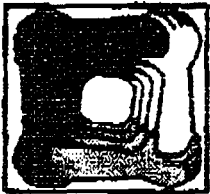
As an organization concerned with reducing the risk posed by arsenic in drinking water supplies, and I, as a Grandmother to eight grandchildren with a Great Grandchild on the way, am very concerned about the large volumes of arsenic leaching from CCA treated wood in to ground and surface waters. Precautionary action taken at the point of manufacture is the safest way to eliminate this long chain of avoidable risks. We want our future generations protected. We owe them that!

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Donna M. Brownell". The signature is written in dark ink and is positioned above the typed name.

Donna M. Brownell, President



# Western MassCOSH

Western Massachusetts Coalition for Occupational Safety and Health

640 Page Boulevard • Springfield, MA 01104 • (413) 731-0760 Fax (413) 731-6888

May 18, 2001

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

Dear Chairperson Brown,

Western Massachusetts Coalition for Occupational Safety and Health (Western MassCOSH) 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. Western MassCOSH is a non-profit coalition composed of workers, labor unions, organizations, and health and safety professionals. We work in partnership with community and labor groups to foster safe, secure jobs and healthy communities in Massachusetts.

Western MassCOSH works with area school systems to address chemical hazard concerns that have potential harm to school personnel and children. As you may be aware, in recent years, there has been a significant increase in asthma incidents to both children and teachers. Chromium is a known asthma causing agent. Reducing the incidents of exposure to any asthma causing agent should be an utmost priority.

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 both 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 actions taken at the point of manufacture are the safest, most efficient way to eliminate this long chain of avoidable risks.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan DeMaria". The signature is fluid and cursive, with a long horizontal stroke at the end.

Susan DeMaria  
Executive Director



**WOMEN'S VOICES FOR THE EARTH**

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114 W. PINE STREET, MISSOULA, MONTANA 59802 TEL. 406-543-3747 FAX 406-728-4134

May 15, 2001

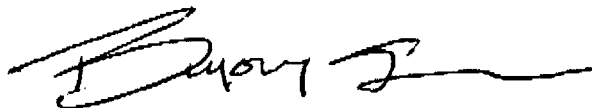
Ann Brown, Chairperson  
U.S. Consumer Product Safety Commission  
Washington, DC 20207-0001

Dear Chairperson Brown,

Women's Voices for the Earth 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.

Women's Voices for the Earth is a women-centered environmental justice organization whose mission is to empower women to create an ecologically sustainable and socially just society. Our work centers on eliminating toxics, especially persistent organic pollutants, from our environment. 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.

Sincerely,



Bryony Schwan  
Executive Director