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HEALTHLINK

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

Dear Chairperson Brown,

HealthLink 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 that has dedicated much of our resources to reducing the risk posed by arsenic in a local drinking water supply, 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,

Lori Ehrlich
HealthLink





HEALTHY SCHOOLS NETWORK, INC.

773 Madison Avenue • Albany, NY 12208 • Tel: 518-462-0632 • Fax: 518-462-0433

www.healthyschools.org

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

May 22, 2001

Dear Ms. Brown:

The Healthy Schools Network, Inc. is writing in support of the petition for rule-making to the Consumer Product Safety Commission from Environmental Working Group and the Healthy Building Network, which seek an immediate ban on copper-chromium arsenate (CCA) treated wood for use in playground equipment; the petition also asks for a review of the safety of this wood for general use.

Healthy Schools Network is a not for profit research, information, education, and advocacy group that promotes schools that are environmentally responsible to children, to school personnel, and to their communities. Centered on protecting children's unique environmental health vulnerabilities, HSN has a nationally accessible information and referral network used largely by parents and schools concerned about school facility conditions and practices, and works in New York State and nationally with leading parent, environment, public health, labor, and education groups to promote healthy schools for all children.

HSN is particularly concerned about school and day care playgrounds because it is well documented that school facilities are not well-maintained (US GAO 1995, NCHS 1999), and further research shows that up to 3.7 million children annually are injured at school, most often during unorganized play before and after schools or during recess (Posner, 2000). According to the US Department of Education ERIC Clearinghouse (EDO-SP: 92-5) each year 200,000 children are treated at hospital emergency rooms for injuries occurring on playgrounds.

For the underlying reasons cited, CPSC prepared its "Handbook for Public Playground Safety" which recommends not only regular inspections of equipment, but also recommends "Materials of Manufacture and Construction":

"All paints and other similar finishes must meet the current CPSC regulation for lead in paint.... Regardless of the material or treatment process, the manufacturer should ensure that the users of playground equipment cannot ingest, inhale, or absorb potentially hazardous amounts of substances as a result of contact with equipment.... Creosote, pentachlorophenol, and tributyl tin oxide are too toxic or irritating and should not be used as preservatives for playground equipment wood. Pesticide containing finishes should also not be used."



HSN believes there are significant health risks associated with visible school injuries. Children and adults should not be further subjected to invisible injuries stemming from acute or chronic low dose exposure to CCA. Hard-pressed schools often rely on community-donated labor and materials to create playgrounds. These all-volunteer efforts to create community assets are clearly undermined by the use of highly toxic materials, and unknowingly schools have been presented with threats to health and learning. Moreover, workers 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.

We will also urge that appropriate federal funding be directed at creating healthier playgrounds for all children. Playgrounds are community and neighborhood "Open Spaces".

Sincerely,

A handwritten signature in black ink, reading "C. L. Barnett". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Claire L. Barnett
Executive director

Institute for a Sustainable Future

5815 Glenwood Ave., Duluth MN 55804
218-525-7806 www.isfusa.org

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

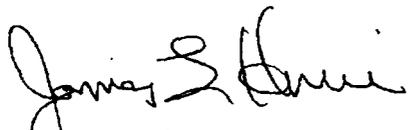
Dear Chairperson Brown,

The Institute for a Sustainable Future (ISF) 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 Institute for a Sustainable Future was created to foster socially and ecologically sustainable economic development.

Beyond the immediate health risks posed to children and adults who come in contact with arsenic treated wood, there is in addition very real 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 risks. Clearly, the lifecycle of CCA wood is unsustainable. It is imperative that we take precautionary action at the point of manufacture.

Thank you, for your attention to this matter.

Sincerely,



James Harvie
Project Director



Learning Disabilities Association of America

4156 Library Road • Pittsburgh, PA 15234-1349 • 412/341-1515 • 412/341-8077 • FAX 412/344-0224

FACSIMILE TRANSMISSION COVER SHEET

DATE: 5-22-01 TOTAL PAGES: _____

TO: Bill Walsh

PHONE: Healthy Bldg. Network FAX: 202-532-0768

FROM: AUDREY R. MCMAHON
7 River Woods Drive #P220
Exeter, NH 03833
603-778-8655 Phone
603-778-1215 Fax
arm@nh.ultranet.com

MESSAGE: We did not receive your form letter re the arsenic in playgrounds but hasten to tell you that LDA has a strong position approving removal of arsenic to the greatest extent possible in water. We approve also of using less toxic alternatives wherever possible.

We thank you and the Consumer Safety product commission for your initiative (petition) and look forward to hearing success stories to spread the word,

Audrey R. McMahon
Professional Advisory Bd. LDA
and Research Services etc,

MASSPIRG

Massachusetts Public Interest Research Group

29 Temple Place Boston, MA 02111

617/292-4800 (ph) 617/292-8057 (f) www.masspirg.org

May 21, 2001

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

Dear Chairperson Brown,

The Massachusetts Public Interest Research Group (MASSPIRG) 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. MASSPIRG is a statewide public interest advocacy organization with over 50,000 members.

MASSPIRG conducts an annual playground safety survey statewide and publishes consumer tips for buying home play equipment. Of all the potential hazards on unsafe playgrounds, the last thing parents should have to think about is health-threatening chemicals in the wood.

Aside from the potential health risks posed to children and adults who come into contact with arsenic-treated wood in playground equipment, we are concerned that at the end of its useful life, arsenic-treated wood continues to pose risks to workers and consumers. Workers involved in wood reclamation, recycling, or chipping, and consumers of recycled and chipped wood are unlikely to be aware of the arsenic risk. Additionally, the disposal of these products in unlined construction and demolition landfills, or municipal solid waste incinerators also poses further risks to human health and the environment.

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

Sincerely,

Iris Vicencio-Garaygay
Environmental Advocate



May 16, 2001

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

Dear Chairperson Brown,

The Michigan Environmental Council (MEC) 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. MEC is a 20-year-old coalition of more than 50 environmental organizations representing more than 170,000 Michigan citizens.

MEC is vitally concerned with the issue of arsenic in consumer products and arsenic exposure generally. Our priority issues include protection of children's health and reduction of the pollutant burden on citizens and the environment of the Great Lakes region. We are currently seeking a state health standard for arsenic in drinking water that is protective of public health.

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, and other materials, 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 reducing the risk posed by arsenic, we are concerned about the large volumes of arsenic leaching from CCA treated wood into ground and surface waters. The CPSC should take immediate action to reduce and eliminate the risks such arsenic poses.

Sincerely,

Dave Dempsey
Policy Advisor

