HP 01-3

ENVIRONMENTAL WORKING GROUP

HEALTHY BUILDING NETWORK
healthybuilding.net

Petition to the United States Consumer Product Safety Commission to Ban Arsenic Treated Wood in Playground Equipment and Review the Safety of Arsenic Treated Wood for General Use

CPSA 6 (b)(1) Cleared 6/22/01
___No Mfrs/PrvtLblrs or Products Identified
___Excepted
___Firms Notified,
Comments Processed,

May 22, 2001

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

Dear Chairperson Brown:

The Environmental Working Group (EWG), a non-profit research organization, and the Healthy Building Network (HBN), a non-profit advocacy organization, petition the Consumer Product Safety Commission (CPSC) to enact an immediate ban of chromated-copper-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 violates provisions of the Federal Hazardous Substances Act and the Consumer Product Safety Act.

In 1990, the Consumer Product Safety Commission issued a study on the "Estimate of Risk of Skin Cancer from Dislodgeable Arsenic on Pressure Treated Wood Playground Equipment." The study concluded that the risks to children playing on manufactured playground equipment were small, but that "a possible hazard might be created when playground equipment is built with unfinished pressure-treated wood from retail sources." At the time, the CPSC declined to take any action against the use of CCA-treated wood in playground equipment. However, during the ten years since, many changes in scientific understanding have made clear that playground equipment and other wood treated with CCA poses imminent and unreasonable health risks to consumers, particularly children.

CPSC is urged to consider the following new information:

- A 1999 National Research Council (NRC) study which concluded that arsenic is a much more potent carcinogen than previously recognized, and a cause of other cancers such as bladder and lung cancer in addition to skin cancer.

- Research by the NRC and others since 1990 which has also shown arsenic to be an endocrine disruptor, and has linked arsenic ingestion to immune system suppression, increased risks of high blood pressure, cardiovascular disease, and diabetes.

- Numerous studies conducted since 1990 which have confirmed that significant quantities of arsenic can be dislodged from the surface of CCA-treated wood, that these levels are greater than what even the wood preservatives industry itself has determined to be safe, and that the cancer risk could be as great as 1 in 1,000.

- The 1990 CPSC study which examined the risks posed to children playing on manufactured playground equipment. However, subsequent studies show that playground equipment represents only a small fraction of the places where children may come into contact with treated wood – other places include, for

example, decks, railings, picnic tables, fences and docks. Another exposure pathway that has not been considered by the CPSC and other analyses is ingestion of arsenic-contaminated soil beneath CCA structures.

- There have been two important changes in the market for pressure treated wood used in children's play structures. First, "unfinished" pressure treated wood appears to be more widely used now in these applications. Second, alternatives to pressure treated wood (including composite "plastic lumber" and wood treated with less toxic treatment compounds) are now widely available and have proven performance.

From the weight of the evidence described in this petition, it is clear that the Consumer Product Safety Commission must take immediate action in order to protect American children from playground equipment that is hazardous to their health. In addition, it is clear that the CPSC must further take prompt action to assess the health threats to consumers posed by the general use of CCA-treated wood.

In this petition, EWG and HBN document that:

1. Arsenic is a more potent and broad-acting carcinogen than previously recognized, and a cause of other cancers such as bladder and lung cancer in addition to skin cancer.

2. Exposure to arsenic from CCA-treated wood is more significant than previously recognized.

3. The health risks from CCA-treated wood are more significant than previously recognized. Arsenic is an endocrine disruptor, and has also been linked to immune system suppression, increased risks of high blood pressure, cardiovascular disease, and diabetes.

4. Many exposure pathways besides manufactured playground equipment exist and need to be addressed.

5. Comparable, less toxic alternatives to CCA-treated wood exist.

6. The Consumer Product Safety Act and the Hazardous Substances Act require the CPSC to ban CCA for use in playground equipment and promptly review the safety of other uses.

Background on CCA

Chromated copper arsenate (CCA) is a mixture of chromium, copper and arsenic used to protect wood from insect attacks and fungal decay. It is 22 percent arsenic by weight (Solo-Gabrielle et al. 2000). Recognized to pose unreasonable risks to workers and nearby residents, CCA has been banned by the EPA for all non-wood uses. (EPA 1993) CCA has also been banned for use as a wood preservative by several other countries. In the United States, however, CCA is by far the most common chemical used to produce "pressure-treated" lumber. In 1997, over 90 percent of the treated lumber, timbers, posts, and plywood, and about 75 percent of treated wood volume overall was produced with CCA (Solo-Gabrielle et al. 2000). In 1996, more than 144 million pounds of CCA wood. (AWPI 1997) This corresponds to more than 30 million pounds of arsenic, making the United States the world's largest consumer. In fact, the U.S. wood treatment industry uses 50 percent of the arsenic produced worldwide. (USGS 1999) Between 1964 and today, an estimated 550 million pounds of arsenic have been put into pressure-treated wood.

Background on Arsenic

The risks associated with CCA stem from arsenic exposure. When ingested or inhaled, arsenic is readily taken up by the body. But people may be completely unaware of their exposure since this toxic metal is tasteless, colorless and odorless. Arsenic causes a wide range of adverse health effects at high, moderate and low doses.

An ounce of arsenic is enough to kill 250 adults (ATSDR 2000). High levels that are not immediately deadly can cause nerve damage, vomiting, fatigue, diarrhea, nausea and the decreased production of red blood cells. Similar effects can also occur after long term ingestion (5 to 15 years) of arsenic at low to moderate levels. (NRC 1999) Recent research has also linked arsenic ingestion to immune system suppression, increased risks of high blood pressure, cardiovascular disease, and diabetes (NRC 1999).

Regulation concerning the exposure to arsenic in drinking water, however, has focused on the risk of cancer. The current drinking water limit for arsenic (MCL, or maximum contaminant limit) is 50 micrograms per liter (ug/L or ppb), which has been the standard since 1947. A new MCL of 10 micrograms per liter was proposed by the EPA under the Clinton administration, but was suspended by the Bush Administration for further review.

1. Arsenic is a more potent and broad acting carcinogen than previously recognized.

Arsenic is classified by the EPA and the World Health Organization as a known human carcinogen. The association between arsenic ingestion and skin cancer has been recognized for more than a hundred years (ATSDR 2000). In 1990, the Consumer Product Safety Commission evaluated the risks of skin cancer from arsenic exposure through treated wood play structures. Over the past 10 years, however, the scientific picture of arsenic carcinogenicity has changed significantly.

In 1999, the National Research Council reviewed the growing body of evidence that arsenic was even more harmful that previously thought. They concluded that there are indisputable links to skin, bladder and lung cancer, and that there is some evidence to suggest links to kidney and liver cancer. These findings were based on human epidemiological studies in Taiwan, Chile, and Argentina where whole populations were exposed to arsenic in drinking water- notable because such extensive human data is rare (NRC 1999).

The NRC concluded that the current drinking water standard was not adequately protective of public health and "requires downward revision as promptly as possible." In fact, NRC analyses showed that consuming arsenic at the current MCL (or 100 ug of arsenic a day) could lead to a cancer risk of 1 in 100 to 1 in 1,000 (NRC 1999). A Dartmouth College research team also found that arsenic acts as an endocrine disruptor at low concentrations: between 25 and 50 micrograms per liter (Kaltreider 2001).

Recent research has also shown that children metabolize arsenic differently, likely making them more susceptible to its harmful effects. Arsenic is metabolized through a process called methylation which converts the metal into a less toxic form which is easier to excrete. Methylation reduces the amount of time the body is exposed to arsenic's toxic effects. Yet studies have shown that substantial variations exist in people's ability to methylate arsenic, and that children are not able to convert arsenic into less toxic forms as readily as adults (NRC 1999). Furthermore, research has also shown that people with poor nutrition may be more susceptible to arsenic related health effects, meaning that low-income children may be especially at risk from treated wood (NRC 1999).

In light of this new information, it is clear that the question of the cancer risk posed by arsenic treated wood needs to be reevaluated by the CPSC. The cancer slope factor used by the CPSC, for instance, is 3 times lower than what is now used by the EPA (Roberts and Ochoa 2001).

2. Exposure to arsenic from CCA-treated wood is more significant than previously recognized.

The 1990 CPSC study found detectable arsenic on only two of the seven play structure samples tested. However, most of these samples had previously been coated with an oil-based stain. Recent studies indicate that these findings may not be representative of the levels of arsenic that are dislodgeable from the

surface of CCA-treated play structures, decks and other structures that children and adults come into contact with on a daily basis.

A research team from the Connecticut Agricultural Experiment Station looked at arsenic levels on the surface of pressure treated wood boards and municipal play structures. Wipe samples of boards that are typically used for decking found a range of 6 to 122 ug of arsenic per 100 cm^2, with an average of 40 ug/100cm^2 (Stilwell 1998). Wipes from horizontal boards of municipal play structures were found to have between 2 and 45 ug of arsenic per 100 cm^2, and averaged 9 ug. Vertical poles were found to have much higher levels, ranging between 5 and 632 ug/100 cm^2, with an average of 105 ug.

Two studies conducted in Canada found surface arsenic levels ranging from 0.05 to 42 micrograms of arsenic per 100cm^2, and averaging 15 and 4.3 micrograms (HWC 1992, Galarneau et al. 1990). Sampling conducted by the Environmental Working Group on two municipal playstructures in California found levels of surface arsenic ranging from 118 to 132 micrograms per 100cm^2.

These results are consistent with a study done by the California Department of Health Services (CADHS 1987) which found a range of 31 to 314 ug/100cm^2 on municipal play structures (no average given) and a mean arsenic level of more than 1000 ug/100cm^2 on a pier. CADHS has also been the only agency to date to look at the amount of arsenic children and adults get on their hands from touching pressure-treated wood. It found that volunteers who rubbed municipal playground wood for five minutes had an average of 236 ug of arsenic on their hands, with levels reaching up to 1,260 ug in one case.

A recent analysis commissioned by the Florida Department of Environmental Protection estimated the daily dose of arsenic associated with exposure to CCA-treated wood from different surface levels of arsenic found in the scientific literature (Roberts and Ochoa 2001). It found that a child might get a dose of 482 ug of arsenic a day if playing on a structure with surface levels of 632 ug of arsenic per 100 cm^2, a dose of 76 ug a day if the structure had arsenic levels of 100 ug/100cm^2, or a dose of 38 ug a day if surface arsenic levels were 50 ug/100cm^2. This is consistent with the CADHS findings which estimate that a child might get a dose of between 24 and 630 ug of arsenic per visit to a play structure made of CCA-treated wood (CADHS 1987).

Taking the results from all studies which have looked at arsenic on the surface of playground equipment (a total of 7 studies and 122 samples), the mean surface arsenic level is 32 ug per 100 cm^2. This has been estimated to correspond to a 24 ug dose of arsenic per day for children, just from playing on CCA-treated play structures (Roberts and Ochoa 2001).

By comparison, the U.S. Food & Drug Administration recently analyzed the typical ingestion of inorganic arsenic through food and found that a six year old child would be consuming an average of 4.6 ug of arsenic per day (Tao and Bolger 1998). Because 90 percent of drinking water systems in the U.S. have arsenic concentrations which are lower than 10 ug/L, and children age 4 through 6 drink an average of 0.45 liters of water a day, most children are ingesting less than 4.5 micrograms of arsenic per day from water (USGS 2000, EPA 2000).

The average child, therefore, is ingesting less than 10 ug of arsenic a day through food and drinking water. A child playing for just a few minutes on treated wood may easily get more arsenic on her hands than she would be ingesting daily from food and water for a day. This fact was recently recognized by the Connecticut Department of Public Health. In a 1998 publication titled "What you need to know about pesticides used in pressure treated wood," the agency states that "exposure from CCA-treated wood can be the major source of arsenic for children who frequently play on CCA-treated playscapes, treehouses, or decks" (CDPH 1998).

It has become evident that significant exposure to arsenic can occur from playing on or handling pressure-treated wood, that these exposures were not adequately assessed in the CPSC's previous analysis, and that these exposures could easily be in excess of those from food and drinking water.

3. The health risks from CCA-treated wood are more significant than previously recognized.

In light of the attention that this issue has received in recent months, the Florida Department of Environmental Protection and the wood treatment industry have taken a new look at the health risks of arsenic in CCA-treated wood. Both studies indicate that the levels of arsenic present on the surface of treated wood put public health at risk.

Commissioned by the Florida Department of Environmental Protection, University of Florida researchers combined data from a number of previously conducted studies to estimate the cancer risk posed to children exposed to CCA-treated wood structures for 5 years during childhood. Including arsenic absorption from skin, and using up-to-date cancer risk assessment factors, they found that the cancer risk from children regularly touching CCA-treated wood ranged from 4 in 100,000 to more than 1 in 1,000 (Roberts and Ochoa 2001). These results are supported by previous work by the California Department of Health Services, which estimated that children faced an additional lifetime skin cancer risk of between 6 in 1,000 to 1 in 10,000 from playing on treated wood play structures (CADHS 1987). At the mean surface arsenic level found on play structures (32 ug/100 cm^2), the researchers shows a cancer risk of 1 in 10,000 for children playing on treated wood for 5 years during childhood (Roberts and Ochoa 2001).

Even the wood preservatives industry's own studies have found that the amount of arsenic on the surface of wood is too high to be safe. Early in 2001, the American Wood Products Institute (AWPI) commissioned and publicized the results of a study to refute media attention showing CCA-treated lumber could be causing harm. In April, however, the industry admitted that the study contained a mathematical error which underestimated the risks by a factor of 1,000. Although the AWPI still maintains that the risks of CCA-treated wood are low, a memo explaining the adjusted values tell a different story (HSWMR 2001, attached). In calculating the amount of arsenic that should be allowed on the surface of wood, the AWPI analysis showed that to protect human health, arsenic levels should be 2 ug per 100 cm^2, a level which is significantly lower than what wipe and hand samples have found.

Numerous cases where consumers have suffered arsenic poisoning from working with CCA-treated wood have also been documented, highlighting the fact that acute risk is present.

- The CADHS began investigating the risk of treated wood in playgrounds after workers building a pier in Monterey, California, developed arsenic poisoning from CCA-lumber in 1978.

- In 1983 a U.S. Department of Agriculture employee experienced internal bleeding followed by complete disability after building picnic tables with treated wood. He sued CCA manufacturers and won more than $700,000 in settlement, discovering in the process that manufacturers had reports of illness from workers sawing treated wood as early as 1968.

- A Washington State schoolteacher was partially paralyzed for three months from arsenic poisoning after building a swimming dock made of wood treated with CCA and settled with manufacturers in 1992.

- A contractor in Bloomington, Ind., suffers from decreased mobility and endured multiple emergency room visits and hospitalizations after getting splinters in his shin while building a deck with treated wood in 1996.

It is becoming increasingly clear that CCA-treated wood presents greater health risks than previously recognized. Moreover, these risks warrant an emergency ban of CCA-treated wood use in playground equipment and an immediate assessment of the safety of treated wood for general use..

4. Many exposure pathways besides manufactured playground equipment exist and need to be addressed.

The 1990 CPSC study examined the risks posed to children playing on manufactured playground equipment. Other studies (e.g CADHS 1987, Roberts and Ochoa 2001) examining the risks associated with arsenic ingestion from CCA-treated wood performed similar focused analyses. However, playground equipment represents only a small fraction of the places where children may come into contact with treated wood.

Pressure-treated wood is ubiquitous. Accounting for nearly a fifth of all softwood boards and timbers sold, treated wood is used not only for children's play structures, but also for decks, railings, picnic tables, fences, docks – basically anywhere wood is used outside. As previously described, almost all of this wood is treated with CCA and therefore is a potential source of arsenic exposure. It is easy to imagine a scenario where children would be coming into contact with treated wood many times during the day. Since kids have a tendency to put their hands in their mouths frequently (an average of 6 and up to 45 times per hour, according to a recent study), it is likely that kids would be ingesting arsenic from each of these sources (Zartarian 1997).

Another exposure pathway that has not been considered by the CPSC and other analyses is soil ingestion. CCA is known to leach from treated wood into the soil below. One study conducted in Connecticut, for example, found levels of arsenic up to 350 parts per million (ppm) and averaging 76 ppm under CCA-treated decks in place for 4 to 15 years. Soils a few meters away averaged only 3.7 ppm (Stilwell and Gorny 1997). Another study of treated wood structures in Florida found the soils underneath to contain up to 217 ppm of arsenic, with an average of 28.5 ppm, while control soils averaged 1.5 ppm (Townsend et al. 2001). The Canadian government found levels of arsenic up to 80 ppm and averaging 50 ppm under CCA treated playground equipment (HWC 1992). These findings have been confirmed by recent tests of soils under municipal play structures in Florida which have shown elevated arsenic levels.

Current analyses that overlook these alternate exposure pathways to arsenic from CCA-treated wood are critically underestimating the risks involved. It is clear that a comprehensive analysis needs to be conducted.

5. Comparable, less toxic alternatives to CCA-treated wood exist.

Safer alternatives to CCA have been used overseas for years and have been gaining acceptance in the U.S. This is a significant change since the EPA last reviewed CCA's registration in 1986, and since the CPSC assessed the safety of CCA treated manufactured play structures in 1990. Wood treated with one alternative chemical, ACQ, is only slightly more expensive than CCA-treated wood, and this price gap is expected to narrow in the future (EBN 2001). Few consumers, however, know of the dangers associated with CCA or the existence of less toxic alternatives.

The most widespread non-arsenic based wood preservative is ammonium copper quat (or ACQ) which is a mixture of copper and didecyl dimethyl ammonium chloride, commonly called quat. Approximately 60 million board feet of ACQ wood was sold in 1998, but a recent agreement by two major wood treatment companies is predicted to significantly expand the availability of ACQ-treated wood (Solo-Gabriele et al. 2000; EBN 2001). ACQ-treated wood is a light tan to olive color, has no detectable odor or vapor, can be painted or stained, and can be used anywhere CCA is used besides marine applications. It has been approved by the American Wood Preservers Association, and was also accepted by the International Conference of Building Officials in 1994 for inclusion in the Uniform

Toxicological and ecotoxicological testing has shown that ACQ-treated wood has low mammalian toxicity, and unlike CCA, the chemical contains no EPA-listed compounds and no known or suspected carcinogens (Solo-Gabriele et al. 2000). Although copper (which is also in CCA) is known to be toxic to some aquatic life, quat is used in shampoos and many other human contact applications. Additional alternatives to CCA also

exist, including one other preservative that has been accepted by the International Conference of Building Officials. This chemical, copper boron azole or CBA, has been used extensively in Europe and Japan, but is relatively unknown in the US (Solo-Gabriele et al. 2000). Governor Jeb Bush has recently asked the Florida legislature to stop the use of CCA in the state's own wood treatment plants out of concern over arsenic. A number of wood treatment plants around the US have switched in recent years to using less toxic alternatives.

With comparable, less toxic alternatives already on the market, there is no reason why a lethal and carcinogenic compound should be used for treating wood children and adults are handling daily.

6. The Consumer Product Safety Act and the Hazardous Substances Act require the CPSC to ban CCA for use in playground equipment and promptly review the safety of other uses.

The Consumer Product Safety Act authorizes the CPSC to enact a ban on products which pose "imminent and unreasonable risk of death, serious illness, or severe personal injury" where "no feasible consumer product safety standard would adequately protect the public from unreasonable risk of injury" (15 U.S.C. §2061(a)). The Federal Hazardous Substances Acts "imminent hazard" provision also authorizes a ban on hazardous products as a temporary remedy during the course of regulatory proceedings, such as a CPSC review (15 U.S.C. §1261(q)(2)).

Although the manifestations of arsenic exposure from CCA-treated play structures may not be immediately apparent – as in the ultimate development of cancer – the legal standard is imminent risk, not imminent injury. Recent research findings (e.g. Roberts and Ochoa 2001) make it clear that children are facing imminent risk in the form of greatly increased cancer risks as a result of playing on CCA-treated playground equipment. The development of a product safety standard is not an adequate response because the playground equipment purchased or constructed during the interim would expose thousands of children to unnecessary "imminent and unreasonable" risk for many years to come (as long as the playground equipment is in use).

The Consumer Product Safety Commission has the legal authority, under the Consumer Product Safety Act and the Hazardous Substances Act, to immediately ban CCA-treated wood for use in children's playground equipment while the Commission reviews the safety of all CCA-treated wood products. Any failure to do so will continue to jeopardize the health of millions of people, including children, from the harmful effects of arsenic exposure.

Conclusion

This petition demonstrates the urgent need and clear legal authority for a CPSC-imposed ban on the use of CCA-treated wood for playground equipment and a new CPSC assessment of the safety of CCA-treated wood for general use. Recent research has shown that arsenic is more carcinogenic than previously recognized, that arsenic is present at significant concentrations on CCA-treated wood and in underlying soil, that the health risks posed by this wood are greater than previously recognized, and that past risk assessments were incomplete. Furthermore, the availability of comparable, less toxic alternatives make these risks unnecessary.

Sincerely,

Richard Wiles, Senior Vice President
Environmental Working Group
Washington, D.C.

Bill Walsh, National Coordinator
Healthy Building Network
Washington, D.C.

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PETITION
SUPPORT COMMENTS

CPSA 6 (b)(1) Cleared
6/23/01
___No Mfrs/PrvtLblrs or
Products Identified
___Excepted by
___Firms Notified,
Comments Processed.

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 Domincian 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

Margaret Weber
Coordinator of Corporate Responsibility
Portfolio Advisory Board

May 21, 2001

Ann 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,

Jan D. Stensland
Member, Board of Directors

Boston Women's Health Book Collective

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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

Judy Norsigian
Executive Director

CENTER FOR ENVIRONMENTAL HEALTH

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Naomi and Nehemiah Cohen Foundation*

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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

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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

CLEAN WATER ACTION

36 Bromfield Street, #204
Boston, MA 02108
(617) 338-8131 Fax: 338-6449
bostoncwa@cleanwater.org

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

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CLEAN WATER ACTION
25TH ANNIVERSARY
Our Water, Our Health, Our Future

CLEAN WATER ACTION

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

CLEAN WATER ACTION

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
California Director

ADDRESS CHANGE: 23 Grant Avenue 3rd Floor, San Francisco CA 94108

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CLEAN WATER ACTION
25TH ANNIVERSARY
Our Water, Our Health, Our Future

CLEAN WATER ACTION

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 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
202-895-0420 ext. 102
afellows@cleanwater.org

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CLEAN WATER ACTION

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

National Office • 4455 Connecticut Avenue N.W. Suite # A300 • Washington, DC 20008 • 202/895-0420
Rocky Mountain Regional Office • 899 Logan Street #101 • Denver, CO 80203 • 303/839-9886 • Fax 303/839-9870

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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,

Marie Zellar
State Director
Clean Water Action Alliance of Minnesota

CC:
Representative Jean Wagenius
CWAA Board and Council

Midwest Regional Office • 526 Hennepin Avenue East • Minneapolis, MN 55414 • (612) 623-3666
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CLEAN WATER ACTION

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 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,

Robert Wendelgass

Bob Wendelgass
PA State Director
215-640-8800
bwendelgass@cleanwater.org

Clean Water Action

May 21, 2001

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

Dear Chairperson Brown,

Texas 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.

Texas Clean Water Action has over 70,000 members in Houston, San Antonio, Austin, Dallas, Ft. Worth, several more communities who are working 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,

Sparky Anderson
Texas Program Director
512-474-0605

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

CLEAN WATER ACTION

372 Broadway
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

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 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

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ECOLOGY CENTER

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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 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.

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.

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 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,

Mary Beth Doyle, MPH
Environmental Health Project
Ecology Center

30 YEARS OF ENVIRONMENTAL ACTION

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FORESTETHICS
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SEATTLE, WA 98107
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 or 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 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. 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

GRRN

GrassRoots Recycling Network

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 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 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,

Bill Sheehan

Bill Sheehan, Ph.D.
Executive Director

P.O. Box 49283, Athens, GA 30604-9283 • Email: zerowaste@grrn.org
Tel: 706-613-7121 • Fax: 706-613-7123 • Website: http://www.grrn.org

GREAT LAKES UNITED

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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GREENACTION

For Health & Environmental Justice

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

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1-800-326-0959 • 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,

R Brent Baeslack

Brent Baeslack
Chair

HEALTHLINK

4 Sewall Street
Marblehead, MA 01945

cleanair@shore.net
www.healthlink.org

1-781/639-8636
FAX 1-781/639-8667

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 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.

As an organization that has dedicated much of our resources to 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 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,

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, NCES 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,

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

LDA

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
Healthy Bldg. Network

PHONE: _____ FAX: 202-332-0468

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 Ctte.

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

MICHIGAN Environmental Council

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 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. 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

Michigan Environmental Council, A Coalition of Organizations Protecting Michigan's People and the Environment
119 Pere Marquette Dr. • Suite 2A • Lansing, MI 48912 • (517) 487-9539 • Fax (517) 487-9541 • mec@voyager.net
http://www.mecprotects.org

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

Salem Sound 2000
Restoring A Common Resource

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,

Cindy Dunn, Esq.
Executive Director

201 Washington Street Suite 9 Salem, MA 01970 (978)741-7900 fax: (978)741-0458

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

141 Main Street, Suite 6 Montpelier, Vermont 05602 Tel: 802.223.5221 Fax: 802.223.6855 www.vpirg.org

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,

Donna M. Brownell

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) 731-6688

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,

Susan DeMaria
Executive Director

WOMEN'S VOICES FOR THE EARTH

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