From: C[redacted] C[redacted] [[redacted]]
Sent: Tuesday, December 21, 2010 6:41 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, and a VOTER I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

C[redacted] C[redacted]
[redacted]
[redacted]

From: C[redacted] R[redacted] [redacted]
Sent: Tuesday, December 21, 2010 7:17 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

C[redacted] R[redacted]
[redacted]
[redacted]

From: M[redacted] M[redacted]
Sent: Tuesday, December 21, 2010 7:27 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

M[redacted] M[redacted]
[redacted]

From: C[redacted] C[redacted] [[redacted]]
Sent: Tuesday, December 21, 2010 7:29 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

C[redacted] C[redacted]
[redacted]
[redacted]

From: A[redacted] R[redacted] [redacted]
Sent: Tuesday, December 21, 2010 8:29 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

A[redacted] R[redacted]
[redacted]

From: p[redacted]s[redacted]
Sent: Tuesday, December 21, 2010 9:08 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

p[redacted] s[redacted]

From: k[redacted] b[redacted]
Sent: Tuesday, December 21, 2010 9:11 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

k[redacted] b[redacted]
[redacted]

From: A[redacted] T[redacted] [[redacted]]
Sent: Tuesday, December 21, 2010 11:43 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

A[redacted] T[redacted]
[redacted]

From: M[redacted] J. K[redacted]
Sent: Wednesday, December 22, 2010 12:20 AM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

M[redacted] J. K[redacted]
[redacted]

From: g[redacted] r[redacted] [redacted]
Sent: Wednesday, December 22, 2010 4:26 AM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

g[redacted] r[redacted]
[redacted]

From: J[redacted] L[redacted] [redacted]
Sent: Wednesday, December 22, 2010 8:43 AM
To: GreenEO4

To whom it may concern,

I was extremely excited to learn that New York State is on the threshold of a new era in the effort to reduce chemical toxins in our environment, and that an interagency committee voted to recommend the adoption of a document entitled "Consideration of Chemicals in the Development of Green Specifications" to use in the procurement of products and services for the State.

I am the parent of young children, and I will do anything to protect the health and wellbeing of my children, and any greater awareness of chemicals in products and the environment will help assure that.

Please know that I am fully in support of your efforts!

Sincerely,
J[redacted] L[redacted]

From: H[redacted] C[redacted]
Sent: Wednesday, December 22, 2010 9:16 AM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

H[redacted] C[redacted]
[redacted]

From: B[redacted] H[redacted]
Sent: Wednesday, December 22, 2010 9:56 AM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

B[redacted] H[redacted]
[redacted]

From: J[redacted] S[redacted] [[redacted]]
Sent: Wednesday, December 22, 2010 10:40 AM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

J[redacted] S[redacted]
[redacted]
[redacted]
[redacted]

From: r[redacted] k[redacted] [redacted]
Sent: Wednesday, December 22, 2010 11:28 AM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

r[redacted] k[redacted]
[redacted]
[redacted]

From: D[redacted]R[redacted]
Sent: Wednesday, December 22, 2010 2:19 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

D[redacted] R[redacted]
[redacted]

From: Anne Rabe [redacted]
Sent: Wednesday, December 22, 2010 2:48 PM
To: GreenEO4
Subject: Comments on Chemicals Recommendation

Dear Office of General Services,

Our organizations are writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." This policy will better protect New Yorkers, as well as our environment, waterways and drinking water supplies.

This recommendation is a prevention-oriented policy based on pollution prevention and the reduction of health and environmental risks from especially hazardous chemicals in products. We strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and the EPA Chemicals in Action Plans being implemented under TSCA.

This recommendation is also based on the guiding principles outlined in EO 4. Also, New York would join a growing number of states and municipalities enacting green purchasing programs that seek to avoid the purchase of products with priority toxic substances, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington.

The recommendation appropriately focuses on especially hazardous toxic chemicals that are already being regulated and prioritized by the federal government, and now need to be prioritized in procurement as well. This is a reasonable and sound approach from an environmental, public health and economic perspective.

Sincerely,

Lois Marie Gibbs
Executive Director
Anne Rabe
Campaign Coordinator
Center for Health, Environment & Justice
Falls Church, VA
Albany, NY

John Bieger
Chair
Buffalo AFL-CIO
WNYCOSH Safety & Health Committee
Buffalo, NY
Peter Anderson
Executive Director
Center for a Competitive Waste Industry
Madison, WI

Barbara J. Warren
Citizens' Environmental Coalition
Albany, NY

Judy Braiman
Empire State Consumer Project
Rochester, NY

Tracy Frisch
Greenwich Citizens Committee, Inc.
Greenwich, NY

Carrie Firestone
Ilion Project
Ilion, NY

Dr. David Carpenter
Institute for Health & the Environment
Rensselaer, NY

Stephen Boese
Executive Director
Learning Disabilities Association of New York State
Latham, NY

Jonathan Rosen
Health & Safety Director
Public Employees Federation (PEF)
Albany, NY

Reverend Cathy Rieley-Goddard
Riverside-Salem United Church of Christ/Disciples of Christ
Buffalo, NY

Lynne Jackson
Sally Cummings
Tim Truscott
Grace Nichols
Save the Pine Bush
Albany, NY

Ted Schettler MD, MPH
Science and Environmental Health Network
Ames, IA

William J. Pienta
Director
District 4
United Steelworkers
Cheektowaga, NY

Roger Cook
Director
Western NY Council on Occupational Safety & Health
Buffalo, NY

From: friends@hbcac.org
Sent: Wednesday, December 22, 2010 3:22 PM
To: GreenEO4
Subject: Support for NYS Chemical Avoidance Purchasing Proposal
Attachments: OGSsupportltr.jpg

Dear Members of the Office of General Services, attach please find Huntington Breast Cancer Action Coalition's letter supporting the recommendation titled "Consideration of Chemicals in the Development of Green Specifications."

Thank you.
Karen Miller, President and Founder
On behalf of Huntington Breast Cancer Action Coalition, Inc.

Huntington Breast Cancer *Action* Coalition

a not-for-profit corporation

746 New York Avenue
Huntington, NY 11743

Telephone: (631) 547-1518
Fax: (631) 547-1520
Email: friends@hbcac.org
Website: www.hbcac.org

December 17, 2010

Dear Office of General Services,

On behalf of the Huntington Breast Cancer Action Coalition, Inc., we are writing in support of the *Recommendation titled "Consideration of Chemicals in the Development of Green Specifications."* This policy will better protect the citizens of New York State and the state's environment and waterways. It is a positive and forward-thinking policy proposal based on pollution prevention and the reduction of health and environmental risks from especially hazardous chemicals in products.

Our coalition strongly supports the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and the EPA Chemicals in Action Plans being implemented under TSCA.

This recommendation is based on the guiding principles outlined in EO 4. It would enable the state to strategically implement the priority attention to toxic substances embodied in the EO. It would meet the goals of EO 4, such as to: "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

New York would join a growing number of states and municipalities enacting green purchasing programs that seek to avoid the purchase of products with priority toxic substances, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington.

The recommendation appropriately focuses on especially hazardous toxic chemicals that are already being regulated and prioritized by the federal government, and now need to be prioritized in procurement as well. This is a reasonable and sound approach from an environmental, public health and economic perspective.

Sincerely,

Karen Miller

Karen Miller, president

From: Angus Crane [acrane@naima.org]
Sent: Wednesday, December 22, 2010 4:27 PM
To: GreenEO4
Subject: NAIMA Comments on New York Executive Order No. 4, "Consideration of Chemicals in the Development of Green Specifications"
Attachments: NAIMACommentsNYEO4ConsiderChemicalsInDevelopmentGreenSpecs122210.doc

Please find attached NAIMA's comments on the above-referenced matter.

Angus E. Crane
Executive Vice President, General Counsel
North American Insulation Manufacturers Association
Ph: (703) 684-0084 ext. 123
Fax: (703) 684-0427

Visit NAIMA online at:
www.NAIMA.org
www.PipeInsulation.org
www.SimplyInsulate.com

NAIMA
NORTH AMERICAN INSULATION MANUFACTURERS ASSOCIATION

Celebrating 75 Years of Energy Efficiency

VIA E-MAIL

December 22, 2010

Ms. Jamie Roth
New York Office of General Services
41st Floor, Corning Tower
Empire State Plaza
Albany, NY 12242

RE: New York Executive Order No. 4, "Consideration of Chemicals in the Development of Green Specifications"

Dear Ms. Roth:

INTRODUCTION

The North American Insulation Manufacturers Association ("NAIMA") strongly objects to the creation of a list of materials, using others lists that are neither current nor contain up-to-date information, that has the potential to constitute a ban on those chemicals or substances from New York State funded projects. As described below, the National Toxicology Program ("NTP"), whose listing is used by the State, is about to complete its detailed scientific delisting process for fiber glass. NAIMA is the association of North American manufacturers of fiber glass, rock wool, and slag wool insulation products.

New York's proposed listing of 85-plus materials is particularly relevant to NAIMA and its members because glass wool (fiber glass insulation) is on the State's proposed list because it currently appears on the NTP's Report on Carcinogens ("RoC"), used by New York State as a basis for its list.

Moreover, fiber glass insulation is both widely used throughout the State of New York and manufactured in New York. Owens Corning operates a fiber glass insulation manufacturing plant in Delmar, New York, which provides hundreds of well-paying union jobs and economic growth for New York.

As the comments set forth below demonstrate, New York's reliance upon NTP's RoC is misplaced, particularly in the case of fiber glass, because NTP's listing does not reflect current scientific findings. Placing an energy efficient product on this list of substances to be banned ignores the tremendous benefit of the product and overlooks the current scientific finding on fiber glass insulation. Most important, New York's lack of public notice and absence of

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stakeholder participation in the process is a violation of due process. NAIMA and its members seek a more fulsome opportunity to participate in a process that will allow the full scientific evidence on fiber glass to be considered.

THE NTP's RoC DOES NOT ALWAYS REFLECT THE MOST CURRENT SCIENCE

New York State has relied upon third party lists to create its own list of virtually banned substances and chemicals without determining whether these third party lists are currently accurate. For example, the NTP's RoC has a listing and delisting process. Before a blanket adoption of the RoC as a valid and accurate list, New York State should have evaluated which substances were undergoing NTP review and whether some substances were completely irrelevant because that chemical or substance is no longer produced or used in the United States. This process would have required a thorough evaluation rather than simply creating a list that is supposed to have credibility by combining or dumping together various lists.

Fiber glass should not be included because it is currently undergoing review through the NTP's delisting process.

Glass wool is currently listed on NTP's RoC. This listing was based on the International Agency for Research on Cancer's ("IARC") listing in 1988. Thus, the listing on NTP could result in a ban on fiber glass in New York because New York State has not assessed the accuracy of NTP's listing. This would be a disadvantage to the State. Consider the history of fiber glass insulation's product stewardship and the enormous benefits of energy efficiency and pollution reduction derived from the installation of these products to fully comprehend why banning these products would be an embarrassment to the State of New York.

Since its introduction into commerce nearly 75 years ago, fiber glass has become one of the world's most useful insulating materials, helping homeowners and industry increase energy efficiency, protect the environment, and reduce energy costs.

NAIMA and its member companies are committed to ensuring that fiber glass products can be safely manufactured, installed, and used. NAIMA's member companies have funded tens of millions of dollars of research at leading independent laboratories and universities in the United States and abroad. The weight of the scientific research shows no association between exposure to glass fibers and respiratory disease or cancer in humans.

The NTP delisting described below follows an international expert review by IARC in October 2001, which re-evaluated the 1988 IARC assessment of glass fibers and removed glass, rock and slag wool fibers from its list of substances "possibly carcinogenic to humans." The IARC experts in 2001 relied upon the large body of scientific data that had been developed following the 1988 IARC assessment. All fiber glass and rock and slag wools that are commonly used for thermal and acoustical insulation have been considered for almost a decade not classifiable as to carcinogenicity in humans (Group 3). IARC noted specifically:

> Epidemiologic studies published during the 15 years since the previous IARC Monographs review of these fibres in 1988 provide no evidence of increased risks of lung cancer or mesothelioma (cancer of the lining of the body cavities) from occupational exposures during manufacture of these materials, and inadequate evidence overall of any cancer risk.

IARC retained its Group 3 classification for continuous glass filaments and the Group 2B "possible carcinogen" classification for certain special purpose glass fibers, which are about 1 percent of total glass wool fiber products and used by OEM manufacturers with established health and safety programs.

The IARC change is consistent with the conclusion reached by the U.S. National Academy of Sciences, which in 2000 found "no significant association between fiber exposure and lung cancer or nonmalignant respiratory disease in the MVF [man-made vitreous fiber] manufacturing environment."

IARC's comprehensive review of the extensive studies developed over the past 15 years indicates that some of the prior expert reviews now need to be updated. Many of these earlier reviews do not account for the new science. For example, the U.S. Department of Health and Human Services (HHS, Shalala 1994) included fiber glass on its list of possible carcinogens based primarily on the 1988 IARC classification.

The Agency for Toxic Substances and Disease Registry's ("ARSDR") Toxicological Profile for Synthetic Vitreous Fibers stated that "In 2002, the International Agency for Research on Cancer (IARC) considered all of the evidence regarding the possible carcinogenicity of synthetic vitreous fibers. Much of the evidence was collected in the 1990s and was not available for earlier assessments made by the U.S. Department of Health and Human Services (DHHS)."[1] Again, ATSDR noted "The U.S. Department of Health and Human Services, National Toxicology Program (NTP 1998, 2000, 2002) classified glass wool (respirable size) as *reasonably anticipated to be a human carcinogen*, based on sufficient evidence of carcinogenicity in experimental animals. This assessment was originally prepared in 1993-1994 for the *7th Report on Carcinogens* (NTP 1994), but has not been updated since then in the *8th, 9th, or 10th Report on Carcinogens* (NTP 1998, 2000, 2002)."[2]

Yet New York's draft regulation has no mechanism to determine the accuracy or timeliness of the very lists they seek to rely upon. New York's limited resources prevent the rapid change in classification of substances that should follow changes, such as IARC's delisting of fiber glass ten years ago or the imminent delisting decision by NTP.

In January 2002, NAIMA petitioned NTP to delist glass wool. The thorough NTP process resulted in the unanimous recommendation of the NTP's selected Expert Panel that glass wool

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[1] *Toxicological Profile for Synthetic Vitreous Fibers* (U.S. Department of Health and Human Services, Public Health Services, Agency for Toxic Substances and Disease Registry), September 2004, p. 7.
[2] *Ibid.* at p. 217.

should be delisted from the RoC (June 2009). In 2010, the NTP Board of Scientific Counselors and the NTP staff acknowledged that the majority of glass wool fibers were not carcinogens. The final NTP outcome will reflect this finding and is expected to be announced in the near future. For an immediate application of this process, New York State is not justified in adding glass wool to a list of substances that should be banned from use in New York funded projects.

NEW YORK SHOULD NOT FOREGO THE SIGNIFICANT BENEFITS OF FIBER GLASS INSULATION

Virtually all of NAIMA's members' products are used and sold in New York. Importantly, a NAIMA member, Owens Corning, provides well-paying union manufacturing jobs to the New York economy. Owens Corning operates a fiber glass building materials manufacturing facility in Delmar, New York. According to public sources, Owens Corning's Delmar facility employs an estimated 320 employees (http://www.gmpiu.org/Horizons/2008/Feb08_Horizons.pdf), most of whom are union members.

New York's manufacturing jobs are valuable. Fiber glass insulation is an important contributor to the New York economy, through direct manufacturing, shipment of finished product to markets within New York and other northeastern states, and export of product to foreign markets. It also supports insulation installers, is a critical material for the construction industry, is widely used by small businesses, and is a much-used material for do-it-yourself consumers. In addition, fiber glass insulation promotes energy efficiency, environmental preservation, and reduces pollutants, including greenhouse gases. Fiber glass is both the most thoroughly used and tested insulation product on the market. As the preferred product for more than 80 percent of the insulation market, its unavailability for New York funded projects would harm the State. The supplies of alternative insulating materials are not sufficient to supply the demands of the market. Moreover, many of these alternative products have not been tested and would not provide a preferable alternative to fiber glass.[3]

In balancing the need to protect and preserve New York's economy with its environmental goals, it is equally important for New York to weigh the significant environmental benefits offered by insulation products. Indeed, it is recognized that improving the energy efficiency of existing buildings can deliver the desired greenhouse gas reductions.[4] In 2008 testimony before the

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[3] J.M.G. Davis, "The need for standardized testing procedures for all products capable of liberating respirable fibres; the example of materials based on cellulose," *British Journal of Industrial Medicine* 1993; 50: 187-190, p. 188.

[4] Insulation does indeed reduce pollutants emitted into the atmosphere. Jonathan I. Levy, Yurika Nishioka and John D. Spengler, "The public health benefits of insulation retrofits in existing housing in the United States," *Environmental Health: A Global Access Science Source*, April 2003, pp.1-16 and Yurika Nishioka, Jonathan I. Levy, Gregory A. Norris, Andrew Wilson, Patrick Hofstetter, and John D. Spengler, "Integrating Risk Assessment and Life Cycle Assessment: A Case Study of Insulation," *Risk Analysis*, Vol. 22, No. 5, 2002, pp. 1003-1017. NAIMA has summarized the findings of these two studies in previous comments which demonstrated the dramatic correlation between the benefits of increased insulation and reduction of air emissions. These Harvard researchers stated that the "magnitude of the economic and public health benefits indicates that creative public policies to encourage" increased insulation "may be warranted." Jonathan I. Levy, Yurika Nishioka and John D. Spengler, "The public health benefits of insulation retrofits in existing housing in the United States," *Environmental Health: A*

Subcommittee on Energy and Air Quality of the Committee on Energy and Commerce of the U.S. House of Representatives, William Fay, Executive Director of the Energy Efficient Codes Coalition, stated that "homes and commercial buildings are this nation's largest sector of energy use and – because of the close relationship between greenhouse gases and energy consumption – also the largest US source of anthropogenic greenhouse gases. Suffice it to say that buildings – and particularly residences – represent one of the last great frontiers of wasted energy."[5]

Since homes and commercial buildings consume nearly one half of New York's energy, these structures must become an integral part of any successful effort to improve energy efficiency. The U.S. Department of Energy, along with various other government and third party organizations, put installation of insulation at the top or in the top five suggestions for energy savings. To understand why, consider the following attributes of insulation and it is easier to understand why this existing technology offers so many advantages.

Energy efficiency is a resource. Indeed, insulation products are resources. In fact, energy efficiency, including insulation, has been deemed the greatest untapped resource available to address the current energy crisis and climate change.[6] Unlike other energy efficiency measures, such as energy efficient appliances or energy saving light bulbs, insulation, once installed, requires no additional energy to save energy.

Therefore, increasing energy efficiency through insulation is cost effective. In *The Ecology of Commerce*, Paul Hawken reported that "ceiling insulation and double glazed windows can produce more oil than the Arctic National Wildlife Refuge at it most optimistic projections; at about one-twentieth the cost, with four times the employment per unit of energy conserved versus the energy consumed by burning oil."[7]

The U.S. Environmental Protection Agency ("EPA") gives weight to cost effectiveness in identifying emissions reductions because a cost effective measure does not present the usual impediments to implementation of an action plan.[8] Rather, cost effective measures help meet goals and objectives expeditiously without overburdening budgets.[9] In focusing on the cost effectiveness of energy efficiency and specifically increased insulation, NAIMA strongly urges New York to not undermine itself by banning the most readily available and widely used insulation product.

Global Access Science Source, April 2003, p.14. The Harvard researchers concluded that "[t]his approach allows us to quantify the benefits of energy efficiency on a national scale not seen before, which takes us far beyond energy savings and energy security. Now it is clear that improving energy efficiency not only helps us as a nation, but also has an immediate, positive impact on us, as individuals, and our families." "Harvard Study Findings," NAIMA-036, September 2003.

[5] Energy Efficient Codes Coalition, Testimony of William D. Fay Before the Subcommittee on Energy and Air Quality of the Committee on Energy and Commerce, U.S. House of Representatives, Thursday, July 17, 2008.

[6] "Transforming Energy Efficiency." www.duke-energy.com/docs/CGI - Fact-Sheet.doc, September 27, 2007.

[7] Paul Hawken, *The Ecology of Commerce* (New York: Harper Business, 1993), p. 178.

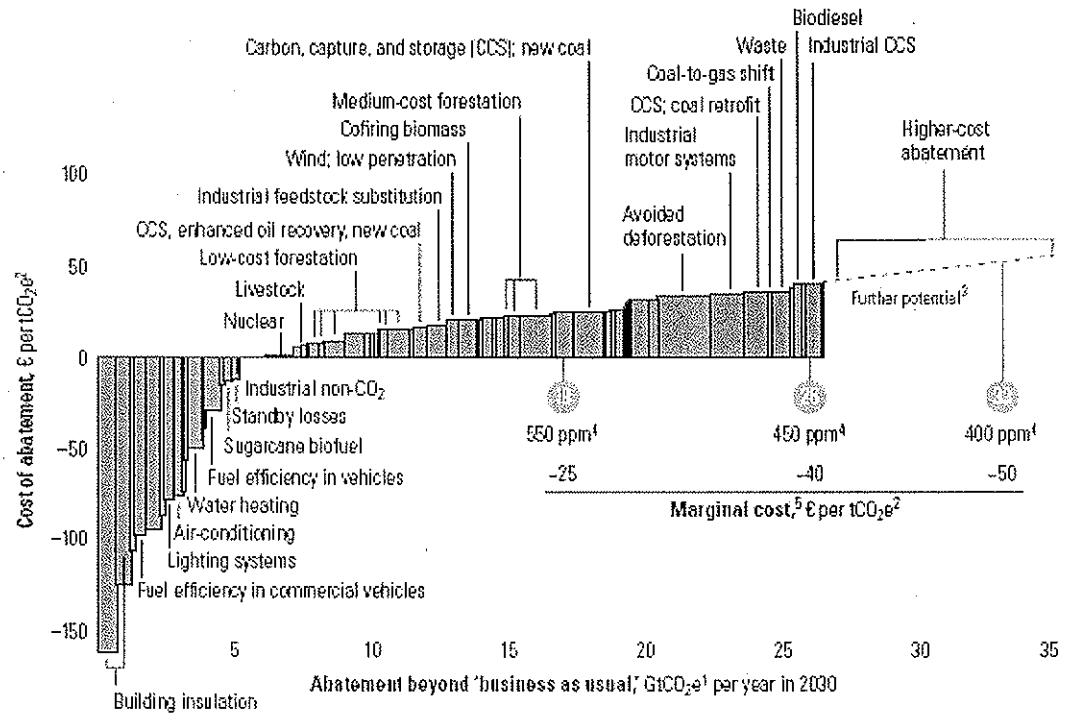
[8] 70 Fed. Reg. 65,983, 66,007, 66,019, 66,020-24, 66,049, 66056, and 66059.

[9] *Ibid.* at 66,006.

In "A Cost Curve for Greenhouse Gas Reduction," the *McKinsey Quarterly* reports "that almost a quarter of possible emission reductions would result from measures (such as better insulation in buildings) that carry no net life cycle cost – in effect they come free of charge.[10] As the graphic from the above-referenced article demonstrates, no other efficiency measure is as cost effective as building insulation.

What might it cost?

Global cost curve for greenhouse-gas abatement measures beyond 'business as usual'; greenhouse gases measured in $GtCO_2e$[1]



[1] $GtCO_2e$ = gigaton of carbon dioxide equivalent; "business as usual" based on emissions growth driven mainly by increasing demand for energy and transport around the world and by tropical deforestation.
[2] tCO_2e = ton of carbon dioxide equivalent.
[3] Measures costing more than €40 a ton were not the focus of this study.
[4] Atmospheric concentration of all greenhouse gases recalculated into CO_2 equivalents; ppm = parts per million.
[5] Marginal cost of avoiding emissions of 1 ton of CO_2 equivalents in each abatement demand scenario.

From a pragmatic perspective, insulation is easily installed and the materials are immediately available. As evidenced by the McKinsey report cited above and the Harvard studies discussed below, insulation delivers significant reduction in pollutants, specifically greenhouse gases. Therefore, it is imperative for New York to protect the insulation industry in New York; it not

[10] Enkvist, Per-Anders, Tomas Nauclér and Jerker Rosander. 2007. "A Cost Curve for Greenhouse Gas Reduction." *The McKinsey Quarterly* 1: 38.

only provides significant economic benefits to New York State, but it helps the state meet its goal to reduce greenhouse gas emissions through increased energy efficiency.

THE CREATION OF THIS LIST VIOLATES THE NEW YORK STATE ADMINISTRATIVE PROCEDURE ACT

One of the major purposes of the New York State Administrative Procedure Act ("SAPA") (Article 2 Rule Making Sections - 202, 202-a, 202-b) is to establish procedural requirements for the adoption, amendment, or repeal of administrative regulations (section 201). In this instance, New York State has not provided adequate notice (section 202(1)(a)(i) and (ii)) to key stakeholders (section 202-b, 6(a-d)), and therefore, the State has violated the notice provisions of the SAPA.

Moreover, there was no initial statement of reason or justification that would explain the specific reasons and purpose of this list or a description of reasonable alternatives (section 202-a). New York State has failed to comply with numerous other provisions of the SAPA.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Angus E. Crane

Angus E. Crane
Executive Vice President, General Counsel

From: G[redacted] B[redacted] [[redacted]]
Sent: Wednesday, December 22, 2010 5:54 PM
To: GreenEO4
Subject: Toxic Chemicals

Importance: High

Please do not allow those toxic chemicals to be used anywhere near people, animals, or water supplies. Many of those chemicals are neurotoxins and detrimental to the central nervous system; there are also chemicals which allow cancers to multiply.

Let's keep NYS healthy and safe.

Sincerely,

G[redacted] B[redacted]

From: Judith Martin [judy@greenhomeswestchester.com]
Sent: Thursday, December 23, 2010 9:57 AM
To: GreenEO4
Subject: Please adopt "Consideration of Chemicals in the Development of Green Specifications"

Please consider this email as support for adopting "Consideration of Chemicals in the Development of Green Specifications".

· Adoption of the list will reduce the amount of taxpayer dollars currently being spent on chemicals that pollute our air, contaminate our water and negatively impact our health.

· Adoption of the list will promote growth in the green economy, creating jobs and sparking innovation.

· Adoption of the list will provide local and municipal government agencies with a concise and well-vetted list of chemicals to avoid when purchasing goods and services.

Judith A Martin, Principal
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http://www.greenhomeswestchester.com
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judy@greenhomeswestchester.com
judy@greenhomesfairfield.com

greenhome
CONSULTING

From: Bobbi Chase Wilding [clean.bobbi@gmail.com]
Sent: Thursday, December 23, 2010 10:38 AM
To: GreenEO4
Subject: Comments on Proposed Consideration of Chemicals recommendation
Attachments: OGSChemicalAvoidanceLetter.doc

Please see the attached letter of support for the proposal.

Best,
Bobbi

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Bobbi Chase Wilding
Organizing Director, Clean New York

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December 22, 2010

Dear Interagency Committee,

Clean New York strongly supports adoption of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating into its purchasing practices a list of toxic chemicals to avoid, New York State can also make it easier for individuals to find affordable, safer products.

Clean New York is a statewide environmental health advocacy organization working to protect new Yorkers from toxic chemicals. We know from Materials Accounting Data collected in New Jersey and Massachusetts that the vast majority (over 90%) of toxic chemicals leave manufacturing facilities in products, not as releases to air, water or soil. Since these toxic chemicals are often not bound to the products, but escape and end up in our bodies where they can cause health problems, we are particularly focused on transforming the marketplace to make products safer and less toxic.

We support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals that are the focus of Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

We disagree with the Interagency Committee's failure to recommend direct adoption of the Chemical Avoidance List proposed by the Advisory Committee. With near-unanimous support for this recommendation, it would have sent even stronger market signals to encourage manufacturers to use safer materials. By weakening the language to "chemicals to consider," rather than "chemicals to avoid," wide latitude is left to purchase products that contain highly toxic chemicals. This does not serve state workers or the public.

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, which are enacting green purchasing programs that avoid buying products made with toxic chemicals.

Adopting this proposal will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

We look forward to the Interagency Committee formally adopting the proposal and encouraging agency purchasers to select products that do not contain the proposed highly toxic chemicals.

Sincerely,

Kathleen A. Curtis, LPN
Policy Director

From: Joel Shufro [jshufro@nycosh.org]
Sent: Thursday, December 23, 2010 12:19 PM
To: GreenEO4
Subject: Support Ltr OGS - EO4
Attachments: Word NYCOSH Stationary.doc

NYCOSH
New York Committee for Occupational Safety and Health, Inc.
116 John Street, New York, NY 10038
(212) 227-6440 - fax (212) 227-9854
www.nycosh.org

December 23, 2010

Office of General Services
41st Floor, Corning Tower
Empire State Plaza
Albany, NY 12242

Dear Office of General Services,

We are writing of the New York Committee for Occupational Safety and Health, a non—profit coalition of 200 local unions in the New York metropolitan area, and 200 safety and health, medical and legal professionals who are dedicated to the rights of all working people to healthful and safe working conditions and in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." This policy will better protect the citizens of New York State and the state's environment and waterways. It is a positive and forward-thinking policy proposal based on pollution prevention and the reduction of health and environmental risks from especially hazardous chemicals in products.

We strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and the EPA Chemicals in Action Plans being implemented under TSCA.

This recommendation is based on the guiding principles outlined in EO 4. It would enable the state to strategically implement the priority attention to toxic substances embodied in the EO. It would meet the goals of EO 4, such as to: "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

New York would join a growing number of states and municipalities enacting green purchasing programs that seek to avoid the purchase of products with priority toxic substances, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington.

The recommendation appropriately focuses on especially hazardous toxic chemicals that are already being regulated and prioritized by the federal government, and now need to be prioritized in procurement as well. This is a reasonable and sound approach from an environmental, public health and economic perspective.

Sincerely

Joel Shufro
Executive Director

RECOMMENDATION
Executive Order No. 4 Interagency Committee on Sustainability and Green Procurement Consideration of Chemicals in the Development of Green Specifications

Executive Order No. 4 (EO 4) charges the Interagency Committee on Sustainability and Green Procurement with the development of green procurement specifications for use by state agencies and public authorities. When choosing priority categories and developing green specifications, EO 4 directs the Committee to consider, among other factors, commodities, services and technology that reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production. The primary purpose of identifying chemicals to be aware of in green procurement is to assist the Interagency Committee on Sustainability and Green Procurement ("Committee") in meeting the goals of EO 4. An added benefit is informing the market of chemicals to be aware of in green procurement.

The federal government has identified chemicals that pose potential harm to human health and the environment. See current U.S. Environmental Protection Agency (EPA) Waste Minimization Priority List (http://www.epa.gov/osw/hazard/wastemin/priority.htm), and U.S. Department of Health and Human Services National Toxicology Program, current Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens (http://ntp.niehs.nih.gov/index.cfm?objectid=32BA9724-F1F6-975E-7FCE50709CB4C932). In addition, pursuant to the federal Toxic Substances Control Act (TSCA), certain chemicals of concern have been identified by the EPA in Action Plans that outline the risks that each chemical may present and identify specific actions EPA will be taking. (http://www.epa.gov/oppt/existingchemicals/pubs/ecactionpln.html).

In accordance with its practice since EO 4 was signed, the Committee shall continue to consider chemicals that pose potential health and environmental impacts, including, but not limited to, chemicals identified in the above sources, when developing green procurement specifications and evaluating existing standards and certification programs. The Committee may, depending on available resources, consider additional information that can be obtained with reasonable effort.

The identification of chemicals to consider in green procurement should not be construed as a ban on the purchase of commodities, services or technology containing and/or using such chemicals. Depending on each commodity, service or technology, and whether sufficient alternatives exist in the marketplace, procurement specifications may restrict or allow considered chemicals to be used or contained in certain commodities, services or technologies (e.g., mercury in fluorescent lamps).

From: Claire Barnett [cbarnett@healthyschools.org]
Sent: Thursday, December 23, 2010 12:30 PM
To: GreenEO4
Subject: comment on Green procurement Recommendations on Chemical Avoidance
Attachments: NYS_OGS_comments on GRProcuremt_Dec2010.pdf

Please find attached our comment regarding EO4 and chemicals avoidance.

Claire

Claire L. Barnett, MBA, Founder and Executive Director
Healthy Schools Network, Inc. - *celebrating 15 years 1995-2010*
518-462-0632

Coordinator, National Coalition for Healthier Schools
...providing the platform and the forum for environmental health at school ...
Mobile: 202-543-7555

www.HealthySchools.org - *Read 2010 Year End News online*
www.NationalHealthySchoolsDay.org - *See Activity Map*
www.CleaningforHealthySchools.org - *Download Free Color Poster for Your School*

"... It's amazing what you can learn, ... especially if the people who are doing the talking also happen to be children." *Greg Mortenson, Stones Into Schools, 2009*

HEALTHY SCHOOLS NETWORK, INC.

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T 518.462.0632 F 518.462.0433

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December 23, 2010 – via email to GreenEO4@ogs.state.ny.us

Inter Agency Committee on Sustainability and Green Procurement
New York State Office of General Services
Albany, NY

Re: Public Comment on Green Procurement

Recommendation "Consideration of Chemicals in the Development of Green Specifications"

Dear Members of the New York State Inter Agency Committee on Sustainability and Green Procurement:

Healthy Schools Network is writing to offer our full support of the Recommendation regarding the "Consideration of Chemicals in the Development of Green Specifications".

We also are writing to:

- Congratulate you on your first annual progress report (April 2010) that documented stunning successes across many purchasing categories, and simultaneously documented savings of over $200 million to state taxpayers in a program that also significantly reduced the purchase of toxic chemicals embedded in products and technologies. New York has demonstrated state agency and national leadership in this program.

- Thank the Committee for embracing and sustaining the state's 2005 and continuing commitment to a well-defined and cost-effective green cleaning program for agencies and public and private schools statewide. This is not only helping to save money (*OGS and SED, March 2010*), improve indoor air quality and reduce asthma, but New York's leadership has since helped international eco-labeler Green Seal upgrade its certification standard (GS 37) for cleaning products, and inspired many states to enact laws and consider bills on similar policies. And, finally,

- Ask the Committee to extend its state leadership in green procurement to the education community through deliberately considering commodities, services, and technologies commonly purchased by PK-12 schools and child care centers. Children are more vulnerable to environmental exposures than adults and cannot remove themselves from harm's way (*Federal Executive Order 13045; American Academy of Pediatrics; NIEHS, ATSDR, APHA, WHO*). The New York legislature and various administrations have acknowledged this, but to date, green procurement has not been embraced by the education community. This can change:

- Given the opportunity to help schools save on purchasing, and given the opportunity to reduce toxics used by and around children, it seems very worthwhile to find ways as quickly as possible to extend the successes in green procurement to all PK-12 schools and child care centers, especially those receiving state funding.
- Given that many school supplies are in fact generic office supplies and equipment (computers), there may be additional areas of overlap that would be worthwhile to explore: for example, lighting (as PCB-contaminated ballasts are replaced) and flooring.
- Given that education construction/renovation is big business, accounting today for about half of all real estate development in NYC. NYC schools are required under a 2005 city law we shaped and won to 'build green', and New York State PK-12 schools are encouraged to adopt NY-CHPS, developed by NYSERDA and SED, a standard for high performance, green design and construction. Green procurement is sometimes required and always encouraged in high performance green buildings.
- Given that Governor Paterson wrote to the New York Board of Regents and Commissioner of Education in April 2010, shortly after the Committee's annual progress report was posted, urging the Regents and the Commissioner to adopt green procurement, a step consistent with the Regents' comprehensive policies on school facility environments.

Regarding the Recommendation on Chemical Avoidance

The Recommendation on the Consideration of Chemicals in Green Procurement is deliberately hazard-based, that is, prevention oriented and consistent with the intent of EO 4 and of EO 134 (green cleaning) which we fully support.

The Recommendation, if adopted as posted, will better protect the citizens of New York State and the state's environment and waterways. It is a forward-thinking policy proposal based on preventing pollution and reducing risks to human health and the environment. We are also supportive of New York's two-pronged approach, in which the state reduces or eliminates specific chemicals and also researches existing high quality certification standards in the private sector to determine product certifications that have well-defined and well accepted leadership standards in place that reduce or eliminate chemicals of concern, standards and can be moved into state specifications.

We also strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and the EPA Chemicals in Action Plans being implemented under TSCA. New York would join a growing number of states and municipalities enacting green purchasing programs that seek to avoid the purchase of products with priority toxic substances, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington.

We also wish to note that the list of toxic chemicals to be considered in developing procurement specifications does not constitute a ban on those chemicals. Depending on each commodity, service or technology, and whether sufficient alternatives exist in the marketplace, procurement specifications may restrict or allow considered chemicals to be used or contained in certain commodities, services or technologies.

Healthy Schools Network is a 501c3 not for profit national environmental health organization founded in New York in 1995 that has shaped and won state and federal funds and laws to improve children's environmental health and the conditions of schools. Through its Healthy Schools/Healthy Kids Clearinghouse it assists thousands of parents and personnel annually. Honors and Awards include a US EPA Children's Health Protection Award, a US EPA Indoor Air Quality in Schools National Special Achievement Award. It founded and coordinates the national Coalition for Healthier Schools that unites a thousand policy advocates nationwide in local, state, and national efforts to create healthier schools for all children.

If you should wish more information, please call.

Claire L. Barnett, MBA, Founder and Executive Director

From: Sheree [redacted]
Sent: Thursday, December 23, 2010 2:54 PM
To: GreenEO4
Cc: anne rabe
Subject: Executive Order No. 4 Interagency Committee on Sustainability and Green Procurement

We support the recommendation "Consideration of Chemicals in the Development of Green Specifications," a proposal based on pollution prevention and the reduction of risks from hazardous chemicals from the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and the EPA Chemicals in Action Plans being implemented under TSCA. This appropriately focuses on especially hazardous toxic chemicals that are already regulated by the federal government, and need to be prioritized in procurement as well.

Not having these chemicals end up in our waste stream is an important factor, which protects flora and fauna such as that in the Pine Bush Preserve adjacent to the Albany Rapp Road Landfill

Thanks so much for considering our request.

Sheree Cammer
on behalf of
Save the Pine Bush
33 Central Ave.
Albany, NY 12210

From: [redacted] on behalf of Laura Haight [lhaight@nypirg.org]
Sent: Thursday, December 23, 2010 2:21 PM
To: GreenEO4
Subject: support for EO4 chemical avoidance purchasing list

Dear Office of General Services,

On behalf of the New York Public Interest Research Group (NYPIRG), I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." This policy will better protect the citizens of New York State and the state's environment and waterways. It is a positive and forward-thinking policy proposal based on pollution prevention and the reduction of health and environmental risks from especially hazardous chemicals in products.

We strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and the EPA Chemicals in Action Plans being implemented under TSCA.

This recommendation is based on the guiding principles outlined in EO 4. It would enable the state to strategically implement the priority attention to toxic substances embodied in the EO. It would meet the goals of EO 4, such as to: "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

New York would join a growing number of states and municipalities enacting green purchasing programs that seek to avoid the purchase of products with priority toxic substances, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington.

The recommendation appropriately focuses on especially hazardous toxic chemicals that are already being regulated and prioritized by the federal government, and now need to be prioritized in procurement as well. This is a reasonable and sound approach from an environmental, public health and economic perspective.

Sincerely,

Laura Haight

Senior Environmental Associate

NYPIRG

107 Washington Ave.

Albany, NY 12210

--

From: [redacted]
Sent: Thursday, December 23, 2010 3:05 PM
To: GreenEO4
Subject: Att: New York State Office of General Services Re: Rec Consideration of Chemicals in the Development of Green Specifications

Dear Office of General Services,

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." This critical pollution prevention policy will have a significant impact on the protection of the residents and the environment of New York State by reducing health and environmental risks from especially hazardous chemicals in products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and the EPA Chemicals in Action Plans being implemented under the Toxic Substance Control Act.

This proposal is consistent with the guiding principles outlined in Executive Order 4 and would enable the state to implement the priority attention to toxic substances embodied in the Executive Order and to meet its goals to: "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington have already enacted green procurement programs that seek to avoid the purchase of products with priority toxic substances. New York would join the growing ranks of states and municipalities enacting such forward-thinking, cost-effective pollution prevention programs.

The Recommendation provides a sound, economical approach to procurement by focusing on especially hazardous toxic chemicals that are already being regulated and prioritized by the federal government to protect public health and the environment. Adoption of the recommendation will reduce the amount of taxpayer dollars that are now spent on chemicals that continue to pollute our air, water and soil and have costly and serious health impacts on the residents of New York State. Promotion of growth in innovation and the green economy will be fostered with the adoption of this vital proposal and local and municipal government agencies will have access to a well-vetted list of chemicals to avoid in their procurement programs. Finally, New York State will serve as an important example for its residents, businesses, institutions and local

municipalities by establishing this vital pollution prevention model.

Sincerely,
E[redacted] W[redacted]
[redacted]

From: Architects [architects@lewisandgould.com]
Sent: Thursday, December 23, 2010 5:08 PM
To: GreenEO4
Subject: Support Green Procurement

Please support the effort to use safe chemicals in our environment. Procurement on a public level is unlikely to consider the impact on the public including children and seniors.

Thank you.
Michele Lewis, AIA
Principal
Lewis and Gould Architects
39 W 37th St.
New York, New York 10018

From: a[redacted] d[redacted] [[redacted]
Sent: Thursday, December 23, 2010 6:32 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

This recommendation is an important part of implementing Executive Order 4, allowing the state to meet its goals, including to "reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production."

It is time for New York to join the growing number of states, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington, that are enacting green purchasing programs that avoid buying products made with toxic chemicals.

As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

a[redacted] d[redacted]
[redacted]
[redacted]

From: k[redacted]b[redacted] [[redacted]]
Sent: Thursday, December 23, 2010 7:53 PM
To: GreenEO4
Subject: Please support the Chemical Avoidance List

I am writing in support of the Recommendation titled "Consideration of Chemicals in the Development of Green Specifications." It is a positive and forward-thinking proposal based on pollution prevention and the reduction of health and environmental dangers from toxic chemicals. By incorporating a list of toxic chemicals to avoid into its purchasing practices, New York State can also make it easier for individuals like me to find affordable, safer products.

I strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and chemicals in Action Plans EPA is implementing under TSCA.

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As a resident of New York State, I urge you to approve this list. It will create a ripple effect, helping to transition our entire economy towards one that is sustainable and healthy for people and the environment.

Thank you for considering my views.

k[redacted] b[redacted]
[redacted]
[redacted]
[redacted]

From: Dr. Rapp's Assistant [redacted]
Sent: Friday, December 24, 2010 1:16 PM
To: GreenEO4
Subject: Re: Public Comment on Recommendation "Consideration of Chemicals in the Development of Green Specifications"
Attachments: Letter to NYS.docx

December 23, 2010 – via email to GreenEO4@ogs.state.ny.us

New York State Office of General Services

Inter Agency Committee on Sustainability and Green Procurement

Albany, NY

Re: Public Comment on
Recommendation "Consideration of Chemicals in the Development of Green Specifications"

To Members of the Inter Agency Committee on Sustainability and Green Procurement:

Healthy Schools Network is writing to offer our full support of the Recommendation regarding the "Consideration of Chemicals in the Development of Green Specifications".

We also are writing to:

- Congratulate you on your first annual progress report (April 2010) that documented stunning successes across many purchasing categories, and simultaneously documented savings of over $200 million to state taxpayers in a program that also significantly reduced the purchase of toxic chemicals embedded in products and technologies. New York has demonstrated state agency and national leadership in this program.

- Thank the Committee for embracing and sustaining the state's strong commitment to a well-defined and cost-effective green cleaning program for agencies and public and private schools. This is not only saving money (source: OGS and SED, March 2010), but New York's national leadership in

2005 has since helped Green Seal upgrade its certification standard (GS 37) for cleaning products, and inspired a dozen states to enact laws promoting or requiring similar policies. And, finally,

- Ask the Committee to extend its state leadership in green procurement specifications to the education community through deliberately considering commodities, services, and technologies commonly used in PK-12 schools and child care centers. Children are more vulnerable to environmental exposures than adults and cannot remove themselves from harm's way (Federal Executive Order 13045; American Academy of Pediatrics; NIEHS, ATSDR, APHA, WHO). The state legislature and various state administrations have acknowledged this, but to date, green procurement has not been broadly embraced in the education community.

- Governor Paterson wrote to the New York Board of Regents and Commissioner of Education in April 2010, shortly after the Committee annual progress report was posted, urging the Regents and the Commissioner to adopt green procurement, a step consistent with the Regents' comprehensive policies on school facility environments adopted in 1995.

- Given the opportunity to help schools save on purchasing, and given the opportunity to reduce toxics used by and around children, it seems very worthwhile to find ways as quickly as possible to extend the successes in green procurement to all PK-12 schools and child care centers, especially those receiving state funding. We note that many school supplies are in fact generic office supplies and equipment (computers). There may be additional areas of overlap that would be worthwhile to explore: for example, lighting (as PCB ballasts are removed), paints, flooring. Education construction/renovation is big business, accounting currently for about half of all real estate development in NYC. NYC schools are required under a 2005 city law to 'build green', and New York State PK-12 schools are encouraged to adopt NY-CHPS, developed by NYSERDA and SED, a standard for high performance, green design and construction.

Regarding the Recommendation on Chemical Avoidance

The Recommendation on the Consideration of Chemicals in Green Procurement is deliberately hazard-based, that is, prevention oriented and consistent with the intent of EO 4 and of EO 134 (green cleaning) which we support.

The Recommendation, if adopted as posted, will better protect the citizens of New York State and the state's environment and waterways. It is a positive and forward-thinking policy proposal based on preventing pollution and reducing risks to human health and the environment. We are also supportive of New York's two-pronged approach, in which the state also researches existing high quality certification standards in the private sector in order to locate product categories that have well-defined and well accepted leadership standards in place that reduce or eliminate chemicals of concern, and can be moved into state specifications.

We also strongly support the inclusion of all the chemicals identified in the Recommendation, including the references to chemicals found in the Environmental Protection Agency Waste Minimization Priority List (PBTs), Department of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and the EPA Chemicals in Action Plans being implemented under TSCA. New York would join a growing number of states and municipalities enacting green purchasing programs that seek to avoid the purchase of products with priority toxic substances, such as California, Massachusetts, Maine, New Hampshire, New Jersey, Oregon and Washington.

We also wish to note that the list of toxic chemicals to be considered in developing procurement specifications does not constitute a ban on those chemicals. Depending on each commodity, service or technology, and whether sufficient alternatives exist in the marketplace, procurement specifications may restrict or allow considered chemicals to be used or contained in certain commodities, services or technologies.

Healthy Schools Network is a 501c3 not for profit national environmental health organization founded in New York in 1995 that has shaped and won state and federal funds and laws to improve children's environmental health and the conditions of schools. Through its Healthy Schools/Healthy Kids Clearinghouse it assists thousands of parents and personnel annually. Honors and Awards include a US EPA Children's Health Protection Award, a US EPA Indoor Air Quality in Schools National Special Achievement Award. It founded and coordinates the national Coalition for Healthier Schools that has successfully advocated for the restoration of the federal EO 13045, a President's Inter Agency Task Force, and US EPA's "Healthy Schools Initiative".

If you should wish more information, please call.

Doris J. Rapp, M.D.

Board Certified in Pediatrics, Allergy and Environmental Medicine

Clinical Assistant Professor of Pediatrics (Emeritus) at SUNYAB.

DJR/fdz

Board Certified in Pediatrics
Pediatric Allergy and
Environmental Medicine

Former Clinical Assistant Professor
Of Pediatrics at SUNYAB
Phone: 480-905-9195
Fax: 480-695-9500

Doris J. Rapp, M.D.
8040 E. Morgan Trail, Suite 13
Scottsdale, AZ 85258

December 23, 2010 – via email to **GreenEO4@ogs.state.ny.us**

New York State Office of General Services
Inter Agency Committee on Sustainability and Green Procurement
Albany, NY

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If you should wish more information, please call.

Doris J. Rapp, M.D.
Board Certified in Pediatrics, Allergy and Environmental Medicine
Clinical Assistant Professor of Pediatrics (Emeritus) at SUNYAB.

DJR/fdz

RECEIVED
DEC 17 2010

ACTION:

Please show your support for getting cancer- causing and persistent toxic chemicals out of products by sending a letter before 12/23/10 to the NYS Office of General Services **December 8, 2010**

Corning Tower, Empire State Plaza
Albany, N.Y. 12242 FAX (518) 474-2437

Dear Members of the Office of General Services:

We are writing in **support** of the **Recommendation titled"Consideration of Chemicals in the Development of Green Specifications".**

We wish you to avoid toxic chemicals in products purchased by state agencies. If approved, this would be a major step in eliminating 85 chemicals that have been linked to many chronic disease- including cancers, asthma, autism, and neuro-developmental disorders in all age groups including children,

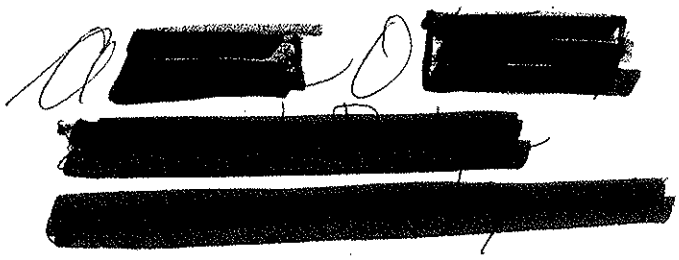
This policy will ultimately help to better protect the citizens of New York State and the state's environment and waterways from especially hazardous chemicals in products. ***It is a positive and forward thinking policy proposal based on pollution prevention and sustainable production.***

The **Recommendation would enable NYS to**

- ***Reduce or eliminate the health and environmental risks from the use or release of toxic substances;***
- ***Minimize risks of the discharge of pollutants into the environment;***
- ***Focus on especially hazardous toxic substances already being regulated by the federal government and now needs to be prioritized in procurement as well.***
- ***This is a reasonable and sound approach from a public health and economic perspective.***
- ***Each year OGS selects 32 products for contracts. If the Recommendation is approved, OGS could assess whether or not these products contain any of the 85 toxic chemicals and could select safer alternatives.***
- *We strongly support the inclusion of all the chemicals identified in the* **Recommendation, *including the references to chemicals found in the US EPA Waste Minimization Priority List, Dept. of Health and Human Services National Toxicology Program Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens, and the USEPA Chemicals in Action Plans being implemented under the Toxic Substances Chemicals Act.***

Thank you for your kind consideration.

Signature



address

League of Women Voters of Great Neck
P.O. Box 220-256 Great Neck, NY 11023-1908

RECEIVED
DEC 17 2010

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Thank you for your kind consideration.

Signature Shirley Siegel

address [redacted]

Natural Resources Chair, Great Neck LWV

FYI

Tentatively Approved by Interagency Committee November 23, 2010

Executive Order No. 4 Interagency Committee on Sustainability and Green Procurement

Consideration of Chemicals in the Development of Green Specifications

Executive Order No. 4 (EO 4) charges the Interagency Committee on Sustainability and Green Procurement with the development of green procurement specifications for use by state agencies and public authorities. When choosing priority categories and developing green specifications, EO 4 directs the Committee to consider, among other factors, commodities, services and technology that reduce or eliminate the health and environmental risks from the use or release of toxic substances; minimize risks of the discharge of pollutants into the environment; minimize the toxicity of packaging; protect public health and the environment, including children; and embody pollution prevention and sustainable production. The primary purpose of identifying chemicals to be aware of in green procurement is to assist the Interagency Committee on Sustainability and Green Procurement ("Committee") in meeting the goals of EO 4. An added benefit is informing the market of chemicals to be aware of in green procurement.

The federal government has identified chemicals that pose potential harm to human health and the environment. See current U.S. Environmental Protection Agency (EPA) Waste Minimization Priority List (www.epa.gov/osw/hazard/wastemin/priority.htm), and U.S. Department of Health and Human Services National Toxicology Program, current Report on Carcinogens, List of Chemicals Known and Reasonably Anticipated to be Human Carcinogens (ntp.niehs.nih.gov/index.cfm?objectid=32BA9724-F1F6-975E-7FCE50709CB4C932). In addition, pursuant to the federal Toxic Substances Control Act (TSCA), certain chemicals of concern have been identified by the EPA in Action Plans that outline the risks that each chemical may present and identify specific actions EPA will be taking. (www.epa.gov/oppt/existingchemicals/pubs/ecactionpln.html).

In accordance with its practice since EO 4 was signed, the Committee shall continue to consider chemicals that pose potential health and environmental impacts, including, but not limited to, chemicals identified in the above sources, when developing green procurement specifications and evaluating existing standards and certification programs. The Committee may, depending on available resources, consider additional information that can be obtained with reasonable effort.

The identification of chemicals to consider in green procurement should not be construed as a ban on the purchase of commodities, services or technology containing and/or using such chemicals. Depending on each commodity, service or technology, and whether sufficient alternatives exist in the marketplace, procurement specifications may restrict or allow considered chemicals to be used or contained in certain commodities, services or technologies (e.g., mercury in fluorescent lamps).

FYI

October 14, 2010
Albany - EO4 Interagency Subcommittee Meeting on Green Procurement

Thank you for the opportunity to speak this morning on behalf of the EO4 Advisory Council. Today I am speaking for myself and several other members of the council who could not be here today. Last night before I left my office I got a call from one member of the council, Scot Case, Vice President of TerraChoice Environmental Marketing, who is currently presenting at the *International Green Technology and Purchasing Conference* in Kuala Lumpur in Malaysia. He joins us in support of your proposed recommendation to consider certain chemicals in green purchasing and will be citing some of New York State's other green initiatives in his presentation on North American Strategies.

The chemicals that your committee has identified for consideration in the development of green specifications have been identified and thoroughly researched by multiple federal agencies and determined to be detrimental to either or both human health and the environment. We applaud your committee for making this effort, joining other states and cities across the country (notably Maine, Los Angeles, New York City, San Francisco, New Jersey and Washington state) who have already enacted similar initiatives and for encouraging others to follow. You will also most certainly be playing a role in advancing green technology industries and creating new markets as well as new jobs.

During our deliberations on this issue, a working group of EO 4 Advisory Council members consulted with leading experts in the emerging field of green purchasing, and worked diligently to identify chemicals that are found in products commonly purchased by the state agencies. A working document was created with contextual information that may be of value to the Subcommittee when undertaking the task of writing specifications. Of course, all the chemicals in this document are included on one or more of the federal lists referenced in your proposed recommendation. We would appreciate the Committee's consideration of the inclusion of this document in your proposed policy.

As an organization that prioritizes the protection of the public's health, especially our children, once again I support you in your decision to carefully consider those chemicals which present the greatest risk to people and the environment. Thank you.

Patti Wood
Executive Director
Grassroots Environmental Education
52 Main Street
Port Washington, NY 11050
516-883-0887
pjw@grassrootsinfo.org

Preliminary Worksheet on Chemicals for Consideration in Green Procurement

Chemical	Concern	List	Products/Ingredients
1,2-Dichloroethane	RA	NTP	Adhesives, building supplies[¥]
1,2,3, Trichloropropane	RA	NTP	Chemical solvent[¥]
1,2,4-Trichlorobenzene	PBT	EPA	Degreasers, lubricants, solvents[†]
1,2,4,5-Tetrachnolorobenzene	PBT	EPA	Intermediate to make pesticides[†]
1,3 Dichloropropene	RA	NTP	Pesticide[¥]
1,4 Dioxane	RA	NTP	Varnish stripper, by-product of surfactants[¥]
1,4-Dichlorobenzene (para-dichlorobenzene)	RA	NTP	Urinal blocks, deodorizers[¥]
2,2 bis(Bromoethyl) 1,3 propanediol	RA	NTP	Flame retardant[¥]
2,3 Dibromo-1-propanol	RA	NTP	Polyurethane foam[¥]
2,3,7,8-Tetrachlorodibenzo-p-dioxin	KHC	NTP	Chlorine-bleached paper products[¥]
2,4,5-Trichlorophenol	PBT	EPA	Fungicide, herbicide[†]
3-Chloro-2-methylpropene	RA	NTP	Pesticide[¥]
4-Bromophenyl phenyl ether	PBT	EPA	Former flame retardant[†]
Acenaphthene	PBT	EPA	PAH, used to make dyes, plastics, pesticides, wood preservatives (creosote, coal tar, roofing tar), auto exhaust[†]
Acenaphthylene	PBT	EPA	PAH, used to make dyes, plastics, pesticides, wood preservatives (creosote, coal tar, roofing tar), auto exhaust[†]
Acetaldehyde	KHC	NTP	Adhesives[¥]
Amitrole	RA	NTP	Pesticide[¥]
Arsenic compounds, Inorganic	KHC	NTP	Wood preservative, treated wood[¥]
Asbestos	KHC	NTP	Roofing shingles, siding[¥]
Benzene	KHC	NTP	Contaminant of solvents[¥]
Benzo (g,h,i) perylene	PBT	EPA	PAH, used to make dyes, plastics, pesticides, wood preservatives (creosote, coal tar, roofing tar), auto exhaust[†]
Beryllium and beryllium compounds	KHC	NTP	Cell phones[¥]
Bis (Chloromethyl) Ether, Technical Grade Chloromethyl Methyl Ether	KHC	NTP	Cleaning products[¥]
Bisphenol A		EPA CAP	Bottles, food packaging[Δ]
Cadmium and cadmium compounds	KHC, PBT	EPA, NTP	Pigments, batteries, plastics, products containing fly ash, stabilizer for PVC[¥†]
Carbon tetrachloride	RA	NTP	Cleaning solvent, adhesive, adhesive remover[¥]
Ceramic fibers	RA	NTP	Fiber board insulation[¥]
Chloroprene	RA	NTP	Glues, adhesives[¥]
Chromium, hexavalent	KHC	NTP	Contaminant, possibly in leather[¥]
Coal tar and pitches	KHC	NTP	Road patching and paving material, roofing material[¥]
Di(2-ethylhexyl) phthalate (DEHP)	RA	NTP	PVC building supplies, office supplies[¥]
Dibenzofuran	PBT	EPA	Coal tar-based products, products containing fly ash, coke dust[†]
Dichloromethane (Methylene chloride)	RA	NTP	Graffiti removers, paint strippers, lubricants[¥]
Diesel exhaust particulates	RA	NTP	Buses, trucks, power generators[¥]
Diethyl Sulfate	RA	NTP	Carbonless paper[¥]

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Dioxins and furans (polychlorinated)	PBT	EPA	Generated from the manufacture and incineration of chlorinated paper products, solvents, pesticides, plastics[†]
Endosulfan	PBT	EPA	Insecticide, wood preservative (not made in the U.S.)[†]
Ethylene dichloride (1,2 Dichloroethane)	RA	NTP	Adhesives, caulking[¥]
Ethylene oxide	KHC	NTP	Hospital-grade sterilant, fungicide[¥]
Fluorene	PBT	EPA	PAH, used to make dyes, plastics, pesticides, wood preservatives (creosote, coal tar, roofing tar), auto exhaust[†]
Formaldehyde gas	RA	NTP	Carpet, tile, glues, adhesives, caulking, particle board, furniture[¥]
Furan	RA	NTP	Wood preservative, asphalt and patching material, roofing patch, resins[¥]
Glass Wool	RA	NTP	Thermal, electrical and acoustical insulation[¥]
Heptachlor; heptachlor epoxide	PBT	EPA	Banned pesticide[†]
Hexachlorobenzene	PBT, RA	EPA, NTP	Banned pesticide, contaminant of products containing chlorinated organics[¥†]
Hexachlorobutadiene	PBT	EPA	Contaminant in the manufacture of rubber[†]
Hexachlorocyclohexane, gamma (Lindane)	PBT	EPA	Pesticide used to control lice and scabies in humans and animals[†]
Hexachloroethane	PBT, RA	EPA, NTP	Artificial smoke, munitions, lubricants, byproduct of incineration of chlorinated products[¥†]
Hexamethylphophoramide	RA	NTP	Rodenticide[¥]
Lead and lead compounds	PBT, RA	EPA, NTP	Batteries, light bulbs, appliances, computers, products containing fly ash, cell phones, other electronics, PVC (pigment/stabilizer)[¥†]
Lindane and other hexachlorocyclohexane Isomers	RA	NTP	Pesticide used to control lice and scabies in humans and animals[¥]
Mercury	PBT	EPA	Light bulbs, appliances, computers, products containing fly ash, thermometers, thermostats[†]
Methoxychlor	PBT	EPA	Insecticide[†]
Methylene Chloride	RA	NTP	Chemical solvent, paint stripper, printing inks, automotive degreasing[¥]
Mineral oils (untreated and mildly treated)	KHC	NTP	Lubricants[¥]
Naphthalene	PBT, RA	EPA, NTP	Mothballs, dyes, leather goods, insecticides, wood preservatives, coal tar-based products[¥†]
Nickel (metallic)	RA	NTP	Batteries[¥]
Nickel compounds	KHC	NTP	Electroplated items[¥]
Nitromethane	RA	NTP	Chemical solvent[¥]
Nitropropane	RA	NTP	Solvent for inks, paints and varnishes[¥]
Nitrosodimethylamine	RA	NTP	Control of nematodes[¥]
PBDEs (octa, penta and deca)		EPA CAP	Furniture, carpeting, computers, other electrical equipment[Δ]
Pendimethalin	PBT	EPA	Herbicide (used on rights-of-way)[†]
Pentachlorobenzene	PBT	EPA	Fire retardant, used to make the fungicide pentachloronitrobenzene (PCNB)[†]

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Pentachloronitrobenzene	PBT	EPA	Fungicide (used as lawn chemical and to prevent slime in industrial water tanks)†
Pentachlorophenol	PBT	EPA	Wood preservative used on power line poles, railroad tracks, fences†
PFOS and PFOA		EPA CAP	Fabrics, paper, cookware, electronics, floor polishes∆
Phenanthrene	PBT	EPA	PAH, used to make dyes, plastics, pesticides, wood preservatives (creosote, coal tar, roofing tar), auto exhaust†
Polybrominated biphenyls (PBBs)	RA	NTP	Brominated flame retardant banned in the U.S. in the 1970s. May still be in imported products.¥
Polychlorinated biphenyls (PCBs)	RA, PBT	NTP, EPA	Banned in the U.S. but may still be contaminant of some manufacturing processes.¥†
Polycyclic aromatic hydrocarbons (PAHs)	PBT, RA	EPA, NTP	PAH, used to make dyes, plastics, pesticides, wood preservatives (creosote, coal tar, roofing tar), auto exhaust¥†
Propylene oxide	RA	NTP	Glues, adhesives, caulking¥
Pyrene	PBT	EPA	PAH, used to make dyes, plastics, pesticides, wood preservatives (creosote, coal tar, roofing tar), auto exhaust†
Selenium sulfide	RA	NTP	Fungicide¥
Silica, Crystalline (respirable size)	KHC	NTP	Paint, primers, cleaning products¥
Tetrachloroethylene (Perchloroethylene)	RA	NTP	Solvents (including dry cleaning), degreasers, graffiti removers, paint strippers, lubricants¥
Tetrafluoroethylene	RA	NTP	Used in the production of Teflon¥
Toluene Diisocyanate	RA	NTP	Floor and wood finishes¥
Trichloroethylene	RA	NTP	Solvents, degreasers, graffiti removers, paint strippers, lubricants, carpet and upholstery cleaners¥
Trifluralin	PBT	EPA	Herbicide (used on rights-of-way)†
Tris (2,3 Dibromopropyl) phosphate	RA	NTP	Flame retardant found in upholstery¥
Urethane	RA	NTP	Sealants¥
Vinyl chloride	KHC	NTP	Siding, piping, roofing, carpet, wall paper, shower curtains¥
Vinyl fluoride	RA	NTP	Wall, pipe and electrical covering¥

Legend:

KHC = Known Human Carcinogen, RA = Reasonably Anticipated to be a Human Carcinogen, PBT = Persistent Bio-accumulative Toxin

EPA = EPA Waste Minimization Priority, EPA CAP = EPA Chemical Action Plans, NTP = National Toxicology Program 11th Report

† = from EPA Waste Minimization Priority Fact Sheet, ∆ = from EPA Chemical Action Plan, ¥ = from NTP Substance Profile and/or NTP Report on Carcinogens Background Document

This list was prepared for the consideration of the EO 4 Procurement Subcommittee by members of the EO4 Advisory Council.

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