

New York State Green Procurement Program  
Response to Comments on

**Proposed Specification on Carpet Cleaning**

**Background:** A specification for carpet cleaning was given tentative approval by the GreenNY Council on June 14, 2023.

**Commenting Entities: Clean + Healthy NY**

Issues Raised by This Organization During the Comment Period:

**1. Storage and Disposal of Chemical Cleaner Guidance**

**Comment:** We suggest specific guidance on the storage and disposal of empty containers which may still contain remnants of the concentrated chemical cleaners that can enter and pollute the environment.

**Response:** With the focus of this specification on procurement as well as best practices related to carpet cleaning, a sentence has been included reminding all personnel to follow labeled storage and disposal directives on cleaning products. Following specific storage and disposal instructions on individual cleaning product labels would be considered best practice.

**Recommendation:** Included a sentence to remind cleaning personnel to follow best storage and disposal practices as labeled on individual products.

**2. Recommendation of Cleaning products entirely free of 1,4 Dioxane.**

**Comments:** At a minimum, we strongly recommend the encouragement of carpet cleaners entirely free of 1,4 Dioxane. This synthetic industrial chemical is found in consumer products including cleaners, which gets into groundwater and has contaminated the water sources of almost 90 million Americans in 45 states.

**Response:** It is understood that studies have indicated that the presence of 1,4 dioxane in consumer products can lead to a number of environmental and health issues. With New York State laws limiting levels of 1,4 dioxane in consumer products, The GreenNY Council believes that following the limits set forth in NYS law is the best guidance to offer in this specification. - [1,4-Dioxane Limits for Household Cleansing, Personal Care, and Cosmetic Products - NYS Dept. of Environmental Conservation](#).

**Recommendation:** No change will be required. The reference to Article 35 of the NYS Environmental Conservation Law relating to 1,4 Dioxane Limits in Household Cleansing, Personal Care, and Cosmetics Products is currently referenced.

### **3. Purchasing carpet cleaners that meet all the third-party certifications listed.**

**Comments:** In addition to the exclusion of intentionally added PFAS, fragrance ingredients, and the recommendation for 1,4, Dioxane free cleaners, we strongly urge that entities purchase carpet cleaners that meet all the listed third-party certifications, rather than providing the option of one convenient and achievable certification that may not satisfactorily attain the goal of safe, toxic free products.

**Response:** The GreenNY Council appreciates the commenter's suggestion to urge entities to purchase carpet cleaning products that meet all the listed third-party certification. However, in order to meet the stringent requirements to achieve one of these third-party certifications, these products have been tested and proven to meet the requirements set forth in this specification. With the high environmental standards that these products must adhere to, they are proven to be reputable for use as an environmentally preferable carpet cleaning option. To ensure that 30% of the market can meet this requirement, we suggest allowing products to meet just one of these certifications.

**Recommendation:** No change will be required.