

Comments to the USGBC TSAC PVC Task Group  
In reference to the USGBC TSAC PVC Draft Report dated December 17, 2004  
from Howard Williams, Vice President/General Manager. Construction Specialties, Inc.

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Like many manufacturers, we strive to be customer-driven. Every product and service that we offer today can be associated with a customer need and/or request.

Our Corporate Vision is, "Enhancing People's Lives By Making Buildings Better" and we're privileged to be in an industry and an economy where vision becomes one with reality.

Daily our Vision effects how we translate customer needs into products that go into their buildings and the daily lives of the people.

Increasingly, building Owners, Trade Associations, Designers, Architects and Specifiers have taken a stand for Sustainability that goes beyond rhetoric as daily they translate their Vision into an active reality. Many have chosen to eliminate/reduce PVC from/in their buildings

In the melding of Vision and Reality we were presented with an opportunity to develop a line of building products (As a customer-driven alternative to our PVC-based product.) that do not contain the dioxin formers, phthalates or halogenated/brominated fire retardants associated with PVC.

Daily the USGBC, too, enjoys living its Vision:Reality as it enhances, encourages and certifies the efficacy of sustainable initiatives and results.

In the scale of Time, Sustainability was recently just a stirring but has rapidly become an awakening. An awakening greatly facilitated by USGBC as it, and parallel organizations around the world, brought diverse constituents together with the means to identify and quantify standards of Sustainable performance.

A stirring. An awakening. And now a self-inflicted "confusing" born from the well-intended, and even now misrepresented, December TSAC PVC Task Group's findings on PVC.

Findings, which say, essentially, PVC is no better or no worse than other products. Although the report says so much more than that, all anyone was waiting to hear was the headline saying PVC rates neither a plus nor a minus.

The least desirable result of this finding will be that manufacturers are left with no Sustainability standard against which the development of alternative products may be measured.

Such product development is costly and the current TSAC findings serve as a reminder to all manufacturers that an awakening may be only a reflection of hope, and not reality but a mirage.

Far more concerning is the USGBC's power to control the reality of Sustainability. I'm certain you felt the weight of this responsibility as you worked through the deliberations. How you now complete the matter may forever determine USGBC's ability to keep together its diverse constituency.

The PVC Task Group's recommendation to the Steering Committee suggesting they allow Innovation and Design credits that further the body of knowledge toward lower health impacts of building materials is, at first look, commendably, a good starting point.

It's here that I think the original framing of the issue may have been flawed because, from a Sustainability standpoint, it's not about PVC.

It's about exposure to dioxin, phthalates, and brominated/halogenated fire retardants.

As with IAQ, it's not about paint; it's about VOC's. It's not about carpet, it's about what's off-gassing from the carpet.

The PVC Task Group has advised the Steering Committee not to use material-based credits that discourage the use of specific materials. Yet, in daily practice USGBC uses its LEED rating system as a "blunt instrument" to discourage the use of solvent-based paints and finishes.

Sustainability is promoted by eliminating, or limiting, dioxin formers, phthalates and brominated/halogenated fire retardants. Or, if not eliminating, then placing it in applications where disposal is no longer an issue because it's in an exterior application with a long in-application life-span.

Where is the integrity in LEED's elective use of material-based credits for only some hazardous chemical generators, VOC's and formaldehyde, and not also a PBT such as dioxin?

PVC is a material with unparalleled attributes, judged, by either side of the issue, either good or bad. What, within TSAC's findings speaks to encouraging the members of the Vinyl Institute to pursue research into a better PVC? Nothing. To the contrary, the Findings may as well say, "Don't bother."

Two years ago, when we redoubled our search for compounds without the questioned elements, I sat across the desk from the V.P. of a large, \$1 billion per year, PVC

compounder/extruder. In reply to my saying the market wants a choice, he said, "They tried to eliminate PVC in Europe, and failed, and they will fail here. I'm on our Corporations committee for new material research and we aren't even looking for alternatives."

I left that meeting thinking how misguided he was and that if I were he I'd at least be researching a better PVC.

The Findings rewarded his reasoning and condemned the investment of all manufacturers currently working with, or toward, improvements and alternatives.

Steering Committee, please:

- Create a series of credits for materials and/or practices that reduce, at either end of the material's life, classes of pollutants and/or particulate emissions associated with building materials.
- In the mean time, while everyone's arguing, and writing these long letters, help pave the way by facilitating an Innovation Credit for the use of materials that, "work toward eliminating a class of pollutants and/or particulate emissions associated with building materials." You know what the pollutants/particulates are, name them and give us a template; give the market an "Easy Button".

With great power comes great responsibility. We commend you for taking on so large a task as to seek to resolve the debate, and we encourage you to complete it.

We, too, recognize the ubiquitous nature of PVC in the building process, and the fact that for some applications it may always remain the material of choice, but is it not wise to move away from PVC where there are viable alternatives, and is it not wise to encourage this move?

You know, and clearly state, that it's about working toward eliminating a class of pollutants and/or particulate emissions associated with building materials. It's not about PVC, just as it's not about paint or carpet.

We've gone from a stirring to an awakening and we're relying upon USGBC to remove the confusion and confirm that the Vision of Sustainability isn't a mirage

Regards,  
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