

**USGBC TSAC PVC Draft Report dated December 17, 2004 (released 12/22/04)
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Submit to tsac@committees.usgbc.org, any time before midnight on February 15, 2005.

Comments submitted by:

First Name	Last Name	Title	Organization	Phone	E-mail	Web site URL
James	Harvie	Executive Director	Institute for a Sustainable Future	218-525-6673	harvie@isfusa.org	

Comments:

Page #	Line #	Comment	Supportive citations
22	6	<p>I am writing to express my shock that the TSAC decided to omit any consideration of lead and organotin leaching from PVC plastic. As part of the original TSAC submission process I submitted a wide variety of peer reviewed journal articles documenting leaching of organotins and lead from PVC. Yet I find no reference to lead leaching anywhere in the report and the only reference to organotins is a mention (page 22, line 26) that articles about leakage of organotin stabilizers from the plastic matrix of certain water distribution pipes...were deemed to fall outside the scope of this report..." with no further explanation.</p> <p>There are numerous journal articles describing human and environmental health impacts from organotins. Target organs include the central nervous system, skin, liver, bile duct, immune system, and reproductive system Furthermore, inorganic and organic tin compounds are easily bioconcentrated through adsorption processes. For these and other reasons, organotins are targeted for priority action by the Convention for the Protection of the Marine Environment of the Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR Convention). It is baffling that a process described as</p>	

the most comprehensive would somehow disregard a toxin which is incorporated into an international convention.

I am similarly baffled by a process which ignores any impact from lead stabilized PVC. Again, I submitted a variety of peer reviewed published data describing lead release from PVC. In one study, the levels of lead in water distributed by lead-stabilized PVC pipes was generally very low, yet the levels of lead in water from newly installed PVC mains were found to temporarily exceed the levels recommended by the World Health Organization (WHO). A variety of studies demonstrate that UV light assists in the migration of lead and tin in PVC pipe. Lead has also been detected in another study of waterlines. Leaching of lead from the PVC appears to be responsible for lead elevation in these water samples.

Lead is a neurotoxicant and was recently listed as a carcinogen. That lead receives no mention in this report is especially concerning. Is it because the TSAC examined the DWV pipe sector, and that the journal articles almost exclusively described metal leaching from water pipes, even though PVC DWV pipes and other PVC pipes are not materially different? We do not know because no justification for the omission of metal toxicants is given. Or is it because the TSAC accepted PVC industry claims that lead is not used as a stabilizer in the United States? Again, we do not know, but the aforementioned studies demonstrate that lead is still used worldwide, and recent consumer alerts of lead stabilized vinyl windows and blind products demonstrate that lead stabilized PVC continues to be a concern domestically.

That the TSAC can ignore the issue of metal toxicity and leaching from both a human and environmental health perspective suggests either a methodology unsuited for the task, and/or very serious and concerning oversight. Around the globe, leading companies are screening their products and processes to remove not only known persistent bioaccumulative toxic compounds, but carcinogens, mutagens and reproductive (CMRs) toxicants and other hazardous chemicals. It is our hope that the TSAC and USGBC inform themselves of this body of work and incorporate into their review, or at a minimum delineate limitations in doing so. Thank you for this opportunity to respond.