

**USGBC TSAC PVC Draft Report dated December 17, 2004 (released 12/22/04)
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Comments submitted by:

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Comments:

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		<p>I write to urge the US Green Building Council not to grant PVC a materials credit in LEED.</p> <p>Last November in <i>Chemistry and Engineering News</i> (the principal chemistry news magazine), I debated with C.T. Howlett, Vice President of the Chlorine Chemistry Council, the wisdom of continuing to expand PVC use in the built environment and elsewhere (http://pubs.acs.org/cen/ncw2004/8242chlorine.html). This expansion is currently occurring on a massive scale and it will continue unchecked without government intervention, irrespective of whether a materials credit in LEED is awarded or not.</p> <p>In the last decades, many governments have regulated dioxins sources, thereby reducing the use of chlorine in certain products and processes. Dioxins are among the most hazardous known anthropogenic pollutants. The regulations have been effective in lowering environmental burdens of dioxins, but the response of the chlorine industry has</p>	

		<p>been to partition more manufactured chlorine into PVC and emphasize the marketing of this material in a myriad of new products. Because of the relationship between adventitious fire and dioxins, the chlorine industry is currently replacing the hard-won reduced releases with a new menace to the public health, namely the growing frequency of adventitious combustion of PVC. Over time, more and more PVC will accumulate in older building stock. As a consequence, sooner or later a sufficient number of the more than one million accidental fires per year in the US will be serious dioxins releases. Environmental dioxins burdens will begin increasing again.</p> <p>It behooves society to try to protect itself against this ominous trend. Green certification of building materials is one mechanism for promoting cultural values in the marketplace that protect the public good. In my opinion, the CCC is a major source of spin in our culture — spin aimed at protecting chlorine products in the marketplace by confusing serious issues of inherent and inescapable hazards in their products and processes. The inescapable reality is that PVC fires are extremely hazardous for multiple reasons. I am not the least surprised that the chlorine industry is seeking to obtain LEED certification. Such certification will further obfuscate these hazards and ultimately undermine public confidence in LEED Certification.</p> <p>I look to the American Building Council to lead the world in establishing environmentally acceptable design for the built environment. Standards that protect the public welfare are fully capable of assisting human beings to secure a sustainable high technology civilization. Promoting sustainability in the built environment means, as a key and perhaps the paramount criterion, standing against the force of capital when that force can only lead to a compromised public health. I again urge you not to grant PVC a materials credit in LEED. Such a move will seriously undermine the American Building Council's ability to promote the building of a sustainable American civilization.</p>	