

From: Morrison, Tom
Sent: Thursday, November 12, 2009 9:50 AM
To: Taylor, Jane
Subject: FW: California Green Building Standards Code Parts 1 & 11 Public Comments comment

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From: Mason, Stephany [mailto:SMason@aq5.com]
Sent: Thursday, November 12, 2009 9:07 AM
To: CBSC (General Mail)
Cc: Walls, Dave
Subject: California Green Building Standards Code Parts 1 & 11 Public Comments

To Whom It May Concern,

Provided below are comments from Air Quality Sciences, Inc. on the current proposed version of the California Green Building Standards Code Parts 1 & 11. All are related to Section 4.5.4 – Pollutant Control

4.5.4.2.1 Adhesives, sealants, and caulks

4.5.4.2.2 Paints and coatings

4.5.4.2.3 Aerosol Paints and Coatings

The requirements in each of these sections are based on product content, not product emissions. In general, the intent of product content limits and rules is to minimize the impacts of the products on the outdoor environment, air and water. They were not designed to address the impact on the indoor environment, the apparent intent of these sections of the CA Green Building Standards Code. Thus, it is recommended that these sections be modified to require adhesives, sealants, caulks, paints and coatings meet emissions criteria. Towards this end, we specifically suggest that the limits meet the requirements of the GREENGUARD Children & Schools Standard (<http://www.greenguard.org/Default.aspx?tabid=110>). This is a comprehensive standard for low-emitting products, including adhesives, sealants, caulks, paints, and coatings. This standard sets emission limits on hundreds of individual volatile organic compounds (VOCs) (including ½ the CA CRELS), formaldehyde, total aldehydes, phthalates, and Total VOCs (TVOC), minimizing the emissions of known and potentially harmful chemicals into the indoor environment. These requirements are consistent with many of the world's most utilized low-emitting standards which place limits on TVOC levels and individual VOC levels to minimize the pollutant load in the indoor environment. It is also suggested that emissions data be no more than 12 months old for use to compliance with these requirements, since formulations and suppliers change so frequently in today's marketplace.

5.504.4.4 Carpet Systems

In this section under option 4 you list Scientific Certification Systems Indoor Advantage Gold (and also mention them in the Notes section therein), when in fact there are no carpets which are certified to this listed certification program (<http://scscertified.com/products/>). It should be removed as it is confusing. We would also like you to consider including reference to the GREENGUARD Children & Schools Standard (<http://www.greenguard.org/Default.aspx?tabid=110>) as it is equivalent to the CA Specification 01350 and the CHPS testing and criteria, with additional levels of stringency.

5.504.4.6 Resilient Flooring Systems

This section needs clarification as it can be read that the code is 1) requiring 50% of all resilient flooring to comply with VOC limits or 2) that 50% of the floor needs to be covered with resilient floor covering for this criteria to apply. Additionally, the listing of the Resilient Floor Covering Institute (RFCI) FloorScore program is redundant as the requirements for certification are the same as for the CHPS program (pass CA/DHS/EHLB/R-174). Thus, this reference should be removed. We would also like you to consider including reference to the GREENGUARD Children & Schools Standard (<http://www.greenguard.org/Default.aspx?tabid=110>) as it is equivalent to the CA Specification 01350 and the CHPS testing and criteria, with additional levels of stringency.

We have also noted that the old **804.4.6 Thermal Insulation & 804.4.7 Acoustical ceilings and wall panels** sections from the previous year's California Green Building Standards Code are not in the new document and believe this may have been an error. These products can be significant contributors to the chemical pollutant load of an indoor environment. These products should be required, at minimum to comply with Collaborative for High Performance Schools Low-emitting Materials List (CA/DHS/EHLB/R-174) and at best we would ask that these products meet the requirements of GREENGUARD Children & Schools Standard (<http://www.greenguard.org/Default.aspx?tabid=110>).

Thank you for your consideration.

Sincerely,

Stephany

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