

From: Walls, Dave

Sent: Monday, November 09, 2009 12:34 PM

To: Taylor, Jane; 'Doug Hensel'; Smith, Howard; dborba@oshpd.state.ca.us; Townsend, Theresa; Nearman, Michael; Keeler, Erika

Subject: FW: California Green Building Standards Code Public Comment

From: Josh Jacobs [mailto:JJacobs@greenguard.org]

Sent: Monday, November 09, 2009 11:56 AM

To: CBSC (General Mail)

Cc: Walls, Dave

Subject: California Green Building Standards Code Public Comment

To Whom It May Concern,

Please take the below comments as GREENGUARD Environmental Institute's public comments on the current draft of California Green Building Standards Code. Please let me know that these have been received and if you have any questions.

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 – In each of these sections the requirements are based on product content, not emissions from the products. There are numerous studies that demonstrate that the content of a product does not directly correlate with the off-gassing potential. While these sections may help with the environmental aspects of the code (if the adhesive or paints makes its way into the waste stream or the outdoor environment), it does not address the actual intent of the sections - providing indoor pollutant control for the betterment of the indoor environment and for people's health. Therefore we suggest requiring adhesives, sealants, caulks, paints and coatings meet emissions criteria, specifically, the requirements of GREENGUARD Children & Schools Standard (<http://www.greenguard.org/Default.aspx?tabid=110>). This standard is the most comprehensive and stringent low-emitting certification currently utilized in the United States for adhesives and paints. By setting emission limits on Individual VOCs (including CA/DHS/EHLB/R-174 criteria), Formaldehyde, Total Aldehydes, Total Phthalates, and Total VOCs (TVOC) this standard minimizes the potential for harmful chemicals to be emitted into the indoor environment. By setting limits for many of the chemicals which can emit from a product, the GREENGUARD Children & Schools Standard is even more comprehensive and stringent than CA/DHS/EHLB/R-174 (CA 01350) which only restricts the emissions of around 60 VOCs (there are more than 11,000 potential chemicals which have been found to off-gas from products). This would also help bring the California Green Building Standards Code's product emissions sections more in-line with many of the world's most utilized low-emitting standards which require limits on TVOC levels and Individual VOC levels to ensure that they are not only capturing the chemicals that we know have harmful effects on humans, but the ones that we don't know about yet along with the total chemical load on indoor environment occupants.. With formulations and suppliers changing so frequently in today's marketplace we also suggest that any prescribed emission limit is met, at the minimum, every 12 months. A product's test results from even two years ago are potentially too permissive for a high performance building.

5.504.4.4 Carpet Systems – Within this section under option 4 you list Scientific Certification Systems Indoor Advantage Gold, 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. The other three listed options will all cover this section completely.

5.504.4.6 Resilient Flooring Systems – This section needs clarification in the language as it can be read that you are only requiring 50% of all resilient flooring to essentially comply with the Collaborative for High Performance Schools Low-emitting Materials List (CA/DHS/EHLB/R-174) or that 50% of the floor needs to be covered with resilient floor covering for this criteria to apply. I am sure that the committee wanted to make sure that all resilient flooring, regardless of coverage area, is required to comply with an emissions standard (as all carpet and carpet padding is required to meet emission standards).

Also the listing of the Resilient Floor Covering Institute FloorScore program is redundant as the requirements to be certified are the same as the CHPS program (pass CA/DHS/EHLB/R-174), therefore it should be removed. In addition we feel that the people of California would best be served by independent third-party certifications. For this reason we would ask that resilient flooring be allowed to meet the requirements of the GREENGUARD Children & Schools Standard (<http://www.greenguard.org/Default.aspx?tabid=110>). This would ensure that the people of California had an industry independent organization certifying products.

Old 804.4.6 Thermal Insulation & 804.4.7 Acoustical ceilings and wall panels (from the previous year's California Green

Building Standards Code) - These sections have not been placed in the new document and we feel that may have been in error. These products can be significant contributors to the chemical 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>).

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