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July 14, 2023

Department of Ecology, HWTR
Safer Products for Washington program
PO Box 47600
Olympia, WA 98504-7600

Submitted Via Online Comment Form

SUBJECT: Safer Products for Washington: Draft Identification of Priority Chemicals Report to the Legislature

Dear Washington State Department of Ecology:

The Chemical Fabrics and Film Association (CFFA) appreciates the opportunity to provide comments on the Draft Identification of Priority Chemicals Report to the Legislature as part of the second five-year cycle of the Safer Products for Washington program.

CFFA is an international trade association whose members manufacture chemical fabrics and film used in numerous applications. The CFFA Vinyl Roofing Division is represented by the leading manufacturers of PVC roofing systems in North America. Its members are committed to making available sound, scientifically backed information on the environmental and functional performance of energy-efficient PVC roofing membranes.

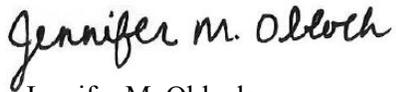
CFFA is providing the following points related to the draft priority chemicals report:

1. As currently drafted, the priority chemicals report is riddled with bias and disparaging claims against PVC. Ecology has identified several chemicals but has not presented any data demonstrating actual exposures to suggest leaching of the chemicals for a vinyl product, in particular vinyl chloride. CFFA requests that any factual findings be shared.
2. Polymerized vinyl is not the source of contamination discovered in the waterways throughout the state. It is CFFA's understanding that once vinyl is polymerized, it does not break down in the landfill. We are not aware of any degradation that would release vinyl chloride or any other monomer from which it was polymerized.
3. References are made in the draft report to roofing materials in connection with environmental exposure to cadmium and lead. Based on a confidential CFFA survey of the historical use of additives in PVC roofing membranes, including cadmium and lead, these heavy metals were eliminated from PVC roofing membranes approximately thirty years ago. Furthermore, in 2015, CFFA was issued a [Safe Use Determination \(SUD\) by OEHHA](#) for DINP in PVC roofing membranes.

CFFA also supports the comments submitted by the Vinyl Institute, which provide additional points related to process and content that demonstrate areas where Ecology should consider updating.

Thank you for the opportunity to comment on the draft priority chemicals report. Please do not hesitate to contact us (cffa@chemicalfabricsandfilm.com) should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jennifer M. Obloch". The signature is written in a cursive, flowing style.

Jennifer M. Obloch

Chemical Fabrics and Film Association – Vinyl Roofing Division