

AlphaGary

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AlphaGary Corporation, 170 Pioneer Drive, Leominster, MA 01453

November 18, 2011

Mr. Ken Sandler
Designated Federal Official
Office of Federal High-Performance Green Buildings
Office of Government Policy
General Services Administration (GSA)
1275 First Street, NE, Room 633D
Washington, D.C. 20417

Dear Mr. Sandler,

As a specialty compounder of materials, AlphaGary would like to comment on your "Green Building Certification System Review" project, following GSA's meeting of the *Green Building Advisory Committee*.

AlphaGary manufactures BOTH PVC-based compounds as well as being a leading compounder of the alternate "halogen-free" technologies. Based on life safety and the robust fire performance codes / standards we have in the United States, products using PVC materials are essential to commercial building requirements. Flexible PVC is found in critical wire & cable, wall coverings, resilient flooring, roofing and in furniture / upholstery. All Federal facilities benefit from the durability, safety, energy conservation, aesthetic appeal, sustainability and the affordability of PVC building products. Flexible PVC products have been used safely and effectively for over 60 years.

As a developer of alternate material technologies, it is important for AlphaGary to have GSA realize the complex engineering balance of performance, safety, health / environmental impact and cost related to achieving a de-selection of PVC. To be certain, the alternate materials / finished goods have not always been proven to meet the complete balance of requirements or benefits that are being sought. With the evolution of PVC technology over the last 15 years, it can be argued that PVC compounds already meet / exceed the benefits of recyclability, health, safety and environmental impact as compared to the alternatives being suggested.

To “de-select” PVC, based on more anecdotal evidence and NOT on scientific fact or comprehensive Life Cycle Assessment tools (that include all risks and hazards) is short-sighted, from our technical analysis. Let alone the impact to manufacturing capability and jobs in the United States, the target by GSA to eliminate PVC does NOTHING to impact the inferred “hazards” of handling / using raw materials that go into the production of virtually ALL plastics, including PVC.

It can be scientifically documented that the referenced / perceived “toxic” impacts of PVC can EQUALLY be attributed to the various alternative plastic materials being proposed, noting that these impacts are merely “different”. The overall benefit to society and public safety is NOT achieved simply on the de-selection of PVC in Building environments. In reality, EACH plastic material has benefits and potential hazards and it is up to the commercial manufacturers of raw materials and plastic compounds to continue to develop and use “safer and greener” products, without short-sighted restraints. These safer and greener product objectives can be certainly be achieved by using both PVC and alternate materials.

Please realize that by de-selecting PVC in Federal buildings and renovation projects will severely limit the government from meeting important National Codes and Standards, such as our National Electrical Code® and Life Safety Code® as adopted throughout the United States and managed by the National Fire Protection Association. De-selection of PVC also brings to the Government an increase in costs and a decrease in jobs / commerce in the United States, with NO documented added benefit to the health & safety of people and our environment. I’m sure that these unintended consequences are NOT what the general public is looking for from the GSA.

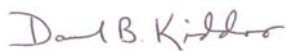
The GSA should not be in the position of unilaterally proposing THE “green building certification system”, without an open review of the competitive and effective standards that are available across the United States. Objective, performance-driven review systems are in place to consider the more scientific “engineering balance” criteria that the public demands. For example, the introduction of the Green Building Initiative’s (GBI) *Green Globes*, as opposed to the U.S. Green Building Council’s (USGBC) LEED or the Living Building Challenge (LBC), has had numerous positive impacts.

The only ANSI-certified system among these alternatives is the GBI’s “Green Building Assessment Protocol for Commercial Buildings”. Indeed, looking at the record, GBI’s program has been more widely adopted than the other systems, due to its more “considered” approach. Green Globes has been used for retail, commercial, institutional and healthcare buildings in both the public and private sectors. I am aware that, recently, the Department of Veterans Affairs committed to certifying buildings to *Green Globes* on over 140 campuses. This year, the number of *Green Globes*-certified buildings is expected to grow from about 130 to over 400. Federal agencies will achieve both performance and cost benefits by having multiple “green” review systems available.

Unfortunately, I have to say that my reading of this work by the GSA indicates that there is a hidden objective to react to the “emotional” debate to de-select PVC, rather than to review the scientific evidence on both the long term use of PVC versus the inadequate assessment of the products being made with alternative materials. The GSA is certainly suggesting a Government-wide procurement policy that would regulate materials and commerce outside the purview of the general public and traditional administrative procedures. This action would be an extremely flawed and serious precedent, based on political and emotional pressures rather than fully considered scientific and commercial evidence / consequences.

Thank you for allowing AlphaGary to respond to your actions on such short notice and comment period. We hope that this will encourage you to adopt more scientifically sound and sustainable design principles for Federal buildings and Government employees.

Sincerely,

A handwritten signature in cursive script that reads "David B. Kiddoo".

David B. Kiddoo
Global Business Manager