



Citizens for a
Healthy
Bay

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March 28, 2018

Ken Zarker, Manager
Pollution Prevention & Regulatory Assistance Section
WA State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Subject: NTA 2018-0470 Fireproof Killer Whales

Dear Mr. Zarker:

Executive Director
Melissa Malott

On behalf of the Citizens for a Healthy Bay, I am pleased to support this Near Term Action (NTA) proposal related to reducing the loading of flame retardants to Puget Sound.

Board of Directors

Jeff Barney
Brice Boland
Sherrie Duncan
Bryan Flint
Jerry Hallman
Charles Joy
Kelly McCord
Marco Pinchot
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Citizens for a Healthy Bay (CHB) is a 28-year-old organization whose mission is to represent and engage people in the cleanup, restoration and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in the Puget Sound area. We work side-by-side with local citizens, businesses and governments to prevent water pollution and make our community more sustainable.

Flame retardants are used in a wide variety of products including furniture foam, plastics, and textiles. Over time, concerns have increased about their ability to migrate out of materials, potential negative health effects, ubiquitous presence in the environment, and accumulation in humans and wildlife. Specific toxic flame retardants have been phased out, but some regrettable substitutes have emerged that are not safer. For upholstered furniture, a recent regulation change in California allows customers to identify and buy furniture without added flame retardants that still meet all flammability safety standards. These labels required by California regulations are also on furniture sold in Washington. These regulations do not address the existing furniture in households nor the used furniture being sold. CHB is concerned that this gap in regulation regarding used furniture will mean that people in lower income bracket, who are more likely to acquire used furniture, will continue to be exposed to toxic flame retardants in furniture for the foreseeable future.

To start to address this issue, this project will focus on developing and sharing materials on the concerns of flame retardants, the actions one can take to decrease exposure in the household, the option and resources on swapping out flame retardant laden foam in existing furniture and how to identify new safer furniture without flame retardants. This information will be made available in multiple languages and distributed through multiple sources.

Addressing flame retardants in existing furniture is important both for reducing the exposure to people in these households and preventing the release of these chemicals to Puget Sound.

CHB welcomes the opportunity to support this effort.

Sincerely,

A handwritten signature in black ink that reads "Melissa Malott". The signature is written in a cursive, flowing style.

Melissa Malott
Executive Director, Citizens for a Healthy Bay
mmalott@healthybay.org, (253) 383-2429