



August 7, 2009

To Whom It May Concern:

Build It Green, as manager of the GreenPoint Rated system, wishes to respond to recent articles featured in local green building web-based newsletters and authored by Linda Kincaid. The first, titled "GreenPoint Rated homes have more formaldehyde than FEMA trailer" was featured July 1, 2009 and the last, titled "GreenPoint Rated Homes: San Jose City Council investigates elevated formaldehyde" featured on August 5, 2009.

Summary Response

Build It Green found the information in the articles quite inflammatory and simplistic, with an elementary perspective on the realities of any green building rating system and the US construction marketplace. Ms. Kincaid also severely misrepresents the standards and intent of California's regulatory safeguards in place to help protect homeowners from actual risks of formaldehyde offgassing. Ms. Kincaid's testing methodology is highly questionable, her conclusions overly simplistic and spurious. Her articles do the opposite of supporting the need for good comprehensive information regarding the realistic dynamics occurring in today's homes.

California's voluntary and mandatory regulations set the highest standards in the nation for formaldehyde levels. GreenPoint Rated refers to those standards as part of its program. If Ms. Kincaid is concerned about the sufficiency of State standards (the most stringent in the nation), the adherence to them by the building industry, or has questions about how she might conform to the testing protocols, Build It Green would recommend that she speak directly to the correct authority and the actual standard setting agency, the California Air Resources Board. As the public is trying to become more aware of the health issues related to our built environment, it is important that proper information is provided. Studies are currently being conducted by a reputable engineering firm under the guidance of the Air Resources Board and will be available shortly. A link to the forthcoming study is below.

While GreenPoint Rated encourages a multitude of practices to address indoor air quality, we do not offer a guarantee for performance, and neither do any other green building rating systems such as LEED, NAHB, LEED for Homes, California Green Builder, Energy Star or the state's newly proposed green building code. All rating programs are intended to educate and inspire the building industry and homeowners to value greater levels of health and sustainability. Product availability, cost, professional experience, buyer interest and legislation will continue to be factors in the achievement of greater awareness and reduced risk of formaldehyde exposure.

Build It Green's Promotion of Better Built Homes

Build It Green's goal is to assist in transforming the residential building market place by increasing the use of green building practices. As part of its mission of promoting healthy homes, Build It Green has long been a strong and active advocate of many important indoor air quality issues including lower formaldehyde content in building products. We fully agree that formaldehyde is a significant issue for all new homes and that in general levels are too high.

Formaldehyde levels in cabinets, carpets, furnishings and other products can create high levels of formaldehyde within the home. California is leading the way for the nation setting standards to reduce formaldehyde levels in interior wood composite products and increase mechanical ventilation in today's tightly built homes.

GreenPoint Rated encourages a wide array of above-code, better building practices and requires performance across the following environmental categories: energy efficiency, indoor air quality, resource conservation and water conservation. Standards and protocols established by government agencies and highly reputed scientific research organizations, such as those cited below, are referenced in the criteria used in GreenPoint Rated. In establishing and reviewing the measures in GreenPoint Rated, Build It Green engages a diverse stakeholder input into the program, including State environmental, energy and water agencies such as the California Air Resources Board (CARB), the Water Resources Board and the California Energy Commission (CEC). Builders, architects, designers, utility representatives and other building experts are invited and sought out for input into the program for its tri-annual review and revision.

Participation in GreenPoint Rated requires a minimum point requirement in the environmental categories of energy efficiency, indoor air quality, resource conservation and water conservation. Criteria for meeting the measures are based on above current codes and standards. GreenPoint Rated currently gives credit to builders meeting California Section 01350, the standard developed by the California Integrated Waste Management Board (CIWMB), California Department of Health Services (DHS), California Air Resources Board (CARB), Office of Environmental Health Hazard Assessment, and noted indoor air quality researchers and architects, and now being adopted by other states in their standards. In Build It Green's pattern of pushing the marketplace further than the common standard, beginning in January 2010, revisions to GreenPoint Rated will include credit for the use of products exceeding California's new stringent regulation, CARB ACTM (see below).

California's Promotion of Best Construction Practices

California has always been a national leader in adopting standards intended to improve indoor air quality within its buildings. The California Department of Public Health's Section 01350 which has been in use since 2002, is a voluntary set of thresholds for reducing room concentration of toxics from building products use in commercial and public buildings. The protocols for product qualification set limits of formaldehyde concentration (and many other chemicals) using chamber testing and modeling emissions based on assumed volume of material and commercial building ventilation rates. Section 01350 is used in writing specifications for the CA Department of General Services architecture and engineering contracts, is referenced in the California High Performance Schools (CHPS) Best Practices manual, and is being adopted by many other forward thinking government and private sector organizations throughout the country. Further information and testing protocols can be found here:

<http://www.ciwmb.ca.gov/greenbuilding/Specs/Section01350/#Indoor>

Recently, California has taken two additional steps to set standards to improve indoor air quality of new homes. First, the California Air Resources Board (CARB) adopted a statewide standard, "Air Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products" (CARB ACTM Phase I and II) effective in 2009 and progressing in stringency through 2012. This new requirement has already gone into effect, setting mandatory thresholds for emissions of formaldehyde from interior wood composite products such as plywood, MDF and particle board used in cabinets and shelving. CARB ACTM is already changing the marketplace, giving rise to ultra-low and zero-formaldehyde wood composite products. Build It Green worked with the California Air Resources Board (CARB) in their adoption of ACTM. The adoption of ACTM has been the first time that such stringent standards have been established that so greatly affect indoor air quality during the construction and materials choice phases of residential projects. Additional information can be found here: <http://www.arb.ca.gov/toxics/compwood/compwood.htm>

Secondly, through the California Energy Commission, mechanical ventilation will be required in all homes permitted after January, 1 2010, which will mitigate the risk of trapping formaldehyde in a tight home.

While CARB ACTM specifies material concentration limits, California Section 01350 specifies room concentration limits. CARB ACTM only references formaldehyde, while Section 01350 references roughly eighty chemicals listed on the CA Office of Environmental Health Hazard Assessment (OEHHA) Chronic Reference Exposure Limit (CREL) list. The methodology for CARB's ACTM determines the concentration emitted from the material using a chamber test, by putting a specific amount of material in a standard chamber for a precise amount of time. The test method they use is a national protocol, ASTM E1333.

Kincaid Testing Protocols and Results

By Ms. Kincaid's own description and photography, it appears that her testing methodology lacks adherence to the protocols adopted by California Department of Public Health's California Section 01350. She further undermines her credibility when she incorrectly refers to CARB 01350, as the regulation. The 01350 standard is not from California Air Resources Board (CARB), but rather is the California Department of Public Health's Section 01350.

As a result of her non-standard testing, Ms. Kincaid has claimed high readings of formaldehyde in the homes. She is not specific about her own testing methods, but the photograph included in the article depicted a formaldehyde detector inside a cabinet, not an approved testing method by any scientific entity, not withstanding the protocols for Section 01350 and CARB ACTM. Ms. Kincaid claimed a reading of 77ppb (parts per billion), which is equivalent to .077ppm (parts per million). Formaldehyde threshold levels for composite woods (cabinet material) under CARB's ACTM Phase I range from .08ppm to .21 ppm. As the testing methodology used by Ms. Kincaid is unclear and questionable, it is impossible to assess her results against any standard. However, a reading of 77ppb (.077ppm) is less than the CARB threshold and would actually meet the new standards. Her assessment of her results leads Build It Green to believe she has confused ppb with ppm, yet Ms. Kincaid has worked hard to create public furor to give the false impression that the formaldehyde levels are too high.

Final Words

Build It Green is a strong and active advocate for the improvement of indoor air quality within our homes. We agree that most homes built today make use of products with higher than ideal formaldehyde levels. Build It Green applauds California's efforts to reduce formaldehyde levels within our homes through it's stringent statewide standard "Air Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products" (CARB ACTM Phase I and II) which became effective in 2009 and progresses in stringency through 2012. As a result of this standard, ultra-low and zero-formaldehyde wood composite products are readily available in the marketplace.

To obtain accurate information from indoor air studies conducted under the guidance of California Air Resources Board, Build It Green encourages the public to review forthcoming research at http://www.davisenergy.com/projects/air_resources_board.php

In conversations with Ms. Kincaid, Build It Green attempted to provide accurate and meaningful information. Ms. Kincaid mentioned her concerns over the State testing methods and protocols as her results varied from Section 01350 thresholds. It was recommended that she contact CARB to understand how her testing protocols might be inconsistent (or consistent) with their testing protocols as well as gain an understanding of the sampling and certification process for the products. Yet, it seems that she has not followed up with the appropriate authorities to research the correct scientific protocols, but has instead go on her own to inflame the public

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incorrectly on the reality of these standards, as well as solely and falsely target GreenPoint Rated of "greenwashing."

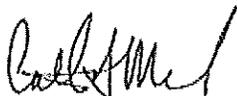
Build It Green strives to maintain open communication with the public and stakeholders in the building community. It is disappointing that Ms. Kincaid chose to use the communications with Build It Green to engaging in inaccurate, cowardly and sensationalistic journalism. As with all our stakeholders, we invite Ms. Kincaid and her adherents to approach Build It Green with meaningful and thoughtful discussion.

Build It Green is a professional non-profit membership organization whose mission is to promote healthy, energy and resource-efficient homes in California. Supported by a solid foundation of outreach and education, the organization connects consumers and building professionals with the tools and technical expertise they need to build quality green homes.

You may find additional information about Build It Green and GreenPoint Rated at:

<http://www.builditgreen.org/>

Best Regards,



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