



Date: July 16, 2021

To: Green Seals Standards (standards@greenseal.org)

From: Andrea Mojica, Vice President, Regulatory Affairs at the Household & Commercial Products Association (HCPA)

Re: Comments on Healthy Green Schools & CollegesTM Standard for K-12 School Districts and Higher Education Institutions

The Household & Commercial Products Association (HCPA) appreciates the opportunity to provide comment on the draft Healthy Green Schools & CollegesTM Standard¹ developed in partnership between Green Seal and the Healthy Schools Campaign. HCPA is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution, and sale of more than \$180 billion annually in the U.S. of familiar and trusted consumer products that help household and institutional customers create cleaner and healthier environments. Our members manufacture, supply, and formulate antimicrobial products, cleaning products, floor care products and pest management products. All these products play an important role in creating a healthy school environment and we look to create a larger partnership with Green Seal and the Healthy Schools Campaign on this standard both as it is finalized and as guidebooks and training resources are developed to implement the standard.

HCPA supports the goal of creating a framework to “make a significant difference in indoor air quality without major capital investments” in schools and provides the comments below for consideration. We are available to meet to discuss our comments.

HCPA Comments

As a general comment, there are parts of this draft standard that duplicate or may conflict with state and federal requirements. To limit confusion the beginning of the standard should remind users that they still must adhere to applicable federal and state requirements. For example, there is information in the standard that is redundant with OSHA, specifically 29 CFR 1910.1200. Additionally, there is information in the standard, e.g., in the Food Service and Laundry sections, that could have the unintended consequence of being less stringent or contradicting federal requirements. For disinfectant and sanitizing products that are subject to the Federal Insecticide Fungicide Rodenticide Act (FIFRA), the label directions for use must be followed to comply with state and federal regulatory requirements.

¹ [HGSC Draft Standard 06.02.2021 \(greenseal.org\)](https://www.greenseal.org/standards/HGSC-Draft-Standard-06.02.2021)

Comments on Section 2: Training

Given the amount of time spent on buses we believe it is appropriate to include transportation personnel as well as third-party contractors in this section.

Comments on Section 3: Communication

We recommend broadening the consideration for risk to vulnerable populations to include allergens already present in the school. It is important to emphasize the role of cleaning to remove dust, dander, pollen and other allergens. However, the physical nature of cleaning can disperse already present allergens into the air and create risk to vulnerable populations. HCPA proposes modifying the sentence below to read, “Document the occurrence of situations where cleaning operations (due to the agitation of allergens that are naturally present in school settings, such as dust, dander and pollen) have the potential to adversely affect any identified members of a *vulnerable population*.”

Comments on Section 4: Procurement

Disinfecting Products

HCPA recommends that the standard does not limit users to EPA’s List N which was specifically developed in response to the COVID-19 pandemic. While List N is a useful resource for the pandemic, List N is a small subset of US EPA registered sanitizers and disinfectants that mitigate illness causing microorganisms beyond COVID. Given the holistic nature of this standard, it is important to include access to all US EPA registered sanitizer and disinfectant products that meet the criteria for this standard.

Regarding the list of eligible active ingredients for the draft standard, it would be beneficial to have a citation or reference that provides a rationale for why the specific ingredients are included. HCPA also believes it is important to note that the use of some active ingredients included in the standard may not be technically feasible across the entire United States. For instance, the volatile organic compound (VOC) limit for non-aerosol products in several states² is one percent. The ready to use level for a couple of these ingredients to be effective antimicrobials – ethyl alcohol and isopropyl alcohol – needs to be substantially higher or combined with another non-VOC active ingredient. These types of limitations should be mentioned. While there is a clear benefit to utilizing as many concentrated products as possible, the use of some of the active ingredients may only make sense in a ready-to-use product. The concentration of some of these active ingredients in combination with inert ingredients that make them effective disinfectant options may also result in the concentrate shipping hazardously in accordance with the 49 Code of Federal Regulations; however, both product and ingredient safety is tied to the label and following directions for use, so HCPA recommends adding qualifiers that any of these ingredients can be used safely or pose a hazard depending on concentration or how the product is ultimately used by the end-user. Helping schools understand the importance of proper dilution, reading and following use directions, storage and ultimate disposal of these products is valuable and sound guidance to ensure safe use for both applicators and bystanders.

² California, Colorado, New Hampshire, Rhode Island, and Utah are all currently effective. New York’s one percent VOC limit for non-aerosol products come into effect January 1, 2022.

HCPA also requests that the recommendation to avoid products that contain hydrogen peroxide and peroxyacetic acid is removed. Both substances are active ingredients approved for use in EPA's Design for the Environment for antimicrobial products; a program that should align with this standard with the goal "to reduce the overall human health and environmental impact of a product". Furthermore, peroxyacetic acid is equilibrium chemistry and there will always be hydrogen peroxide present in solutions of peroxyacetic acid.

Comments on Section 5: Facilities Operation and Maintenance

Cleaning by Hand

The last bullet of the section needs to be modified to state that products should be used according to label directions. HCPA recommends editing the bullet to read, "Follow the label directions when spray bottles are necessary for product application." Consider that, in some cases, cloths can neutralize or bind with and hold specific ingredients in a product making the cleaning less efficacious leaving behind the naturally present allergens.

Disinfecting Tasks

HCPA requests that the following sentence, "Do not use products that contain quaternary ammonium compounds (quats)" be removed from this section. While we understand that the standard goes above and beyond government requirements by providing a list of ingredients eligible for this standard, the standard should not contradict what the US government allows. Quats have been cleared for use by the US EPA and are considered safe when used according to label directions. During the 2006 review of the quats the EPA concluded that there is a reasonable certainty of no harm for infants and children when quats are used according to directions.^{3,4}

The EPA is currently re-reviewing the quats as part of a normal re-evaluation cycle that all chemicals undergo over the years as part of EPA's comprehensive review program. As part of their review, the EPA takes into consideration all the available scientific literature and makes its decision based on the review of this information. This re-review program is designed to ensure that all registered chemicals are continuously evaluated under current scientific methods and current scientific knowledge to maintain relevant and accurate evaluations of chemicals in the program. The re-evaluation decision for quats is expected in the next year.

Location Specific Cleaning Requirements

Recommend adding a "High-touch Surfaces" section to cover door handles, knobs, handrails and other high-touch areas. Included in this section could be the following, "Require tracking and logging daily high touch-point cleaning activities for verification."

Material Handling and Storage

Recommend providing another option outside of strip tests conduct periodic strip tests (chemical test strips) "or other means" to ensure proper chemical ratio is produced.

³ [US EPA - Pesticides - Reregistration Eligibility Decision \(RED\) for Adbac](#)

⁴ [US EPA - Pesticides - Reregistration Eligibility Decision \(RED\) for Aliphatic alkyl quaternaries \(ddac\)](#)

Section 6: Building Systems Maintenance and Repair

Sidewalk, Pavement, and Grounds Maintenance

Site Management Plan

HCPA requests that a reference be added for what is considered a “toxic species”.

Glossary

Concentrate – HCPA recommends modifying this definition to read, “Concentrate. A product that must be substantially diluted with water to form the appropriate solution for use (a minimum of at least 1:4).”

Environmentally Preferable Product - Can you please clarify what is meant by “market leadership”?

Vulnerable Populations - Please add to the definition, “(e.g., fragrances, pathogens, environmental soils)”