



## BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003  
202-543-5450 phone ■ 202-543-4791 fax  
info@beyondpesticides.org ■ www.beyondpesticides.org

December 11, 2006

Stephen Johnson  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re. Registration of Acid Copper Chromate (ACC); Petition to Cancel Uses

Dear Mr. Johnson:

Please consider this submission both a petition for cancellation of Acid Copper Chromate (ACC) and formal comments to be considered as a part of the agency's current deliberations on expanding ACC to residential uses. The undersigned organizations are writing to express serious concerns about EPA continuing to move forward with the allowance of ACC treatment of wood for residential uses, expanding on its earlier decision to allow commercial uses in July, 2006.

To add to the overwhelming body of evidence that supports prohibiting both the purposeful and unintended (as toxic waste) introduction of hexavalent chromium into the environment, we are attaching a background paper, *Acid Copper Chromate: No need for a carcinogenic wood preservative approved on SHAKY Science*, which provides the scientific support for our position to ensure that all uses of ACC are prohibited.

We urge EPA to seriously reconsider and reverse the track it is on and prohibit any continued use to protect public health and the environment.

Sincerely,

Jay Feldman, Beyond Pesticides  
Bill Walsh, Healthy Building Network  
Jennifer Sass, Natural Resources Defense Council