

Comments and Responses on Proposed Rules for the Green Cleaning Schools Act

*Submitted to the Lt. Governor's Office on behalf of the
Illinois Green Governments Coordinating Council*

Compiled from February 1 to March 17, 2008

A.) Commentators:

<i>Name</i>	<i>Organization</i>	<i>Street address</i>	<i>City, State, Zip</i>
Corryn Antonizio	School District U46	1460 Sheldon Drive	Elgin, IL 60120
Frances Archer		1736 Constitution Drive	Glenview, IL 60026
Herson Astorga	Letch Corporation	2010 W. Fulton Street F-104C	Chicago, IL 60612
Susan Bishop		3415 N. Albany Ave.	Chicago, IL 60618
Stuart Brodsky		9028 Samoset Trail	Skokie, IL 60076
Joan Brumm RN	Gurnee District 56	4817 N Hickory Way Dr.	Johnsburg, IL 60051
Pat Bybee	Glenwood Intermediate School	465 Chatham Rd	Chatham, IL 62629
Icy Cade-Bell	Friend Family Health Center	800 E. 55th St	Chicago, IL 60615
Nita Carey	Schuyler-Industry District #5	750 North congress	Rushville, IL 62681
Bess Celio	Healthy Schools Campaign	815 Columbian Ave.	Oak Park, IL 60302
Marek Ciborowski			IL 60649
Bunnie Dewar		494 Cornell Ave	Des Plaines, IL 60016
Antonina Duckles		1833 Summit Drive	West Lafayette, IN 47906
Josie Elbert	Chicago Academy of Sciences' Peggy Notebeart Nature Museum	2430 N. Cannon Dr	Chicago, IL 60614
Laura Ellsworth		360 Pinehurst Drive	Des Plaines, IL 60016
Kristen Engelman	Nettelhorst School (Parent)	3110 N. Sheridan #910	Chicago, IL 60657
Vince Fagan	United Supply Service, Inc.	1550 S. Indiana Avenue	Chicago, IL 60605
Kim Fulbright	Alton School District	3486 Manassas	Edwardsville, IL 62025
Linda Gibbons	Illinois Assoc of School Nurses	4202 Woodland Ave.	Western Spring, IL 60558
Jeri Gooding	Will County School District 92	15161S. Gougar Rd	Homer Glen, IL 60441
Moyra Gorski		132 Danada Dr	Wheaton, IL 60187
Kara Green	DuPage County Health Dept	111 N. County Farm Rd.	Wheaton, IL 60187
Claudia Greene	Whittier School	1900 W. 23rd Street	Chicago, IL 60608
Susan Gregory	Joliet District 86 Schools	21729 Kelly-Ann Lane	Shorewood, IL 60404
Michelle Gunderson	Nettelhorst School (Teacher)	3252 N. Broadway	Chicago, IL 60657
Meaghan Haak		230 Prairie Ridge Drive	Woodstock, IL 60098
Mindy Hahn		381 Poplar St	Winnetka, IL 60093
Amy Harrison		658 County Road 1100N	Carmi, IL 62821
Hedy Helfand	Whittier School	1900 W. 23rd St.	Chicago, IL 60608
Charlotte Hendrickson		7351 N Winchester	Chicago, IL 60626
Mark Herrmann	Host/Racine Industries, Inc.	2010 Greystem Circle #304	Gurnee, IL 60031
Maribeth Hill		446 Amherst Ave	Des Plaines, IL 60016

<i>Name</i>	<i>Organization</i>	<i>Street address</i>	<i>City, State, Zip</i>
Char Jackson	Chippewa Middle School	123 Eighth Avenue	Des Plaines, IL 60016
Mary Janik		1N130 Timothy Lane	Carol Stream, IL 60188
Kris Jennings		511 W Aldine	Chicago, IL 60657
Christina Kappaz		624 Hinman Ave. Apt 2	Evanston, IL 60202
Jessica Kwiatkowski		1929 N Hoyne	Chicago, IL 60647
Paula Lichtenstein	Barrington CUSD #220	215 Eastern Avenue	Barrington, IL 60010
Janan MacDonald	Friends of Mayer	1480 W. Webster Ave.	Chicago, IL 60614
Julie Malinowski		11638 Millennium Pkwy	Plainfield, IL 60585
Sally Martin-Ranft	Awakenings Holistic Healing Center	880 Lee Street 201A	Des Plaines, IL 60016
Lilan Marunde		735 N. Chestnut Ave	Arlington Hts, IL 60004
Deanne McCannon		1206 Cleveland St. Unit 1	Evanston, IL 60202
Irene McCarthy		2134 Collett Ln	Flossmoor, IL 60422
Felipa Mena	Andersen Academy	1026 N.Paulina	Chicago, IL 60622
Christine Nadelhoffer	Naperville North High School	899 N Mill St	Naperville, IL 60563
Tamra Nelson		2635 N. Drake Ave.	Chicago, IL 60647
Sara Nowak	Olive-Mary Stitt School		IL 60004
Jacqueline Pacione		2207 W. Giddings St	Chicago, IL 60625
Nancy Pepe		1327 North Chestnut Ave.	Arlington Heights, IL 60004
Nancy Petrik	School District #33	130 E. Forest Ave	West Chicago, IL 60185
Shelli Rosenfeld			IL 60613
Jill Rusten	Plum Grove PTSA	767 S Middleton Ave	Palatine, IL 60067
Jean Salley			IL 61115
Sandra Silva	Senior Options Consulting	3712 N. Broadway Ste #184	Chicago, IL 60613
Jo Smith		25339 390th St	Pittsfield, IL 62363
Nikki Stein	Polk Bros. Foundation	20 W. Kinzie Street	Chicago, IL 60610
Catherine Stoesser RN	IL Certified School Nurse, u-46 School District	75 Leo Ct.	Roselle, IL 60172
Stephen Tiwald		440 Lampwick Ct	Naperville, IL 60563
Brian Urbaszewski	Respiratory Health Association Metro Chicago	1440 W. Washington	Chicago, IL 60607
William G. Vest Jr.	President, John Mills School PTA	7868 W. Cressett Drive	Elmwood Park, IL 60707-1340
Robi Vollkommer		Schaumburg Oyanokai	IL 60193
Margaret Walker	MarBeth Consulting	1921 N. Halsted St.	Chicago, IL 60614
Jane Walther		1916 N. Oakley	Chicago, IL 60647
Tracy Wozniak	Nettelhorst School	825 W Eastwood Ave #1W	Chicago, IL 60640
Kyra Wright	Assistant Principal, Connections Day School, South Campus	909 E. Wilmette Road	Palatine, IL 60074
Catherine Wzykowski	Illinois Education Association	603 Honeytree Drive	Romeoville, IL 60446
Jaime Zaplatosch		3146 W Walnut	Chicago, IL 60612
Donna	Healthy Schools Campaign	2371 Asbury Road	Northbrook, IL 60062
Anne			IL 60056

Text of Comments (in common across commentators):

I am writing to express my support for the Green Cleaning Guidelines developed through the Green Government Coordinating Council.

These guidelines were developed in a consensus-based process that allowed a broad range of stakeholders to participate and come together on health and environmental issues. These guidelines are important to protect the health of students throughout the state and will help position Illinois as a leader in protecting the health of its children.

Please support these guidelines and allow Illinois to become the second state in the nation to protect students from exposures to toxic cleaning chemicals in schools.

Response:

The Council notes the support of these commentators for the current version of the proposed rules for the Green Cleaning Schools Act.

B.) Commentator:

<i>Name</i>	<i>Organization</i>	<i>Street address</i>	<i>City, State, Zip</i>
David E. Rothschild	Mars Sales & Equipment Co. Inc.	123-125 East McCord St., PO Box 463	Centralia IL 62801

Text of Comments:

Reference: Green Cleaning for Schools

Please clarify under Section 2800.20 paper products are paper towels or other paper used for cleaning. Does this include hand towels and toilet tissue used for drying hands and bottoms?

Thank you for your quick reply.

Response:

The requirements for “paper products” are intended to apply only to paper used for the purpose of cleaning school facilities. This includes paper towels and other forms of paper used to wipe or dust surfaces such as furniture, fixtures, glass, walls, or floors. This does not include toilet paper, facial tissue, or paper towels used for drying hands.

C.) Commentators:

<i>Name</i>	<i>Organization</i>	<i>Street address</i>	<i>City, State, Zip</i>
Dr. Dan Bertrand	Superintendent, Community High School, Marengo District #154	110 Franks Road	Marengo, IL 60152
Steven Fink	Superintendent, Cambridge Community School District #227, Illinois Association of School Boards	300 South West Street	Cambridge, IL 61238
Susan Hilton	Assistant Director of Governmental Relations, Illinois Association of School Boards	2921 Baker Drive	Springfield, IL 62703
DeJuan Kea	Government Relations & Public Relations Director, Illinois Principals Association	2940 Baker Drive	Springfield, IL 62703
Paul Kuczek	Maintenance Supervisor, Township High School District #211	1750 South Roselle Road	Palatine, IL 60067

Text of Comments:

See PDF of letters attached.

Main points:

1. “We oppose the language as written in Section 2800.50 b.5. The language seems to give the Council powers of review and approval of exemption submittals, when according to P.A. 95-0084, schools must only provide written notification to the Council”
2. “We believe that the inclusion of paper products goes beyond the intent of the legislation, which was to encourage schools to use green cleaning solvents.”
3. “We request the inclusion of an exemption option that recognizes the human cost of implementing these guidelines (e.g., training costs).
4. “We also request the inclusion of an exemption option that recognizes that green cleaning supplies may not work as well as standard cleaners. As “green cleaners” are still a fairly new market, and schools are limited to the cleaners approved by the Council, the exemption form should provide a section where a school can be exempted with a note that a green cleaner they used did not perform as well as their previous standard cleaner. School management officials are committed to ensuring that schools are safe and clean for children.”
5. “We also believe that obtaining these products may not be easy for some schools throughout the state based on their geographic locations, which may not enable them to bargain shop when it comes to Green Cleaning Product Providers.”
6. “We request that the act not adapt the GS-40 standard for floor finishes, strippers and burnishing floor restorers at this time. The Illinois act specifically calls for the use of a product that has a 3-year proven performance record. Many of these products have been certified for less than that period. I addressed the committee asking that Illinois reference the New York law and exclude floor care products at this time. Current floor finishes can, with proper care, exceed 3 years of service in schools. The rush to

purchase and apply unproven Green finish systems can have a negative effect on the quality of care we provide. Everybody uses the floors. A poor floor care program will increase labor and product costs.”

Response:

1. Section 2800.50 b.5 states, “If the costs of the three comparable green cleaning supplies, accounting for dilution factors, are higher than the cost of the current product in use, the Council will find economic infeasibility for that supply category. The finding of economic infeasibility is specific to the supply category and the applicant school.”

This statement is intended to state the requirements for notification and explain the Council’s review of exemption notification forms *only to ensure accurate completion*. The Council in no way “approves” submitted notification forms other than confirming that the information on the forms is complete and accurate.

2. The text of P.A. 95-0084 makes no mention of “solvents.” Section 10 of the Act governs “Use of green cleaning supplies” and refers specifically to “environmentally-sensitive cleaning products.”

The Council interpreted these terms to be inclusive of paper products used for the purpose of cleaning school facilities. This includes paper towels and other forms of paper used to wipe or dust surfaces such as furniture, fixtures, glass, walls, or floors. This does not include toilet paper, facial tissue, or paper towels used for drying hands.

3. Training is indisputably a critical component of implementing a green cleaning program. Training on the use of green cleaning products should replace current training on the use of conventional cleaning products.

The Council is not aware of data that indicate that training for green cleaning is more costly than training for conventional cleaning. In addition, the Council is not aware of data on baseline training costs for conventional cleaning (i.e., current costs). In the absence of any accurate, reliable, and consistent method of calculating the *potentially* higher *incremental* cost of training for green cleaning, the Council decided against allowing exemption on the basis of this claim.

4. The text of P.A. 95-0084 makes no mention of exemption based on a school’s determination of the ineffectiveness of a green cleaning product.

The six required categories for green cleaning products (Section 2800.30 a) were selected on the basis of having a sufficiently diverse market to allow schools to purchase from among a broad selection of green products. If a school tries a green cleaning product and finds that the product is not as effective as the conventional version, the school may switch to a different green cleaning product.

As is true of conventional cleaning products, green cleaning products vary in their effectiveness. However, the product certification and recognition programs cited in the proposed rules establish minimum performance standards that all certified and recognized products must attain.

5. As stated in the Act and in the proposed rules, schools may submit exemption notification if they find that the costs of available green cleaning products are higher than the costs of available conventional cleaning products. This provision addresses exactly the concern expressed in this comment.
6. The proposed rules do not include requirements for floor finishes, strippers and burnishing floor restorers at this time. More specifically, they do not require the GS-40 standard for these products. Floor finishes, strippers, and polish are addressed only in the *Recommendations* section of the full guidelines and specifications document.

D.) Commentator:

<i>Name</i>	<i>Organization</i>	<i>Street address</i>	<i>City, State, Zip</i>
Michele Whyte	3M Company, Product Responsibility Specialist	3M Center	St. Paul, MN 55144

Text of Comments:

See PDF of letter attached. Note that the letter was received after the end of First Notice period.

Main points:

1. “3M asks that the rules be revised to make clearer in the definitions for “disinfectants” and “sanitizers” that those products include products registered with the US EPA under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), and that these products are exempt from the rules.”
2. “3M asks that governments that are developing green cleaning product standards allow for self-certification by companies, in addition to products that are certified by reputable 3rd party organizations.”

Response:

1. Because disinfectants kill organisms, they are regulated as “pesticides” under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). The U.S. EPA interprets FIFRA as prohibiting manufacturers from making claims that disinfectants and sanitizers are “green” or “environmentally sensitive.” Therefore, such products are not included in the Green Cleaning for Elementary and Secondary Schools rulemaking.

The Green Cleaning for Elementary and Secondary Schools rules are written so as to *include*, rather than *exclude*, specific categories of supplies. Since disinfectants and sanitizers are not among the supply categories included in the rules, exempting disinfectants and sanitizers is not necessary (nor even applicable to the rules as written).

2. The Council had lengthy deliberations concerning the alternative qualification standards. The Council decided against self-certification to ensure that all approved products are subject to the same consensus-based quality standards. The chosen standards represent a cross-section of products and a diversity of manufacturers.