

CHEMICALS OF CONCERN IN ARCHITECTURE

MILLER | HULL

CHRIS HELLSTERN | AIA | LFA | LEED AP | CDT
LIVING BUILDING CHALLENGE SERVICES DIRECTOR

Today's Agenda

Challenges Section

- Chemicals of concern intro
- Detail on select chemicals of concern
- Chemical Impact (Human & Environmental)
- Social Justice concerns

Hope Section

- Action we can take
- Regulation examples
- Example Projects
- Q&A

Slides will be made available





Seattle
LBC 3.1



San Diego
LBC 4.0



Just.

Organization Name: The Miller Hull Partnership, LLP
Organization Type: Architecture
Headquarters: Seattle, Washington
Satellite Facilities: San Diego, California
Number of Employees: 97

Social Justice and Equity Indicators:

Diversity

- Non-Discrimination
- Gender Diversity
- Ethnic Diversity

Worker Benefit

- Worker Happiness
- Employee Benefit
- Continuing Education

Equity

- Full Time Employment
- Pay-Scale Equity
- Employee Friendly
- Living Wage
- Gender Pay Equity
- Family Friendly

Local Benefit

- Local Control
- Local Sourcing

Stewardship

- Responsible Investing
- Community Volunteering
- Positive Products
- Charitable Giving
- Animal Welfare
- Transparency

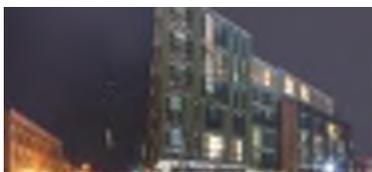
Safety

- Occupational Safety
- Hazardous Chemicals

THE SOCIAL JUSTICE LABEL

MHP-001

EXP. 01/05/2021



LIVE

WORK

LEARN

GATHER

SERVE

THINK



* 9 LIVING BUILDINGS



* Six certified, two under construction + one in design (not pictured)



MATERIALS TOXICITY

Most Chemicals are not effectively regulated

- ~62,000 Chemicals are grandfathered
- ~23,000 New Chemicals have been introduced
 - 85% Have no health data
 - 67% Have no data at all



Chemicals subject to
TSCA

The Toxic Substances Control Act of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures.

6

1. PCBs
2. Asbestos
3. Radon
4. Lead
5. Mercury
6. Formaldehyde



Certain substances are generally **excluded** from TSCA, including, among others, food, drugs, cosmetics and pesticides.

Six Classes of Harmful Chemicals

1

Highly
Fluorinated



2

Antimicrobials



3

Flame
Retardants



4

Bisphenols
+ Phthalates



5

Some
Solvents



6

Certain Metals



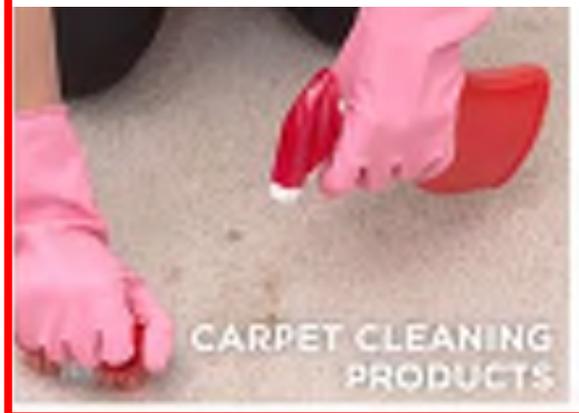
Antimicrobials



Flame Retardants



PFAS (Fluorinated Chemicals)



BPA

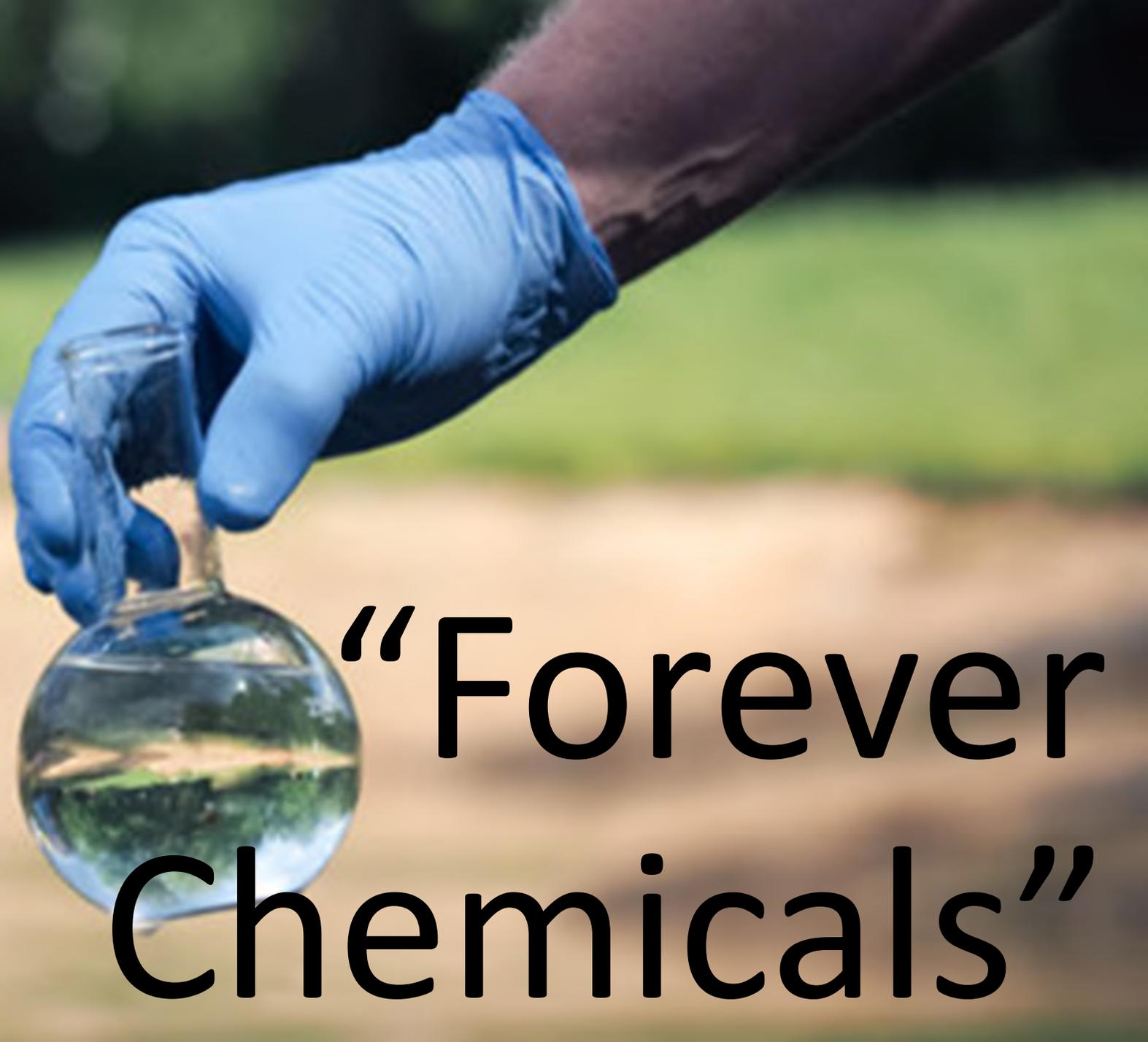


Phthalates (*thal-lates*)



Detected in 97% of all people tested

Persistent
Bioaccumulative
Toxins



**“Forever
Chemicals”**

Found in:

- Carpeting
- Upholstery
- Apparel
- Food Packaging
- Non-stick cookware
- Dental Floss

Health Affects:

- Kidney, prostate, ovarian, testicular cancer
- Thyroid Disease
- Delayed puberty, decreased fertility
- Reduced Testosterone
- Reduced Immune Response
- Elevated Cholesterol

Fluorochemicals



Nearly 100% of people tested in the United States have two phased-out PFC's in their blood:

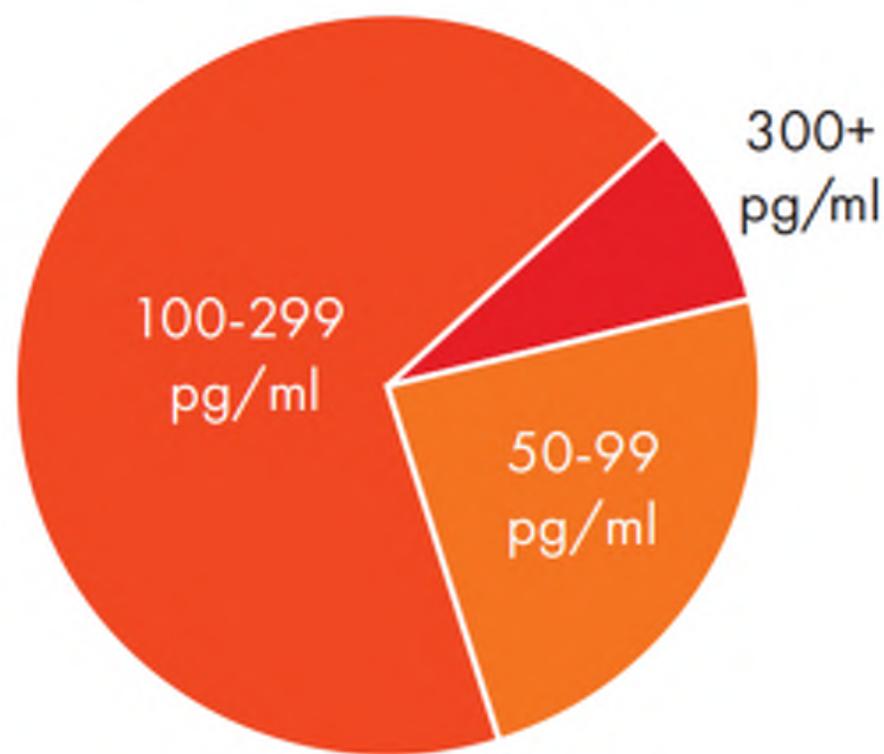
- **PFOS (Scotchgard)**
- **PFOA (Teflon)**

Toxic Chemicals in Breast Milk

How we can solve this problem

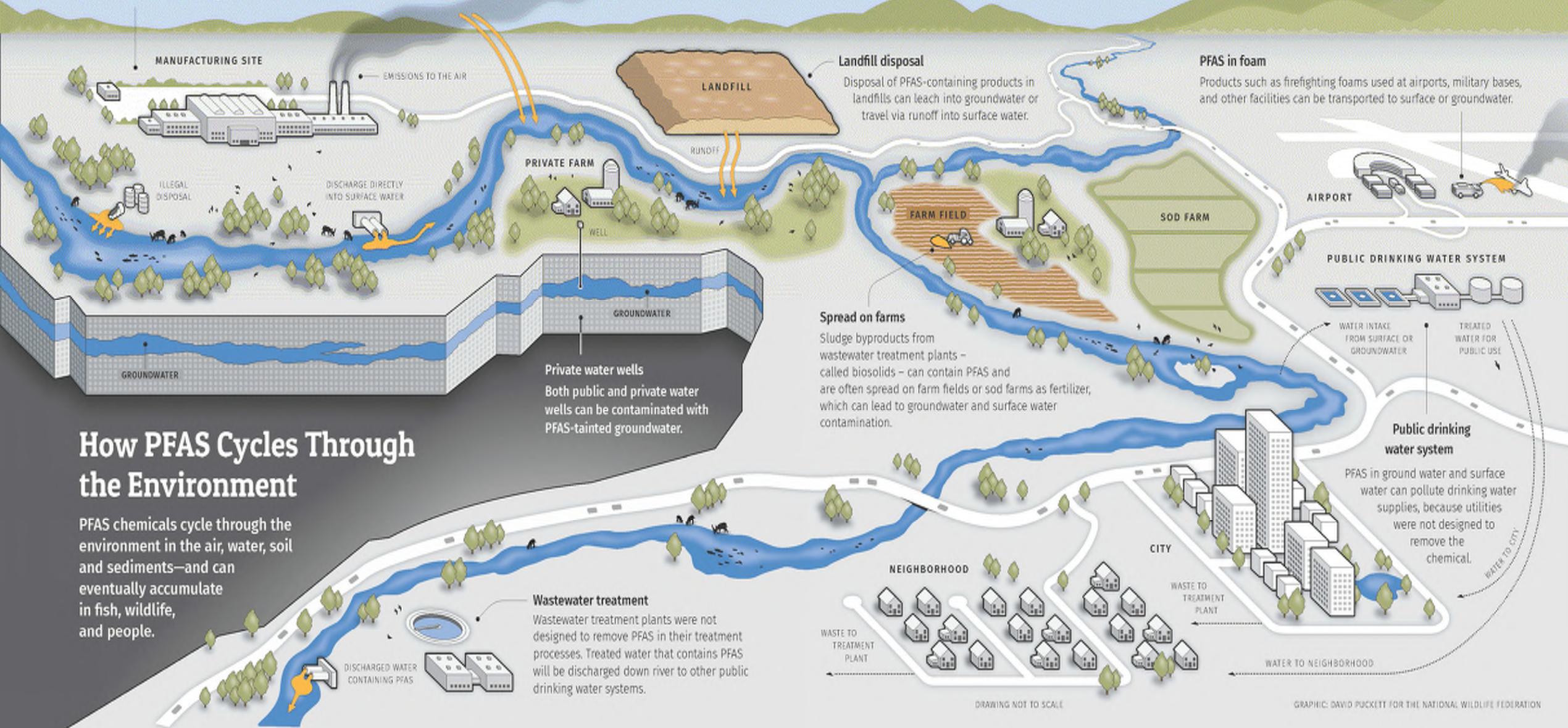
100% of Tested Breast Milk Samples Contained PFAS

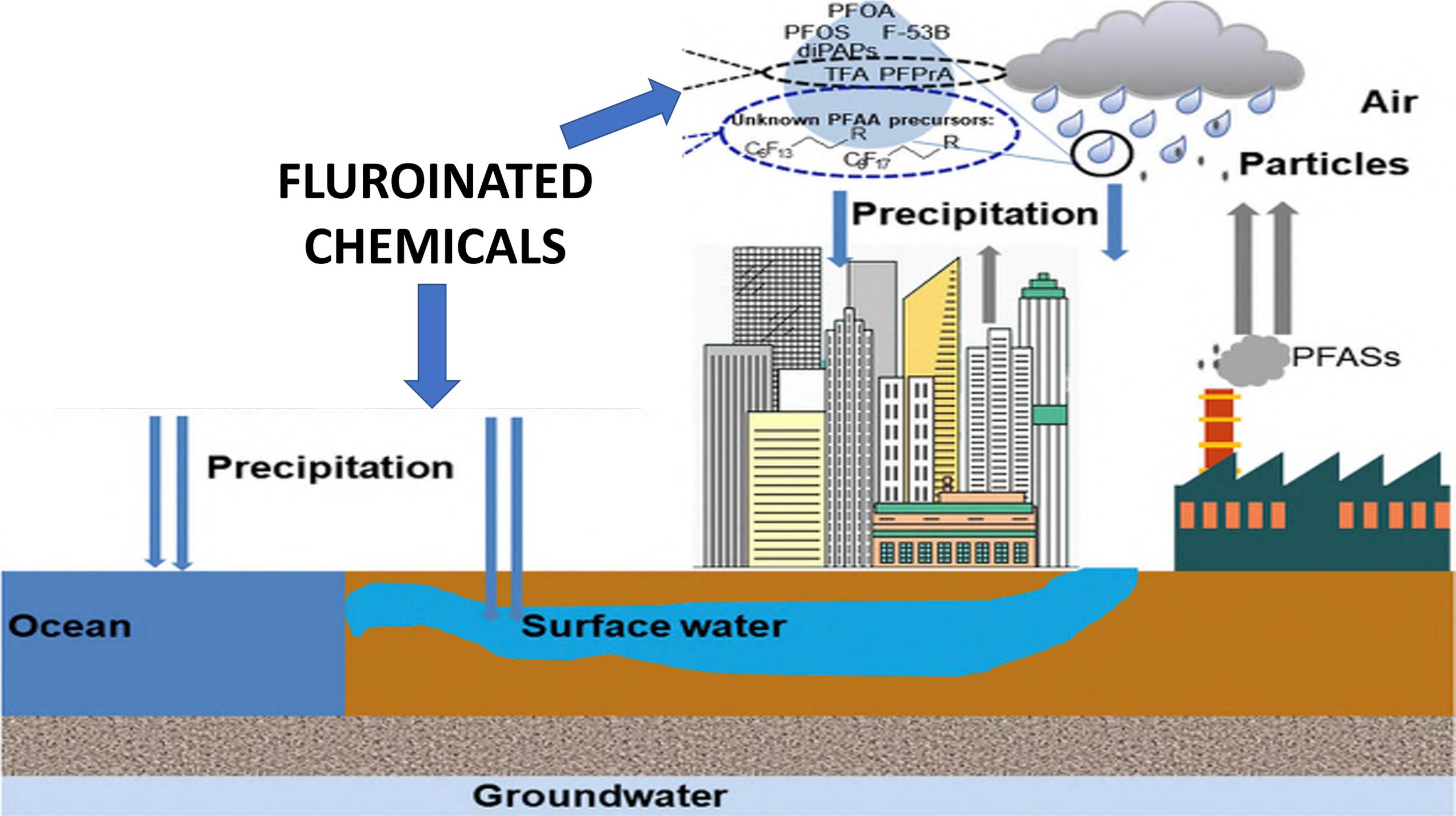
PFAS Levels in Breast Milk from 50 Mothers



PFAS contamination at manufacturing sites

Primary sources of PFAS contamination include manufacturing sites that produce PFASs or use PFASs in industrial processes and release the chemicals into the environment through wastewater discharges into surface water or municipal sewer systems, on-site or illegal disposal that can leach into groundwater or surface water, and emissions to the air that can deposit in waterways.





The Olympics just saw its first 'forever chemical' disqualifications

Waxes containing PFAS are banned at the Milan-Cortina Games. Three athletes already have been disqualified for using them.





PVC (Vinyl)

East Palestine, Ohio



The Vinyl/Asbestos connection stems from:



PVC production is the largest single use for industrial chlorine

=



Chlorine production is the largest single consumer of asbestos in the US



*What will be
the **lead** of
the future?*

Flint...Newark...Olympia...

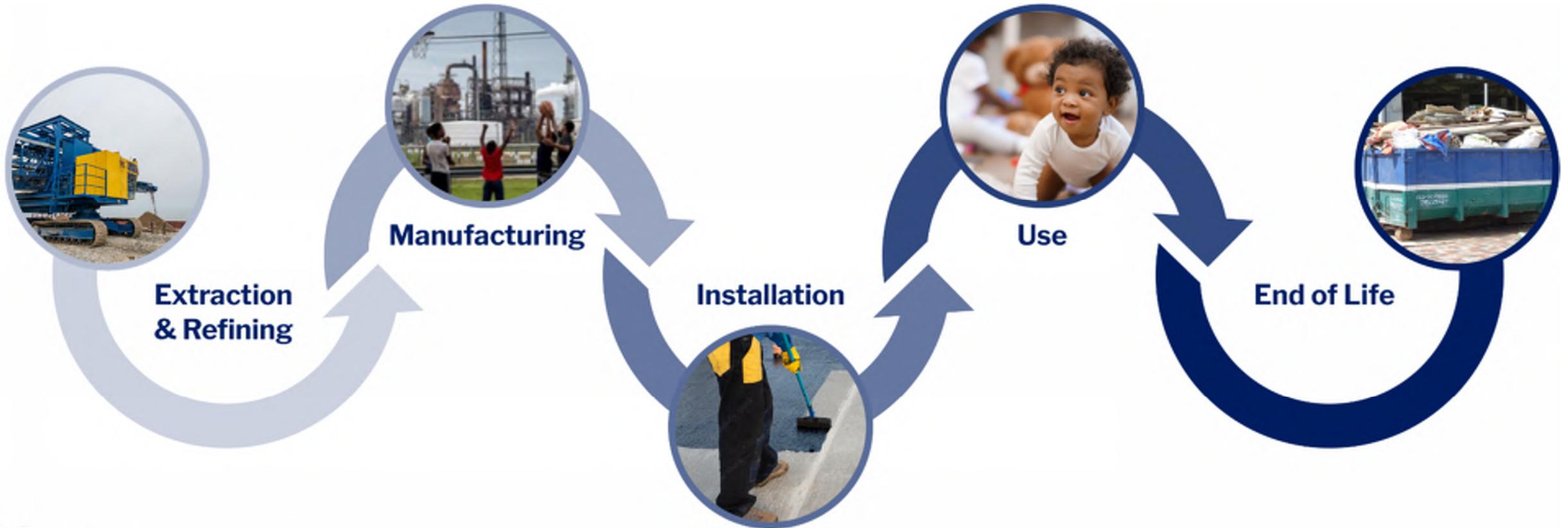
Chemicals of Concern Create Emissions



CHEMICAL IMPACT ON HUMAN HEALTH

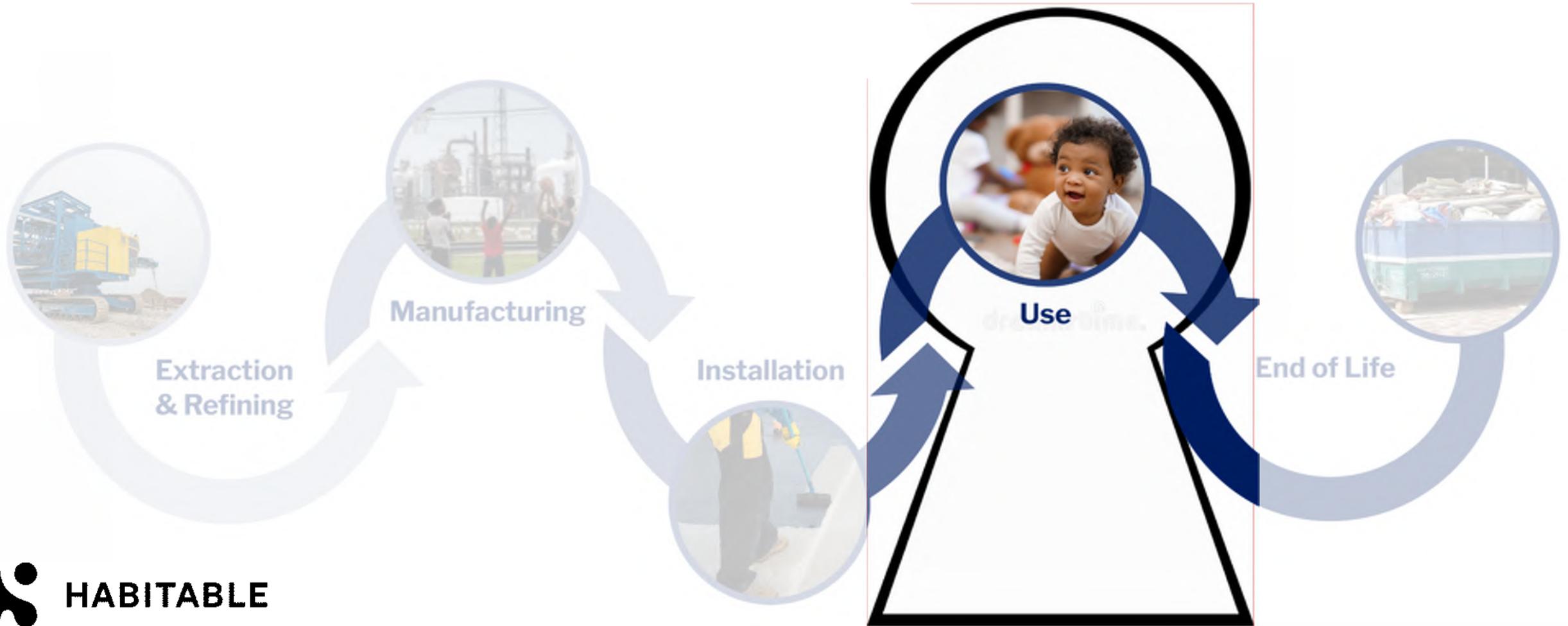


The Lifecycle of our Materials and Products



Problem: Looking through a keyhole at the finished product

...ignores life-cycle impacts and exposures along the supply chain.





PFAS producers/
PFAS-using factories



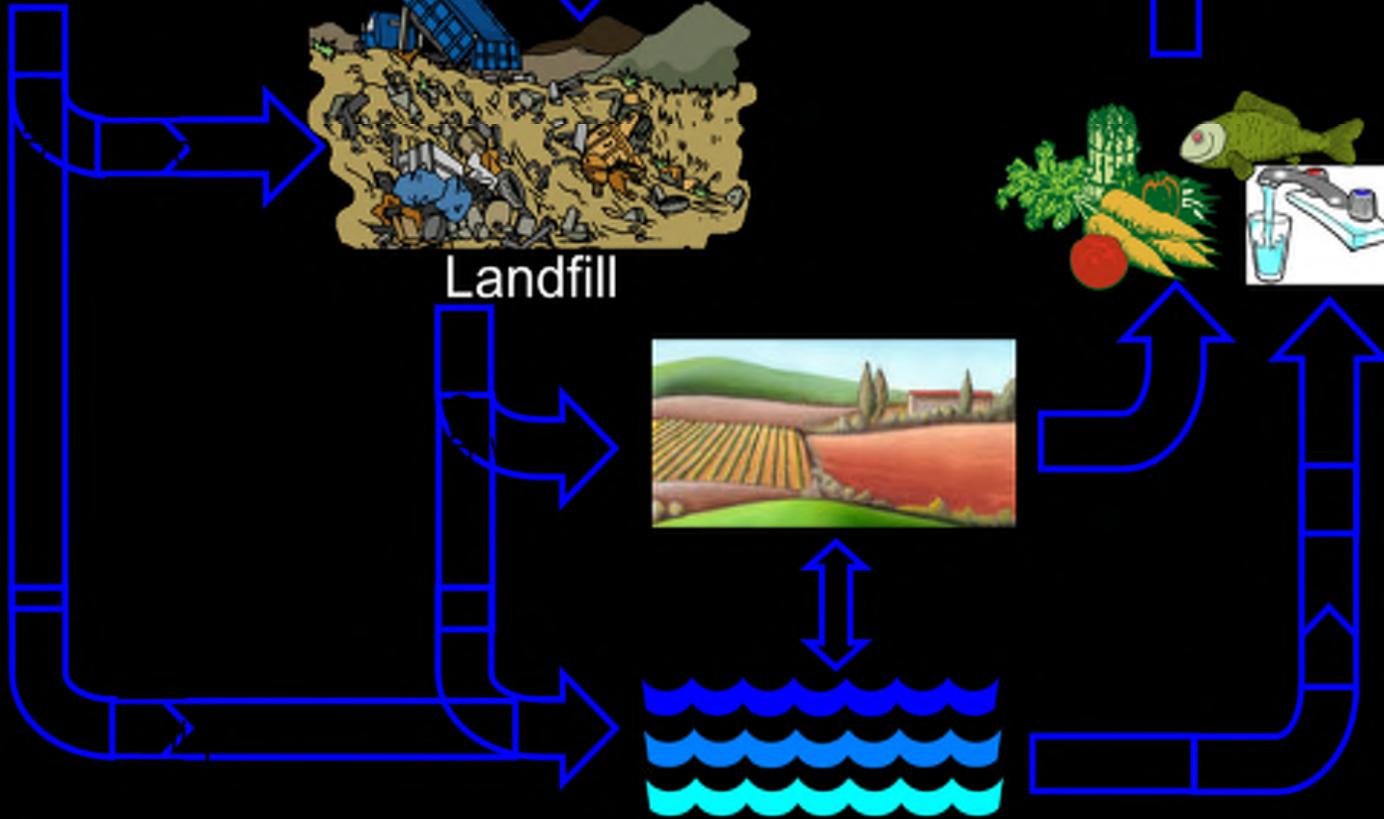
Human exposure

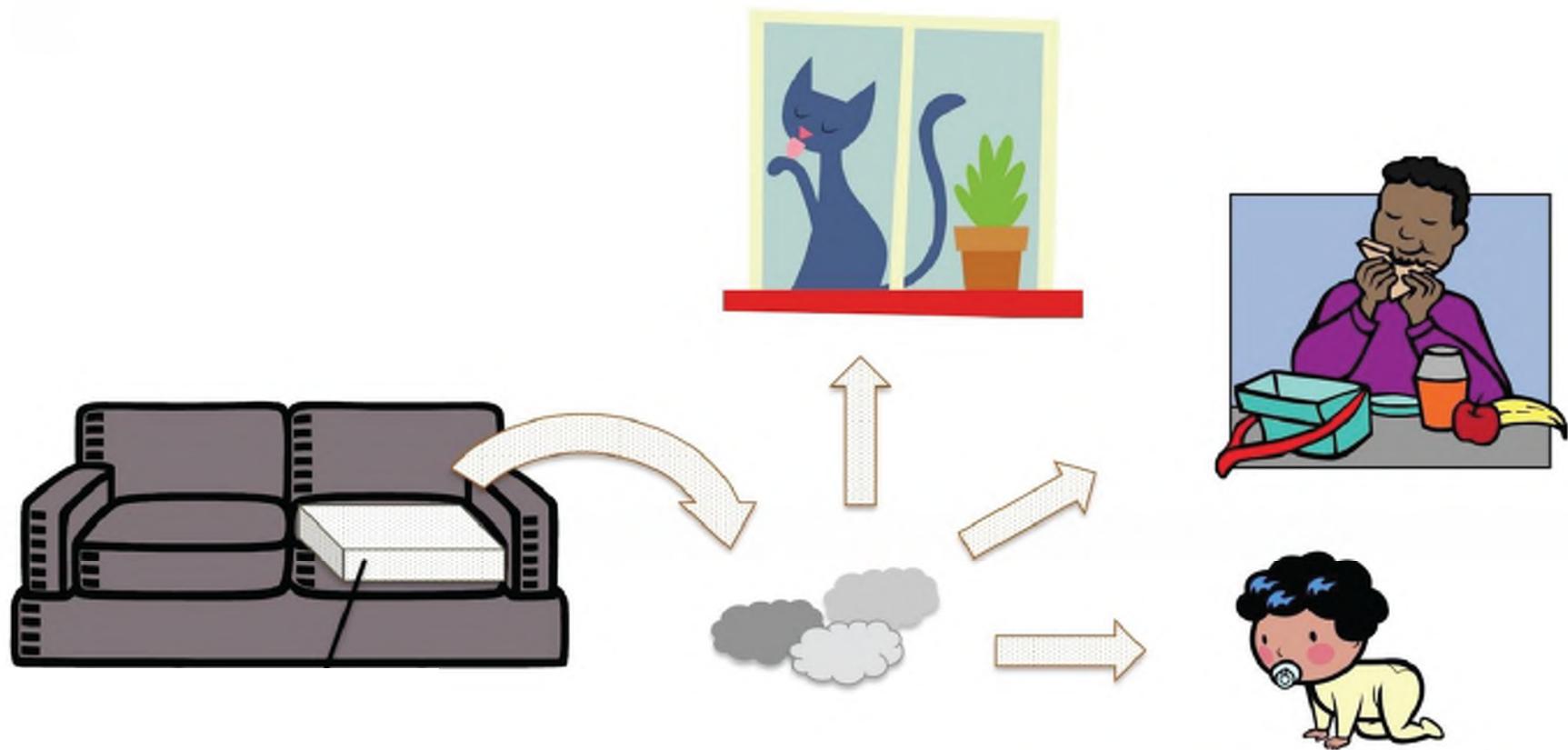


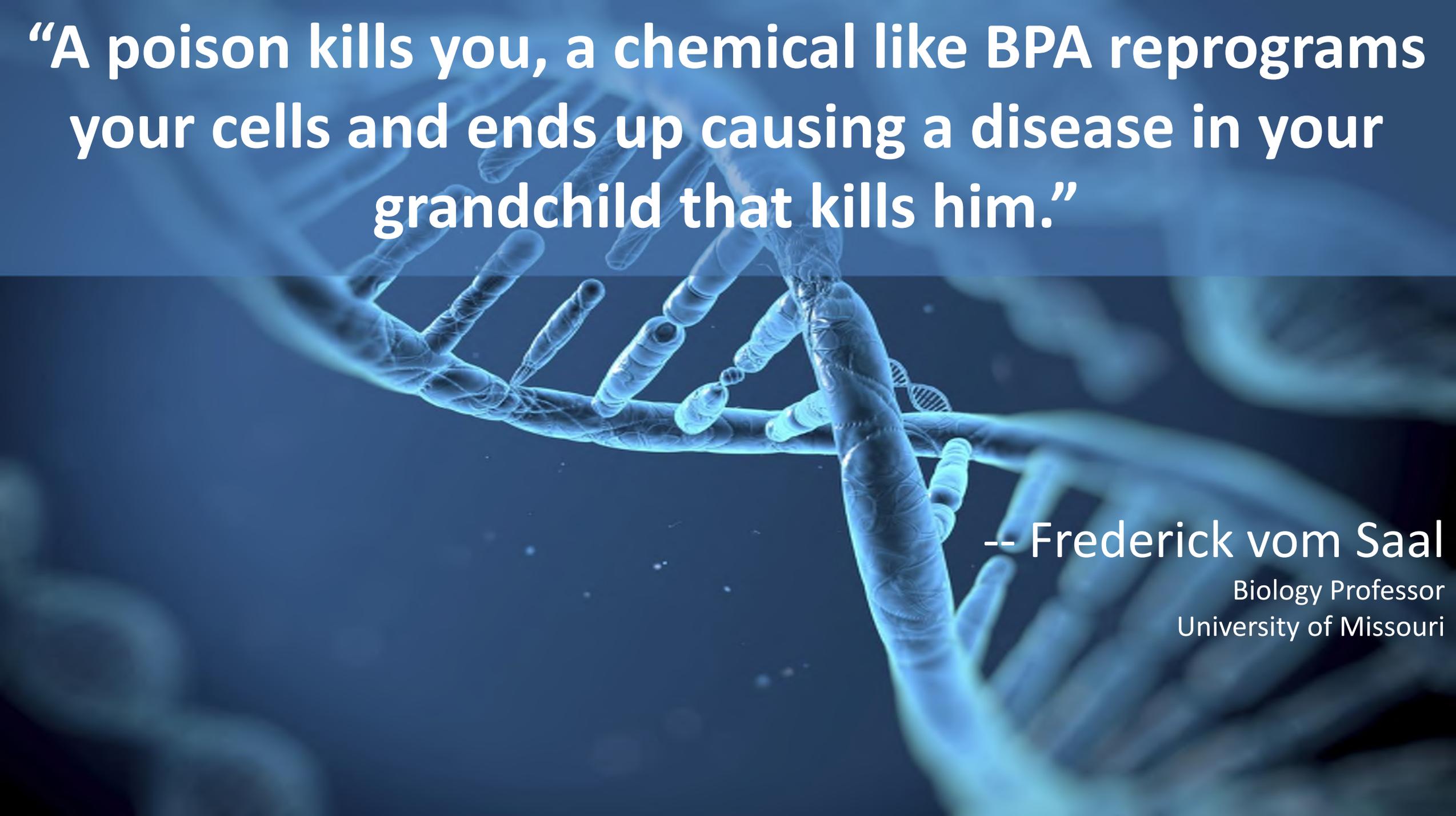
Prenatal/infant
exposure



Landfill







“A poison kills you, a chemical like BPA reprograms your cells and ends up causing a disease in your grandchild that kills him.”

-- Frederick vom Saal

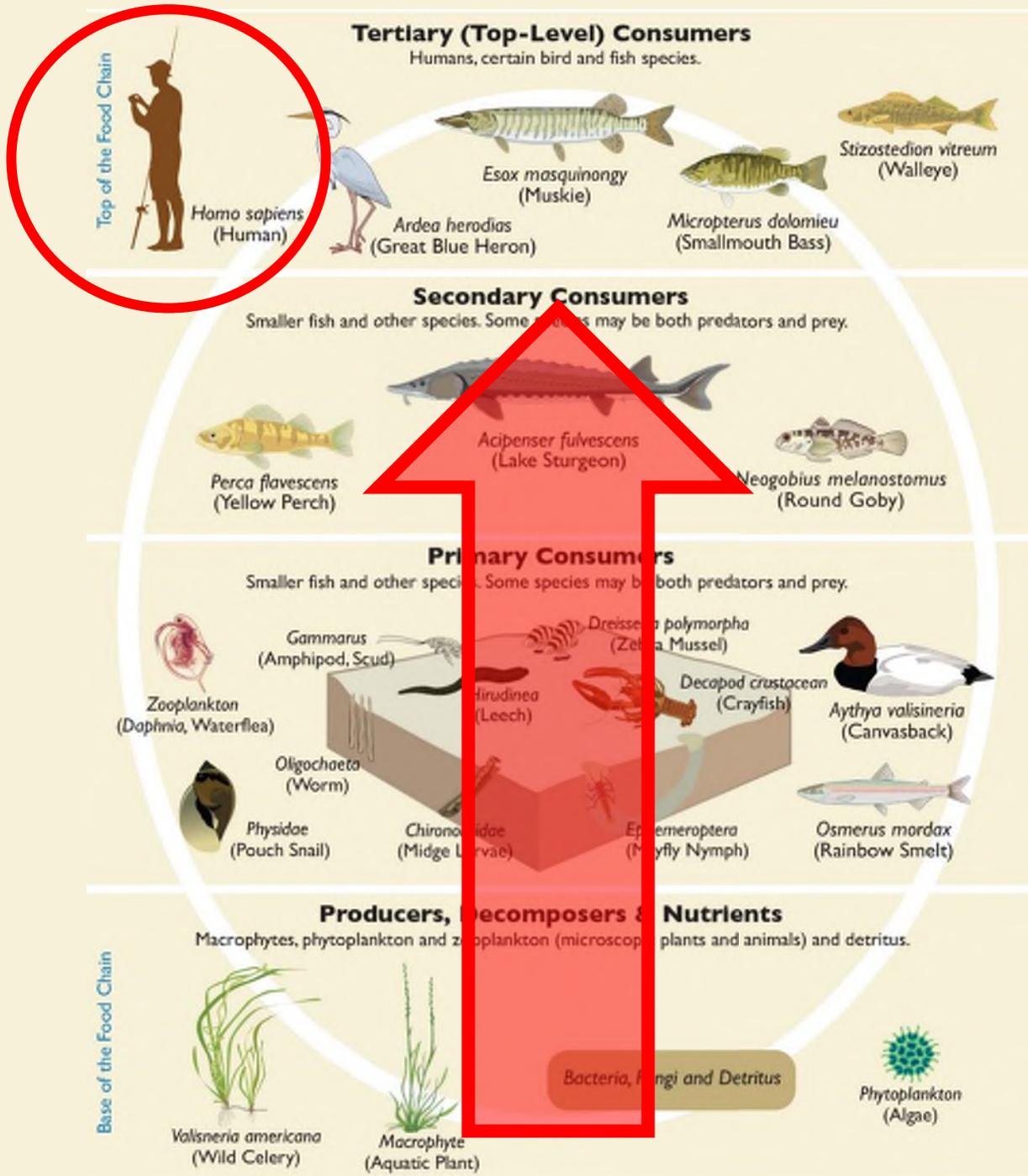
Biology Professor
University of Missouri

**CRUSTACEANS, SIX
MILES DEEP, WERE
HIGHLY CONTAMINATED**



**MARINE MAMMALS
CONTAIN SOME OF THE
HIGHEST LEVELS**

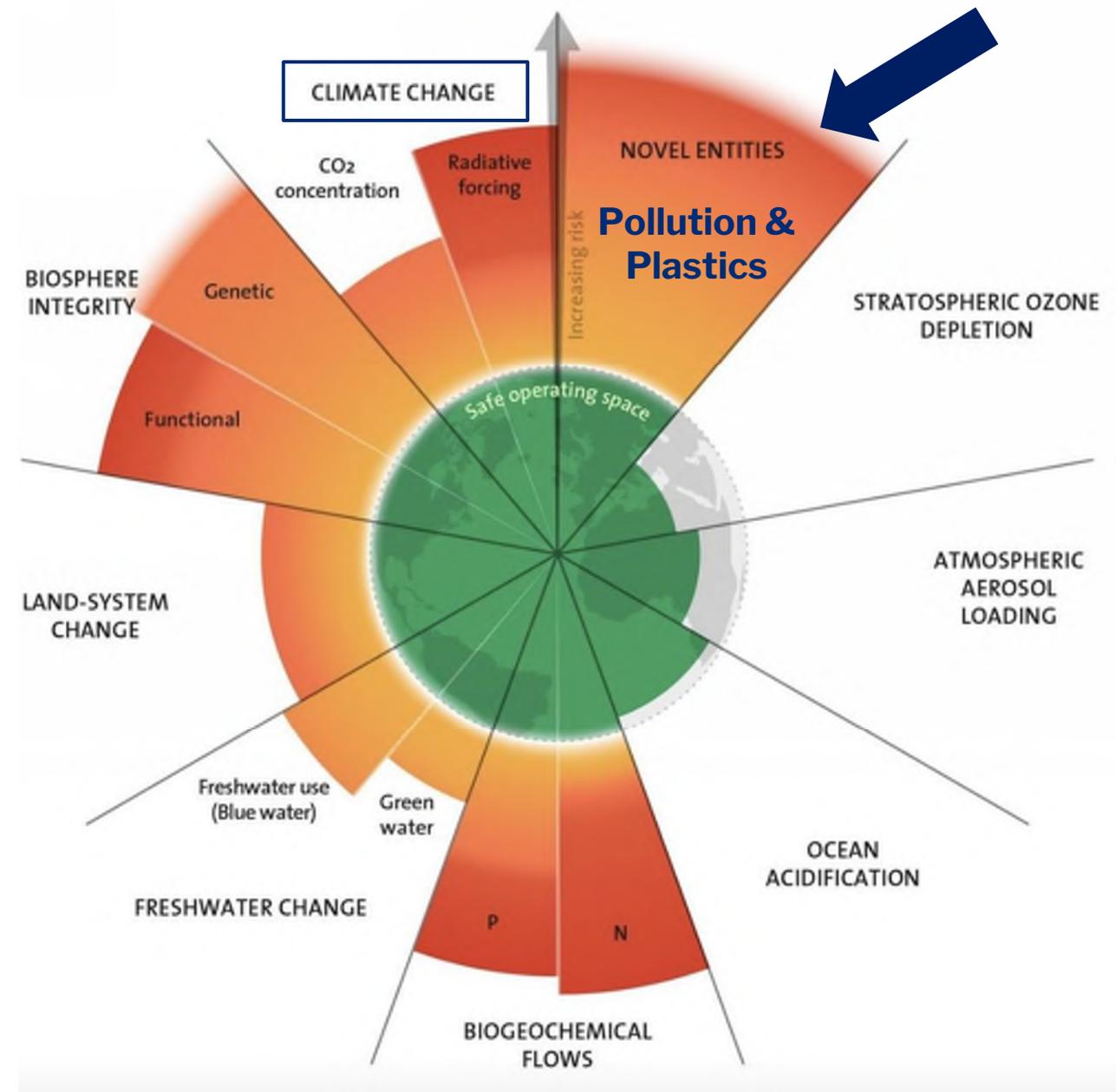




9 Earth Systems

Status of Planetary Boundaries

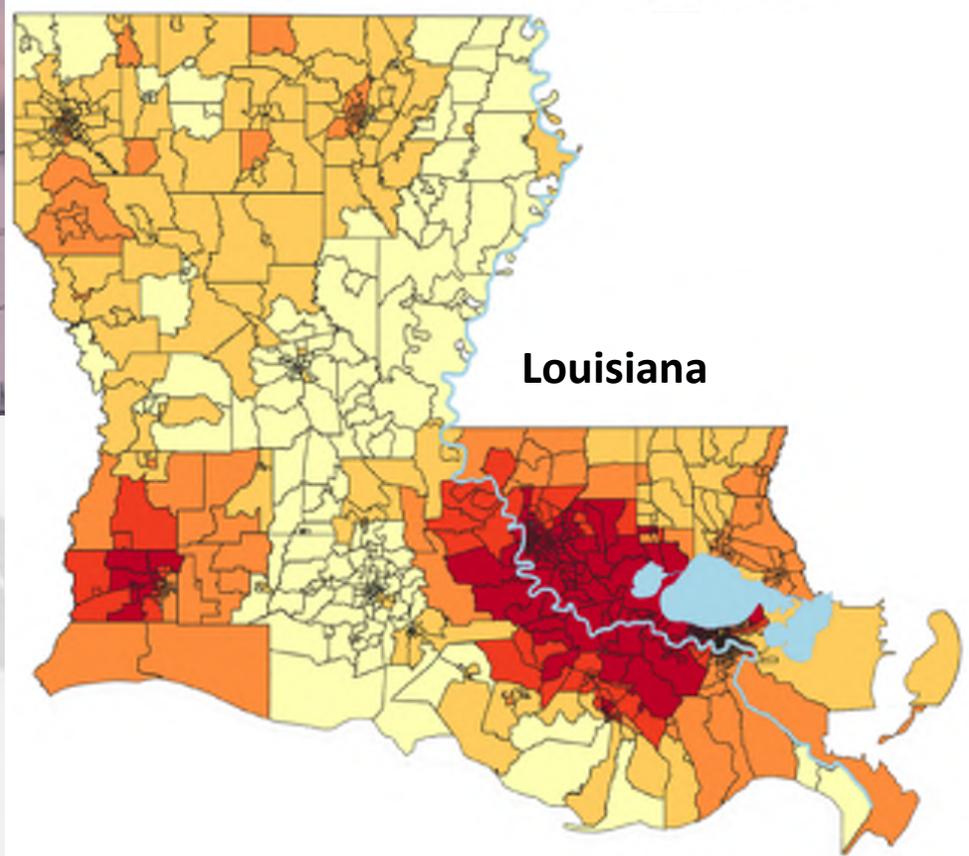
Chemical Pollution & Plastics have crossed the planetary boundary deemed safe for humanity.



SOCIAL JUSTICE



The Cancer Corridor

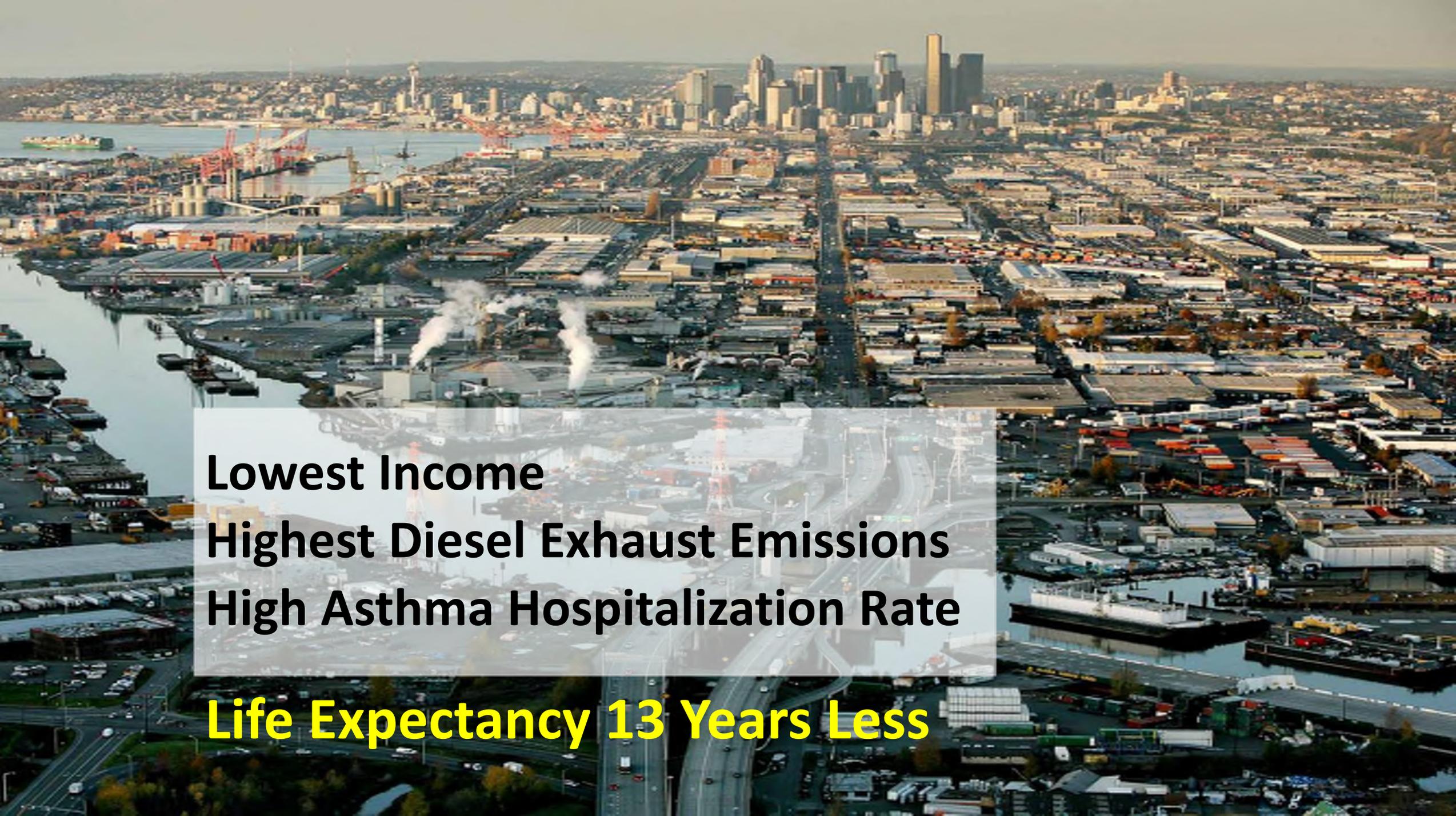






Not All Populations Impacted Equally





Lowest Income
Highest Diesel Exhaust Emissions
High Asthma Hospitalization Rate

Life Expectancy 13 Years Less

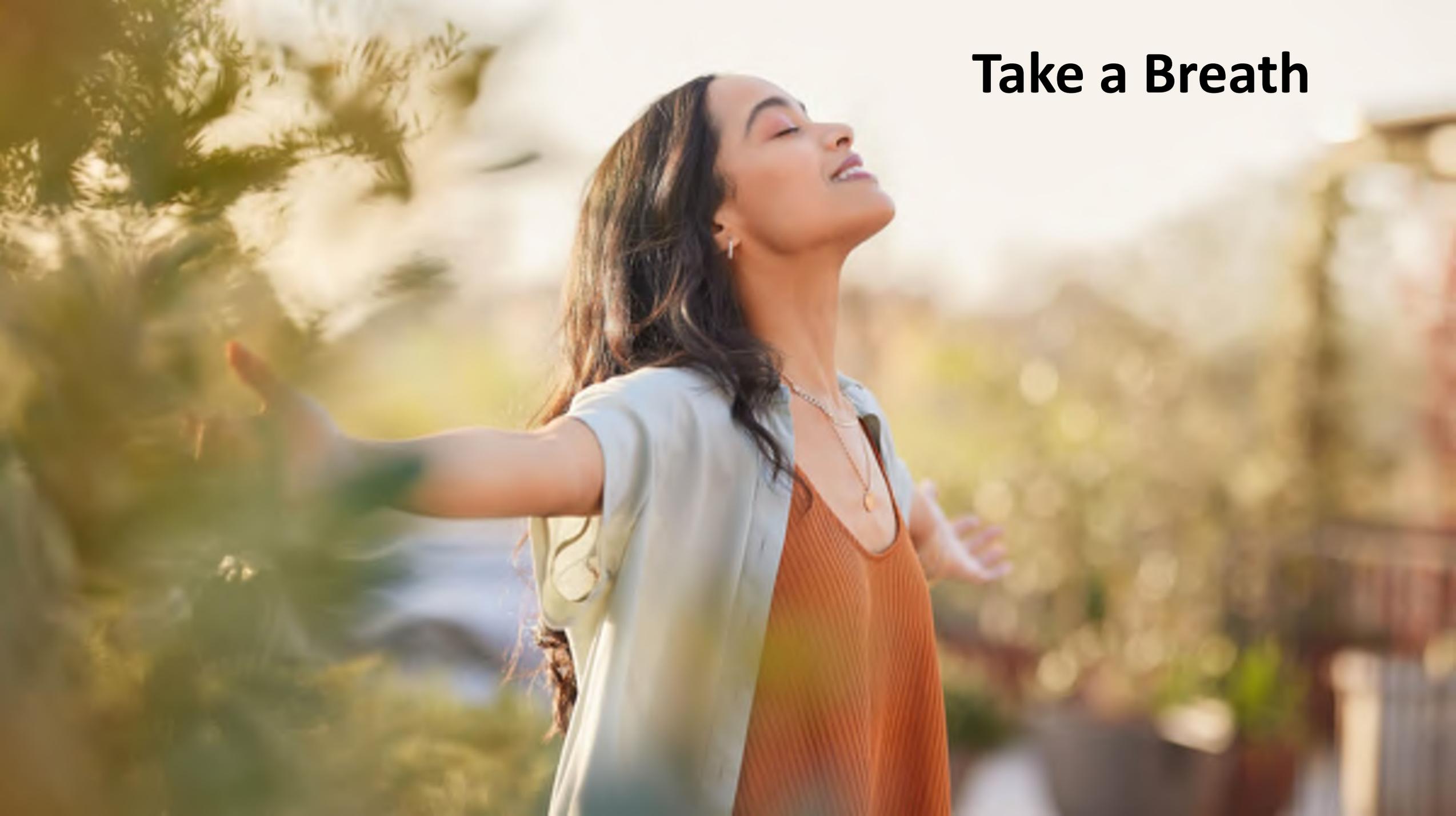
Chemical Pollution is
Global

Finite Capacity of
Earth to Absorb
Chemicals

Demands a Globally
Coordinated Response



Take a Breath





MATERIALS ACTION
for
ARCHITECTURAL PROJECTS



Ethics

FROM THE OFFICE OF GENERAL COUNSEL

CANON VI **Obligations to the Environment**

E.S. 6.3 Building Materials:
Members should select and use building materials to minimize exposure to toxins and pollutants in the environment to promote environmental and human health and to reduce waste and pollution.



DESIGN WORK

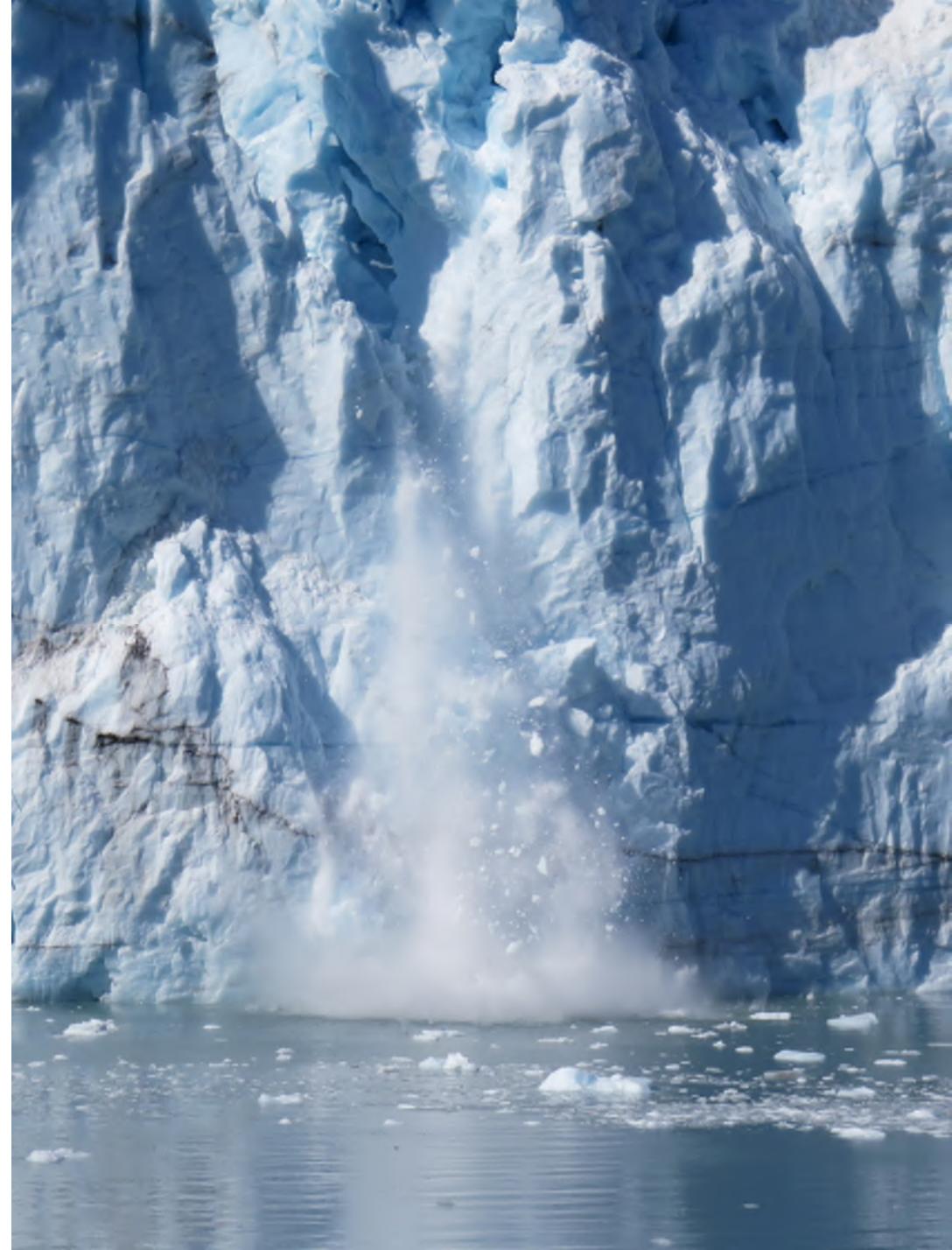
100% Regenerative Design by 2030

- Target **net positive operational energy**
- Achieve **zero embodied carbon** emissions
- Target **net positive water**
- Design for a **regenerative site**
- Prioritize holistically optimized building materials (i.e. **AIA Materials Pledge**)
- Prioritize **occupant health**
- Design for **community resilience**

Precautionary Principle

When an activity raises threats of harm to human health or the environment, **precautionary measures should be taken** even if some cause and effect relationships are **not fully established scientifically.**

--UN World Charter for Nature



Do we really need it?

Is it worth it?

Is there a safer alternative?



LIVING BUILDING CHALLENGESM

**A Visionary Path to a
Regenerative Future**



INTERNATIONAL
LIVING FUTURE
INSTITUTE™

MATERIALS

Building with Products that are
Safe for All Species Through Time

🌱 I-12 RESPONSIBLE MATERIALS

I-13 RED LIST

I-14 RESPONSIBLE SOURCING

I-15 LIVING ECONOMY SOURCING

I-16 NET POSITIVE WASTE

MATERIALS

IMPERATIVE

13

RED LIST



The intent of this Imperative is to foster a transparent materials economy free of toxins and harmful chemicals.

All projects must avoid the following Red List chemical classes in 90% of the project's new materials by cost.³² "In situ" materials do not need to be removed or vetted for Red List chemical classes.³³

- Antimicrobials (marketed with a health claim)
 - Alkylphenols and related compounds
 - Asbestos compounds
 - Bisphenol A (BPA) and structural analogues
 - California-banned solvents
 - Chlorinated Polymers, including:
 - Chlorinated polyethylene (CPE)
 - Chlorinated polyvinyl chloride (CPVC)
 - Chloroprene (neoprene monomer)
 - Chlorosulfonated polyethylene (CSPE)
 - Polyvinylidene chloride (PVDC)
 - Polyvinyl chloride (PVC)
 - Chlorobenzenes
 - Chlorofluorocarbons (CFC) and hydrochlorofluorocarbons (HCFC)
 - Formaldehyde (added)
 - Monomeric, polymeric and organophosphate halogenated flame retardants (HFRs)
 - Organotin Compounds
 - Perfluorinated compounds (PFCs)
 - Phthalates (orthophthalates)
 - Polychlorinated biphenyls (PCBs)
 - Polycyclic aromatic hydrocarbons (PAHs)
 - Short-chain and medium-chain chlorinated paraffins
 - Toxic heavy metals
 - Arsenic
 - Cadmium
 - Chromium
 - Lead (added)
 - Mercury
 - Volatile organic compounds (VOC) (wet-applied products)^{*}
 - Wood Treatments containing creosote or pentachlorophenol
- *VOCs are limited, not banned. Refer to the v4.0 Materials Petal Handbook for specific reference standard + thresholds.

³² Refer to the v4.0 Materials Petal Handbook for complete and up-to-date listings of the numerous Red List exceptions. For purposes of the Living Building Challenge, "Materials" includes systems furniture and excludes FFSE.

³³ A list of CAS registry numbers that correspond with each Red List item is available and should be projects based on their date of registration. Materials deemed hazardous by a remediation professional must be addressed appropriately.

Declare.

THE NUTRITION LABEL FOR BUILDINGS

Find healthy products for your next project. Declare is a transparency platform and product database that is changing the materials marketplace

DECLARE YOUR PRODUCT

FILTER BY:

MANUFACTURER

STATUS

CSI DIVISION

LOCATION

Q



WINSTONE WALLBOARDS
10 MM GIB AQUALINE®
PLASTERBOARD



9WOOD
1100 CROSS PIECE
GRILLE/2100 PANELIZED
LINEAR (FSC DOUGLAS...)



9WOOD
1100 CROSS PIECE
GRILLE/2100 PANELIZED
LINEAR (FSC HEMLOCK)



WINSTONE WALLBOARDS
13 MM GIB AQUALINE®
PLASTERBOARD



Health Product DECLARATION™

CONTENT INVENTORY

- Threshold per material
- 100 ppm
 - 1,000 ppm
 - Per GHS SDS
 - Per OSHA MSDS
 - Other

Residuals and impurities considered in 1 of 1 materials

- see Section 2: Material Notes
- see Section 5: General Notes

Based on the selected Content Inventory Threshold:

- Characterized.....
- Are the Percent Weight and Role provided for all substances? Yes No
- Screened.....
- Are all substances screened using Priority Hazard Lists with results disclosed? Yes No
- Identified.....
- Are all substances disclosed by Name (Specific or Generic) and Identifier? Yes No

CONTENT IN DESCENDING ORDER OF QUANTITY

Summary of product contents and results from screening individual chemical substances against HPD Priority Hazard Lists and the GreenScreen for Safer Chemicals®. The HPD does not assess whether using or handling this product will expose individuals to its chemical substances or any health risk. Refer to Section 2 for further details.

MATERIAL | SUBSTANCE | RESIDUAL OR IMPURITY
GREENSCREEN SCORE | HAZARD TYPE

CARPET TILE | FLY ASH **LT-UNK** LIMESTONE; CALCIUM CARBONATE **LT-UNK**
BIS(2ETHYLHEXYL) TEREPHTHALATE **UNK** POLY(VINYL CHLORIDE-CO-METHYL ACRYLATE)
LT-UNK ETHYLENE-VINYL ACETATE COPOLYMER **LT-UNK** POLYETHYLENE TEREPHTHALATE
(PET) **LT-UNK** GLASS / MINERAL FIBER **LT-UNK** C8-18ALKYLBIS(2-
HYDROXYETHYL)AMMONIUM BIS(2-ETHYLHEXYL)PHOSPHATE **LT-P1** | MAM | SKI | AQU
CALCIUM OXIDE **LT-UNK** ALCOHOL ETHOXY SULFATE **UNK** SOLUBLE STARCH
(POLYETHYLENE-ACRYLIC ACID) COPOLYMER **LT-UNK** NYLON 6,6 **LT-UNK** NYLON 6 **LT-UNK** |

Number of Greenscreen BM-4/BM3 contents..... 0

Contents highest concern GreenScreen Benchmark or List translator Score..... LT-P1

Nanomaterial..... No

INVENTORY AND SCREENING NOTES:

As included in the finished Product, none of the material(s) identified with a "Hazard Type" designator have been shown to present any increased risk to human health under normal conditions of use or exposure.

VOLATILE ORGANIC COMPOUND (VOC) CONTENT

CERTIFICATIONS AND COMPLIANCE

VOC Content data is not applicable for this product category.

- Self-Published*
- Third Party Verified

VERIFIER: SCREENING DATE: February 22, 2016 EXPIRY DATE*: February 22, 2019
VERIFICATION #: RELEASE DATE: February 22, 2016 * or within 3 months of significant change in product contents

*See HPDC website for details

CRADLE TO CRADLE
PRODUCTS
INNOVATION
INSTITUTE

Material
Health



PLATINUM



Accoya® Wood (Radiata Pine & Alder)

ISSUED TO Accsys Technologies

STANDARD 3.1

EXPIRES 9 August 2019

LEAD ASSESSMENT BODY
MBDC

ASSESSED APPLICATIONS
Manufacture, Installation, Use Outdoors, Landfilling, Composting, Incineration

PRODUCTS COVERED
Accoya® Wood - Radiata Pine
Accoya® Wood - Alder

PRODUCT OPTIMIZATION SUMMARY

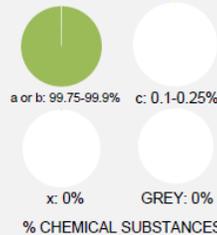
- Cradle to Cradle Certified™* Banned List compliant
- Material Health optimization strategy not required
- No exposure from carcinogens, mutagens, or reproductive toxicants
- VOC emissions testing not required for this product type
- Product is fully optimized - does not contain any GREY or x-assessed chemicals
- Process chemicals have been identified and none are GREY or x-assessed

PERCENTAGE OF CHEMICAL
SUBSTANCES ASSESSED BY
WEIGHT

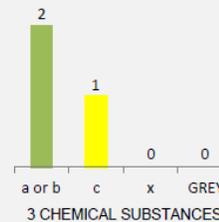
100%

Inventory threshold for chemicals in each
material = 100 ppm

ASSESSMENT RATINGS
BY WEIGHT



PRODUCT
OPTIMIZATION



Health Profile

- ✓ An aggregation of potential health hazards, represented by % of total product weight, as reported by a health hazard screening process. This does not factor in an exposure or risk assessment. See Methodology for more details on health hazard screening.





Bisphenol A (BPA)

CASRN: 80-05-7

Building Products

Where it's Commonly Found

BUILDING PRODUCT

MASTER SPEC SECTIONS

Epoxy Grouting

09 30 00 – Tiling
09 30 13 – Thin-Set Ceramic Tiling
09 31 00 – Thin-Set Tiling
09 31 33 – Thin-Set Stone Tiling

Epoxy Paint or Epoxy Coatings

09 91 00 – Painting
09 96 00 – High Performance Coatings
09 96 56 – Epoxy Coatings

Epoxy Resinous Flooring

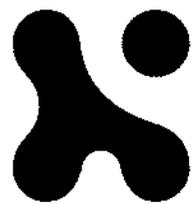
09 67 00 – Fluid-Applied Flooring
09 67 23 – Resinous & Epoxy Resinous Flooring

Fluid-Applied Flooring

09 67 00 – Fluid-Applied Flooring
09 67 23 – Resinous & Epoxy Resinous Flooring
09 67 25 – Troweled Resinous Flooring

High Pressure Laminate

06 41 00 – Architectural Wood Casework
06 41 16 – Plastic-Laminate Clad Architectural Cabinets
06 42 19 – Plastic-Laminate Faced Wood Paneling



INFORMED

HABITABLE



Flooring



Paint



Drywall



Countertops



Cabinetry & Millwork



Doors



Insulation



Flooring Installation



Sealants



Turf



Water Pipes



Roofing



Waterproofing & Dampproofing



Fire Protection



Firestopping & Fireblocking



Acoustical Ceilings & Treatments



Window Frames



Exterior Cladding & Siding

- Best in Class
- Better
- Good
- Reduce
- Eliminate
- Worst in Class



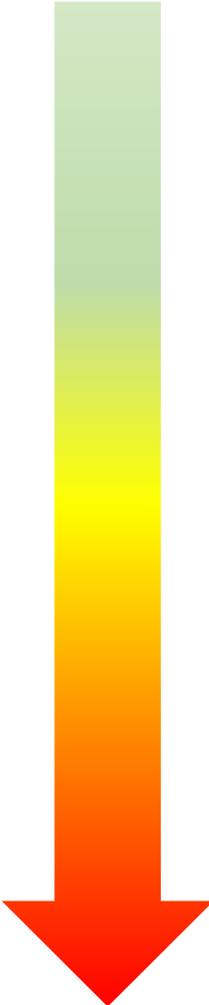
Resilient Flooring

Hazard Spectrum



Linoleum	▼
Solid Wood Floors (pre-finished)	▼
Concrete (no finish/accessories or only densifier without PFAS)	▼
Ceramic Tiles (made in the USA/lead-free with no CRT content)	▼
Solid Wood Floors (site-finished)	▼
Cork Floors (pre-finished)	▼
PVC-free Resilient Flooring	▼
Engineered Wood Floors (pre-finished)	▼
Rubber or Rubber/Cork Floors (made without tire-derived crumb rubber)	▼
Laminate	▼
Carpet (with no fly ash, no vinyl or polyurethane backing, and no PFAS)	▼
Polyurethane (PU) Resilient Flooring	▼
Engineered Wood Floors (site-finished)	▼
Vinyl Floors (no phthalates or hazardous recycled content)	▼
Ceramic Tiles (not made in the USA/presence of lead is unknown/CRT tiles)	▼
Concrete (with sealers or with densifiers/coatings containing PFAS)	▼
Rubber or Rubber/Cork Floors (made with tire-derived crumb rubber)	▼
Carpet (containing fly ash, vinyl or polyurethane backing, and PFAS)	▼
Vinyl Floors (containing phthalates, hazardous stabilizers, and hazardous recycled content)	▼

USE



AVOID



INFORMED

Informed guidance considers all 5 AIA Materials Pledge areas



Human Health



Climate Health



Ecosystem Health



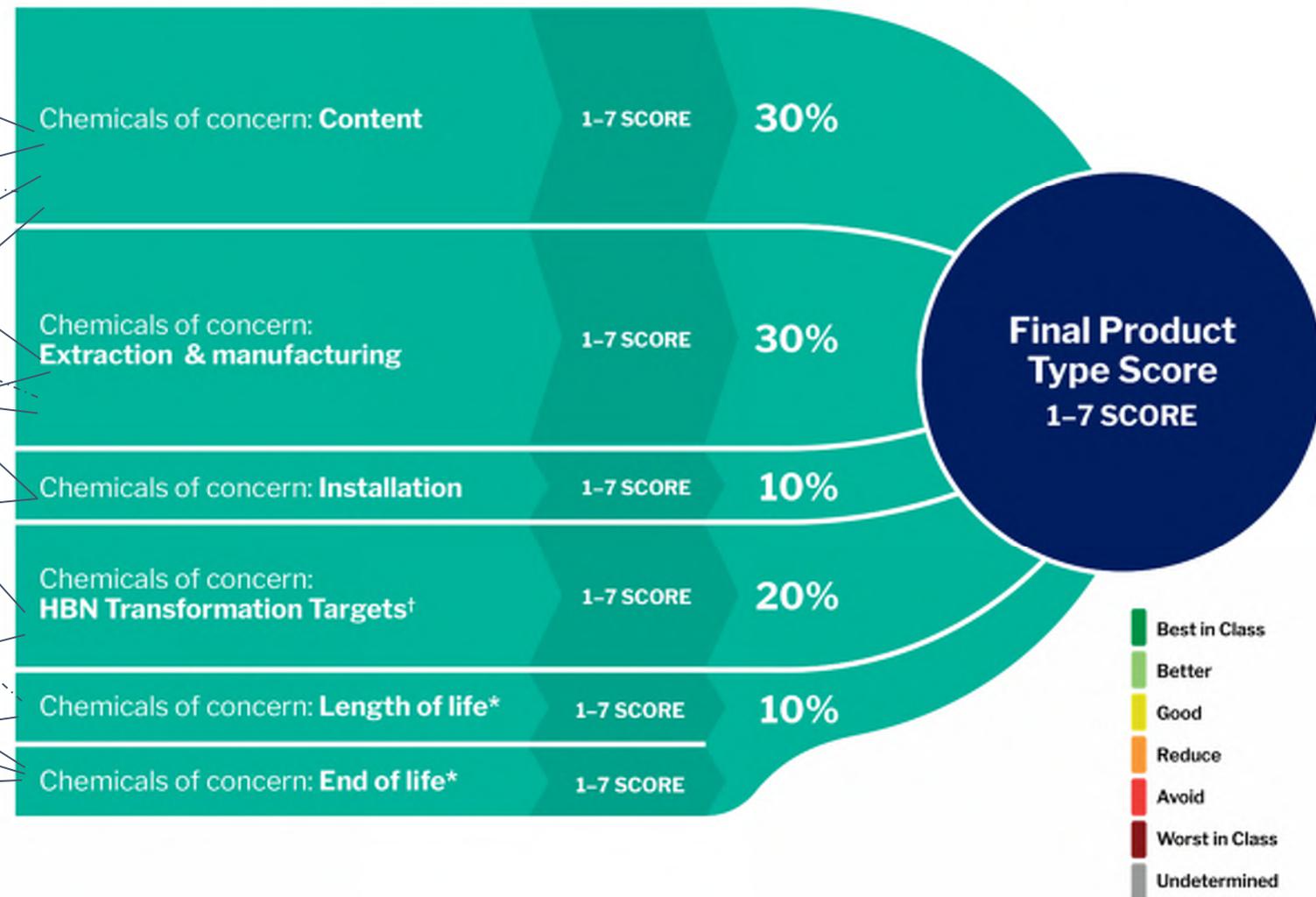
Social Health & Equity



Circular Economy

Scoring a Product Type

A weighting factor is then applied to each criteria to calculate one final Product Type score. This provides the starting point for ranking a group of Product Types in a category color ranking used in Informed™.

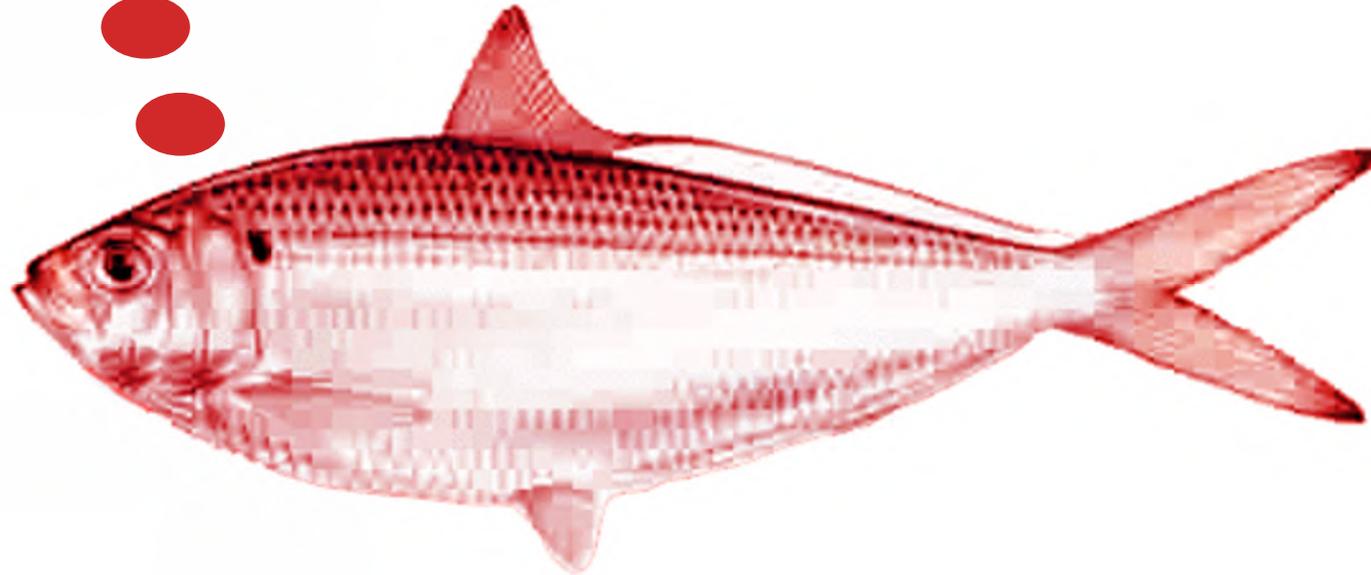


- Trust their disclosed data
- Consider claims / explanations with caution



Manufacturers As Partners

I'M HERE TO DISTRACT YOU



“Encapsulated”

“Not Present in End Product”

Instead: Consider Full Life Cycle Effects

REGULATORY ACTION



Pollution Prevention for our Future Act

- Nation's strongest legislation regulating harmful building and consumer chemicals
- Directs state agencies to address **classes** of chemicals
- Department of Ecology has authority to ban or restrict chemicals
- Establishes timelines for oversight and increased action every 5 years





PFAS Regulation

In January 2024, the EPA finalized a rule that prevents companies from manufacturing or processing PFAS without an EPA review and risk determination

In February 2024, the FDA announced that manufacturers are no longer selling grease-proofing substances containing PFAS for food contact use in the US

In April 2024, the EPA established the first legally enforceable national drinking water standard for PFAS, setting limits for six PFAS compounds.



The **Restriction of Hazardous Substances (RoHS)** Directive is a European Union regulation aimed at reducing the environmental and health impacts of electronic and electrical equipment by restricting the use of certain hazardous substances.

10 Restricted Substances:

Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent Chromium (Cr VI)
Polybrominated Biphenyls (PBB)	Polybrominated Diphenyl Ethers (PBDE)	Bis(2-ethylhexyl) phthalate (DEHP)	Butyl benzyl phthalate (BBP)
	Dibutyl phthalate (DBP)	Diisobutyl phthalate (DIBP)	

Compliance: Products must comply with RoHS to be sold in the EU market. This includes meeting maximum concentration values for the restricted substances and ensuring proper labeling and documentation.



Purpose: REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) aims to **protect human health and the environment** from risks posed by chemicals, while enhancing the competitiveness of the EU chemicals industry.

- **Scope:** It applies to **all chemical substances** used in industrial processes and daily life, such as cleaning products, paints, and articles like clothes and furniture.
- **Responsibilities:** Companies must **identify and manage risks** associated with the substances they manufacture and market in the EU. They need to demonstrate safe usage and communicate risk management measures.
- **Regulation:** REACH shifts the burden of proof from public authorities to industry, requiring companies to register substances and work together to assess and manage risks

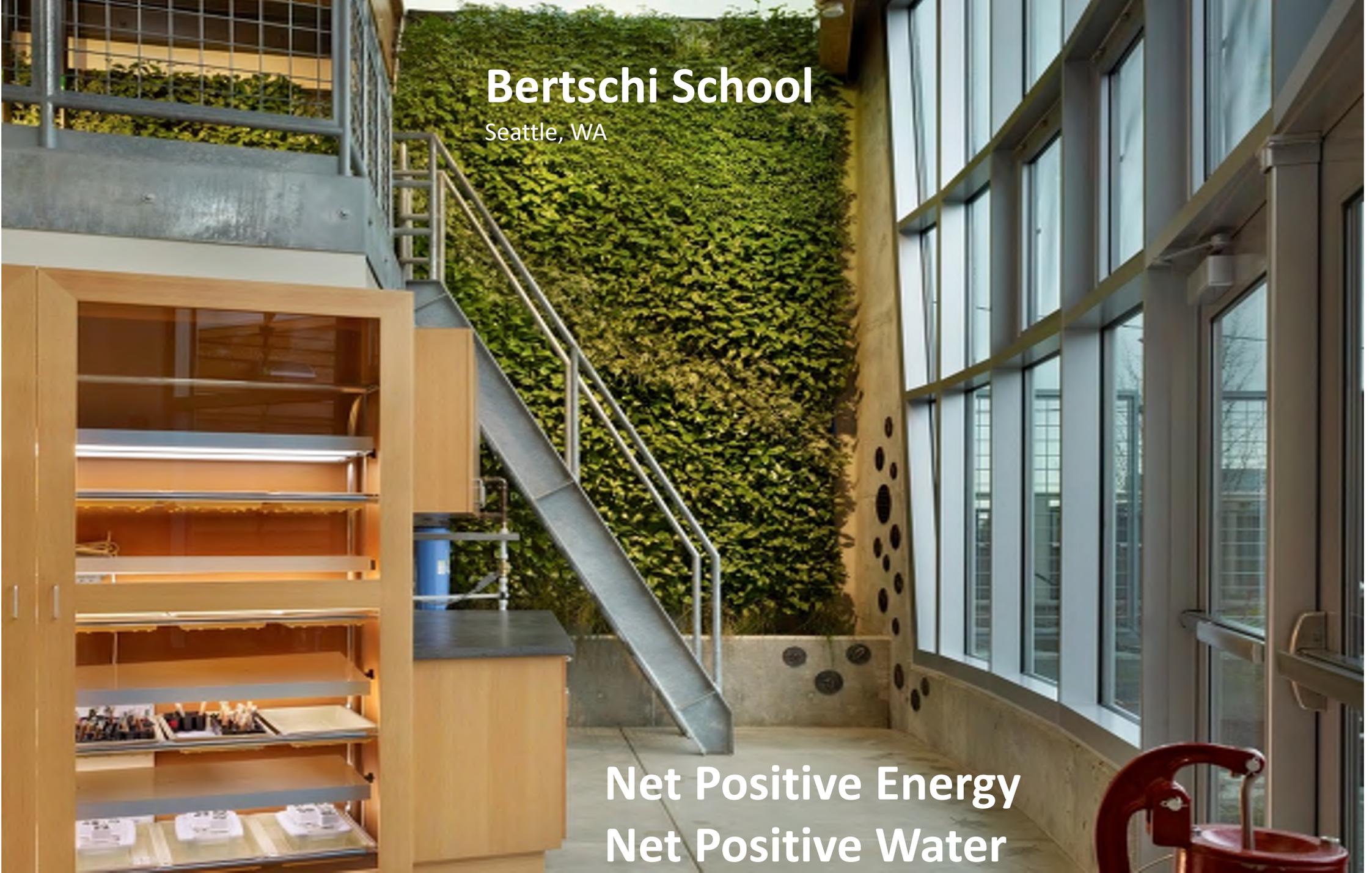
EXAMPLE PROJECTS



Bertschi School

Seattle, WA

Net Positive Energy
Net Positive Water





Bullitt Center

Seattle, WA

Net Positive Energy
Net Positive Water

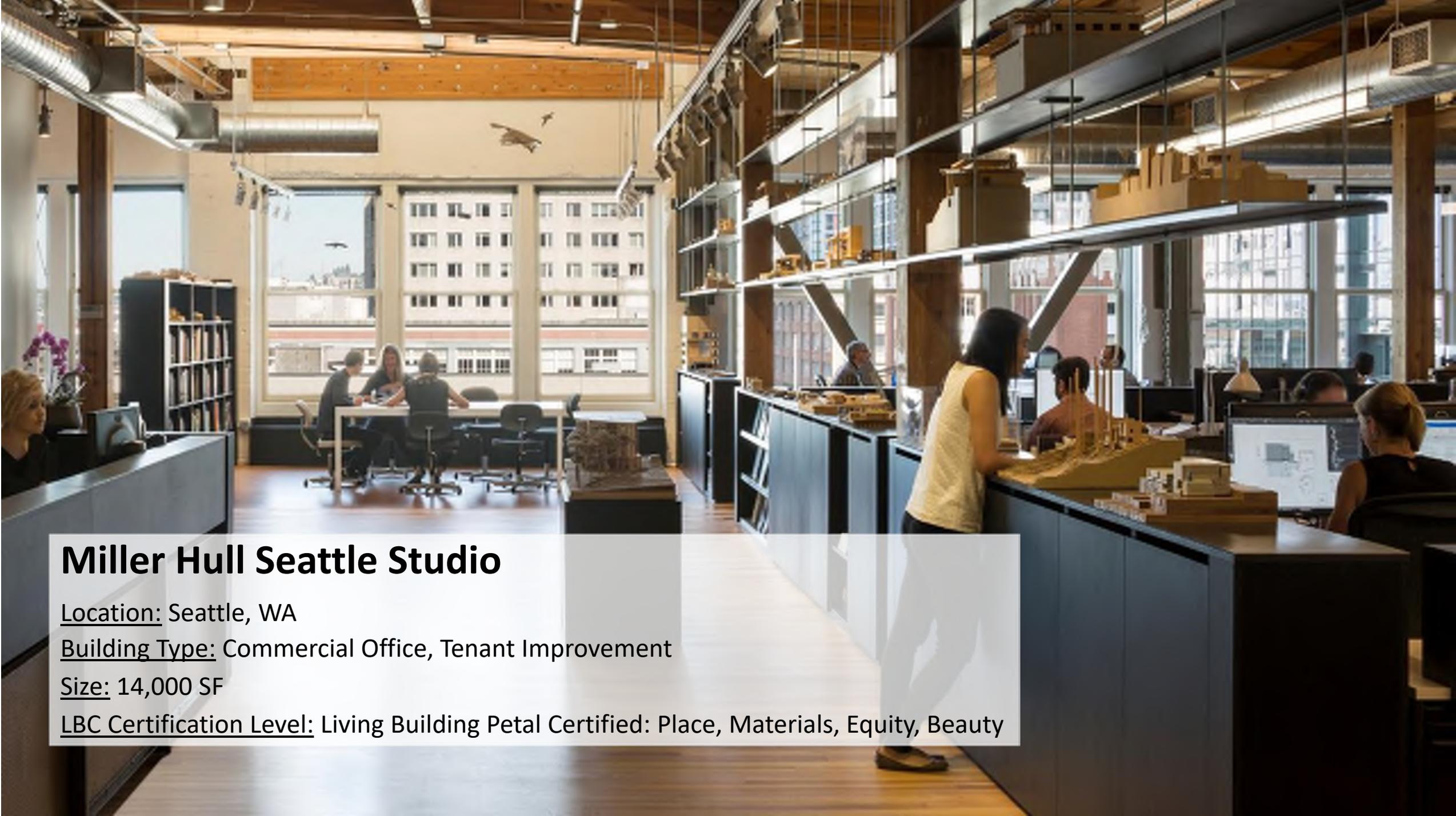


Kendeda Building

Atlanta, GA



Net Positive Energy
Net Positive Water



Miller Hull Seattle Studio

Location: Seattle, WA

Building Type: Commercial Office, Tenant Improvement

Size: 14,000 SF

LBC Certification Level: Living Building Petal Certified: Place, Materials, Equity, Beauty



Miller Hull San Diego Studio

Location: San Diego, CA

Building Type: Commercial Office, Tenant Improvement

Size: 4,600 SF

LBC Certification Level: Living Building Petal Certification: Place, Energy, Health & Happiness, Materials, Equity, Beauty



Loom House

Location: Bainbridge Island, WA

Building Type: Single Family Residential, Renovation

Size: 3,400 SF

LBC Certification Level: Full Living Certified



University of Washington Hans Rosling

Location: Seattle, WA

Type: Higher Education

Size: 300,000 SF

Certification: LEED Platinum and Fitwel

Deschutes Public Library, Redmond

Location: Redmond, OR

Type: Civic

Size: 38,000 SF

Certification: LEED (Pending)



Newhouse Replacement Building

Location: Olympia, WA; Capitol Campus

Type: Civic, Office

Size: 59,300 SF

Certification: LEED Platinum







Review: What Can You Do?

- Set Goals
- Prioritize
- Educate
- Advocate
- Use The Tools
- Make This Your Standard Process
- Do We Really Need It?

A scenic photograph of a sunset over a body of water. The sun is low on the horizon, creating a bright orange and yellow glow that reflects on the water's surface. In the background, there are dark, silhouetted mountains under a sky with scattered clouds.

THANK YOU

CHRIS HELLSTERN

LIVING BUILDING CHALLENGE SERVICES DIRECTOR

chellstern@millerhull.com