

Basis Statement
Citizen Petition to Initiate Rulemaking
Proposed Rule Chapter 888
Designation of four members of the Chemical Class ‘Phthalates’ as Priority Chemicals

Basis Statement

On May 14, 2014, a citizen petition to initiate rulemaking to designate four members of the chemical class phthalates as priority chemicals was submitted to the Department of Environmental Protection (“Department”). The petition sought to establish di(2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), benzyl butyl phthalate (BBP), and diethyl phthalate (DEP) as Priority Chemicals, and require manufacturers of specified categories of children’s products to report their intentional use in such products to the Department.

In accordance with the *Maine Administrative Procedure Act*, 5 M.R.S.A. § 8055, any person may petition an agency for the adoption or modification of any rule. Within 60 days after receiving such a petition, the agency must either notify the petitioner of its denial, or initiate the appropriate rulemaking proceedings. However, because this petition was submitted by more than 150 registered voters of the State of Maine, the Department was required by law to initiate rulemaking (5 M.R.S.A. § 8055(3)). The nature of the petition’s proposed rule chapter 888 is such that proceedings follow the Department’s routine technical rulemaking process.

The draft rule, as proposed in the citizen’s petition, was published on July 9, 2014. Following the direction provided by the *Maine Administrative Procedure Act*, 5 M.R.S.A. § 8052(1), a public hearing on this petition was held on July 29, 2014. The public comment period closed on September 29, 2014, with the Department receiving over 900 comments.

Because numerous sections of petitioner’s originally proposed draft rule were in conflict with governing statute and rule, it was necessary for the Department to modify language in the proposed draft to better align the rule with currently effective Maine law. Some sections of the proposed draft rule were substantially revised from the petitioner’s proposal as a result of these necessary changes. Additionally, some sections of the rule required modification to provide greater clarity. This required the Department to republish the proposed draft in its amended form on February 11, 2015, and provide for another public comment period. This second comment period specifically requested input from the public concerning the modification of language from

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the originally proposed draft (5 M.R.S.A. §8052(5)(B)) and closed on March 13, 2015, with the Department receiving 36 comments.

Basis for Amended Language

The Commissioner is unable to adopt the originally proposed applicability section of draft rule chapter 888 because it fails to identify distributors as a regulated entity and omits exemptions which appear in previous priority chemical rules. Additionally, the originally proposed language was unclear and did not accurately reflect the statutory language of, “product for sale in the State” (38 M.R.S.A. § 1695(1)) when describing products subject to regulation under this rule.

Within section 2 of the proposed draft rule, changes were necessary to properly cite Department rule chapter 880.

Several definitions within the originally proposed rule were modified to be consistent with the Department’s other rules and with federal regulatory definitions so that the regulated community can more readily comply with the rule. Section 2(I) was amended to remove unnecessary descriptive language so that it is clearer which compounds are regulated, similar to changes made in section 3(A). Rather than duplicate the list of criteria from statute, the Department made section 3(B) more meaningful by describing which of the designation criteria had been met.

Because the rule must be consistent with statute, the Commissioner cannot adopt the originally proposed tiered reporting system. Governing law states that regulated entities must submit applicable information, “not later than 180 days after a priority chemical is identified...” (*Toxic Chemicals In Children’s Products*, 38 M.R.S.A. § 1695(1)). The Department is unable to create a reporting condition in rule which does not align with statutory requirements.

Petitioner’s proposed rule provided a waiver of disclosure for regulated entities that are subject to reporting requirements in the State of Washington. However, Maine law specifies that priority chemical disclosure applies to a manufacturer or distributor providing a product for sale in the State of Maine (*Toxic Chemicals In Children’s Products*, 38 M.R.S.A. § 1695(1)). This specificity regarding the location of commerce, and the substantial distance between the Maine and Washington marketplaces, leaves this section of the petitioner’s proposed draft misaligned

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with statute and unenforceable. Additionally, information reported to Washington State through its *Children’s Safe Products Act*, Chapter 70.240 RCW, does not mirror information required by Maine law.

These amendments to proposed rule chapter 888 have resulted in a statutorily aligned and enforceable regulation, which fits within the scope and purpose of the Department’s existing Safer Chemicals Program. Because evidence in the record shows that the phthalates listed in the proposed rule have met the criteria for designation as Priority Chemicals, and that publicly accessible information which reflects the information requested by the proposed rule does not exist, the Department moves to designate the four phthalates named in proposed rule chapter 888 as Priority Chemicals.

Comments on the rulemaking proposed in the petition are summarized below. Comments are grouped according to which version of the proposed draft they apply to and may be consolidated. Department responses follow the comments.

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Please Note: Some commenters have submitted more than one written comment and, as a result, are noted within this list by an asterisk (). The asterisk is also used to complete commenter names that were not legible.*

List of Commenters

1. Emma Halas-O'Conner
EHSC
969 Congress St.
Portland ME 04101
2. Deb Rice, PhD
EHSC
83 George Wright Rd.
Woolwich, ME 04579
3. Dr. Geoff Gratwick
1230 Kenduskeag Ave.
Bangor, ME 04401
4. Bettie Kettell
ANA- Maine
103 Rabbit Rd.
Durham, ME 04222
5. Syd Sewall
Maine Chapter AAP
6. Jeff Gearhart
Ecology Center
117 N. Division
Ann Arbor, Michigan 43104
7. Robin Dodson
Silent Spring Institute
29 Crafts Street
Newton, MA 02458
8. Paige Holmes
Holmes Consulting
20 Poplar Circle
Lisbon, ME 04250
9. Tracy Gregoire, Kim Moody,
Virginia Mott, Carol Tiernan
Learning Disabilities Assoc. of Maine
59 Ward Rd
Topsham, ME 04086
10. Suzanne Lafreriere
Roman Catholic Diocese of Portland
510 Ocean Ave.
Portland, ME 04074
11. Beth Ahearn
Maine Conservation Alliance
30 Pine Street
Freeport, ME 04032
12. Steve Taylor
Coming Clean
59 Ward Rd.
Topsham, ME 04086
13. Megan Rice
Prevent Harm
29 Grandview Drive
Belgrade, ME 04917
14. Maddy Roberts
870 Brewer Lake Rd.
Orrington, ME 04474
15. Regina Creeley
104 Corinth Rd.
Hudson, ME 04449

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- | | | |
|--|--|--|
| 16. Ginger Jordan Hillier
49 Welch Ave.
Monmouth, ME 04259 | 25. Mark Collatz
Adhesive and Sealant Council
7101 Wisconsin Avenue #990
Bethesda, MD 20814 | |
| 17. Donna Herzig
173 Longfellow St.
Portland, ME 04103 | 26. Jevaneh Nekoomaram
Stephen Wieroneiy
American Coatings Association
1500 Rhode Island Ave N.W.
Washington, DC 20005 | |
| 18. Bettyann Sheats
Finishing Touches Shower Doors
32 Waterview Drive
Auburn, ME 04210 | 27. Michael Belliveau
Environmental Health Strategy Center | |
| 19. Fred Miller
Maine Physicians for Social Responsibility
22 Pond Street
Orono, ME 04473 | 28. Curtis Picard
Retail Association of Maine
45 Melville Street, Suite 1
Augusta, ME 04330 | |
| 20. John Newton
Don Berry
Maine AFL-CIO
135 Sheridan St #303
Portland, ME 04101 | 29. Members of the
Maine State
Legislature:
Rep. Beaudoin
Rep. Beavers
Rep. Beck
Rep. Berry
Rep. Boland
Rep. Bolduc
Rep. Briggs
Rep. Carey
Rep. Casavant
Rep. Cassidy
Rep. Chenette
Rep. Chipman
Rep. Cooper
Rep. Daughtry
Rep. DeChant
Rep. Devin
Rep. Dill
Rep. Fowle
Rep. Frey
Rep. Gattine | Rep. Hubbell
Rep. Jones
Rep. Jorgensen
Rep. Kaenrath
Rep. Kent
Rep. Kornfield
Rep. McLean
Rep. Monaghan-Derrig
Rep. Moonen
Rep. Moriarty
Rep. Morrison
Rep. Nadeau
Rep. Nelson
Rep. Noon
Rep. Peoples
Rep. Peterson
Rep. Plante
Rep. Priest
Rep. Rankin
Rep. Rochelo
Rep. Rotundo
Rep. Russell
Rep. Rykerson |
| 21. Kathy Kilrain del Rio
Maine Women's Policy Center
19 Eastern Promenade Apt 1
Portland, ME 04101 | | |
| 22. Jody Spear
PO Box 42
Brooksville, Maine | | |
| 23. Peter Millard
29 Wright Street
Belfast, ME 04915 | | |
| 24. Heather Spaulding
MOFGA
PO Box 170
Unity ME 04988 | | |

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- | | | |
|---|----------------|----------------------------|
| Rep. Gideon | Rep. Sanborn | 32. Catherine Walsh |
| Rep. Gilbert | Rep. Saucier | Cape Elizabeth, ME 04107 |
| Rep. Goode | Rep. Saxton | |
| Rep. Graham | Rep. Schneck | 33. Amy Ducharme |
| Rep. Grant | Rep. Hamann | Studio Allure |
| Rep. Luchini | Rep. Harlow | 27 River Rd |
| Rep. MacDonals | Rep. Herbig | Topsham, ME 04086 |
| Rep. Marks | Rep. Hickman | |
| Rep. Mason | Rep. Hobbins | 34. Ben Butler |
| Rep. Mastraccio | Rep. Kruger | Ben's Old Port Barber Shop |
| Rep. McCabe | Rep. Shaw | 28 Milk St. |
| Rep. Treat | Rep. Short | Portland ME 04101 |
| Rep. Tipping-Spitz | Rep. Stanley | |
| Rep. Verow | Rep. Stuckey | 35. Bob Gilgan |
| Rep. Villa | Rep. Theriault | Bella Hair Studio |
| Rep. Welsh | Sen. Cleveland | 34 Main St. |
| Rep. Werts | Sen. Craven | Bangor, ME 04401 |
| Rep. Dion | Sen. Dutremble | |
| Rep. Dorney | Sen. Gerzofksy | 36. Brenda Broder |
| Rep. Eves | Sen. Gratwick | Amore Styles |
| Rep. Farnsworth | Sen. Haskell | 1 Gold St. |
| Rep. Fowle | Sen. Hill | Portland, ME 04101 |
| Rep. Frey | Sen. Jackson | |
| Rep. Gattine | Sen. Johnson | 37. Burke Fournier |
| Rep. Gideon | Sen. Lachowicz | Salon Burke |
| Rep. Gilbert | Sen. Mazurek | 490 Congress St |
| Rep. Goode | Sen. Millett | Portland, ME 04101 |
| Rep. Dorney | Sen. Patrick | |
| Rep. Eves | Sen. Tuttle | 38. Carmen Westa |
| Rep. Farnsworth | Sen. Valentino | Cornerstone Barber Shop |
| Rep. Kumiega | Sen. Vitelli | 210 Exchange St. |
| Rep. Kusiak | Sen. Alford | Bangor, ME 04401 |
| Rep. Lajoie | Sen. Boyle | |
| Rep. Libby | Sen. Cain | 39. Chelsy Sewell |
| Rep. Longstaff | | Amore Styles |
| | | 1 Gold St. |
| 30. Owen Caine | | Portland, ME 04101 |
| Consumer Specialty Products Association | | |
| 1667 K Street, NW, Suite 300 | | 40. Christina Archambault |
| Washington, DC 20006 | | Trimmings |
| | | 240 US 1 |
| 31. Harold I. Zeliger, Ph.D. | | Falmouth, ME 04105 |
| 25 River Place Drive #2514 | | |
| South Portland, ME 04106 | | |

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- | | |
|--|---|
| 41. Crystal Esculanal
Centre Street Hair Studio
25 Centre St.
Bath, ME 04530 | 50. Mallory Doria
Men's Room
8 City Center
Portland, ME 04101 |
| 42. Erica Lestrangle
Prime Cut Hair, Nail & Tanning
33 E Concourse
Waterville, ME 04901 | 51. Mary Lou Martin
Classic Cuts
26 S. Reynolds Rd.
Winslow, ME 04901 |
| 43. Jennifer Leigh
02 Salon & Spa
650 Congress St.
Portland ME 04101 | 52. Nancy Shiples
Gerry's Beauty Salon
1148 Main St Clinton ME 04917 |
| 44. Jessica Hunter
Ethan Hunter Salon
295 Fore St Portland, ME 04101 | 53. Pam Harrington
Total Image
122 College Ave.
Waterville ME 04901 |
| 45. Jonathan Kenyon
Apollo Salon & Spa
91 Silver St.
Waterville, ME 04901 | 54. Patti Baker
SumMER Island Studio
149 Main St.
Brunswick ME 04011 |
| 46. Kelley Keenan
Kelley's Salon
97 Commercial St.
Bath, ME 04530 | 55. Raymond Harris
Evolution Salon
15 Bay St.
Winslow ME 04901 |
| 47. Kristina Moran
Salon KLM
550 Congress St.
Portland, ME 04101 | 56. Sharon Carter
Country Clipper Styling Salon
22 Cookson Rd.
Albion ME 04910 |
| 48. Lanu French
Para Vida Day Spa
138 Main St.
Brunswick, ME 04011 | 57. Shawn Durost
Salon Paragon
486 Congress St.
Portland ME 04101 |
| 49. Louis M.
Senior Citizen Barber Shop
664 Congress St.
Portland, ME 04101 | 58. Stacey Witham
Adorn Hair and Nail Salon
1 Union St.
Portland, ME 04101 |

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- | | |
|--|---|
| 59. Thomas Leighton
Parlour
137 Kennebec St.
Portland, ME 04101 | 75. Connie Finley
Inland Hospital
200 KMD
Waterville, ME 04901 |
| 60. Tia Webb
Trims & Fade
64 Auburn St.
Portland, ME 04101 | 76. Amy Downing
358 Oak Hill Rd.
Smithfield, ME 04978 |
| 61. Molly Stone
Camden, Maine | 77. Carol White
Bangor, ME |
| 62. Caron Seadler
119 Dorothy St.
Portland, ME 04103 | 78. Chelsey Sevell |
| 63. Suzanne Lyon | 79. Steve Wilson
580 Main St.,
Corinth, ME 04427 |
| 64. Amanda Vannis | 80. Winn Ceneta |
| 65. Vic Schalk | 81. Malory Doria |
| 66. Susan Mich | 82. Louis A. M****
664 Congress St.
Portland, ME |
| 67. C. Stromgren | 83. Madeline Love |
| 68. Kate Boak | 84. Maria Verrill |
| 69. Pamela Fesq Bonney
28 Ceyce Cod Hill Rd.
New Sharon, ME 04955 | 85. Alyssa Taylor |
| 70. Noah Defilippis | 86. Carmen Westa * |
| 71. Erin
Bangor, ME | 87. Cathy Anderson *
27 Central St |
| 72. Tracy Monaghan | 88. Lassandra Freedman |
| 73. G. Rankey
Portland, ME | 89. Brandon Mcinnis |
| 74. Amy Allen,
Bangor, ME | 90. Janet Sirois |
| | 91. Sara Lozefski
485 West Rd.
Belgrade, ME 04917 |

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|--|--|
| 92. Tracy Canak
15 Neck Rd.
China, ME 04358 | 111. Nick Rosoline |
| 93. Zeth Lindy
30 Central St.
Bangor, ME | 112. Marie Stock |
| 94. Jennifer Leigh * | 113. Kristina L. Moran |
| 95. Arnie L***** | 114. Sara Stevens
252 Nowell Rd.
Bangor, ME 04401 |
| 96. Beth Clark
70 Pleasant St.
Hartland, ME 04943 | 115. Melvin M. ***** |
| 97. Kimberly D. Shields
32 Bower St.
Bangor, ME 04401 | 116. Stacey ***** |
| 98. Ben Butler | 117. Shanna Lilian |
| 99. Jessica Hunter | 118. Betsy Lindy
157 Maine St.
Bangor |
| 100. Matt Coombs | 119. Susan Durost |
| 101. J. Steinbach | 120. Hilary Sinaver |
| 102. Stephen Kirstead | 121. Christina Archambault * |
| 103. Burke Fournier * | 122. Jennifer Hikel |
| 104. Iberb**** Tweddes
82 Rebecca Lane
Yarmouth, ME | 123. Rob Gilgan |
| 105. Mark N Randa | 124. Hannah Kreitzer
1672 Ohio St.
Bangor, ME 04401 |
| 106. Kim Pauley * | 125. William Guillette
17 Feddreal St.
Brunswick, ME |
| 107. Elizabeth Caron | 126. Zack Anchors
64 Vesper St.
Portland, ME |
| 108. Lucy Dawson | 127. Kriya Davis
31 Cleeve St.
Portland, ME 04101 |
| 109. Joe Carter | |
| 110. M***L***** (Blackparrot@Maine.rr.com) | |

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- | | |
|--|---|
| 128. Carry Lappas
520a S.U., Bowdoin College
Brunswick, ME 04011 | 138. Adrienne Hanson
Bowdoin College
338 Smith Union
Brunswick, ME 04011 |
| 129. Steve Mcclelland
578 Smith Union
Bowdoin College
Brunswick, ME 04011 | 139. Nicholas Tonckens
20 Mineral Spring Way
Kennebunk, ME 04043 |
| 130. Jennie N. Hanson
7 Cottagewood Lane
Kennebunk, ME | 140. Caryl Everett
26 Old Hollis Rd.
Biddeford, ME 04005 |
| 131. Craig Cassella
19 Riverrun
Lyman, ME | 141. Barbara Dibiase
221 Middle Rd.
Falmouth, ME |
| 132. Cynthia Paquette | 142. Jo Mornssey |
| 133. Lynda Carscallers
19 Riverrun
Lyman, ME | 143. Norma Vavelliver
757 Congress
Portland, ME |
| 134. Madeline Davis
Bowdoin College
250 Smith Union
Brunswick, ME 04011 | 144. Steven Horton |
| 135. Jule Gerrish
173 Kings Hwy.
Kennebunkport, ME 04046 | 145. Laura R French |
| 136. Joanne Krejsa
210 High St.
Bath, ME 04530 | 146. Wendy F****
111 State St., Apt 3
Portland, ME 04101 |
| 137. Clara Belite
Bowdoin College
79 Smith Union
Brunswick, ME 04011 | 147. Ilona Davis
Falmouth, ME |
| | 148. Ellen Kinkel |
| | 149. Kerry Boyd
Portland, ME |
| | 150. Meghan Morgan
Falmouth, ME |
| | 151. Sly W****, Maine |

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- | | |
|---|---|
| 152. Patti L. Bokes | 170. Crystal |
| 153. The Staff At Indranis
Brunswick, ME | 171. Sly |
| 154. Kelley Keenan * | 172. Amy Dicharme |
| 155. Crystal Escoland | 173. Sharon Carter * |
| 156. Ericc Lesbrange | 174. Johathan Kenyon |
| 157. Pam Harrington * | 175. Ann Kerr
Cumberland, ME |
| 158. Mary Lou Martin * | 176. Tina Keene
No. Yarmouth, ME |
| 159. Nancy Staples | 177. Erica Klein
Portland, ME |
| 160. Raymond Harris * | 178. Diana Theriault
N. Yarmouth, ME |
| 161. April Humphrey
Yarmouth, ME | 179. Luann Jones,
Westbrook, ME |
| 162. Jessica Steele
14 Hunt St.
Portland, ME 04103 | 180. Zach H***
150 Neal St.
Portland, ME 04107 |
| 163. Laurie Peavey Ross
550 Post Rd.
Bowdoinham, ME 04008 | 181. Joanne Bartlett
Portland |
| 164. Amanda Krunkel
Scarborough, ME | 182. Anita Coupe,
Biddeford Pool |
| 165. Jacquie Adams
Portland, ME | 183. Michelle Lamb
Falmouth |
| 166. Rita Bagala | 184. Genevieve Lysen
261 Merrill Rd.
Lewiston, ME 04240 |
| 167. Marisa Browing-Karrins,
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111 Smith Union
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| 168. Allen Irving * | |
| 169. Amy
Studio Allure, Maine | |

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| 186. Heidi Brooke, MD
1 Pleasant St. #2
Lewiston, ME 04240 | 198. Osep Rolf |
| 187. Sarah Nichols
310 Grove St.
Bangor, ME 04401 | 199. Laurent F. Gilbert, Sr.
39 Cote St.
Lewiston, ME 04240 |
| 188. Artemis | 200. Melissa Dunn
45 Jefferson St.
Lewiston, ME 04240 |
| 189. Judith Ottmann
407 Lincolnville Ave.
Belfast, ME 04915 | 201. Susann Pelletier
26 Taylor Hill Rd.
Lewiston, ME 04240 |
| 190. William D. Hill
Po Box 1485
Standish, ME 04084 | 202. Shawn Henri Levesque
7 Tammy Lane
Lewiston, ME 04240 |
| 191. Tanya Lima
Portland, ME | 203. Brooke Lyons-Justus
491 Main St.
Old Town, ME 04469 |
| 192. Timothy Wyant
130 Central Ave.
Peaks Island, ME | 204. Susan L. Charles
81 Ash St Apt 4
Lewiston, ME 04240 |
| 193. Jim Devine
696 Congress St.
Portland, ME | 205. Zileen E. Ward
681 Hudson Rd.
Glenburn, ME 04401 |
| 194. Alex Jackimovicz
47 Shackletons Way
Boothbay, ME | 206. Susan Alexa
47 Eighteenth St.
Bangor, ME 04401 |
| 195. H. Davida AmMERman
487 White Schoolhouse Rd.
Madison, ME 04950 | 207. Lee Giles
1026 Olive St. Apt 3
Veazie, ME 04401 |
| 196. Ashley Gorczyca
67 North St. Apt 2
Portland, ME 04101 | 208. Ester Topolavora
78 Pine St. Apt A
Orono, ME 04476 |
| 197. Marie Pineo
A6 Juniper East
Yarmouth, ME 04096 | |

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- | | |
|--|--|
| 209. Sara Hutchkiss
2 Pitcher Rd.
Waldoboro, ME | 221. Lynn Pussic
Troy, Maine |
| 210. Michael J. Herz
29 Water St.
Damariscotta, ME 04543 | 222. Polly Armstrong
South Thomaston, Maine |
| 211. Darryl Larson
12 Spruce Ridge Rd.
Edgecomb, ME 04556 | 223. Dwight Rideout
Hampden, Maine |
| 212. Sandra Llewellyn
1309 Broadway
South Portland, ME 04106 | 224. Karen O'bryan
Damariscotta, Maine |
| 213. Scott Rittan
1 Rittan Rd.
Boothbay, ME | 225. Katina Colombotos
Bryant Pond, Maine |
| 214. Kellie Pelletier
Lewiston, ME 04240 | 226. Frederica Marshall
Deer Isle, Maine |
| 215. Skip Hor***** | 227. Harold Roberts
Brunswick, Maine |
| 216. Shannon Watts
199 N Main St. Apt 2
Brewer, ME 04412 | 228. Robert Fritsch
Dexter, Maine |
| 217. Tim ConMEe
380 Snows Corner Rd.
Orrington, ME 04474 | 229. David White
Bar Harbor, Maine |
| 218. Jim Lysen
26 Taylor Hill Rd.
Lewiston, ME 04240 | 230. Pauline Hunneman
Freeport, Maine |
| 219. Lisa J. Mccarty
Windsor, ME | 231. Charlie Tryder
Fryeburg, Maine |
| 220. Jennifer Halm-Perazone
Portland, ME | 232. Barbara Snowadzky
Winthrop, Maine |
| | 233. David Sanderson
Lamoine, Maine |
| | 234. Craig Saddlemire
Lewiston, Maine |
| | 235. Elizabeth Castro
Winterport, Maine |

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- | | |
|---|---|
| 236. Melinda Gale
Brunswick, Maine | 251. Melissa Elie
Leeds, Maine |
| 237. Mary Mcvey
Cape Elizabeth, Maine | 252. Peg Rush
Steuben, Maine |
| 238. Keith Robillard
Turner, Maine | 253. Brian Conklin-Powers
Stonington, Maine |
| 239. Sam Bergman
Hancock, Maine | 254. Ruth Elkin
Portland, Maine |
| 240. Doug Wescott
Belgrade, Maine | 255. Helen Hoad
Windsor, Maine |
| 241. Mary Fraser
Portland, Maine | 256. Alan Whittemore
Limestone, Maine |
| 242. Sharon Peralta
Springvale, Maine | 257. Susan Wind
Rockland, Maine |
| 243. Marcie Lister
Portland, Maine | 258. Cari Whitaker
Berwick, Maine |
| 244. Amanda Painter
Portland, Maine | 259. Polly Grindle
North Yarmouth, Maine |
| 245. Beatrix Gates
Penobscot, Maine | 260. Wanda Webber
Brunswick, Maine |
| 246. Carol Howell
Jefferson, Maine | 261. Karen Heck
Waterville, Maine |
| 247. Robert Warrington
South Paris, Maine | 262. Joanne Dunlap
Rangeley, Maine |
| 248. Timothy Wilkins
Cape Elizabeth, Maine | 263. Bettyann Sheats *
Auburn, Maine |
| 249. Peggy Stevens
Isle Au Haut, Maine | 264. B.A. Gehrling
Oakland, Maine |
| 250. Chris Crawford
Gorham, Maine | 265. Victoria Kostadinova Bernard
Cliff Island/Portland, Maine |

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- | | |
|---|---|
| 266. Barrie Colbath
Fayette, Maine | 278. Monique A. Roy-Portier
131 Northern Ave #2
Augusta, ME 04330 |
| 267. Andrea Breau
Lewiston, Maine | 279. Toby Hollander
112 Ludlow Street
Portland, ME 04103 |
| 268. Victoria Boucher
Manchester, Maine | 280. Lisa Wells
12 Center St.
Richmond, ME 04357 |
| 269. Kate Josephs
29 Water Street
Damariscotta, Maine 04543 | 281. Carlos Zalabantu Wisi
133 Grant St Apt 14
Portland, ME 04101 |
| 270. Doug Zyskowski
Po Box 753
Boothbay, Maine | 282. Tyler Anderson
493 Westbrook St.
South Portland, ME 04106 |
| 271. Karen Nix
31 Eastman's Rd.
Orland, ME 04472 | 283. Kenneth Martin |
| 272. Laura Cowan May
11 Chapel Rd.
Orono, ME 04473 | 284. Eileen Twiddy |
| 273. Stacey Mclean
8 Maple St. #1
Augusta, ME 04330 | 285. Michelle And Stanley Moody
237 Foreside Rd.
Topsham, ME 04086 |
| 274. Veronica Moffitt
453 West St.
Princeton, ME 04668 | 286. Nathan Hagelin
Portland, Maine |
| 275. John Beaman
43 Laurel Lane
Cumberland, ME 04021 | 287. Hannah Grover (Hgrover541@Gmail.Com) |
| 276. Katie Lane
85 Mt. Hunger Shore Rd.
Windham, ME 04062 | 288. Jeremy Kennedy
Portland, Maine |
| 277. Linda Lacasse
17 Market Square
South Paris, ME 04281 | 289. Jack Bannon (Jackbannon@Rocketmail.Com) |
| | 290. Crystal Ganet
33 Pembroke St.
Portland, ME 04103 |
| | 291. Zachary Bouchard
Portland, ME |

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- | | |
|---|---|
| 292. Paul Wesley Lock
Ellsworth, ME | 306. Oliver Hagelin
Portland, ME |
| 293. Beedy Parker
Camden, ME | 307. Peg Huhamel
Woolwich, ME |
| 294. Alison Van Zandbergen, RN
Wellness Advocate
Falmouth, ME | 308. Jennifer Frick
Portland, ME |
| 295. Erica Rudloff
Exeter | 309. G. Forbes
Portland, ME |
| 296. Juanita C Wilson-Hennessey
West Bath, ME | 310. Nora C.
Portland, ME |
| 297. William Lppincott
Hampden, ME | 311. Robert Belaward
Portland, ME |
| 298. Diane Wilkins
9 Lakeside Drive
Falmouth, ME | 312. Annie Wadleigh
Portland, ME |
| 299. Karin Anderson
Portland, ME | 313. Michael Bruno Bakeman
Waterville, ME |
| 300. Colleen Macklin
South Portland, ME | 314. Karen Curtis
Gorham, ME |
| 301. Aura Russell-Bedder
Portland, ME | 315. Janet Kuech
Gorham, ME |
| 302. Simon Pritchard
Brunswick, ME | 316. Elaine G. Mcgillicuddy
Portland, ME |
| 303. David Travers
Westbrook, ME | 317. Jesse McMahon
Topsham, ME |
| 304. Kenny Shapiro
Brunswick, ME | 318. James Hoare
West Bath, ME |
| 305. Mike Curran
Portland, ME | 319. Caroline Knight, Bsn,Rn, Ccrp,
Rockport, ME |
| | 320. Dianne Wilkins
Falmouth, ME |

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- | | |
|---|---|
| 321. Peter Sirois
Madison, ME | 335. Ashley M Collins
Phippsburg, ME |
| 322. David L. Adams, M.D.
Yarmouth, ME | 336. Debra J Yates
Nursery School Teacher
Brunswick, ME |
| 323. Nancy Artz, Ph.D.
Cumberland, ME | 337. Karen Nix
Regional Parent Support Coordinator
Orland, ME |
| 324. Cindy Curran
Bowdoinham, ME | 338. Deanna M Lenfest
Belfast, ME |
| 325. Alice Schleiderer
Wells, ME | 339. Sanda & Ole Jaeger
Georgetown, ME |
| 326. Owen M. Wall
Portland, ME | 340. Jenny Radsma
Fort Kent, ME |
| 327. Robin E Brooks, Teacher
Topsham, ME | 341. Amy D. Russell
Camden, ME |
| 328. Andrew Jones
South Portland, ME | 342. Charlotte Jacques
Biddeford, ME |
| 329. Lana Fortier
Gorham, ME | 343. Sharon L Peralta
Springvale, ME |
| 330. Lori Ann Huot
Topsham, ME | 344. Dr. Polly Armstrong
South Thomaston, ME |
| 331. Beth Anne King
Freeport, ME | 345. James MeElloh
Portland, ME |
| 332. Carol
Statewide Program Director, G.E.A.R.
Augusta, ME | 346. Susan Weiser Mason
Nobleboro, ME |
| 333. Cindy
Frankfort, ME | 347. Destry Oldham-Sibley
Camden, ME |
| 334. Norm Leblanc
Topsham, ME | 348. Linda Dartt
Montville, ME |

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- | | |
|--|--|
| 349. Priscilla Dreyman
South Portland, ME | 363. Roberta Brezinski
Durham, ME |
| 350. Anne Davis Griffin
Bangor, ME | 364. Karen Letourneau
Wales, ME |
| 351. Robin Swennes
6 Chapman Lane
Kennebunk, ME 04043-6289 | 365. Nancy Miles
Cape Elizabeth, ME |
| 352. PaMEla Mcalinden
Acton, ME | 366. Anne Johnson
Hollis, ME |
| 353. Colleen Whitcomb
Cape Elizabeth, ME | 367. Susan Lessard
Saco, ME |
| 354. Denisa Cundick
Farmington, ME | 368. Sierra Fletcher
Portland, ME |
| 355. Becky Bartovics
North Haven, ME | 369. Ellen D Harris-Howard
Lebanon, ME |
| 356. Dr. Sam Bergman
Hancock, ME | 370. Holly Weidner, Nurse Practitioner
Vassalboro, ME |
| 357. Norma Rossel
Troy, ME | 371. James
Portland, ME |
| 358. Cheryl & Jay Denis
Portland, ME | 372. David A. White, Business Owner
Bar Harbor, ME |
| 359. Mary Najarian
Portland, ME | 373. Bettie Kettell, Retired RN
Durham, ME |
| 360. Jon Kerr
Belfast, ME | 374. Maria Hautala
Levant, ME |
| 361. Amy Fischer
Camden, ME | 375. Ann Davis Griffin
Bangor, ME |
| 362. Linda Kallin
Rome, ME | 376. Margaret Williams, Student
Portland, ME |
| | 377. John Bernard, Professor
South Portland, ME |

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- | | |
|--|---|
| 378. Tracy Gregoire
Maine Healthy Children's Project Coordinator
Topsham, ME | 391. Carol A. George
Winslow, ME |
| 379. Noreen Hutcherson
Portland, ME | 392. Mary F. Dunn
Portland, ME |
| 380. Elizabeth Perry
South Portland, ME | 393. Melissa C. Hovey
North Berwick, ME |
| 381. Melissa Gilman
Sebago, Maine | 394. Jane E. Mackey
Gardiner, ME |
| 382. Sarah Rodgers
Brunswick, ME | 395. Michelle A. Small
Brunswick, ME |
| 383. Carol Hubbard
Dr. Of DevelopMEntal-Behavioral Pediatrics
Cape Elizabeth, ME | 396. Karen Wyman
Portland, ME |
| 384. Denise Tepler
Topsham, ME | 397. Judy Dinmore
Cape Elizabeth, ME |
| 385. Ronda B. Mcgonigle
Bangor, ME | 398. Corinne Sternlieb
Houlton, ME |
| 386. Wendy Keller
Newcastle, ME | 399. Sarah Woodard
Maine Finance Director
Freeport, ME |
| 387. Wendy Girardin
Behavioral Health Professional
Owls Head, ME | 400. Gail Witherill
Cumberland Center, ME |
| 388. Ralph Scheidler
Children's Care Management Supervisor
Fort Fairfield, ME | 401. Lorraine M. Cote
Biddeford, ME |
| 389. Alison Romano
Poland, ME | 402. Allison Pringle Bennett
Clinical Social Worker
South Thomaston, ME |
| 390. Jean M. Tucker
York, ME | 403. Kristina Meredith
Ellsworth, ME |

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- | | |
|--|---|
| 404. Judith Watters
Topsham, ME | 419. Frank Zito
Southwest Harbor, ME |
| 405. Theresa Kapuskasing | 420. Diane Smith, Special Needs Service-Provider
Cushing, ME |
| 406. David Dow
Falmouth, MA | 421. Margaret Morey
Lincolntonville, ME |
| 407. Sandy Chappell
Portland, ME | 422. Cynthia Paquette
Kennebunkport, ME |
| 408. Laura Chase
Mapleton, ME | 423. Jo Ann Myers
Waldoboro, ME |
| 409. David And Holly Travers
Westbrook, ME | 424. Bethany Woodworth
Parent & Educator
South Portland, ME |
| 410. Van Beckman
Standish, ME | 425. Catherine Walsh
Cape Elizabeth, ME |
| 411. Julia Harper
Lewiston, ME | 426. Michelle Boisvert
Portland, ME |
| 412. Elizabeth Horton
Portland, ME | 427. Priscilla Keene
Seal Cove, ME |
| 413. Larry Tyrrell
Brunswick, ME | 428. David A White
Bar Harbor, ME |
| 414. Rachel, Grandmother
South Portland, ME | 429. Jennifer Charrette
Yarmouth, ME |
| 415. Mary Ann Lock
Ellsworth, ME | 430. Michael Taylor, Md, Mph
Portland, ME |
| 416. Ron
Roslindale, MA | 431. Liesha Petrovich
Norway, ME |
| 417. Lee Stackpole
Franklin, ME | 432. Caroline Pryor
Mount Desert, ME |
| 418. Susan
Kittery Point, ME | 433. Cheryl Thompson
Winthrop, ME |

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- | | |
|--|---|
| 434. Karen Coker
Cape Elizabeth, ME | 449. Maxine Linnenbom
Richmond Heights, MO |
| 435. Linda Rottmann
Portland, ME | 450. Darby Fleming
Little Deer Isle, ME |
| 436. Sean Mccloy, Md Mph Ma
Portland, ME | 451. Kathleen Molatch
Eastbrook, ME |
| 437. Paul Grenier
North Monmouth, ME | 452. Rachel Moses
Bar Harbor, ME |
| 438. Bruce Hautala
Levant, ME | 453. Jane Mccloskey
Deer Isle, ME |
| 439. Daniel Oppenheim
Falmouth, ME | 454. Daniel Meyer
Readfield, ME |
| 440. Robert W. O'connor
Kingfield, ME | 455. Kathryn Adamsky
Union, ME |
| 441. M. Chase
Scarborough, ME | 456. Kathleen Young
Orono, ME |
| 442. William H. Slavick
Portland, ME | 457. Amy Graham
Farmington, ME |
| 443. Lynda Carscallen
Lyman, ME | 458. Jeffrey Hefferon
Auburn, ME |
| 444. Kenneth Paigen
Bar Harbor, ME | 459. Lindsey Beverage
North Haven, ME |
| 445. Hannah Pingree
North Haven, ME | 460. Brescian Lander
Bar Harbor, ME |
| 446. Caitlin Meredith
Mount Desert, ME | 461. Madeline M. Roberts
Orrington, ME |
| 447. Ken Oberholtzer
Stockton Springs, ME | 462. Margaret
Portland, ME |
| 448. Bonita Roux
Richmond Heights, MO | 463. Robyn Ball
Bar Harbor, ME |

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- | | |
|---|---|
| 464. Cathy Conroy
Portland, ME | 478. Robin Brooks
Topsham, ME |
| 465. Deane Buck
Readfield, ME | 479. Rosemary Wood
Lewiston, ME |
| 466. Sue Hartman
Cumberland, ME | 480. Karen D'andrea
Scarborough, ME |
| 467. Donna Somma
Portland, ME | 481. Joyce Racine
Portland, ME |
| 468. Priscilla Carothers
Parent & Coach
Cumberland, ME | 482. Elizabeth Carson
South Portland, ME |
| 469. Barry G. Timms, Fimls, M.Phil.Ph.d,
Professor EMeritus
Sanford School Of Medicine
Northport, ME | 483. Antoinette Broadhead
Cumberland, ME |
| 470. Jean Keller
South Portland, ME | 484. Tina Selmar
Portland, ME |
| 471. Rosemary Fecteau, Phd
North Yarmouth, ME | 485. Denise Berube
Portland, ME |
| 472. Barbara Barbeau
Kennebunk, ME | 486. Barbara Loring
Scarborough, ME |
| 473. Sabrina Morano
Old Town, ME | 487. Laura Hannan
Scarborough, ME |
| 474. Jenny Radsma, Professor Of Nursing, Fort
Kent, ME | 488. Nickola Cole
Portland, ME |
| 475. Ben Asselin
Portland, ME | 489. Carl Sierak
Scarborough, ME |
| 476. Robert Dale
Brunswick, ME | 490. Carol Ross
Portland, ME |
| 477. Lynn Ellis
Durham, ME | 491. Karen Minton
Biddeford, ME |
| | 492. Noelle Hoey
Gorham, ME |

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- | | |
|---|---|
| 493. Will Albeck
Portland, ME | 508. Binton Kunjo
Brunswick, ME |
| 494. John Herzof
Falmouth, ME | 509. Alex Tearnion
Wayne, ME |
| 495. Gay Pearson
Falmouth, ME | 510. Linda Miller
Brunswick, ME |
| 496. Erin Brown
Bath, ME | 511. Catherine Lynch
Brunswick, ME |
| 497. Amy Dye
Falmouth, ME | 512. Nancy Myer
Falmouth, ME |
| 498. Mindy Hegelton
Portland, ME | 513. Rosemary Bouchard
Gorham, ME |
| 499. Barbara Ward
Falmouth, ME | 514. Margaret Hickey
Westbrook, ME |
| 500. S. Holmes
Pittston, ME | 515. Susan Cota
Standish, ME |
| 501. Steffie Belcher
Tenants Harbor, ME | 516. Mary Von Lien
Portland, ME |
| 502. Theresa Oleksin
Freeport, ME | 517. Clare Ruthenberg
Portland, ME |
| 503. Ann Burt
Edgecomb, ME | 519. Bettie Kettell, Retired Rn
10 Rabbit Rd.
Durham, ME |
| 504. Karen Peterson
Topsham, ME | 520. Lawrence Crowley
441 Pheasant Run
Louisville, Co 80027-1141 |
| 505. Margaret Marchand
Gorham, ME | 521. Janet Neihart
6751 Geneva Ave S
Cottage Grove, MN 55016-1019 |
| 506. Kathe Chipman
Brunswick, ME | |
| 507. Rev. Jeffrey Belchen
Tenants Harbor, ME | |

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- | | |
|---|---|
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4437 Garden Club St.
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| 527. Paul Sheridan
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Northport, ME 04849 | 539. Hildegard Covensheary
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Portland, ME 04103-4230 |
| 528. G M
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Afton, MN 55001-0111 | 540. Rebecca Lockridge
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Windham, ME 04062-4910 |
| 529. Lorenz Steininger
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Kennebunkport, ME 04046-6918 |
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| 532. Jackie Moreau
1137 Washington Ave.
Portland, ME 04103 | 544. Rosemary Gordon
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Eliot, ME 03903-1744 |
| 533. Richard Budd
20 Shaw Brook Ln.
Gray, ME 04039 | |

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- | | |
|---|--|
| 545. Mark Greene
36 Eastern Ave.
Long Island, ME 04050-3010 | 556. Charles Kettell
103 Rabbit Rd.
Durham, ME 04222-5241 |
| 546. Virginia Baghdoyan
67 Nottingham Rd.
Winthrop, ME 04364 | 557. Sherwood Treadwell
45 Plymouth Grove Dr.
Kennebunk, ME 04043-6999 |
| 547. Peggy Smith
2807 Atlantic Hwy.
Lincolnton, ME 04849 | 558. Louise Tate
55 Deake St.
South Portland, ME 04106 |
| 548. Barb Ericksen
33 Papoose Ln.
Saint Albans, ME 04971 | 559. Andrea Goodman
305 E. Side Rd.
Trevett, ME 04571-3113 |
| 549. Raymond Pineau
44 Lavoie St.
Jay, ME 04239-1624 | 560. Mike D'arcangelo
82 Daggett Dr.
Raymond, ME 04071-6442 |
| 550. Robert Foster
206 Front St.
South Portland, ME 04106 | 561. Kenneth Austin
32 Pinewood Dr.
Belgrade, ME 04917-3500 |
| 551. Wendy Flaschner
74 Old Kents Hill Rd.
Readfield, ME 04355 | 562. Patricia Prieto
48 Sheffield St.
Portland, ME 04102-2707 |
| 552. Britt Rose
24 South St.
Freeport, ME 04032-1538 | 563. William Nelson
156 High St.
Belfast, ME 04915-6549 |
| 553. Jeanne Handy
189 Saint John St.
Portland, ME 04102-3014 | 564. Darwin Hatheway
10 Middle St Apt 1
Hallowell, ME 04347 |
| 554. Nancy Treadwell
45 Plymouth Grove Dr.
Kennebunk, ME 04043-6999 | 565. Sharon Balzer
15 Beach Bluff Ter.
Cape Elizabeth, ME 04107-2101 |
| 555. Shanda Vincent
229 Tuttle Rd.
Pownal, ME 04069-6345 | 566. James Parakilas
85 Pinewoods Rd.
Lewiston, ME 04240 |

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- | | |
|---|--|
| 567. Christianna Skoczek
44 Miller Rd.
Kittery Point, ME 03905-5644 | 578. Jock Winchester
Po Box 242
New Harbor, ME 04554-0242 |
| 568. Kristine Gustavson
7 River View Ter.
Greene, ME 04236-3717 | 579. Earl Morse
39 Whiting Ave.
Waterford, ME 04008-0202 |
| 569. Beth Sehlmeyer
14b Park Ave.
Kittery, ME 03904-1510 | 580. Linda Stevens
28 Hearn Rd.
Scarborough, ME 04074-9136 |
| 570. Thomas Tripp
34 Canterbury Rd.
Brewer, ME 04412-1606 | 581. Eduardo Duarte
17 Kenwood St.
Portland, ME 04102-2704 |
| 571. Marion Messenger
Po Box 212
Wayne, ME 04284-0212 | 582. Michelle Lesperance
103 Candlewyck Ter.
Portland, ME 04102-1517 |
| 572. Janet Roberge
12 Thomas Ave.
Berwick, ME 03901-2330 | 583. Michael Porter
27 Soule Rd.
Chebeague Island, ME 04017-3034 |
| 573. Paul Beltramini
79 Carding Machine Rd.
Bowdoinham, ME 04008-5409 | 584. Sharon Peralta
82 Stanley Rd.
Springvale, ME 04083-6305 |
| 574. Richard Matthews
15 River Rd.
Philips, ME 04966-4000 | 585. John Mollica
9 Hedgerow Dr.
Cumberland Center, ME 04021-4025 |
| 575. Lorrel Nichols
10 Zeitler Farm Rd.
Brunswick, ME 04011 | 586. Ben Bernard
Po Box 70
Cliff Island, ME 04019-0070 |
| 576. Theresa Crosby
11 Alora St.
Lisbon Falls, ME 04252-1442 | 587. Shawn Kane
135 Hidden Lake Rd.
Otisfield, ME 04270 |
| 577. Richard Flanagan
179 Covell Rd.
Fairfield, ME 04937-3137 | 588. Julie Trudel
Charette Hill Rd.
Fort Kent, ME 04743 |

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- | | |
|---|---|
| 589. Michael Rauth
43 LongMeadow Rd.
Scarborough, ME 04074-8413 | 600. Mary Saunders
27 High St.
Limestone, ME 04750-1315 |
| 590. Martha Young
27 Zion Rd.
Wellington, ME 04942-8608 | 601. Trish Stevens
142 N Dixmont Rd.
Troy, ME 04987-3036 |
| 591. Colleen McKenna
85 Old Pennellville Rd.
Brunswick, ME 04011-7911 | 602. Sarah Bischoff
21 Old Fort Rd.
Cape Elizabeth, ME 04107 |
| 592. Barbara Schenkel
Po Box 2133
South Portland, ME 04116-2133 | 603. Jenny Radsma
UMFK, 23 University Drive
Fort Kent, ME 04743 |
| 593. Denise Damboise
169 Town Farm Rd.
New Gloucester, ME 04260-4435 | 604. Richard Garrett
27 Zion Rd.
Wellington, ME 04942-8608 |
| 594. David White
1552 State Highway 102
Bar Harbor, ME 04609-7149 | 605. Don Fuller
Po Box 9
Peru, ME 04290-0009 |
| 595. Stephen Neil
288 Libby Rd.
Pownal, ME 04069-6329 | 606. Jane Sloven
367 Summit St.
Portland, ME 04103-2242 |
| 596. Carl Hevey
9 Myrtle St.
Biddeford, ME 04005-3507 | 607. Dr. Rebekka Freeman
Po Box 284
Belfast, ME 04915-0284 |
| 597. Sarah Waite
44 Wellstone Dr.
Portland, ME 04103-2771 | 608. Om Devi Reynolds
551 Mayberry Hill Rd.
Casco, ME 04015 |
| 598. Barrie Colbath
215 Fayette Ridge Rd.
Fayette, Maine 04349-3414 | 609. Diana Rigg
11 Applewood Ln.
Camden, ME 04843-2079 |
| 599. N David Semon
87 Baker Rd.
Freeport, ME 04032-6627 | 610. Bill Nave
9 Turkey Ln.
Winthrop, ME 04364-4131 |

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- | | |
|---|---|
| 611. Jane Sanford
57 High St.
Belfast, ME 04915-6245 | 622. Cokie Giles
341 Parkway S
Brewer, ME 04412-1721 |
| 612. Kathy Carlson
11 Friar Ln.
Cumberland, ME 04021-4103 | 623. Steve Hudson
17 Park View Ln.
Southwest Harbor, ME 04679-4238 |
| 613. Peggy Drake
Po Box 94
Steuben, ME 04680-0094 | 624. James St. Pierre
9 Union St.
Hallowell, ME 04347-1365 |
| 614. Charles Anderson
65 Cranberry St.
Wells, ME 04090-3743 | 625. Tricia Naddaff
11 Fessenden Rd.
Cape Elizabeth, ME 04107-9538 |
| 615. Bill Creighton
74 Bow St.
Freeport, ME 04032-1544 | 626. Wanda Webber
1 Colonial Drive
Brunswick, ME 04011-3203 |
| 616. Harriet Modr
247 Basin Point Rd.
Harpwell, ME 04079 | 627. Scott Reed
124 Ohio Hill Rd.
Fairfield, ME 04937-3436 |
| 617. Jan Roberge
12 Thomas Ave.
Berwick, ME 03901-2330 | 628. Nina Schmir
39 Congress St.
Portland, ME 04101-3655 |
| 618. Jeff Lind
505 Emerys Bridge Rd.
South Berwick, ME 03908-1938 | 629. Jim Riley
Po Box 530
Berwick, ME 03901-0530 |
| 619. Ronald Small
830 Knowlton Corner Rd.
Farmington, ME 04938-6219 | 630. Joyce Racine
246 Auburn St. Apt 119
Portland, ME 04103-2163 |
| 620. William White
8 Moose Ledge Ln.
Phippsburg, ME 04562-5266 | 631. Gabriel J. Godwyne
518 Cross Rd
Putney, VT 05346-9092 |
| 621. Ken Converse
474 S. Bridgton Rd.
Bridgton, ME 04009-3942 | 632. Christine A. Detroy
43 Willow Grove Rd.
Brunswick, ME 04011-2965 |

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- | | |
|---|--|
| 633. Meeghan Mclain
64 Hillside St.
Yarmouth, ME 04096-8343 | 644. Robert Greenberg
56 Brookside Rd.
Portland, ME 04103-4611 |
| 634. Janet Efron
2 Wabun Rd.
Cape Elizabeth, ME 04107-2831 | 645. Mike D'arcangelo
82 Daggett Dr.
Raymond, ME 04071-6442 |
| 635. Oksana Lane
246 Canco Rd.
Portland, ME 04103 | 646. Leroy Smith
4597 Sunset Dr.
Lockport, NY 14094-1225 |
| 636. Marjorie Monteleon
85 Herrick Rd., Po Box 1302
Southwest Harbor, ME 04679-4434 | 647. Mary Newman
32 Sawyer St.
Portland, ME 04103-3451 |
| 637. William Everitt
14 Vernon Pl.
Portland, ME 04101-2807 | 648. Hesper Schleiderer-Hardy
19 Tufts Rd.
Wells, ME 04090-7426 |
| 638. Valerie Heath
36 Boody St.
Brunswick, ME 04011-3047 | 649. Caroline Thorne-Lyman
32 Beech Hill Rd.
Freeport, ME 04032-6713 |
| 639. J. Winchester
Po Bo X242
New Harbor, ME 04554-0242 | 650. Kim Favreau
98 Johnson Rd.
Falmouth, ME 04105-1233 |
| 640. James Masterson
963 River Rd.
Saint George, ME 04860-4620 | 651. Linden Thigpen
148 Hillside Ave.
South Portland, ME 04106-4816 |
| 641. Kimberly Potts
14 Line Dr.
North Yarmouth, ME 04097-6555 | 652. R.C. Petersen Jr.
105 Horace Mills Rd.
Wells, ME 04090-6516 |
| 642. Deborah Murphy
24 Pilot Point Rd.
Cape Elizabeth, ME 04107-2825 | 653. Sally Trice
100 Dorset St.
Portland, ME 04102-1103 |
| 643. Helen Anderson
180 Delaware Ct.
Portland, ME 04103-6109 | 654. D. Mason
3 Orchard Rd.
Windham, ME 04062-4424 |

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- | | |
|---|---|
| 655. John Collins
53 Harborview Ave.
South Portland, ME 04106-4418 | 676. Phillip J. Crabill
902 W Eldorao Pkwy.
Little Elm, TX 75068-5249 |
| 666. Eleanor Lacombe
61 North Rd.
Hope, ME 04847-3307 | 677. Michael Toobert
667.212 Mallard Dr.
Gross Valley, CA 95945-5745 |
| 667. David Laing
12 Cape Jellison Rd.
Stockton Springs, ME 04981-4352 | 678. John Markowski
Po Box 500
Edgecomb, ME 04556-0500 |
| 668. Roger Condit
141 Eastmont Sq.
Farmington, ME 04938-7023 | 679. Allan Strouss
121 Dover Rd.
Boothbay, ME 05437-4306 |
| 669. Steve Harmon
22 Hannaford Cove Rd.
Cape Elizabeth, ME 04107-9505 | 680. Doris Hennedy
25 First St.
Biddeford Pool, ME 04006 |
| 670. Christine Hopf-Lovette
128 Federal St.
Wiscasset, ME 04578-4015 | 681. Debbie McCarthy
188 Hare St.
Phillips, ME 04966-4340 |
| 671. John Pincince
Po Box 172
Lincolntonville, ME 04849-0172 | 682. Maurice Neault
59 Main St.
Canaan, ME 04924-3401 |
| 672. Caren Minzy
195 Back Narrows Rd.
Boothbay, ME 04537-5102 | 683. Diane Lee
PO Box 12
Mount Vernon, ME 04352-0012 |
| 673. Flo Wilder
Po Box 436
Hancock, ME 04640-0436 | 684. George Seel
710 West Rd.
Belgrade, ME 04917-4215 |
| 674. E. Scott Dow
80 Allenwood Park Rd.
Augusta, ME 04330-0913 | 685. Theron Wentworth
4 Wells Ct.
Kennebunk, ME 04043-7035 |
| 675. Ann Webber
369 Mary Jane Rd.
Buxton, ME 04093-3144 | 686. Lanier Hines
3015 Catalpa Ct.
Redding, CA 96002-2290 |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
Proposed Rule Chapter 888
Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- | | |
|---|---|
| 687. William Sharfman
50 Riverside Dr.
New York, NY 10024-6555 | 698. Joseph Mccarthy
265 Beans Corner Rd.
New Sharon, ME 04955-3218 |
| 688. Priscilla Skerry
95 Emery St.
Portland, ME 04102-3781 | 699. Peggy York
128 Summit Park Ave.
Portland, ME 04103-2820 |
| 689. Stephen Ross
92 Nichol St.
South Paris, ME 04281-6584 | 700. Frank Ridley
211 Eaton Hill Rd.
Solon, ME 04979-3329 |
| 690. Douglas Hardy
11 Cluf Bay Rd.
Brunswick, ME 04011-9349 | 701. Anne Olivio
79 Jordan Ave.
Brunswick, ME 04011-1614 |
| 691. Julia Ventresco, Private
Ellsworth, ME 04605-1343 | 702. Will Blake
12 School St.
Bath, ME 04530-2552 |
| 692. John Martin
8287 Hickory Dr.
King George, VA 22485-4104 | 703. Richard Johnson Sr.
32 Summer St.
Hampden, ME 04444-1212 |
| 693. Deborah Endl
14 Trim St.
Camden, ME 04843-1626 | 704. Michael Percy
262 Back Rd.
Brooklin, ME 04616-3429 |
| 694. John Bernard
56 Mildred St.
South Portland, ME 04106-2727 | 705. Linda Murnik
50 Federal St.
Portland, ME 04101-4202 |
| 695. Margaret Williams
123 Hills Beach Rd.
Biddeford, ME 04005-9540 | 706. David Mahoney
Po Box 133
Hebron, ME 04238-0133 |
| 696. Joan Russo
10 Old Blue Point Rd.
Scarborough, ME 04074-7600 | 707. Jean Noon
78 Sunset Rd.
Springvale, ME 04083-6024 |
| 697. Kathleen Brittain
PO Box 78
Rangeley, ME 04970-0078 | 708. Anne Pinkerton
800 Kimberton Rd.
Phoenixville, PA 19460-4161 |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
Proposed Rule Chapter 888
Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- | | |
|---|---|
| 709. Kathryn Gaianguest
128 Great Ledge Rd.
Lamoine, ME 04605-4337 | 720. Karen Campbell
775 Scarsdale Rd. Unit 37
Tackahoe, NY 10707-6511 |
| 710. Melinda Small
10 Tibetan Trak
Harpwell, ME 04079-3478 | 721. Robert Crosen
12 Hillcrest Dr.
Cumberland Center, ME 04021-4009 |
| 711. Peter Darling
7 Apple Tree Ln.
Cape Elizabeth, ME 04107-5100 | 722. Helen Balgooyen
256 Oak Hill Rd.
Norridgewock, ME 04957-4021 |
| 712. Kathleen Edgar
562 Harpswell Neck Rd.
Harpwell, ME 04079-2808 | 723. Mj Crowe
12 Vine St.
Belfast, ME 04915-6920 |
| 713. David Chipman
25 Thornton Way Apt. 325
Brunswick, ME 04011-3287 | 724. Stephen Underwood
17 Schooner Rd.
Scarborough, ME 04074-8775 |
| 714. William Strathmann
Po Box 548
Casco, ME 04015-0548 | 725. Judity Ventresco
18 Caldwell St.
Portland, ME 04103-2404 |
| 715. Elizabeth Lussier
Po Box 633
Boothbay Harbor, ME 04538-0633 | 726. Randy Eckard
Po Box 854
Blue Hill, ME 04614-0854 |
| 716. Philip Gregory
95 Town House Rd.
Vienna, ME 04360-3201 | 727. David Wall
4 Hemlock Ridge Ln.
York, ME 03909-5343 |
| 717. Sally And Bill Howell
25 Thistle Point Ln.
Phippsburg, ME 04562-4350 | 728. Jeanne Lombardi
Po Box 709
York Harbor, ME 03911-0709 |
| 718. Christina Thomas
Colby College
Waterville, ME 04901 | 729. Sally Trice
100 Dorset St.
Portland, ME 04102-1103 |
| 719. Judy Savage
23 Running Tide Dr.
Scarborough, ME 04074-9093 | 730. Doris Luther
River Road
Hollis Center, ME 04042-0000 |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
Proposed Rule Chapter 888
Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- | | |
|---|---|
| 731. Margo Wood
18 Lawn Ave.
Portland, ME 04103-9363 | 742. Lynn Shaffer
650 Shore Rd.
Cape Elizabeth, ME 04107-1021 |
| 732. Jason Wentworth
42 Hammond St.
Portland, ME 04101-2522 | 743. Karen Campbell
595 Washington Ave.
Portland, ME 04103-5119 |
| 733. Susan Wind
274 Limerock St.
Rockland, ME 04841-2232 | 744. Katherine Rhoda
Po Box 58
Hiram, ME 04041-4549 |
| 734. Jolene Lemelin
46 Sycamore Ln.
Kennebunk, ME 04043-7177 | 745. Willow Femmechild
81 Morning St.
Portland, ME 04101-4429 |
| 735. James Chalfant
18 Winter St.
Rockport, ME 04856-6121 | 746. Bob Boothe
54 Cottage Park Rd.
Portland, ME 04103-8000 |
| 736. William Moss
41 Beech St.
Rockland, ME 04841-2902 | 747. Jeff Hopkins
69 Amber Ct.
Lindenhurst, IL 60046-7912 |
| 737. John Davidson
74 Central Ave.
Waterville, ME 04901-6214 | 748. Elizabeth Perry
5 Lahave St.
South Portland, ME 04106-4901 |
| 738. Karen Stivaletti
11 Cumberland Rd.
South Portland, ME 04106-6315 | 479. Cheryl Denis
21 Wendy Way
Portland, ME 04103-2928 |
| 739. Lori Proos
58 Old Post Rd.
York, ME 03909-5812 | 750. Kimberly Rigano
58 Old Post Rd.
York, ME 03909-5812 |
| 740. Michelle Laughran
20 Pine Dr.
Standish, ME 04084-5217 | 751. Leonard Poulin
6 Richard Rd.
Gorham, ME 04038-2064 |
| 741. Barbara West
17 S River Rd.
Arrowsic, ME 04530-7218 | 752. Tarik Sivonen
6 Sokokis Cir.
Saco, ME 04072-1874 |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
Proposed Rule Chapter 888
Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- | | |
|--|--|
| 753. Karen Stivaletti
11 Cumberland Rd.,
South Portland, ME 04106-6315 | 764. Paul Ayotte
2842 W. River Rd
Sidney, ME 04330-2735 |
| 754. Leah Wentworth
259 Log Cabin Rd.
Arundel, ME 04046-7720 | 765. Sassy Smallman
1 Florence Cir.
Kennebunk, ME 04043-7252 |
| 755. William Locke
255 Mere Point Rd.
Brunswick, ME 04011-7723 | 766. Mary Sohl
162 Ridlonville Rd.
Sweden, ME 04040-5218 |
| 756. Janine Moore
32 Gilman St.
Waterville, ME 04901-5441 | 767. Linda Pankewicz
9 Pulpit Rock Rd.
Raymond, ME 04071-6560 |
| 757. Gail Williams
157 Howes Cove Rd.
Liberty, ME 04949-3732 | 768. Peggy Stevens
Po Box 74
Isle Au Haut, ME 04645-0074 |
| 758. Jeanne Schacker
60 Harriet St.
South Portland, ME 04106-2003 | 769. Ann Mclaughlin
Po Box 423
Damariscotta, ME 04543-0423 |
| 759. Jackie Elliot
148 West Rd.
Waterboro, ME 04087-3210 | 770. Stephen Fournier
1495 North Rd.
North Yarmouth, ME 04097-6702 |
| 760. Phoebe Barnes
Po Box 676
Southwest Harbor, ME 04679-0676 | 771. Nancy Grayson
100 State St.
Portland, ME 04101-3747 |
| 761. Dyan Albano
11 Arthur St.
Portland, ME 04103-1932 | 772. Carol M. Larson
23 Laurel Pines Dr.
Gorham, ME 04038-1654 |
| 762. David Boyer
3 Kerry Gdns.
Belfast, ME 04915-6167 | 773. Laurie Davis
134 Oakdale St.
Portland, ME 04103-4441 |
| 763. James Sullivan
25 Page St.
Hallowell, ME 04347-1418 | 774. Tim Mommers
24 Bog Rd.
Brownfield, ME 04010-4221 |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
Proposed Rule Chapter 888
Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- | | |
|--|---|
| 775. Kathleen Zambello
21 Mackworth Ln.
Cumberland Foreside, ME 04110-1325 | 786. Bonnie Ginger
87 Bryers Cir.
Boothbay, ME 04537-4840 |
| 776. Robin Swennes
6 Chapman Ln.
Kennebunk, ME 04043-6289 | 787. Paul Breeden
19 Willow Brook Ln.
Sullivan, ME 04664-3146 |
| 777. Susan Siens
51 Libby Hill Rd.
Unity, ME 04988-3414 | 788. Mary Serina
Po Box 115
East Boothbay, ME 04544-0115 |
| 778. Susan Camp
526 Monroe Rd.
Winterport, ME 04496-4627 | 789. Michael Stevens
12 Cliff Rd.
New Harbor, ME 04554-4910 |
| 779. Ann Geller
108 Orchard St.
Farmington, ME 04938-5926 | 790. Nancy Wilds
35 Bangs Shore Rd.
Orrs Island, ME 04066-2406 |
| 780. Barbara Smith
252 Spurwink Ave.
Cape Elizabeth, ME 04107-9613 | 791. Hera Gerber
13482 Mason Village Ct.
Saint Louis, MO 63131-1011 |
| 781. Mary Bacon
Po Box 221
Mount Desert, ME 04660-0221 | 792. Rebecca Seel
710 West Rd.
Belgrade, ME 04917-4215 |
| 782. Marcia White
Po Box 234
Stratton, ME 04982-0234 | 793. David Kirstein
8 Phinneas Ln.
Scarborough, ME 04074-7904 |
| 783. Jeffrey Collins
33 Pond Rd.
South Portland, ME 04106-3131 | 794. Rob Nobrega
3601 N Military Trl.
Boca Raton, FL 33431-5507 |
| 784. Jean K.
22 Elsemere Ave.
South Portland, ME 04106-4934 | 795. Kate Winn
12 Hamilton St.
South Portland, ME 04106-4436 |
| 785. George Muller
120 Portland St.
South Berwick, ME 03908-1224 | 796. Stan Davis
Wayne, Maine |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
Proposed Rule Chapter 888
Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- | | |
|--|--|
| 797. Rick Gaffney
Po Box 84
West Poland, ME 04291-0084 | 805. Daniel Gregoire
19 Mitchell St
Lewiston, ME 04240 |
| 798. Gail L. Carlson, Ph.D.
Colby College
Waterville, ME | 806. Aaron Kinutson
101 Crestview Lane
Brunswick, ME 04101 |
| 799. Shanna Swan, Ph.D.
Soo Churl Cho, MD, PhD
Philip J. Landrigan, MD, MSc, FAAP
Kimberly Yolton, PhD
Frederick vom Saal, PhD
Bruce Lanphear, MD, MPH
Gail L. Carlson, PhD *
R. Thomas Zoeller, PhD
Sydney R. Sewall, MD, MPH
Veena Singla, PhD
Sarah Janssen, MD, PhD, MPH
Steven G. Gilbert, PhD, DABT
Richard Clapp, DSc, MPH
Ted Schettler, MD, MPH
Jennifer B. Sass, PhD
Deborah Rice, PhD * <i>duplicate</i> | 807. Melissa Kinutson
101 Crestview Lane
Brunswick, ME 04011

808. Sylvia Garrison
220 Lewiston Rd
Topsham, ME 04086

809. Karen Gay
karen9692@gmail.com

810. Marguerite Pennoyer, MD, FAAAI
(represented by Ed Miller, American Lung
Association of Maine)
Allergy, Asthma and Immunology
200 Professional Drive, Suite One
Scarborough, ME 04074 |
| 800. Malory Otteson Shaughnessy
45 Prospect Street
Portland, ME 04103 | 811. John Weaver
LFK
Portland |
| 801. Sandra Cort
125 Harrisburg Ave #8
Westbrook, ME 04092 | 812. Laura Ker
Find
Portland |
| 802. Jo-Ann Gregoire
19 Mitchell St
Lewiston, ME 04240 | 813. Carolyn Fernald
Nomad's
Portland |
| 803. David C. Gay
davidcgay@gmail.com | 814. Deanna Fernandez
Dirt Road Designs
Windham |
| 804. Hilary Cocker
170 Ward Rd
Topsham, ME 04086 | |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
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Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- | | |
|---|--|
| 815. Todd Russell
The Merchant Company
Portland | 826. Se-Jong Park
Sun Oriental Market
Portland |
| 816. Matt Atilsen
Hallowed Ground Body Art
Portland | 827. Chris Bowe
Longfellow
Portland |
| 817. Donato Giovine
Gorgeous Gelato
Portland | 828. Chris Cutshall
Odessey Whale Watch
Portland |
| 818. Alysia Zois
East End Cupcakes
Portland | 829. Lisa Belanger
Art by Lisa
Portland |
| 819. David Levi
Vinland
Portland | 830. Peggy Nichols Lee
Silver Teardrops
Portland |
| 820. Breendan Evans
Strange Maine
Portland | 831. Robert Sevigny
The Paper Patch
Portland |
| 821. Andrew Chang
Moody Lords
Portland | 832. Andres Verzosa
Aucocisco Galleries
Portland |
| 822. Jenny Davis
Haberdashery
Portland | 833. Mike Fink
Guitar Grave
Portland |
| 823. Jessica Yandell
Hair Love
Portland | 834. Leo Pelletier
Gall Art
Portland |
| 824. Sidnay Ferrelli
Satya Sanctuary
Portland | 835. Jeffery Weeks
Bang
Portland |
| 825. Jasmine Clayton
Kurier
Portland | 836. Will Condon
The Higher Concept
Portland |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
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Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- | | |
|---|---|
| 837. Mike Breton
Electric Buddhas
Portland | 848. Nancy Waldron
Maine by Mainers
Bangor |
| 838. Thomas Gehricht
Found
Portland | 849. Dennis J. Watson
Burr Printing
Bangor |
| 839. Jenny Smick
She-Bear Gallery
Portland | 850. Cynthia Cavanaugh
Best Bib and Tucker
Bangor |
| 840. Constance Boivin
Charles Inn
Bangor | 851. Timothy Gallon
Black Bear Brewery
Orono |
| 841. Paul Zebiak
Maritime International
Bangor | 852. Phoebe Fask
Hair After,
Orono |
| 842. Theresa Soucy
Aqua Pura
Bangor | 853. Deidra Fournier
Hair After
Orono |
| 843. Irma Card
Nurture ME
Bangor | 854. Juli Aghamoose
Orono Pharmacy
Orono |
| 844. Bernadette Gaspar
Frank's Bake Shop
Bangor | 855. Robert M. Bradson
The Store Ampersand
Orono |
| 845. Jonathan Lambert
Yankee Cobbler
Bangor | 856. Victoria K. Erker
Front Porch Books
Orono |
| 846. Sadie Flood
Everex
Bangor | 857. Jim Rose
Rose Bicycle
Orono |
| 847. Chris Ruhila
Ruhin Corp
Bangor | 858. Summer Allen
Valentine Footwear
Bangor |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
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- | | |
|---|--|
| 859. Tracy Thibodeau
Associated Design Partners Inc.
Falmouth | 870. David White
MDI Imported Car Service Inc.
Bar Harbor |
| 860. Joseph Kennedy
Kennedy Plumbing
Ripley | 871. Doris Luther
Mediation & Conflict Resolution Services
Hollis |
| 861. Craig Saddlemire
Round Point Movies
Lewiston | 872. Lori Hussey
Ava Anderson Non-Toxic
Wells |
| 862. Elizabeth A. DellaValle
AICP
Portland | 873. Geno Scalzo
DESC
Owls Head |
| 863. Ken Converse
Quality Images
Bridgton | 874. Mary Driscoll
Madris
Belfast |
| 864. Anna Myerson
The Legitimate Company
Camden | 875. Albert Nickerson
I Love Flowers
Biddeford |
| 865. Ken Converse
Quality Images
Bridgton | 876. Dale King
Appaloosa Antiques
Scarborough |
| 866. Ann Gold
Pole Star Maritime
Woolwich | 877. David Daniels and Jodee Davidson
Middle Jam Sessions
Standish |
| 867. Grank Ridley
Different Drummer Workshop
Solon | 878. Sally Sawyer
Mountain Greenery Greenhouse
Bethel |
| 868. Theron Wentworth
Wentworth-Allen Fine Woodworking,
Kennebunk | 879. Claire Mortimer, MSN, FPN
Many Paths of Healing LLC
Blue Hill |
| 869. Kathy Missal
Recycling Retro
Woolwich | 880. Marie Guey
Marie Guey Psychiatry
York |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
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- | | |
|--|---|
| 881. Jacqueline Grohoski, RN
Ed's Electric Inc.
Ellsworth | 892. Noah Defilippis
Pinecone & Chickadee
Portland |
| 882. Steven Konstantino
Maine Green Building Supply
Portland | 893. Jessica Hunter
Ethan Hunter Salon
Portland |
| 883. Meredith West
Black Parrot
Portland | 894. Ben Butler
Ben's Old Port Barber Shop,
Portland |
| 884. Jennifer Leigh *
O2 Salon & Spa
Portland | 895. Mallory Doria
Men's Room
Portland |
| 885. Shawn Durost *
Salon Paragon
Portland | 896. Burke Fournier *
Salon Burke
Portland |
| 886. Stacey Witham
Adorn Hair and Nail Spa
Portland | 897. Kristna Moran
Salon KLM
Portland |
| 887. Hilary Sinauer
Blanche and Mimi
Portland | 898. Kim Pauley
Just Kim
Portland |
| 888. Cassandra Freedman
Lots of Tots
Falmouth | 899. Nick Rosolino
The Mind Gift Shop
Portland |
| 889. Christina Archambault *
Trimmings
Falmouth | 900. Marie Steele
Lisa-Marie's Made in Maine
Portland |
| 890. Julie Steinbach
Rainbow Toys
Falmouth | 901. Tia Webb *
Trims & Fade
Portland |
| 891. Chelsey Sewell
Amore Styles
Portland | 902. Carmen Westa
Cornerstone Barber Shop
Bangor |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
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Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- | | |
|---|---|
| 903. Cathy Anderson
The Briar Patch
Bangor | 914. Amy Ducharme *
Studio Allure
Topsham |
| 904. Tracy Monaghan
Metropolitan Soul
Bangor | 915. Kelley Keenan *
Kelly's Salon
Bath |
| 905. Betsy Lundy
Central Street Farmhouse
Bangor | 916. Crystal Esculanal *
Centre Street Hair Studio
Bath |
| 906. Bob Gilgan *
Bella Hair Studio
Bangor | 917. Lanu French *
Para Vida Day Spa
Brunswick |
| 907. Sharon Carter *
Country Clipper Style Salon
Albion | 918. Pattie Baker
Summer Island Studio
Brunswick |
| 908. Jonathan Kenyon *
Apollo's Salon & Spa
Waterville | 919. Allen Irving *
Wilde Oats Bakery
Brunswick |
| 909. Erica Lestrangle *
Prime Cute Hair Nail & Tanning
Waterville | 920. Brittany Feltovic
Bard Coffee
Portland |
| 910. Pam Harrington *
Total Image
Waterville | 921. Jen Atkinson
The Blue Lobster
Portland |
| 911. Mary Lou Martin *
Classic Cuts
Winslow | 922. Kelly Fernald
Nomads
Portland |
| 912. Nancy Shiples *
Gerry's Beauty
Clinton | 923. Charline Edwards
City Slickers Salon
Portland |
| 913. Raymond Harris *
Evolution Salon
Winslow | 924. Sam Smith
Lucky Ju Ju
Portland |

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
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Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

- 925. Ryan Wilson
Til' Death Tattoo
Portland

- 926. Nelly Hall
CS Boutique
Portland

- 927. Thomas Grant
Simply Scandinavian
Portland

- 928. John Mina
Curry Printing
Portland

- 929. Marion and Mackenzie Morris
Etain
Portland

- 930. Meg Donovan
Casco Variety
Portland

- 931. Phil Coupe
Revision Energy
Portland/Liberty

- 932. Bettyann Sheats *
Finishing Touches Shower Doors
Auburn

Continued on page 43

Supplemental Basis Statement
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Designation of four members of the Chemical Class ‘Phthalates’ as Priority Chemicals

933. Academy of Little Learners
American Academy of Pediatrics – Maine Chapter
American Association of University Women
American Nurses Association – Maine
Belfast Co-op
Bella Luna Toys
Brigham Montessori School
Central Maine Labor Council
Citizens For a Green Camden
Citizens For a Green Gorham
Citizens For a Green Scarborough
Coalition for Maine Woman
Colleen A. Detour HoME Daycare
Conservation Law Foundation
Disability Rights Center
Environment Maine
Environmental Health Strategy Center*
Family Planning Association of Maine
G.E.A.R. Parent Network
Learning Disabilities Association of Maine
Learning Tree Preschool
Life Academy Daycare
Lorrie Goodrich Home Daycare
Mabel Wadsworth Health Center
Maine Centers for Women, Work, and Community
Maine Children’s Alliance
Maine Choice Coalition
Maine Conservation Voters
Maine Council of Churches
Maine Developmental Disabilities Council
Maine Equal Justice Partners
Maine Labor Group on Health
Maine Medical Association
Maine Organic Farmers and Gardeners Association
- Maine Osteopathic Association
Maine Parent Teacher Association
Maine Peoples Resource Center
Maine Primary Care Association
Maine Public Health Association
Maine Rivers
Maine Small Business Coalition
Maine Women’s Lobby
Maine Women’s Policy Center *
Morning Glory Natural Food Store
National Association of Social Workers – Maine
Natural Resources Council of Maine
North Yarmouth Academy
Northwest Atlantic Marine Alliance
Physicians for Social Responsibility *
Planned Parenthood of Northern New England
Prevent Harm *
The Gazebo School
Toxic Action Center
Voter Education Brigade
934. American Academy of Pediatrics
Maine Academy of Family Physicians
Maine Public Health Association *
Maine Medical Association *
Maine Primary Care Association *
Physicians for Social Responsibility Maine Chapter *
Maine Osteopathic Association *

Supplemental Basis Statement
Citizen Petition to Initiate Rulemaking
Proposed Rule Chapter 888
Designation of four members of the Chemical Class 'Phthalates' as Priority Chemicals

**Comments Regarding Amended Draft Rule
February 2015**

- | | |
|---|--|
| 1b. Javaneh Nekoomaram
Stephen Wieroniey
American Coatings Association
1500 Rhode Island Ave, NW
Washington, DC 20005 | 11b. Andy Jones
Toxics Action Center
142 High Street, Suite 624
Portland, Maine 04101 |
| 2b. Amanda Painter | 12b. Paul Sheridan
88 Hart Road
Northport, Maine 04849 |
| 3b. Sue Hartman | 13b. Carla Whitehead |
| 4b. Tracy Gregoire
Learning Disabilities Association of Maine | 14b. Jim Melloh |
| 5b. Anna Libby
Maine Organic Farmers and Gardeners
Association
PO Box 170
Unity, Maine 04988 | 15b. Priscilla Jenkins
67 Mallard Lane
Winthrop, Maine 04364 |
| 6b. Mary Anne Libby
Mt. Vernon, Maine | 16b. James Keene |
| 7b. Megan Rice
Belgrade, Maine | 17b. Roberta Brezinski
Durham, Maine |
| 8b. Beth Ahearn
Maine Conservation Alliance
Freeport, Maine | 18b. David Adams
Yarmouth, Maine |
| 9b. Emma Halas-O'Connor
Environmental Health Strategy Center
565 Congress Street, Suite 204
Portland, Maine 04101 | 19b. Margaret Huskey
Pownal, Maine |
| 10b. Jarryl Larson
Edgecomb, Maine | 20b. Rosamond Brown
Freeport, Maine |
| | 21b. Sally Chappell
60 Punkin Valley Drive
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Health

1. Comment: Commenter was one of 25 people tested in Maine for phthalates, noting that all participants tested positive for some level of phthalates in their body. Commenter states that phthalates can cause birth defects in boys, learning disabilities, asthma, and reproductive harm. Commenter states concern for workers in the manufacturing process who are directly exposed to phthalates and for consumers purchasing finished products. Commenter states that there is a body of evidence indicating that even low levels of exposures to phthalates can cause hormone disruption and other harmful effects, and goes on to state that environmental and occupational regulatory agencies have largely ignored them to date. Commenter states that his affiliated organization demands that the Maine DEP ensure that this proposed rule is adopted because we all have a basic human right to live and work in a clean and healthy environment, stating that our laws and rules must protect and ensure these rights. (20)
2. Comment: Commenter states that phthalates are anti-androgenic compounds; they interfere with the expression of male testosterone which is essential for the normal development of the reproductive system of boys. Commenter claims that this results in an increased risk of birth defects in males. Commenter claims to have 25 years' experience delivering babies and has seen many cases of hypopadias (the urethra exits from the bottom of the penis) and believes this is becoming more common. Commenter states that the disruption of the natural expression of testosterone may also result in decreased fertility in adult males. Commenter claims phthalate exposure is also linked to adverse changes in brain function, poor development in infancy, poor intellectual function during childhood and poor social behavior, including decreased IQ and other cognitive deficits. Commenter states that the lack of disclosure of phthalates in consumer products does not give consumers the information they need to avoid these potentially toxic substances. Commenter states that children have higher levels of phthalates in their bodies as a consequence of their increased exposure. Commenter strongly urges the Maine DEP to add these four additional chemicals to the priority list. (23)
3. Comment: Commenter is aware of the challenges and costs incurred by families with children and adults that have behavioral and developmental disabilities. Commenter claims that approximately 13% of children in the U.S. have a developmental disability, that according the U.S. CDC an average of 1 in 68 children in the U.S. have an autism spectrum disorder, the prevalence of ADHD has increased an average of 5.5%, and in Maine, 9% of children were diagnosed with ADHD in 2007. Commenter states that the incidence of these types of disabilities is rising every year at an alarming pace. Commenter believes that environmental exposure to toxic chemicals may be a factor, as the National Academy of Sciences committee on Developmental Toxicology estimates that at least 28% of developmental defects are caused in whole or part by environmental exposure to toxic chemicals. Commenter states that children are

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most vulnerable to toxic chemicals like phthalates because they eat drink and breathe more than adults do and that studies show that fetal exposure to phthalates can be especially harmful and may lead to neurological and learning challenges. Commenter states that scientific studies have shown that exposure to phthalates in the womb, during infancy, or in childhood, can set the stage for life-long adverse health effects. Commenter cites 18 studies linking phthalates to neurological and developmental harm (commenter notes that these studies will be submitted into the record by a different commenter). Commenter cites a myriad of adverse health effects due to exposure to phthalates at various stages of life and that phthalate levels were higher in children with autism spectrum disorders. Commenter states that consumers are left in the dark without information about which products contain phthalates and supports the adoption of proposed rule chapter 888. (9)

4. Comment: Commenter believed to have been protecting family against harmful chemicals by limiting exposure through healthful choices, e.g. eating organic foods and choosing glass instead of plastics. Commenter was a participant in a study of phthalate levels in a group of Maine citizens and had the highest total level of phthalates in the group (specifically diethyl phthalate (DEP)). Commenter cites the Chronic Hazard Advisory Panel report released in 2014 stating that there is an urgent need to reduce exposure to DEP particularly for women of commenter’s age. Commenter states that this same report also concludes that products marketed to children are not the major source of phthalate DEP exposure, which means gathering information about their use in other products used in the home is the start. Commenter states that information about where exposure to phthalates might take place is frustrating because information about their use is almost non-existent; they are not listed on labels of products and may be hidden behind the word fragrance. Commenter is concerned about the adverse health effects of phthalates on boys. Commenter states that the chemical safety system at the federal level is out of date and is criminal, and that in Maine the Toxic Chemicals in Children’s Products law has put in place measures that will protect us. (8)
5. Comment: Commenter states that we must adhere to the precautionary principle; if a chemical has a suspected risk of causing harm the burden of proof that it is not harmful falls on those promoting use of that chemical. Commenter states that phthalates migrate out of virtually every product, particularly the four forms that we want to ban [*sic*] today that have short side chains, causing them to be ingested through our skin, in our food and as we breathe. Commenter states that phthalates are endocrine disruptors and exposure to them is linked to birth defects, abnormal development, male reproductive damage, learning and behavioral problems, obesity, asthma and allergies, and is linked to greater risk of prostate and testicular cancer. Commenter participated in a group of Maine citizens tested for phthalates present in their bodies, which found detectible levels of phthalates, some at higher levels than those found in the average American. Commenter considers whether his own prostate cancer may have been caused by exposure.

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Commenter notes that the U.S. CDC biomonitoring studies reveal the presence of phthalates in virtually all Americans, with higher levels found in children than adults, and women having levels above safe values. Commenter states that the question before the board [*sic*] is whether the data linking phthalates to disease is strong enough to outweigh their commercial value. Commenter notes that an online search reveals the battle lines between the American Chemical Institute and health professionals. Commenter states that this legislation [*sic*] is supported by good data and states that Maine physicians are in strong support of this proposal and urges the DEP to adopt this low-burden, high impact rule. (3)

6. Comment: Commenter states that the four phthalates named in the proposed rule were chosen from the six listed on Maine's CHC because of the overwhelming evidence that these four present serious risk to human health. Commenter states there are hundreds of toxicity studies documenting adverse effects; these phthalates are endocrine disruptors and developmental toxicants. Commenter states that exposure results in: abnormalities in the reproductive organs of the male fetus; changes in brain chemistry and behavior; and, sensitization of the immune system. Commenter states that there are also documented studies linking exposure to adverse behavioral effects, increased asthma and allergic responses, and other adverse effects in children. Commenter states that dozens of human studies have documented the presence of these phthalates in most people, as the U.S. CDC also reports these and other phthalates are present in most people through its ongoing biomonitoring efforts which show levels are higher in children than adults. Commenter states that phthalates are free to migrate out of products and have been found in house dust and indoor air. Commenter notes the CHAP of U.S. CPSC has reaffirmed that these phthalates continue to pose a serious risk to human health because so many sources of exposure remain unregulated. Commenter states that the phthalate DEP is not present in children's toys or childcare articles, and that the CHAP asserted that exposure to this phthalate from personal care products, pharmaceuticals, and diet can be substantial and stated there is an urgent need to implement measures to reduce exposure to this particular phthalate. Commenter states that with substantial evidence of hazard and exposure to these phthalates it is only reasonable that the public and government agencies be able to identify the products that are the sources of exposure. (2)
7. Comment: Commenter states that phthalates are produced at very high volumes and used as softeners and solvents in many consumer products, and are released from these products through normal use and are ubiquitous in human tissues. Commenter states that it is well established that phthalates are endocrine disruptors and interfere with proper hormone function in humans and lab animals. Commenter states that phthalates have anti-androgenic effects, resulting in inhibition of proper hormone function. Commenter states that a vast body of scientific research demonstrates that phthalate exposure can harm the health of our children, and the first step to

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protecting them is requiring public disclosure of phthalate use in consumer products so that we may understand how phthalate exposure occurs. (798)

8. Comment: Commenter states that there is a well-founded scientific basis to adopt the proposed rule and that the lack of disclosure of phthalates in more consumer products presents a serious impediment to efforts to reduce exposure. Commenter states that phthalates are anti-androgenic, interfering with the reproductive system of boys and they disrupt the natural expression of testosterone. Commenter states that prenatal exposure to phthalates is associated with serious birth defects in males, added childhood exposure, and adverse effects include brain function and social behavior. Commenter states that “developmental exposure” to phthalates is linked to other adverse health effects, including asthma and changes in metabolic function. Commenter states that phthalates are present in household dust and indoor air due their widespread use in hundreds of everyday products and building materials found in the home and are free to migrate out of products. Commenter states that children have higher levels of phthalates in their bodies than adults as a consequence of increased exposure from food and house dust. Commenter strongly urges the Maine DEP to adopt the rule, stating that the information gathered will allow health providers and consumers to prevent unnecessary exposures to phthalates that may cause preventable health problems. (799)
9. Comment: Commenter states that phthalates are ubiquitous in all consumer products. Commenter states that consumers love products such as plastic shower curtains and cosmetics, many of which contain this group of chemicals as a way to keep scents longer, and those products that deodorize homes and clothing which contain phthalates. Commenter states that small children get even larger doses of phthalates because of their size and increased metabolism. Commenter feels that nearly thirty years of good science is enough reason to declare a substance a priority chemical. (4)
10. Comment: Commenter states that there are increasing rates of asthma and allergies among the pediatric population and a growing body of evidence linking phthalates to respiratory illness. Commenter states that occupational respiratory disease due to plastics industry exposure has been well known for decades and, goes on to state, there is alarming data that phthalate exposure can adversely affect the respiratory health of our children, including significant lung function reductions with elevated phthalate urinary levels as seen in an NIH epidemiologic review of the 3rd National Health and Nutrition Examination Survey (NHANES) data. (810)
11. Comment: Commenters state that exposure to phthalates has been documented in Maine citizens, with particular concern for exposure during pregnancy and early childhood and the resulting health care costs. Commenters state that several phthalates have been slated for regulatory action by authoritative government agencies; some have even been banned in products intentionally marketed to children. Commenters express concern that parents and businesses

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have largely been left in the dark about which common consumer products still contain phthalates, and support the rule because the resulting information gathered will inform future consideration of the Department and other agencies on whether additional regulatory actions are appropriate to reduce phthalate exposure. Commenters state that strong scientific and regulatory consensus on phthalates demonstrates that it’s not too soon for Maine to take action, and the market movement away from phthalate use adds confidence to Maine’s rulemaking.

Commenters state that phthalate use and exposure is widespread, and the lack of information available on products which contain phthalates underscores that this policy action is needed.
(29)

Response to Comments #1 - 11: The four phthalates listed in the proposed rule are currently listed on Maine’s Chemicals of High Concern list and, therefore, already meet the criteria for Maine’s priority designation (38 M.R.S.A. § 1694(1)). Because of this, additional findings of potential harm resulting from exposure to any of the four phthalates listed are not necessary for the Department to adopt the proposed rule requiring disclosure of use in certain children’s product categories. However, the Department does consider evidence related to the need for and appropriateness of such regulatory action, including the need for information on the use of the four listed phthalates in children’s products and the extent of the chemical’s use in such products. The Department also must consider whether regulatory action is necessary and appropriate in light of actions taken or underway with respect to these chemicals in other jurisdictions. No change to the rule.

Definitions

12. Comment: Commenter expresses concern for the broadly defined product categories listed in the proposed rule. Commenter states that the rule must remain focused on children’s products as contemplated by the statute and not sweep in unintended consumer products, because absent clarifications, manufactures and consumers will face unnecessary costs unrelated to the purpose of the underlying legislation. Commenter is concerned that the proposed definition of “Arts and Crafts” could draw products into consideration that technically are not intended for arts and crafts applications but may on occasion be utilized for such projects. Commenter cites the proposed definition of “Arts and Crafts Products” with concern that this could include products not intended for the arts and crafts market. Commenter recommends the Department add those products which are excluded from enforcement as ‘art materials’ per the U.S. Consumer Product Safety Commission’s regulations under the Labeling of Hazardous Art Materials Act; those products are not arts and crafts products in the scope of the rule. Commenter also requests reconsideration of the building products category in the proposed rule, because it is expansive and outside the scope of the rule. Commenter notes that Maine statute (38 M.R.S.A. § 1691(8))

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states that a product sold for outdoor residential use is limited to products that a child under 12 years of age may have direct contact with. Commenter suggests modifying the definition of “Home Maintenance Products” to also reflect this statutory definition, as well as clarifying only chemically formulated consumer products are captured. (25)(26)(30)

13. Comment: Commenter states that meaningful improvement to the proposed rule would be accomplished if the federal CPSIA definition of “children’s product” were utilized, and recommends this consistency would align with other state and federal definitions by identifying regulated products as those manufactured for or marketed to children 12 years and younger. Commenter states that the proposed rule sections 4(C) and 4(D), which would create a four-tiered reporting system based on a company’s tax filings, is in conflict with Maine law 38 M.R.S.A. § 1695(1), which sets forth a hard 180 day reporting deadline for products already in the stream of Maine commerce at the time of prioritization and a 30 day reporting deadline for new products entering Maine’s commerce stream. Commenter states that the uniform deadline set in statute for all companies, regardless of size, does not permit the type of tiered reporting system contemplated by sections 4(C) and 4(D) and that this approach was rejected legislatively. Commenter also states that definitions in the proposed rule go far beyond the scope or intention of the law by adding numerous new categories to the regulations that would not normally be considered children’s products, such as “Arts and Crafts Products,” “Building Products,” “Cosmetics and personal care products,” “Home maintenance products,” “Household and commercial cleaning products,” “Personal accessories,” and “Household furniture and furnishings.” Commenter states that these expanded definitions would broaden the scope of the regulation to include virtually any consumer product, which is far beyond the intent of the framework law to protect children. Commenter recommends that the proposed rule require reporting for manufacturers and formulators of product because retailers, importers, and distributors typically do not hold the product formulation information needed to comply directly with the reporting request and will look to manufacturers to supply the information. Commenter would like a better understanding and explanation of the purpose for the reporting fee if all consumer products are subject to reporting; if the rule applies to all General Use categories of products this will likely result increase the cost to manufacturers that will create unnecessary cost to Maine consumers. Commenter requests additional time to inform and educate manufacturers who may not have reporting awareness, should the regulated product categories be expanded to General Use products under the heading Children’s Products; it will take time for industry to gain broad understanding of the expanded meaning of Children’s Products and should be allotted time to potentially modify formulations of General Use product categories. (28)
14. Comment: Commenter is concerned that the currently drafted definitions unnecessarily include categories that do not pose the exposure risk to children that the authorizing legislation had intended to regulate. Commenter suggests that the definition of “Home maintenance products”

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be modified to clarified because not all adhesives, sealants and finishes are designed for home maintenance and requests the definition specify that products are captured in this category if a child under 12 years of age may have direct contact with the item. Commenter is concerned that the definition of “Household and commercial cleaning products” presented in the draft rule could be unnecessarily applied to automotive products, which pose low probability of coming in contact with children under 12 years of age. Commenter suggests that auto care products be excluded from this definition. Commenter states that there may be the presence of phthalates in some products as a result of an input fragrance raw material, and that because phthalates are not providing a “specific characteristic, appearance or quality” in the final product, due to its lack of function in the raw material, there must be some level of clarification within the rule to clarify how the definition of intentionally added will be applied for this particular type of chemical. Commenter believes the regulated community would greatly benefit from having the rule explicitly name those categories captured by the regulation. (30)

Response to Comment #12 – 14: The originally proposed definitions describing regulated children’s product categories were so broad in scope, as to make nearly all consumer products subject to the rule. Because the originally proposed definitions were ambiguous and not sufficiently clear, the regulated community would not have had fair notice of whether they would be subject to the regulation. Additionally, the Department must provide clearly defined product categories subject to the rule which are anticipated by the regulated community, and which can be easily interpreted and enforced equitably. Changes to the rule include clarifying definitions, and clearly modeling regulated product categories based on the federal definition of children’s product. Because the guiding law requires regulated entities to submit information to the Department no later than 180 days after the effective date of the rule (38 M.R.S.A. § 1695(1)), changes to the originally proposed tiered reporting system were necessary to align this rule with statute. The final rule provides more specificity and clarity than the original proposal.

General Support

15. Comment: Commenters represent a group of small business owners operating in Maine and strongly support the proposed rule as they are very concerned about health and the business impacts that can arise if products used or sold contain toxic chemicals like phthalates. Commenter expresses concern for the cost of preventable childhood diseases and uncertainty about the safety of chemicals which erodes consumer confidence. Commenter points out that as business owners, there is often no ways to determine which chemicals are in the products used or sold, the level of hazard from exposure, and whether safer alternatives exist. Commenter states that every Maine consumer deserves a home that is free of toxic chemicals and every Maine business deserves the right to know that the products they use or sell are safe, and avoid choosing

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between good health and good business; commenters urge prompt action to adopt Chapter 880 [*sic*]. (811-932)

16. Comment: Commenters represent salon owners, managers, and stylists who are concerned that phthalates are used in many shampoos, cosmetics, lotions, and other personal care products. Commenters sell large quantities of personal care products and unless the manufacturer specifically advertises “phthalate-free,” there is no way to ensure that products used or sold do not contain phthalates. Commenters state that dozens of human health studies link phthalates exposure to serious health effects, and that phthalates enter the human body through breathing, skin contact, and eating. Commenters state that chemical companies aren’t required to ensure their chemicals are safe and manufacturers aren’t required to list their chemical ingredients. Commenters state that better information is needed; no Maine business wants to sell or use products that could harm customers or employees. Commenters strongly support the proposed rule. (Commenters #33-60)
17. Comment: Commenter states that this rule will take an important step towards [*sic*] protecting Maine families from toxic chemicals by providing critical information on which consumer products contain phthalates, which will give more transparency and choice to parents, businesses, health professionals, and all consumers. Commenter states that the U.S. CDC finds phthalates in the bodies of most Americans and testing of 25 Maine people this past spring found similar results. Commenter believes it is in all of our best interests to gain the right to know whether the products we buy contain toxic chemicals like phthalates. (934)
18. Comment: Commenter states that three of the phthalates proposed for regulation in rule chapter 888 (DEHP, BBP, DBP) are subject to regulation by the European Chemicals Agency (EHCA) as Substances of Very High Concern. Commenter states that these same three chemicals have been named as Action Plan chemicals by the U.S. Environmental Protection Agency and that an expert science panel to the Consumer Product Safety Commission has released a report that states exposures to these phthalates are still unacceptably high. Commenter states that adoption of the proposed rule is necessary because there is no other authority taking such action nor is there duplicate information currently available. Commenter states that only the State of Washington requires reporting of the use of these four phthalates, but their scope is limited. Commenter states that although several federal agencies and states have acted on phthalates, the chemicals are still widely used in products. Commenter states that if adopted the rule will allow Maine to contribute to the solution by gaining more use information that is not currently available. (27)
19. Comment: Commenter wants phthalates identified not only because of the endocrine disrupting factor but because they are in so many chemical fragrance products, as well as building materials. Commenter has a hypersensitivity to chemical fragrances and did not know that

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phthalates are used to fix fragrances in consumer products. Commenter states that understanding that getting rid of these plasticizers is a key to managing and recovering from the neurological problems is a personal issue. Commenter states it is particularly important to phthalates are removed from hospital settings and states it is unsettling to learn that most exposure to phthalates is from food. (22)

20. Comment: Commenter states that after attempting to avoid plastic products and making selective purchases, commenter was surprised to have the second highest level of phthalate DEHP out of a testing group, and levels of the other three phthalates at 75% higher than all Americans. Commenter states that avoiding exposure to hormone disrupting chemicals like phthalates is important but we do not have the information needed to make educated purchasing decisions. Commenter claims that roughly 10% of pregnant women from the National Health and Nutrition Examination Survey had cumulative phthalate exposures that exceeded a Hazard Index of 1. Commenter states that the Maine Legislature has taken a leadership role on this issue, but six years have passed since Maine’s law was passed. Commenter claims that the support for the rule is from citizens only asking for information – information that will empower parents to make the safest, healthiest choices for their kids. (13)
21. Comment: Commenter has concerns about chemicals contaminating our food supply through product packaging, processing and cooking. Commenter’s organization has broadened its focus to include toxic packaging and equipment used in food processing. Commenter notes that while the proposed rule does not specifically focus on food packaging, it is essential to recognize that packaging may be a significant source of phthalates exposure. Commenter states that the University of Washington and the National Institute for Environmental Health Sciences released a study indicating that one of the most common routes of exposure to phthalates is through food consumptions, particularly high fat dairy products, poultry and cooking oils. Commenter states that the study referenced suggests that exposure levels for infants through adolescents exceeded limits set by the Environmental Protection Agency. (24)
22. Comment: Commenter states that there is research which demonstrates that pregnancy makes women’s bodies more susceptible to the toxins in our environment, and that this susceptibility threatens the health of woman’s pregnancy and shows long-lasting results on fetal development. Commenter states that the American College of Obstetricians and Gynecologists announced in 2014 that reducing exposure of pregnant women to environmental toxins is critical to preventing birth defects, citing the College’s publication of “Exposure to Toxic Environmental Agents.” Commenter notes that because manufacturers are not required to disclose information about where phthalates are used, even the most educated doctors are not able to better advise their patients on how to avoid exposure to them. Commenter notes that women cannot make healthy choices when they don’t know which products contain phthalates. Commenter states that all

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consumers need more information on the use of phthalates, so they can make healthy and responsible choices for themselves and their families; without knowledge of where these chemicals are used, they are unable to control this very basic aspect of their health and that of their families. (21)

23. Comment: Commenter believes that every Maine consumer deserves the right to know if there are toxic phthalates in the products they use and every Maine business deserves the right to know if the products they sell to their customers are safe. Commenter installs glass shower doors and surrounds for a living and believes them to be a safer alternative to plastic vinyl. Commenter states that finding products to purchase for rental properties that do not contain these chemicals is a guessing game. Commenter states that disclosure of phthalates used in our everyday products would allow consumers and business owners to seek safer alternatives to protect their health. Commenter is part of a group of small business owners who signed a letter of support of the adoption of proposed chapter 888. Commenter believes that passing smart, low-cost policies that create market incentives for safer alternatives creates leverage that Maine’s small businesses cannot create on their own. Commenter claims that action now to disclose the use of phthalates in consumer products will increase consumer confidence and decrease this chemicals’ effect on our children. (18)
24. Comment: Commenter states that the proposed rule is modeled after elements included in the adopted Department rules for cadmium, mercury, and arsenic to accomplish a comparable self-funding use of DEP/CDC financial and human resources. Commenter claims that whereas the Department deferred action on the proposed designation of formaldehyde [at the time of testimony, July 2014], the associated financial and human resources would be available to help accomplish the tasks proposed in the citizen petition to initiate rulemaking for proposed chapter 888. Commenter states that the citizen petition’s proposed rule established a multi-year and staggered reporting deadline schedule (2015-2017 and beyond) as a strategy to further reduce the associated financial and human resources used in any single year. Commenter states that the proposed multi-year staggered reporting limits the negative impact on reporting entities in 2015 to the “largest manufacturer” with aggregate gross annual sales both within and outside of Maine of more than one billion dollars. Commenter states that petitioners have provided scientifically credible information to accompany the proposed draft rule to provide significant assistance in reducing the time and cost to the Department for the due diligence review necessary prior to adopting a chemical reporting rule such as that proposed. Commenter states that the proposed rule makes use of the Department’s authority to charge fees to reporting manufacturers to cover the cost of information management. Commenter states that the proposed rule chapter 888 and supporting documentation has been well researched and documented in an effort to assist in providing the information in a manner that reduces the DEP/CDC due diligence review efforts, avoids the costs of obtaining cited scientific studies, avoids the costs of proposal development,

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models many of the DEP's own recently proposed and adopted strategies, and spreads the reporting effort out over multiple years to further reduce costs in any one year. Commenter believes a finding of adequate financial and human resources to support a priority designation is justified and further supported by the Department's fiscal impact statement. (16)

25. Comment: Commenter states that the evidence strongly indicates that the inclusion of phthalate compounds in so many consumer products, while useful in some way to producing those products, poses enough of a cumulative health risk that the four phthalates specified in the proposed rule should be listed as Priority Chemicals. Commenter states that we need more data about the use of phthalates in manufacturing soft vinyl plastics such as kids' backpacks and rain jackets, shower curtains, flooring, IV tubing used in hospitals and clinics, packaging, and fragrances used in many personal care products. Commenter states that manufacturers should be required to report which of their products sold in Maine contain the priority phthalates, which would educate the public and empower consumer's choices. Commenter states that making educated choices is especially important for pregnant women and young children where phthalates pose the greatest health risk, specifically because of its anti-testosterone effects, sperm damage, an increased risk of prostate cancer, and learning and behavior problems such as ADHD, and asthma and allergies. Commenter advocates for safer chemicals in children's products so that the grandkids' ongoing development is not harmed. Commenter states that we need more information from manufacturers about phthalates used in consumer products, which would help physicians to be able to make more informed, preventative health recommendations to their patients. (19)
26. Comment: Commenter states there is good scientific reason to limit exposure to phthalates as they are endocrine disrupters that can negatively affect our reproductive systems, are associated with birth defects in boys, are linked to changes in brain function, and are related to an increase in asthma. Commenter states that the proposed rule is a small first step to providing consumers with the ability to avoid these chemicals if they so choose. Commenter specifies this is not a ban, nor labeling, rather information consumers have a right to know. Commenter states that toxic chemicals should be screened for safety at the federal level, but they are not because federal toxic chemical policy is woefully inadequate to protect consumers from harm. Commenter claims that to date the EPA has tested about 200 of the 80,000 chemicals on the market and has restricted the use of just five. Commenter claims that the American Chemistry Council represents manufacturers of phthalates, and that along with the Koch brothers, have stalled progress on toxic chemical policy reform at the federal level. Commenter states that Maine has the ability to fill the void. Commenter states that once the use of phthalates is known, this information can be used to evaluate further action under KSPA (i.e. the *Toxic Chemicals in Children's Products* law). Commenter states that information about chemical use is the key piece that enables this law to function as intended. Commenter states that this rule requiring

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disclosure is modest in scope, requiring manufacturers to disclose which products contain phthalates and the reporting of existing alternative assessments, while avoiding unreasonable burden on manufacturers. Commenter urges adoption of the proposed rule. (11)

27. Comment: Commenter states that it is necessary to protect our children from undue exposure to known harmful chemicals. Commenter states that human life is threatened all too often in today’s culture and these chemicals threaten the health of all Mainers. Commenter states that the proposed rule takes a proactive approach to protecting the well-being of our youngest and most vulnerable population – which we are morally obligated to do. Commenter states that commitment to protecting the health and dignity of all is unwavering and urges the Department to adopt the rule. (10)
28. Comment: Commenters represent organizations supporting the adoption of proposed rule chapter 888. Commenters state the rule will take an important step towards [*sic*] protecting Maine families from toxic chemicals by providing critical information on which consumer products contain phthalates giving more transparency and choice to all consumers. Commenter states that phthalates are endocrine disrupting chemicals, alter the production or expression of hormones in the body, wreaking havoc on human development, and that hundreds of studies have documented the link between prenatal and childhood exposure to phthalates and health problems. Commenter states that phthalates are everywhere around U.S. in our homes and leach easily from consumer products into our bodies. Commenter states that phthalates have been found in the bodies of most Americans, including 25 people from Maine who volunteered to be tested for their presence. Commenter states that without access to information even the most careful and well-informed consumers are unable to identify their source of exposure to phthalates. Commenters urge the Maine DEP to use its authority to adopt the proposed chapter 888 and designate phthalates as priority chemicals. (933)
29. Comment: Commenter states that he has extensively studied the toxicity of phthalates and states that they are toxic to just about all body systems and organs. Commenter states that the diseases known to be caused by exposures to phthalates are numerous, including cancers. Commenter also states that phthalates induce co-morbidities, meaning that a person with one of the other conditions said to be caused by phthalate exposure is more than likely to become ill with a second illness. Commenter states that phthalates are all around us, found in adhesives, paints, plastics, cosmetics, fragrances, medical supplies, vinyl flooring, and toys. Commenter writes that with knowledge and diligence, exposure to them can be sharply curtailed. Commenter states that phthalates fit the description of priority chemicals and urges the department to list them as such and distribute lists of products that contain them so that consumers can avoid exposure to them. (31)

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Response to comments #15 – 29: The four phthalates listed in rule have been elevated to priority status in response to the concerns of Maine citizens who have supported this rulemaking. The rule will require regulated entities to submit information to the Department which details the intentional use of any of the four listed phthalates in certain children’s products. This information will help the Department gain a better understanding of the current uses of regulated phthalates. This additional insight into chemical use in children’s products will enable the Department to make insightful decisions about whether additional management steps regarding the use of these phthalates in certain children’s products might be appropriate. No change to the rule.

30. Comment: Commenter states that there is no question the four phthalates in the proposed rule meet the hazard and exposure criteria for becoming priority chemicals. Commenter states that these phthalates are chosen because of the wealth of strong credible scientific evidence of both hazards to human health and human exposure that elevate the human health risk. Commenter states that the CHAP report on phthalates affirms the need for stronger measures to reduce children’s exposure to phthalates and underscores the international consensus that the evidence on phthalates supports priority actions at every level of government. Commenter states that phthalates should receive priority attention because of their prevalence in household products, and that action taken on phthalates will have a significantly stronger benefit in contributing to reducing risk to human health. Commenter states that phthalates are used in so many products but because they are largely unreported by manufacturers, there is a large information gap that the State of Maine should help to fill through the adoption of this proposed reporting requirement. Commenter states that phthalate use in personal care products is often hidden behind the term ‘fragrance’. Commenter states that many authoritative agencies at both the state and federal level have already prioritized phthalates; all uses of three of these phthalates will be banned in Europe in February 2015, leaving Maine consumers exposed to phthalates from products that can no longer be sold in the European Union. Commenter states that utilizing the language in Maine law of the definition of children’s product includes any product that a child or pregnant woman is exposed to around the home, giving Maine a tool that no other regulatory agency has to gather information on phthalates in products that are not marketed to children but are nevertheless among the most important sources of exposure to pregnant women and children. Commenter states that the recently released CHAP report directly affirms the need to address exposure to phthalates beyond products marketed to children. (1)
31. Comment: Commenter states that there is mounting evidence that chemicals such as phthalates are leading to a host of disorders. Commenter claims that preconception, prenatal, and postnatal exposures to environmental chemicals have been shown to have a profound effect on health, specifically reproductive and developmental health. Commenter states that America is definitely not a leader in looking out for the people or protecting its health as a nation, that other countries

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are now the leaders in ensuring the health and safety of its citizens. Commenter states that the, “EU has **banned** 3 of the 4 phthalates that we are merely asking to be *identified* by manufacturers.”(sic) (61)

Response to Comment 30-31: Because the Department believes it is important that the public have accurate information regarding the regulation of chemical use in children’s products, this rule specifically addresses the misperception that all uses of phthalates have been prohibited in Europe. Since 2006, the European Union has prohibited the intentional use, above 0.1% by mass of the plasticized material, of di(2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), and benzyl butyl phthalate (BBP) in toys and childcare articles (EU Directive 2005/84/EC). Additionally, the European Union has prohibited the intentional use, above 0.1% by mass of the plasticized material, of di-isononyl phthalate (DINP), di-isodecyl phthalate (DIDP), and dioctyl phthalate (DNOP) in toys and childcare articles which can be placed in the mouth by a child (EU Directive 2005/84/EC). This EU Directive sorted six phthalates into two groups, with one group being less restricted than the other. Noting that this Directive clearly specifies a limited scope of products affected and divides the identified chemicals into two groups to further limit the scope of products affected by specifying those products which “can be placed in the mouth by a child,” this regulation does not constitute a ban affecting all uses of phthalates, as has been stated by some commenters. However, since November 2006, cosmetic products containing benzyl butyl phthalate (BBP) have been prohibited for sale to European consumers as stipulated by Commission Directive 2005/80/EC. No change to the rule.

Other Supporting Comments

Comment #32 is a consolidation of many comments received and can be attributed to multiple commenters, specifically those listed below.

32. Commenters 5-7, 12, 14-15, 32-60, 62-797, 800-809 consist of members of the public, such as parents, grandparents, concerned citizens, healthcare professionals, and business owners, who have provided similar opinions of support for the rule. While each individual comment is given equal weight in the review of the record, due to their similar nature these comments have been consolidated and summarized below.

- Phthalates are in many consumer products without being listed as an ingredient; this rule must be adopted so that consumers can make better educated decisions about which products to purchase especially if they want to avoid phthalates.
- Phthalates are linked to serious health problems; if we don’t know what products they are in we can’t protect our families.

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- The public has a right to know if these toxic chemicals are in the products we're buying.
- Because these chemicals are impossible to avoid, the DEP needs to adopt this rule so that manufacturers are required to disclose which products contain phthalates.
- Consumers have the right to know what ingredients are in the products we buy; this information is vital to making decisions about avoiding harmful chemicals.
- Future generations should not be burdened with medial issues that could be avoided; consumers need to know what is in our products so that parents can make informed choices on behalf of children.
- There are too many items that contain chemicals we aren't aware of; we should all be informed of ingredients so that we know what we're purchasing and can make informed choices.
- We should all have the choice of buying chemical free products, but we need to know where they are used.
- Countless consumer products contain these plasticizers; however no one can consciously avoid them because there is no requirement for labeling of phthalates.
- Consumers have a right to protect their bodies and their children from easily identifiable hazards like phthalates.
- Commenter states that more data about the use of phthalates in manufacturing soft vinyl plastics, packaging, fragrances, and personal care products is needed.

Response to Comment 32: The Department has considered the comments submitted and has moved forward with adoption of rule chapter 888 which will require manufacturers to disclose their intentional use of regulated phthalates in certain children's products. No change to the rule.

Comments Regarding Amended Rule February 2015

- 1a. Comment: Commenter states that regulated product categories intended to fall within the scope of “children’s products” are too broad and without further clarification manufacturers and consumers will face uncertainty regarding which products are covered and potentially face unnecessary costs. Commenter suggests that the category of “building products” be removed from the proposed rule in order to narrow its focus on true children’s products. Commenter suggests that without removing the definition of “building products”, this category could be further clarified by adding the phrase “during application” to its definition. Commenter explains that the addition of this phrase clarifies that exposure to a chemical is significantly less likely to occur if the child does not make contact during application of the product. Commenter states that similarly the definition of “home maintenance products” should be further clarified by adding the language “chemically formulated products” to make clear that the intended products in the scope of the proposal are chemically formulated products and not articles. Commenter provides examples of chemically formulated products as adhesives, caulking, and grouts. Commenter goes on to state that separating “building products” from “home maintenance products” into two distinct product categories will further clarify which products are regulated, particularly when examples are provided. Commenter writes that these clarifications of the listed product categories will allow the agency to focus its enforcement efforts on children’s products without deterring from Maine’s stated policy to collect information and regulate children’s products to reduce exposure of children and other vulnerable populations to chemicals of high concern by substituting safer alternatives when feasible. (1b)
- 2a. Comment: Commenter states that the elimination of all products within several product categories except those marketed for use by children ages 0-12 is arbitrary. Commenter states that proposed rule chapter 888 should align with strong science by requiring reporting of regulated phthalates in all products that could be sources of exposure for children and pregnant women within the categories of cosmetics, personal care products, clothing, footwear, craft supplies, and jewelry. Commenter claims the proposed rule modifies regulated product categories in such a way as to create the “total elimination of all accessories” including backpacks and other accessories which are possible sources of exposure, especially those that contain soft plastic parts likely to use phthalates as plasticizers. Commenter writes that the proposed rule eliminates “all products used for outdoor residential use” except when a child under 12 years of age may have direct contact with the product, which according to the commenter, does not protect against documented paths of exposure such as inhalation. Commenter claims that the proposed rule changes arbitrarily eliminate products from reporting requirements without any scientific basis. Commenter states that proposed changes to the rule create additional complications for implementation due to the lack of determining factors when

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attempting to differentiate a product intended for use by a 12 year old versus a product intended for a teenager or an adult, which creates a greater degree of complexity for implementation and compliance. (9b)

Response to Comments 1a-2a: See response to comments #12-14, page 52.

- 3a. Comment: Commenter states that several medical researchers whose peer-reviewed papers were provided in the initial submission were not consulted in the redraft of the rule. Commenter states that changes to the proposed rule miss the most vulnerable child in the womb. Commenter states that changes to the definition of building and home maintenance products assumes that children and adults do not touch, handle or come in direct contact with products that fall into these categories. Commenter goes on to state that all of these products, building and maintenance materials, frequently leach into the home where the family breathes, eats, and sleeps and explains that “a meeting with a degreed researcher in this field could do a better job of informing you than either I or a manufacturer.” Commenter requests that the proposed rule be “re-examined in conference with some of the medical degreed researchers before a final” decision is made. (10b)
- 4a. Comment: Commenter states that recent changes to chapter 888 “greatly reduce the number of products that must be labeled if they contain phthalates.” Commenter goes on to state that it seems obvious that children don’t come into contact with only products marketed to children, they live in homes filled with all kinds of products and it is unavoidable that they will come into frequent contact with many of these now unlabeled products. Commenter requests that there be a return to” the original, broad application of chapter 888, and require labeling of *all* household products that contain phthalates.” (36b)

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General Comments of Support

Comment 5a is a consolidation of several comments received and can be attributed to multiple commenters as listed above:

5a. Commenters # 2b-8b, 11b-35b, consist of members of the public, such as parents, grandparents, concerned citizens, healthcare professionals, business owners, who have provided similar opinions of support for the rule. While each individual comment is given equal weight in the review of the record, due to their similar nature these comments have been consolidated below.

- Changes to the rule leave pregnant women in the dark about phthalates in their products.
- The DEP should adopt the originally-proposed version of chapter 888.
- A wealth of peer-reviewed scientific information linking prenatal exposure to phthalates and many serious human health threats has been submitted to the DEP.
- This proposed version of the rule is not broad enough to give consumers the information they need about which products contain phthalates.
- Consumers have a right to know what chemicals are in the items they purchase.
- We need to get toxins out of our products because manufacturers will not do so independently.
- Phthalates are a frightening additive and must be taken out of products in common use.
- Consumers should be warned about phthalate use in the products we must choose from by clearly showing a list of ingredients.

Response to Comments 3a-5a: The Department has considered the comments submitted and has moved forward with adoption of rule chapter 888 which will require manufacturers to disclose their intentional use of regulated phthalates in certain children's products. No change to the rule.