



AMERICAN PUBLIC GAS ASSOCIATION

August 19, 2009

Ms. Inez Tenenbaum, Chairman
Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Dear Chairman Tenenbaum:

RE: Advisory on Chinese Drywall

On behalf of the American Public Gas Association (APGA), I write on a matter of the highest concern to our members and the more than five million residential and commercial customers they serve— safety. Our concern is with the Consumer Product Safety Commission's (CPSC) advice to consumers that could lead a natural gas customer to mistakenly identify natural gas odorant as an indication of defective Chinese drywall. We strongly urge the CPSC to amend its advisories to the public about how to identify defective Chinese drywall.

APGA is the national association for publicly-owned natural gas distribution systems. There are approximately 1,000 public gas systems in 36 states and over 720 of these systems are APGA members. Publicly-owned gas systems are not-for-profit, retail distribution entities owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities.

Earlier this year, the CPSC began to advise consumers about the dangers of certain drywall products made in China that emit corrosive gases. One indication is an odor of "rotten eggs." CPSC's website (<http://www.cpsc.gov/info/drywall/how.html>) states that "consumers raising concerns about drywall have typically identified **a rotten egg smell** within their house, several health symptoms while in the home, and corrosion or blackening of certain metal items." [emphasis added]

We are troubled with the approach employed by the CPSC to educate the public about how to identify defective drywall because such advice could lead to confusion.

Therefore, we urge the CPSC to amend its advisories to the public by highlighting the

fact that “a rotten egg odor” could also indicate a natural gas leak and they should immediately contact their gas utility.

Natural gas, primarily methane, is an odorless gas. To comply with federal safety requirements, a natural gas utility must inject an odorant so it can be detected using the normal sense of smell when it leaks outside of that utility’s pipeline system. The odorant, usually a mercaptan compound, is often described as having the odor of rotten eggs. This odor is similar to the one described by the CPSC as associated with decomposing or defective Chinese drywall. However, while the odor described by the CPSC may be caused by a non-emergency, slow-developing property and health hazard, it may also be the indicator to an immediate life- and property-threatening situation.

A natural gas customer that smells “a rotten egg odor” should first be concerned about the presence of a flammable gas in their home. Only after a natural gas leak is ruled out as the source of the “rotten egg odor” should that customer entertain the possibility of defective Chinese drywall.

Suffice it to say, while APGA fully supports the CPSC’s effort to educate the public about how to identify defective drywall, such effort should not lull a natural gas customer into a false sense of security.

We appreciate your attention to our concern.

Sincerely,

A handwritten signature in black ink, appearing to read "Bert Kalisch". The signature is fluid and cursive, with the first name "Bert" and last name "Kalisch" clearly distinguishable.

Bert Kalisch
President & CEO