

Robert A. Niblock, Chairman and CEO
Lowe's Companies, Inc.
1000 Lowes Blvd
 Mooresville, NC 28117-8520

April 12, 2018

Dear Mr. Niblock,

Our organizations support and advocate on behalf of children and adults with learning, intellectual and developmental disabilities, along with their families, educators and health and service providers. We are writing to express our concern over neurotoxic chemicals in paint stripping products that you sell. Last year, the U.S. EPA proposed to make a determination that two chemicals – methylene chloride (DCM) and N-methyl pyrrolidone (NMP) – used in paint stripping products, pose an unreasonable risk to human health.

We are especially concerned with exposures to pregnant women and children from NMP and DCM in paint strippers. During the prenatal period, the developing brain is extremely vulnerable to harm from even low-level exposures to toxic chemicals.ⁱ, ⁱⁱ Scientific evidence from multiple studies shows that both men's and women's exposures to toxic solvents including DCM and NMP are linked to lasting problems with brain development, cognition and behavior in their children.

DCM also causes death. In 2017, a young man died from exposure to DCM after using a product that he purchased at Lowe's. In fact, there have been more than 50 deaths across the country from using products containing DCM. Perhaps the most tragic aspect of these deaths is that they are absolutely preventable.

DCM is so toxic that it is banned in consumer paint strippers in Europe, and home improvement retailers like Kingfisher are now selling safer alternatives. We urge Lowe's to join them.

Since the EPA is now backpedaling on its commitments to protect the public from DCM and NMP, **we ask that you take action now to help protect people's health and lives, especially those of childbearing age, by phasing out the sale of these toxic products within six months or less.** When preparing a nursery, no expectant parent should have to worry that the chemicals in the paint strippers they are using might do irreparable harm to their baby's developing brain. Specifically, we ask you to stop purchasing products from suppliers if those products contain DCM or NMP and to halt the sale of paint strippers containing DCM or NMP.

A recent review of scientific studies of pregnant women exposed to these solvents at work found that prenatal exposures were associated with impaired motor and verbal skills, impaired memory function and attention deficit hyperactivity behaviors in their children. All of the women studied were exposed to solvents at permissible levels, again demonstrating that low-level exposures to these toxic solvents can have lasting effects on babies' brains.ⁱⁱⁱ

Women’s exposures to these solvents at work – prior to conception and during pregnancy – also can result in an increased risk of children’s brain tumors. The risk for brain tumors was highest with maternal exposure to chlorinated solvents – such as DCM. The fathers’ exposures to solvents at work in the year before conception also were associated with increased risk of brain tumors in their children.^{iv}

Scientific studies demonstrate that these solvents impair sperm quality, with one outcome being higher risk of babies with low birth weights. NMP, in particular, has been identified as a developmental toxicant, linked to low birth weights.^v Low birth weight, in turn, is a contributing factor to learning and developmental disabilities.^{vi}

We encourage you to address this issue now, rather than waiting for EPA and allowing these toxic exposures to continue to put children’s health and people’s lives at risk. We greatly appreciated Lowe’s leadership in getting phthalates out of vinyl flooring, as phthalates are linked to neurodevelopmental disorders including learning disabilities and attention and behavior disorders. We hope you will take action again to help ensure people’s health and safety when using products they purchase at Lowe’s.

Thank you. We look forward to your response. Please contact Maureen Swanson with the Learning Disabilities Association of America at mswanson@ldaamerica.org.

Sincerely,

Beth McGaw, President
Learning Disabilities Association of America

Kim Musheno, Vice President, Public Policy and Advocacy
Autism Society of America

Esme Grant Grewal, Senior Director of Government Relations
American Network of Community Options and Resources

Annie Acosta, Director of Fiscal and Family Support Policy, Public Policy
The Arc of the United States

State Organizations:

Matthew Talley, President
Learning Disabilities Association of Alaska

Jordan Lindsey, Executive Director
The Arc of California

Jon Meyers, Executive Director
The Arc of Arizona

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Louis Allen, M.D., Healthy Children Project
Coordinator
Learning Disabilities Association of Utah

CC: Chris Cassell, Director of Corporate Sustainability

ⁱ Committee on Improving Risk Analysis Approaches Used by the U.S. EPA, Board on Environmental Studies and Toxicology, Division on Earth and Life Studies, National Research Council. 2009. Science and Decisions: Advancing Risk Assessment. Washington, DC: National Academies Press.

ⁱⁱ Zoeller RT, Brown T, Doan L, Gore A, Skakkebaek N, Soto A, et al. 2012. Endocrine-disrupting chemicals and public health protection: A statement of principles from the endocrine society. *Endocrinology* 153(9): 4097-4110.

ⁱⁱⁱ Julvez J and Grandjean P. 2009. Neurodevelopmental toxicity risks due to occupational exposure to industrial chemicals during pregnancy. *Industrial Health* 2009, **47**, 459–468.

^{iv} Peters S, Glass DC, Greenop KR, Armstrong BK, Kirby M, Milne E, Fritschi L. 2014. Childhood brain tumours: associations with parental occupational exposures to solvents. *British Journal of Cancer* 111: 998-1003.

^v U.S. Environmental Protection Agency, TSCA Work Plan Chemical Risk Assessment, N-Methylpyrrolidone: Paint Stripper Use, CASRN: 872-50-4, EPA Doc # 740-R1-5002, March 2015, https://www.epa.gov/sites/production/files/2015-11/documents/nmp_ra_3_23_15_final.pdf.

^{vi} Schieve LA, Tian LH, Rankin K, Kogan MD, Yeargin-Allsopp M, Visser S, Rosenberg D. 2016. Impact of preterm birth and low birth weight on developmental disabilities in US children. *Ann Epidemiol.* Apr;26(4):267-74
doi:10.1016/j.annepidem.2016.02.012.