

June 11, 2002

Bob Nardelli, President & CEO
The Home Depot
2455 Paces Ferry Road, NW
Atlanta, GA 30339-4024

Dear Mr. Nardelli:

We, the undersigned organizations, are writing to request that Home Depot discontinue the sale of Ironite fertilizer. We know that you will be as concerned as we are about this particular fertilizer product because of your commitment to the environment and public health, demonstrated by your recent decision to phase out chromated copper arsenate in pressure-treated wood products before the official Environmental Protection Agency (EPA)/industry agreement takes effect.

In 1997, The Seattle Times published an award-winning exposé, "Fear in the Fields: How Hazardous Wastes Become Fertilizer" (enclosed). The Times report revealed that many fertilizers—both agricultural and consumer—are being made from toxic industrial waste including that from steel mills, pulp mills, cement kilns, mining, and other industries. These fertilizers may contain nutrients to help plants grow, but they can also contain toxic heavy metals such as lead, arsenic, cadmium, and mercury, as well as dioxins.

Ironite is made from a 60-acre pile of mine tailings in Arizona. It is sold in Home Depot and other major retail outlets across the country for use as a home and garden fertilizer and to neutralize soil alkalinity.

We have serious concerns about this product because it contains arsenic and lead. Arsenic is a known carcinogen. Exposure to lead presents a health hazard, particularly for children. Lead can lower IQ and permanently damage the nervous system. More specifically,

- Data compiled by EPA on fertilizer contaminants shows that Ironite contains-by a wide margin-the highest levels of arsenic of all fertilizer products surveyed.
- Testing of Ironite by the state of Minnesota shows that the product contains up to 6020 parts per million arsenic and 3400 parts per million lead. According to information provided by the Ironite Products Company and published by the Washington State Department of Agriculture, it contains 4380 parts per million arsenic and 2940 parts per million lead. These ingredients are not listed on the label.
- According to a Washington State Department of Health news release on Ironite's potential health hazards issued in May 1998, "Depending on how much arsenic is actually absorbed into the body after ingestion, accidental ingestion of less than 1/2 teaspoon of this fertilizer may be toxic to small children."

- In 1998, the state of Oregon performed a hazardous waste test on Ironite. Oregon found that Ironite classifies as a hazardous waste due to the levels of arsenic in the product.
- University of Minnesota soil scientist Carl Rosen applied Ironite to his own garden. While the background level of arsenic is about 1 part per million in Minnesota soils, the soil in Dr. Rosen's garden was 100 parts per million after he applied Ironite.
- In April 2002, the state of Maine went to court seeking penalties and an injunction against Ironite, alleging the company failed to obtain state permits necessary to distribute a fertilizer made from solid waste. In May 2002, the makers of the fertilizer Ironite decided to remove the product from Maine store shelves until a court decides whether it is legal to distribute it.

The company claims the product is safe because the toxic chemicals are bound tightly and are not absorbed by the body. However, the state of Washington conducted tests to determine whether the arsenic and lead in Ironite are bioavailable, and the tests indicated that up to 36% of the arsenic and up to 81% of the lead is bioavailable.

We respectfully request that Home Depot stand up for full disclosure and safe fertilizer. We request that you act to protect human health and consumers' right to know by discontinuing the sale of Ironite at Home Depot stores nationwide. We also request that you examine your product line and discontinue the sale of other fertilizers made from toxic waste.

We look forward to your personal response in the near future. We will also be contacting other major retailers that sell Ironite fertilizer. If you have any questions or need any additional information, please contact Laurie Valeriano at the Washington Toxics Coalition at 206-632-1545, ext. 14.

Sincerely,

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