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August 18, 2004

Ms. Dorothy Shimer
Research Division
Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Dear Ms. Shimer:

This letter is in response to the Draft Report to the California Legislature on Indoor Air Pollution (Assembly Bill 1173). Thank you for inviting comments on this report.

I would like to voice my concern about how citrus-derived d-Limonene and citrus terpenes are represented in this document. I will not attempt to make the technical argument here. I am sure this will be done by the Citrus Industry and Florida Chemical.

However, I will ask you to show caution in making negative statements about the health effects of d-Limonene and citrus terpenes. These products are key to the agricultural sustainability of citrus growers. Citrus terpenes and d-Limonene are derived-naturally through the pressing of citrus peels in the juicing process. d-Limonene has a GRAS rating from FDA and is not listed on the National Toxicology Program list (NTP). Citrus terpenes and d-Limonene have been replacing known toxic chemicals for over 40 years.

On behalf of citrus growers and citrus processors, I ask that these misleading and negative statements about citrus terpenes and d-Limonene be removed. These misleading conclusions will have a devastating effect on the citrus community.

Regards,

Steven Nagy

Steven Nagy, Ph.D.
Scientist/Editor