



August 26, 2004

Ms. Dorothy Shimer, *ah1173@listserv.arb.ca.gov*
Research Division
Air Resources Board
P. O. Box 2815
Sacramento, CA 95812

Re: Comment on Draft Report: Terpene sections/ Indoor Air Pollution in California

Dear Ms. Shimmer:

This letter is in response to the draft report to the California Legislature on Indoor Air Pollution AB 1173 and is submitted on behalf of the members of the Florida Citrus Processors Association, a trade association representing the citrus juice and by-products manufacturers of Florida since 1931.

Please allow this letter to serve as a stringent objection to the inaccurate characterization of d-Limonene and citrus terpenes in the draft report. These products are naturally occurring citrus by-products and have long been considered a safe alternative to many of the dangerous chemicals identified in the aforementioned report. I would ask that you reference the attached technical comments from Dr. R. J. Braddock, Institute of Food and Agricultural Sciences, University of Florida, and also his publication, *Handbook of Citrus By-Products and Processing Technology*. As evidenced in his letter and in the support material referenced, citrus terpenes and d-Limonene are not toxic air pollutants, carcinogens or indoor air pollutants. To characterize these compounds in this way is false. d-Limonene has a GRAS (Generally Recognized As Safe) rating from FDA and is not listed on the National Toxicology Program (NTP) list. These citrus by-products have been regarded as trusted, safe compounds for decades.

The Florida Citrus Processors Association requests that you give every possible consideration to removing any reference to citrus terpenes and d-Limonene as harmful or toxic. Your effort to address indoor air quality for the citizens of California is very much respected and in your due diligence, we are confident that you will allow well-founded science to prevail in your decision. If you find that we can be of assistance or provide you with any additional information, please do not hesitate to contact me.

Sincerely,


Lisa Young Rath
Executive Vice President

LYR/II
attachment
Cc: FCPA BOD

Florida citrus processors association
LOCATION: 400 Third Street NW MAIL: Post Office Box 780
CITY: Winter Haven STATE: Florida ZIP: 33882 0780
VOICE: 888.294.6171 FAX: 888.293.4746 WEB: www.fcpanet.org