



STATE OF FLORIDA
DEPARTMENT OF CITRUS

1115 E. MEMORIAL BLVD./P.O. BOX 148/LAKELAND, FLORIDA 33802-0148



DAN L. GUNTER
EXECUTIVE DIRECTOR
Phone: 863-499-2500
Fax: 863-284-4300

ANDREW R. TAYLOR
CHAIRMAN
FLORIDA CITRUS COMMISSION

August 25, 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.

The representation of citrus derived d-Limonene and citrus terpenes in this document is of concern to the Florida citrus industry. A technical response on the report was delivered to your office from Florida Chemical. The Florida Department of Citrus supports the efforts of Florida Chemical and requests that you take this opportunity to review the content of the report in regards to citrus derived compounds.

These products are economically important products to citrus processors and growers. Citrus terpenes and d-Limonene are derived naturally through the pressing of citrus peels in the juicing process. d-Limonene has a GRAS (Generally Recognized as Safe) 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 the Florida citrus industry, we request you give serious consideration to the comments from Florida Chemical and remove all conclusions that are not supported by science from the draft report to the California Legislature.

Sincerely,

A handwritten signature in black ink that reads "Dan L. Gunter".

Dan L. Gunter
Executive Director