



Millennium Specialty Chemicals Inc. | P.O. Box 389, Jacksonville, Florida 32201-0389 U.S.A. | Phone 1-904-924-2799 | Fax 1-904-924-2826

20 August, 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 terpenes are represented in this document. I have reviewed the technical argument as presented by Florida Chemical Company, and will not repeat what they have already argued. I am sure you will review their argument

However, I will ask you to show caution in making negative statements about the health effects of d-Limonene and terpenes. Terpenes and their derivatives are a major part of the flavor and fragrance industry. They occur naturally in plants. D-Limonene and other terpene hydrocarbons also provide non-toxic alternatives to petrochemical solvents and cleaners. Millennium Specialty Chemicals is a member of the Fragrance Manufacturers Association (FMA) as well as the Flavors and Extracts Manufacturers Association (FEMA). We would be glad to sponsor discussions with our association's toxicologists about the effects of terpenes on human health.

For further contact, I can be reached at the above numbers or through e-mail at James.Geller@millenniumchem.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Geller', with a long, sweeping underline that extends to the left.

James Geller, Specialist
Regulatory Affairs / Environmental

