



August 18, 2004

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

Sunkist Growers, Inc.
616 E. Sunkist Street
Ontario, CA 91761

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. We would like to voice our concerns about how citrus-derived d-Limonene and citrus terpenes are represented in this document. Citrus Terpenes is a distillate, a by-product obtained from citrus peel oil and/or citrus juice during concentration process. Citrus terpenes are an unsaturated cyclic hydrocarbon of the formula C₁₀H₁₆ (Carbon-10 and Hydrogen-16). Citrus terpenes are also known as essential oil. It is a GRAS (Generally Recognized As Safe) per United States CFR-21, Part 182.20 and 101.22,(a)(3) as Natural Flavor.

The CAS Nos. for Lemon Terpenes is 68917-33-9 and 68647-72-3 for Orange Terpenes. The products are identified as "0" (zero) Health per Hazardous Material Identification Guideline.

We 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 have been replacing known toxic chemicals for over 40 years.

On behalf of citrus growers and citrus processors, we 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,

Tony Banegas
Leader of Technical
And New Product Development

John Ayers
Leader of Operations

Lex Kongmebhol
Leader of Citrus Oils
Chemist