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December 23rd, 2004

Ms. Dorothy Shimer
Research Division
Air Resources Board
P.O. Box 2815
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USA

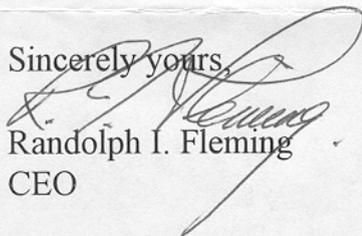
Dear Ms. Shimer:

My letter to you is in reaction to review of the *Draft (For Peer Review, November, 2004) Report to the California Legislature, Indoor Air Pollution in California in response to Assembly Bill 1173*. I would like to share my concern about how the ARB continues to misrepresent citrus-derived d-Limonene and citrus terpenes in this document, although I will not attempt to make a technical argument, leaving this to others in the Citrus Industry to convey.

I do ask that you exercise caution in making negative comments about the health effects of d-Limonene and citrus terpenes. These products are key to the viability of citrus operations. Citrus terpenes and d-Limonene are derived naturally in the pressing of citrus peels in the juicing process. D-Limonene has a GRAS rating from the FDA and is not listed on the National Toxicology Program List (NTP). Citrus terpenes and d-Limonene have been leading the way for over 40 years as replacements for known, toxic chemicals, addressing the safety issues outlined in your report.

In concert with other citrus growers and citrus processors, I ask that you remove the misleading and negative statements about these products from your report inasmuch as they would have a negative effect on the already depressed citrus industry.

Sincerely yours,


Randolph I. Fleming
CEO

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