



*Advancing public policy to  
improve the health and safety  
of workers and the community.*

November 17, 2009

Mr. Maziar Movassaghi  
Director, Department of Toxic Substances  
CalEPA  
1001 I Street  
Sacramento, CA 94814

**Subject: Straw Proposal for Safer Alternatives Regulation**

Dear Mr. Movassaghi:

You may recall that the California Industrial Hygiene Council (CIHC) first submitted a letter to you in April 14, 2009 (attached) addressing our general support, views and expectations for the Green Chemistry Initiative, as well as some concerns we requested you consider as your deliberations moved forward. The CIHC again submitted comments to your office in a letter dated July 13, 2009 (attached), again requesting your consideration. This third communication to you, recognizing that few of our initial suggestions in the previous letters were integrated, now addresses the most recent straw proposal.

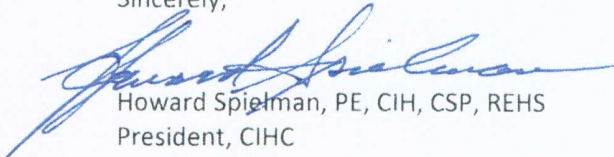
By way of background, the CIHC was founded in 1990 to establish a legislative presence in California to represent the Industrial Hygiene profession. The field of Industrial Hygiene is dedicated to the anticipation, recognition, evaluation, and control of occupational and environmental health hazards. CIHC, representing the five Local Sections of AIHA in California, views its mission as bringing good science to the legislative and/or regulatory table which impacts the health of both workers and the public. It is affiliated with the National American Industrial Hygiene Association (AIHA), a 12,000 member organization, as well as the International Occupational Hygiene Association (IOHA), which represents the global community of Occupational Hygiene organizations in over 26 countries.

We recognize that the state and many stakeholders from around California have spent tremendous energy, time and skill in crafting, studying and commenting on the specifics in the most recent straw proposal. While we agree with many of the scientific concerns cited by other stakeholders about the straw proposal, our real concern resides with the "deployment" of any final regulation. We would submit that full scale deployment, absent an opportunity to review, evaluate, and comment on any new

process in action, is not only unlike our regulatory process, but is also unwise, not cost effective or efficient, and could potentially compromise the best efforts of the state to put forth a comprehensive regulation. We encourage you to "test run" the proposed process so you know it is as effective as you want it to be and adjust it in advance of a robust, full scale effort. This simply represents good management and leadership!

The California Industrial Hygiene Council (CIHC), comprised of members in government, academia, industry, labor and consulting, is dedicated to the anticipation, identification, evaluation and control of occupational and environmental health risks. We are available to assist in the scientifically sound development and implementation of this Initiative's goals. We look forward to offering our technical assistance for this most worthwhile project. Let us know how we can help you! At the end of the day, our charters remain the same—to protect our workers and the public!

Sincerely,



Howard Spielman, PE, CIH, CSP, REHS  
President, CIHC  
hspielman@healthscience.com  
P: (714)-220-3922  
Hspielman@healthscience.com

Sincerely,



Chris Laszcz-Davis, MS, CIH, REA  
Vice-President, CIHC  
ChrisLD@EQ-Organization.com  
P: (925)-330-1774  
[ChrisLD@EQ-Organization.com](mailto:ChrisLD@EQ-Organization.com)

cc. The Honorable Linda Adams, Secretary, Cal EPA  
Cindy Tuck, Undersecretary, CalEPA  
Patty Zwarts, Deputy Secretary, CalEPA  
John Moffatt, legislative Affairs, Office of the Governor  
Victoria Bradshaw, Cabinet Secretary, Office of the Governor  
The Honorable Joe Simitian, California State Senate  
The Honorable Sam Blakeslee, Assembly Republican Leader  
The Honorable Mike Fuerer, California State Assembly  
Jeff Wong, DTSC  
Don Owen, DTSC  
Kathy Barwick, DTSC  
Rick Brausch, DTSC  
Peggy Harris, DTSC

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2220 Capitol Avenue • Sacramento, CA 95816 • (916) 447-7341 fax 448-3848  
e-mail: [CIHC@sacadvocacy.com](mailto:CIHC@sacadvocacy.com) [www.CIHOnline.org](http://www.CIHOnline.org)