



Green Chemistry Alliance

Committed to Product Sustainability in the Global Economy

March 17, 2009

Alliance of Automobile
Manufacturers

American Chemistry Council

American Electronics
Association

American Forest & Paper
Association

California Chamber
of Commerce

California League of Food
Processors

California Manufacturers
& Technology Association

California Paint Council

California Restaurant
Association

California Retailers
Association

Can Manufacturers Institute

Chemical Industry Council of
California

Citizens for Fire Safety
Institute

Consumer Specialty Products
Association

Grocery Manufacturers
Association

Industrial Environmental
Association

Metal Finishers Association

National Paint and Coatings
Association

Personal Care Products
Council

Plumbing Manufacturers
Association

Soap & Detergent Association

Toy Industry Association

Western Plant Health
Association

Western States Petroleum
Association

Maziar Movassaghi
Acting Director
Department of Toxic Substances Control
1001 I Street
Sacramento, CA 95814

Joan Denton
Director
Office of Environmental Health Hazard Assessment
1001 I Street
Sacramento, CA 95814

Dear Directors Movassaghi and Denton:

The Green Chemistry Alliance (GCA) has appreciated the opportunity to participate in California's Green Chemistry Initiative, and submits this letter regarding the implementation of SB 509, which creates a Toxics Information Clearinghouse (TIC).

The Clearinghouse is being established to collect, maintain, and distribute specific chemical traits, and toxicological and environmental information. It will be very helpful to the State and to stakeholders in pursuing the objectives of the Green Chemistry Initiative. The Office of Environmental Health Hazard Assessment (OEHHA) is charged with evaluating and specifying the specific chemical hazard traits and environmental and toxicological endpoints and any other relevant data to be included in the TIC by January 1, 2011. The Department of Toxic Substances Control (DTSC), in the purview of SB509, is responsible for establishing by January 1, 2012, the TIC for collection, maintenance, and distribution of various traits/endpoints and other relevant data to be included.

The Green Chemistry Alliance believes there is great value in publicly available databases of reliable scientific information on chemicals. The planned California database can get started quickly by providing a user-friendly portal providing direct links to a large set of reliable information on chemicals that already is available on the Internet. It is critical for the State to ensure that information provided through the Clearinghouse be reliable for use by the State and by stakeholders. There is a significant amount of "junk science" on the Internet and California will have to vet the sources that will be presented to ensure the quality of the information.

In establishing the Clearinghouse, the type of information provided should not just be restricted to hazard characteristics, but should also include available

sources of use and exposure information. Once it is well developed, the Clearinghouse should be a useful tool in informing priority chemical identification and alternatives analysis as well as meeting the needs of a variety of stakeholders.

The Green Chemistry Alliance supports the American Chemistry Council's comments on this topic, attached. In particular, it references the many currently available sources of reliable information on chemicals that, if integrated into the Clearinghouse, will provide a quick startup for the program.

If you have any questions or comments, please feel free to contact us. We look forward to our continued work together on this important public policy initiative.

Sincerely,

//original signed by//

Caroline Silveira
On Behalf of the Green Chemistry Alliance

cc: Linda Adams, California EPA
Jeff Wong, DTSC
Rick Brausch, DTSC
Don Owen, DTSC
Peggy Harris, DTSC