



Representing Household & Institutional Products

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October 16, 2012

via email - john.faust@oehha.ca.gov

John Faust
Office of Environmental Health Hazard Assessment
1515 Clay St., Suite 1600
Oakland, CA 94612

RE: Draft California Communities Environmental Health Screening Tool – CalEnviroScreen

Dear Mr. Faust:

The Consumer Specialty Products Association appreciates the opportunity to review and provide comments on the Draft California Communities Environmental Health Screening Tool - CalEnviroScreen. We are hopeful the eventual use of CalEnviroScreen comports with Secretary Rodriguez's statement announcing the release of the document, "Our objective is to provide state and local decision makers with information that will enable them to focus their time, resources and programs on those portions of the state that are most in need of assistance." The following comments are intended to offer support that will assist in the implementation and communication of CalEnviroScreen.

The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$80 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; candles, and fragrances and air fresheners that eliminate odors; pest management products for home, garden and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day.

We believe CalEnviroScreen is a tool which identifies communities for further investigation. Such investigation should be limited to incentive funding and public investments to reduce vulnerabilities within the communities identified. We oppose the use of CalEnviroScreen for regulatory programs decisions as it employs a variety of assumptions and information developed for different purposes. Misusing the CalEnviroScreen data could result in negative economic impacts on the very communities it is designed to screen and identify for additional resources.

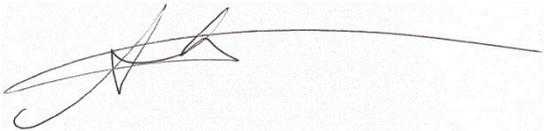
Communication with impacted communities and entities supporting the communities is critical. Without clear context and a statement of the intended use, the information produces an unclear

designation which may result in unintended consequences, including lost economic opportunities. We encourage the Office of Environmental Health Hazard Assessment to include information in the Report and with all communications of CalEnviroScreen which clearly states to community residents, local government decision makers, and the general public that CalEnviroScreen should not be used for regulatory decisions.

We appreciate the stakeholder outreach efforts and look forward to the reviewing and commenting on the revised California Communities Environmental Health Screening Tool.

Please contact either of us if you have questions regarding our comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Bennett', with a long horizontal flourish extending to the right.

Steven Bennett, Ph.D.
Director,
Scientific Affairs

A handwritten signature in black ink, reading 'Kristin Power', written in a cursive style.

Kristin Power
Director, State Affairs
West Region

cc: CSPA Scientific Affairs Committee
CSPA State Government Affairs Advisory Committee
Laurie Nelson, Randlett/Nelson/Madden