



June 11, 2012

Monet Vela
California Environmental Protection Agency
Office of Environmental Health Hazard Assessment (OEHHA)
1001 I Street
Sacramento, CA 95812-4010
via e-mail: monet.vela@oehha.ca.gov

Re: PCBs MADL/NSRL

Dear Ms. Vela,

This letter serves to provide comments of the American Herbal Products Association (AHPA) on OEHHA's April 13, 2012 proposals to adopt an updated "safe harbor" No Significant Risk Level (NSRL) for polychlorinated biphenyls (PCBs) of 0.35 micrograms per day by amending Title 27, California Code of Regulations, section 25705.1; and to adopt a "safe harbor" maximum allowable dose level (MADL) of 2.3 micrograms per day for adoption into Section 25805.

AHPA is the national trade association of the herbal products industry. AHPA includes among its members companies that sell a wide variety of foods, including dietary supplements, that consist of or contain fish oil ingredients. AHPA and its members therefore have an interest in the above-described OEHHA proposals.

AHPA supports OEHHA's proposals to adopt an updated NSRL for PCBs of 0.35 micrograms per day; to adopt an MADL for PCBs of 2.3 micrograms per day; and to amend the California Code of Regulations as necessary to establish these "safe harbor" levels.

AHPA Chief Science Officer, Steven Dentali, Ph.D., is in receipt of correspondence dated with today's date from Robert Scofield, D. Env., the Director of the Center for Exposure Assessment and Dose Reconstruction for Exponent. This correspondence is a scientific review of the basis for the proposed NSRL and MADL for PCBs. This correspondence is attached to AHPA's submission of comments, and is incorporated by reference in its entirety in these comments.

Please feel free to contact me if you need any clarification or additional information on these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. McGuffin". The signature is fluid and cursive, with a large initial "M" and a long, sweeping tail.

Michael McGuffin
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cc: P65Public.Comments@oehha.ca.gov
Steven Dentali (sdentali@ahpa.org)

Attachment