



*PPG Architectural Finishes*

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Ms. Monet Vela  
Office of Environmental Health Hazard Assessment  
1001 I Street  
Sacramento, CA 94814

August 30, 2013

RE: Proposed Changes to Prop 65 Warnings

Ms. Vela,

PPG Architectural Finishes appreciates the opportunity to submit our comments on the proposed changes to Prop 65 where additional and more extensive warnings are being sought. We have several concerns with the proposed additional warning statements.

Due to the number of chemicals that are now listed as Prop 65 chemicals, it is rare to see a consumer product label without a Prop 65 warning. This proposal would involve changing printing plates, label formats, etc. to include the expanded warning. And it must not be overlooked that the change would impact MSDS's as well since many manufacturers have now moved to include Prop 65 warnings on their MSDS. These changes would be far reaching by impacting millions of documents and costing companies millions of dollars.

Second, it would be duplicative. Federal and state regulations (such as OSHA/GHS, FHSA, EPA) already require (and have for many years now) warnings that speak to target organ effects, routes of exposure, etc. on the label. There is no need to include additional warnings that simply repeat the information already there.

Third, it seems to conflict with information already on the label that directs the user to additional information on the hazards of the chemical/chemical mixture. On any given label you will find directions to consult the MSDS for more hazard information. This proposal to add additional sources (such as a website) to find more information, is conflicting and in my view confusing to direct the user to multiple sources of information.

We believe sufficient warnings are already available on labels and MSDS and this proposal will have little impact on improving those warning, yet it will cost companies millions of dollars to alter existing labels and MSDS.

Again, we appreciate the opportunity to share our concerns and stress that OEHHA not move forward on this proposal.

Sincerely,

James R. Kantola  
Regulatory Affairs Manager