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October 31, 2016

Ms. Michelle Ramirez  
Office of Environmental Health Hazard Assessment  
P.O. Box 4010, MS-12B  
Sacramento, CA 95812-4010

Subject: 2016 CIC Prioritization of Asphalt Emissions Associated with Roofing

Dear Ms. Ramirez:

This Association represents union roofing and waterproofing contractors throughout Northern California. On behalf of our members and the skilled union craftsmen they employ, I am writing today to express our support for the comments submitted by the Asphalt Roofing Environmental Council in their submission of October 24, 2016.

Proposition 65 already requires that warnings be provided where the use of asphalt roofing products can expose California workers to carcinogens in roofing asphalts and their emissions. Any doubt about this matter was settled in 2003, when enforcement actions brought by both the State of California and a private plaintiff resulted in consent judgments that contain a very specific warning for roofers and waterproofers working with asphalt-containing products.

In the intervening years, this Association and the joint apprenticeship program we co-sponsor with three Locals of the Roofers Union have trained hundreds of roofers and waterproofers in work practices and engineering controls designed to minimize their exposure to carcinogens in asphalt fumes. We have been aided in the important task of protecting workers by two very significant developments: (1) the recommended application temperature for hot asphalt has been reduced, which in turn has reduced hot asphalt emissions and worker exposures to them, and (2) the use of hot asphalt has declined markedly. A decade ago, hot asphalt was the predominant form of low-slope roofing. According to a survey published in the July-August 2016 edition of *Western Roofing* magazine, however, hot asphalt roofing now commands just 14.4% of the commercial marketplace in California.

For the above reasons, we whole-heartedly agree with the Asphalt Roofing Environmental Council that roofing asphalt should be assigned a low priority. The listing of roofing asphalt would neither expand the scope of the existing obligation of California employers to provide cancer warnings, nor significantly advance public health objectives.

Thank you for your attention and consideration.

Yours very truly,

William D. Callahan, Ph.D.  
Executive Director