



CALIFORNIA ASSOCIATION of SANITATION AGENCIES

1215 K Street, Suite 2290 • Sacramento, CA 95814 • TEL: (916) 446-0388 – FAX: (916) 231-2141 • www.casaweb.org

Via Electronic Mail

September 12, 2011

Fran Kammerer
Office of Environmental Health Hazard Assessment
P. O. Box 4010
1001 I Street
Sacramento, California 95812-4010

Re: Proposed Green Chemistry Toxics Information Clearinghouse Regulation

Dear Ms. Kammerer:

The California Association of Sanitation Agencies (CASA) would like to express our support for the proposed Green Chemistry Toxics Inventory Clearinghouse (TIC) regulation. CASA represents more than 90 percent of the sewered population of California and has long been a proactive leader on wastewater, recycled water, biosolids management, and climate change mitigation issues. Our members are largely public agencies charged with protecting the environment and public health.

CASA members are concerned about the growing number of consumer products that contain ingredients that may compromise effluent quality, treatment plant operations, biosolids management options, and our compliance with NPDES permit requirements. We support the concept of Green Chemistry with the hope it can stem the tide of harmful chemicals that all too often make their way down drains to our wastewater treatment plants.

We are pleased that the proposed regulation defines a very comprehensive set of hazard traits and environmental and toxicological end-points that will assist in the development of a meaningful TIC database. We appreciate the changes made in Sections 69404.3 and 69405.3, with regard to wastewater treatment organisms and processes, and environmental persistence of chemicals in fresh, estuarine and marine waters and sediments.

The wastewater community supports the proposed regulation and believes it will provide a strong foundation for the Department of Toxic Substances Control's development of criteria to evaluate chemicals and alternatives. Please contact Greg Kester at gkester@casaweb.org or 916-844-5262 if you have any questions.

Sincerely,

Gary W. Darling, President

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