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Via electronic submission to
https://oehha.ca.gov/comments
Monet Vela
Office of Environmental Health Hazard Assessment
P.O. Box 4010
Sacramento, California 95812-4010

Re: Proposed Adoption of New Section Under Article 7: No Significant Risk Levels
Section 25704: Exposures to Listed Chemicals in Coffee Posing No Significant Risk

CERT'S PRELIMINARY SUBMISSION REGARDING OEHHA'S PROPOSED TEXTUAL MODIFICATION OF THE REGULATION

Dear Ms. Vela:

As you are aware, my firm represents the Council for Education and Research on Toxics (CERT), which has previously submitted comments regarding the above-referenced proposed regulation. CERT desires to provide written comments regarding OEHHA's modification of the proposed text of the regulation, but cannot do so at the present time, because CERT's Board of Directors does not understand the reason(s) for the proposed textual modification. CERT therefore requests that OEHHA provide an explanation of its reason(s) for proposing the textual modification and extend the comment period for a period of at least 15 additional days (preferably 30 additional days), to allow CERT sufficient time to evaluate OEHHA's reason(s) for the textual modification and prepare its comments to be submitted to OEHHA.

Very truly yours,

Raphael Metzger

RM:ip

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