

June 19, 2024

Via Electronic Mail

Esther Barajas-Ochoa
Associate Governmental Program Analyst
California Office of Environmental Health Hazard Assessment

Subject: Request for Extension re: Notice of Proposed Rulemaking Title 27 California Code of Regulations, Section 25705 No Significant Risk Level for Titanium Dioxide

Dear Ms. Barajas-Ochoa:

The Personal Care Products Council (PCPC)¹ and the American Chemistry Council (ACC)² appreciate the opportunity to provide comments on the California Office of environmental Health Hazard Assessment (OEHHA) proposed rule amending Title 27, California Code of Regulations, section 25705(c)(2) to establish a no significant risk level for titanium dioxide. We are diligently developing comments in concert with our large and diverse memberships to provide OEHHA with a thoughtful response to its proposed rule. This is a time-intensive process, however, and to provide truly valuable feedback to OEHHA additional time is necessary. The comment period is currently scheduled to end on June 24, 2024. We respectfully request a 30-day extension of the comment period until Wednesday, July 24, 2024.

Additional time will allow us to provide OEHHA with valuable input regarding the proposed NSRL's alignment with NIOSH's risk assessment for titanium dioxide. We also intend to address the inconsistency between the 0.8 micrometer and 10 micrometer proposals.

Thank you for considering this request. If you have any questions, please contact me.

¹Based in Washington, D.C., the Personal Care Products Council is the leading national trade association representing the \$250 billion global cosmetic and personal care products industry. Founded in 1894, PCPC's more than 600 member companies manufacture, distribute, and supply the vast majority of finished personal care products marketed in the United States. As the makers of a diverse range of products that millions of consumers rely on every day, from sunscreens, toothpaste, and shampoo to moisturizer, lipstick, and fragrance, member companies are global leaders committed to product safety, quality, and innovation.

² ACC represents the leading companies engaged in the business of chemistry. ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier, and safer. ACC promotes improved environmental, health and safety performance through Responsible Care®, common sense advocacy designed to address major public policy issues, and health and environmental research and product testing.

Request for Extension of Public Comment Period

Docket No.: Comment Submissions - Notice of Proposed Rulemaking Title 27 California Code of Regulations,
Section 25705 No Significant Risk Level for Titanium Dioxide - OEHHA

June 18, 2024

Page **2** of **2**

Respectfully submitted,

Emily Manoso

EVP, Legal & Regulatory Affairs & General Counsel, PCPC

Tim Shestak

Senior Director, State Affairs, ACC

Cc: David Edwards, Chief Deputy Director

Office of Environmental Health Hazard Assessment

Monet Vela

Office of Environmental Health Hazard Assessment