

August 12, 2010

Sent via email: GCRegs@dtsc.ca.gov

RE: Comments on Green Chemistry Draft Regulations Released June 23, 2010

Dear DTSC staff:

This e-mail follows on my comments made at the Green Chemistry Workshop July 8, 2010 at CalEPA during the “public comment” section of the agenda.

As I stated at the workshop, the California Product Stewardship Council submitted comments on the Green Chemistry Regulations Development on July 29, 2009, and again November 4, 2009, and I have attached it again for the record as the same comments apply.

In short, our comments are that DTSC please develop a very streamlined analysis for products that have already been analyzed for toxicity and deemed too toxic to dispose of or current law prohibits disposal in engineered and monitored landfills in California. Those products should then go directly to “End of Life Management” regulatory response.

We are concerned about the industry comments at the workshop to the effect that they do not believe DTSC has the authority to require product take-back or that it was somehow limited. We re-read the law and it was clear – DTSC can require take-back and there are no conditions to that option. We urge DTSC to move quickly for products already banned from disposal to require either safer alternatives or mandatory take-back to protect public health, the environment, as well as taxpayers and ratepayers.

We thank you for the opportunity to comment and look forward to seeing the next draft.

Sincerely,



Heidi Sanborn, Executive Director
California Product Stewardship Council