



April 8, 2015

Ms. Monet Vela
Office of Environmental Health Hazard Assessment
P.O. Box 4010
1001 I Street
Sacramento, California 95812-4010
Via email: P65Public.Comments@oehha.ca.gov

Re: Clear and Reasonable Warning Regulations

Dear Ms. Vela:

On behalf of our nearly 25,000 member dentists, the California Dental Association ("CDA") appreciates the opportunity to provide comments on the Office of Environmental Health Hazard Assessment's ("OEHHA") Notice of Proposed Rulemaking regarding the Clear and Reasonable Warning Regulations in Article 6 in Title 27 of the California Code of Regulations pursuant to The Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65").

The California Dental Association is committed to the success of our members in service to their patients and the public. CDA is the recognized leader for excellence in member services and advocacy promoting oral health and the profession of dentistry.

As a champion of oral health, CDA is pleased with the language that is provided in the "Dental Care Exposure Warnings" section of the most recent regulatory package (namely, Sections 25608.8 and 25608.9), and the continuation of the "safe harbor" approach that is applied to dental offices.

CDA appreciates the efforts of OEHHA staff to assist with reasonable implementation of the updated warning notice. Given the number of dentists in California, providing a two-year delayed implementation date (as provided in Section 25600(b)) allows adequate time for CDA to educate its members on the new regulations and support their compliance.

Finally, with respect to the proposed regulation regarding the lead agency website (Section 25205), CDA supports the lead agency website so long as the process allows for professional organizations like CDA to provide relevant chemical and exposure information for the website on behalf of our member dentists as a supplement to the warnings required under Section 25249.6. As a professional organization representing organized dentistry in California, CDA is uniquely situated to provide this information as a service both to its member dentists and to the public.

Sincerely,

A handwritten signature in black ink, appearing to read "Brianna Pittman", is written over a horizontal line.

Brianna Pittman
Legislative Director