



**Western Wood
Products Association**

522 SW Fifth Avenue Suite 500 Portland Oregon 97204
503-224-3930 fax: 503-224-3934

www.wwpa.org

July 9, 2009

Ms. Cynthia Oshita
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-19B
Sacramento, Calif. 95812-4010

RE: Comment on Proposition 65 proposed listing for chemicals

Dear Ms. Oshita,

We would like to comment on the proposal to include wood dust as a carcinogen for listing under the Labor Code mechanism for Proposition 65.

While the definition of wood dust is somewhat broad, we recognize that IARC and NTP have listed wood dust as a potential carcinogen. Our concern is that should wood dust be listed, the product communications and labeling requirements established by California will exceed existing requirements established by OSHA on the federal level.

More stringent communications and labeling requirements will create undue financial hardships for a host of businesses, from those manufacturing wood products to home builders, remanufacturers and other small businesses.

The wood manufacturing industry is now in compliance with the established OSHA limits on wood dust exposure to workers. The industry also provides a MSDS on Wood Dust to downstream users, fulfilling the communications requirements set by the federal government.

We encourage the state of California to make the product communications and labeling requirements, if any, consistent with federal regulations and not add additional costs for compliance.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Cheung". The signature is written in a cursive, flowing style.

Dr. Kevin Cheung
Director, Technical Services